



# Customer Privacy Notice

last updated 6 July 2023

West Bromwich Albion Football Club Limited (the **Club**) respects the privacy of all fans and other customers and everyone else associated with them. We will collect and use personal data responsibly and in ways that are consistent with our obligations and your rights under the law.

This Privacy Notice explains how the Club uses and protects your personal data, as well as your rights in respect of it, how to exercise your rights and how to contact us. More information about how the Club processes personal data in general can be found in our Privacy Policy at <https://www.wba.co.uk/privacy-policy>.

## Information about other people

If you provide information to us about any other people, you must give them a copy of this Privacy Notice so that they understand how their information will be used. You should only provide information about them if you are authorised to do so.

## Changes to this Privacy Notice

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our Privacy Notice. If we want to make any significant changes to the way in which we will use your personal data we will contact you and, if required, seek your consent.

## About us

Unless we say otherwise, the Club is the data controller in respect of all personal data we obtain about you. This means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

You can contact us as follows:

Address: West Bromwich Albion Football Club, The Hawthorns, West Bromwich, West Midlands B71 4LF  
Phone: 0121 524 3470  
Email address: [dataprotection@wbafc.co.uk](mailto:dataprotection@wbafc.co.uk)

If you have any questions or concerns about how we are handling your personal data, you can direct them to Club's HR Department at [dataprotection@wbafc.co.uk](mailto:dataprotection@wbafc.co.uk) or you can make a complaint to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

## Security

We take the security of personal data seriously. We use security technology, including firewalls, password protection and encryption to safeguard information and have procedures in place to ensure that our paper and computer systems and databases are protected against unauthorised disclosure, use, loss and damage. We have processes in place to deal with a data breach in the unlikely event one should occur.

We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

## Categories of personal data that we process

The personal data we process may vary depending on the goods or services you are getting and whether they are paid for or free. You should expect the following types of personal data to be processed for our purposes and the Club is the controller of this data.

<p><b>Personal details</b></p> <p>Title, name, any 'known as' name and personal pronoun</p> <p>Contact details such as address, email address and phone number</p> <p>Relationship with others you book or purchase for or who have booked or purchased for you</p> <p>Age / date of birth</p> <p>Photograph (<i>where you hold a <a href="#">MYALBION</a> account and/or it is required to provide a product/service to you</i>)</p> <p><a href="#">MYALBION</a> account details</p> <p>Social media identifiers</p> <p>Disability / health conditions / dietary preferences (<i>if applicable</i>)</p> <p>Medical passport / certificate / pass or vaccine certificate (<i>if applicable</i>)</p> <p>Travel certificate / confirmation (<i>if applicable</i>)</p> <p>Vehicle registration number (<i>if applicable</i>)</p>	<p><b>History</b></p> <p>Products and services you have asked us to provide (and whether we have done so)</p> <p>Products and services others have asked us to provide for you (and whether we have done so)</p> <p>Key events (birthday, celebratory events, key work projects)</p> <p>How you are known to the Club</p> <p>Details of any feedback you provide</p> <p>Details of any incident involving you or someone else in your party</p>	<p><b>Diversity and inclusion</b> (where relevant)</p> <p>Marital status</p> <p>Age / date of birth</p> <p>Religious beliefs</p> <p>Gender / Gender reassignment</p> <p>Ethnicity</p> <p>Sexual orientation</p> <p>Political opinions</p> <p>Disability / health conditions / pregnancy and maternity</p>
<p><b>Preferences</b></p> <p>Details of any consents and preferences chosen</p>	<p><b>Safeguarding information</b></p> <p>Safeguarding concerns (including information about concerns raised, details of those persons involved, witness details, welfare reports, actions recommended and taken)</p>	<p><b>Payment details</b></p> <p>Details of payments received and declined and any refunds given</p> <p>The Club does not usually receive any payment card details. Instead, we use a PCI compliant service provider (such as <a href="#">Secutix / Adyen</a> for ticketing and <a href="#">Optomony</a> for merchandising) to process payments.</p>

Certain personal data is designated as 'special category data' in law, which means it has special protection. This includes: information about health, race or ethnicity, genetic and biometric data and information concerning a person's sex life or sexual orientation.

## Sources of personal data

<p>You</p> <p>Someone else who has made a booking or purchase for you (<i>if applicable</i>)</p> <p>Other clubs you are associated with (for example, if you or purchase a ticket as an 'away' fan or you purchase one for someone else)</p> <p>Our own records or those from <a href="#">CLUB AFFILIATES</a> such as <a href="#">THE ALBION FOUNDATION</a> or <a href="#">West Bromwich Albion Women's team</a></p>	<p>Our sponsors or partners where they provide goods or services for you</p>	<p>Stakeholders in anti-corruption matters including other sports organisations, the Gambling Commission, betting operators and sports related integrity units</p> <p>Social media</p> <p>Insurers</p> <p>Police and other law enforcement agencies</p> <p>Statutory Agencies (e.g. Children Services or Adult Services)</p> <p>Entities or individuals that book events that you are to attend at the Club</p> <p>Legal and other professional advisers</p>
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## Automated decisions using personal data

We do not normally take any solely automated decisions.

## Sponsor and partner programmes

The Club teams up with a variety of sponsors and commercial partners each of which bring value to the game and many of them are happy to make offers and opportunities available to you so that you can also benefit from them being in the WBA family.

You can view an up-to-date list of [CLUB SPONSORS & PARTNERS](#) by clicking the link.

## Purposes for which we process personal data and the legal basis for doing so

We process personal data for a number of purposes, which are:

Purpose	Legal basis
<b>Administration.</b> Administration of any requests you make of us such as to purchase tickets, set up a <a href="#">MYALBION</a> account, to purchase items from our shop, to provide <a href="#">WBA.TV</a> , send you newsletters, administer competitions and prize draws.	Personal data It is necessary to fulfil the contract that you (or someone booking or making a purchase for you) are going to enter into or have entered into with us and/or
	Consent It is necessary for compliance with a legal obligation and/or
<b>Match and event administration and security.</b> Includes match / event admission, match / event security, dealing with incidents. obtaining insurance	It is necessary for our legitimate interests which are to ensure staff meet the Club's policies and objectives and managing its business effectively and meet any requirements set by football governing bodies and
	and, in addition for 'special category' personal data
<b>Direct marketing.</b> Including creating a personal profile for you and maintaining details of your preferences. This may include offers from <a href="#">CLUB SPONSORS &amp; PARTNERS</a> and <a href="#">CLUB AFFILIATES</a>	Explicit consent or
	It is necessary for carrying out obligations and exercising the individual's rights or those of the Club in the field of employment and/or
	It relates to personal data that are manifestly made public by you and/or
	It is necessary for insurance purposes and/or
<b>Commercial activities.</b> Administration and carrying out Club commercial activities including those that have been specifically agreed with you / the person who has booked / purchased for you ( <i>as applicable</i> ). This may include offers from <a href="#">CLUB SPONSORS &amp; PARTNERS</a> and <a href="#">CLUB AFFILIATES</a>	It is necessary for the establishment, exercise or defence of legal claims
	Personal data
	It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or
<b>Health and welfare.</b> Dealing with any medical issues, injuries, allergies, special needs and mental health concerns, providing physical and emotional support	It is necessary for our legitimate interests which are to ensure are able to effectively perform their duties and meet insurance requirements

	<table border="1"> <tr> <td data-bbox="699 161 1412 201">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="699 210 1412 250">Explicit consent or</td> </tr> <tr> <td data-bbox="699 259 1412 318">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="699 327 1412 385">It is in your vital interests or the vital interests of another person and/or</td> </tr> <tr> <td data-bbox="699 394 1412 488">It is necessary for the purposes of preventative medicine, medical diagnosis or the provision of health or social care or treatment and/or</td> </tr> <tr> <td data-bbox="699 497 1412 555">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It relates to personal data that are manifestly made public by you and/or	It is in your vital interests or the vital interests of another person and/or	It is necessary for the purposes of preventative medicine, medical diagnosis or the provision of health or social care or treatment and/or	It is necessary for the establishment, exercise or defence of legal claims		
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<p><b>Safeguarding matters.</b> Administration of support in safeguarding children and adults at risk Including dealing with safeguarding concerns raised/suspected.</p>	<table border="1"> <tr> <td data-bbox="699 618 1412 658">Personal data</td> </tr> <tr> <td data-bbox="699 667 1412 707">It is necessary for compliance with a legal obligation; and/or</td> </tr> <tr> <td data-bbox="699 716 1412 797">It is necessary for our legitimate interests and those of others to ensure the safety of all persons that are involved with or come into contact with the Club and to preserve the reputation of the Club</td> </tr> <tr> <td data-bbox="699 837 1412 878">and, in addition for 'special category' personal data</td> </tr> <tr> <td data-bbox="699 887 1412 927">Explicit consent or</td> </tr> <tr> <td data-bbox="699 936 1412 1016">It is necessary to protect an individual from neglect or physical, mental or emotional harm or to protect the physical, mental or emotional well-being of an individual</td> </tr> <tr> <td data-bbox="699 1025 1412 1084">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="699 1093 1412 1151">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	Personal data	It is necessary for compliance with a legal obligation; and/or	It is necessary for our legitimate interests and those of others to ensure the safety of all persons that are involved with or come into contact with the Club and to preserve the reputation of the Club	and, in addition for 'special category' personal data	Explicit consent or	It is necessary to protect an individual from neglect or physical, mental or emotional harm or to protect the physical, mental or emotional well-being of an individual	It relates to personal data that are manifestly made public by you and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p><b>Anti-corruption and fraud.</b> Monitoring, compliance and enforcement</p>	<table border="1"> <tr> <td data-bbox="699 1223 1412 1263">for personal data and 'special category' personal data</td> </tr> <tr> <td data-bbox="699 1272 1412 1330">It is in our legitimate interests and those of other sports to preserve standards in sport and</td> </tr> <tr> <td data-bbox="699 1339 1412 1397">It relates to personal data that are manifestly made public by you and/or</td> </tr> <tr> <td data-bbox="699 1406 1412 1464">It is necessary for the prevention or detection of an unlawful act and/or</td> </tr> <tr> <td data-bbox="699 1473 1412 1514">It is necessary for the prevention of fraud and/or</td> </tr> <tr> <td data-bbox="699 1523 1412 1581">It is necessary for the establishment, exercise or defence of legal claims</td> </tr> </table>	for personal data and 'special category' personal data	It is in our legitimate interests and those of other sports to preserve standards in sport and	It relates to personal data that are manifestly made public by you and/or	It is necessary for the prevention or detection of an unlawful act and/or	It is necessary for the prevention of fraud and/or	It is necessary for the establishment, exercise or defence of legal claims		
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<p><b>Diversity and inclusion monitoring.</b> Diversity monitoring and compliance (such as in respect of ethnicity, gender, race, age and disability) and providing equal opportunities</p>	<table border="1"> <tr><td>personal data</td></tr> <tr><td>It is necessary for compliance with a legal obligation and/or</td></tr> <tr><td>It is necessary for our legitimate interests which are to ensure we meet the Club's objectives and requirements set by football governing bodies</td></tr> <tr><td>and, in addition for 'special category' personal data</td></tr> <tr><td>Explicit consent or</td></tr> <tr><td>It is necessary for the purposes of equality of opportunity and/or</td></tr> <tr><td>Is necessary for the establishment, exercise or defence of legal claims</td></tr> </table>	personal data	It is necessary for compliance with a legal obligation and/or	It is necessary for our legitimate interests which are to ensure we meet the Club's objectives and requirements set by football governing bodies	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for the purposes of equality of opportunity and/or	Is necessary for the establishment, exercise or defence of legal claims	
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<p><b>Quality and improvement monitoring</b></p>									
<p><b>Record keeping.</b> Maintaining Club records including historical records of resources, incidents and compliance</p>	<table border="1"> <tr><td>personal data</td></tr> <tr><td>It is necessary for our legitimate interests and those of others which are to ensure effective administration of Club activities and to ensure they meet the Club's objectives and the requirements set by football governing bodies and it is in our legitimate interests to maintain records.</td></tr> </table>	personal data	It is necessary for our legitimate interests and those of others which are to ensure effective administration of Club activities and to ensure they meet the Club's objectives and the requirements set by football governing bodies and it is in our legitimate interests to maintain records.						
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<p><b>Reputation.</b> Club reputation management</p>									
<p><b>Publicity.</b> Publicity and media activity</p>	<table border="1"> <tr><td>and, in addition for 'special category' personal data</td></tr> <tr><td>Explicit consent or</td></tr> <tr><td>It is necessary for scientific or historical research or statistical purposes and/or</td></tr> <tr><td>It is necessary to protect the integrity of sport and/or</td></tr> <tr><td>Is necessary for the establishment, exercise or defence of legal claims</td></tr> </table>	and, in addition for 'special category' personal data	Explicit consent or	It is necessary for scientific or historical research or statistical purposes and/or	It is necessary to protect the integrity of sport and/or	Is necessary for the establishment, exercise or defence of legal claims			
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<p><b>Security.</b> Including maintaining security and safety at our stadium and other premises</p>	<table border="1"> <tr><td>personal data</td></tr> <tr><td>It is necessary for compliance with a legal obligation and/or</td></tr> <tr><td>It is necessary for our legitimate interests and those of others which are to ensure effective safety of players, staff, fans and others at our offices, training grounds and match and other venues</td></tr> <tr><td>and, in addition for 'special category' personal data</td></tr> <tr><td>Explicit consent or</td></tr> <tr><td>It relates to personal data that are manifestly made public by you and/or</td></tr> <tr><td>It is necessary for insurance purposes and/or</td></tr> <tr><td>It is necessary for the establishment, exercise or defence of legal claims</td></tr> </table>	personal data	It is necessary for compliance with a legal obligation and/or	It is necessary for our legitimate interests and those of others which are to ensure effective safety of players, staff, fans and others at our offices, training grounds and match and other venues	and, in addition for 'special category' personal data	Explicit consent or	It relates to personal data that are manifestly made public by you and/or	It is necessary for insurance purposes and/or	It is necessary for the establishment, exercise or defence of legal claims
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<p><b>Legal matters.</b> Including dealing with legal claims and dispute.</p>	<table border="1"> <tr><td>Personal data</td></tr> <tr><td>It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or</td></tr> <tr><td>It is necessary for compliance with a legal obligation; and/or</td></tr> </table>	Personal data	It is necessary to fulfil the contract that you are going to enter into or have entered into with us and/or	It is necessary for compliance with a legal obligation; and/or					
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	Explicit consent or
	It relates to personal data that are manifestly made public by you and/or
	It is necessary for the establishment, exercise or defence of legal claims

### Who we may disclose your personal data to

You

Your agent / representative(s)

Family members

Emergency contacts

Football governing bodies such as The FA, EFL and English Premier League, UEFA, FIFA

The Club's owner(s) and shareholders

Professional staff (including external medical professionals if applicable)

Relevant service providers that provide services for the Club for example, if you book a DJ as part of a [WEDDING PACKAGE](#)

The world at large via Club websites, social media, brochures, match day programmes, press / media releases, newsletters and publicity materials

The media / press / broadcasters

Media agencies

Stakeholders in anti-corruption matters including other sports organisations, the Gambling Commission, betting operators and sports related integrity units

Fans and club members *(where relevant)*

[CLUB SPONSORS & PARTNERS](#)

Disciplinary panels

[CLUB AFFILIATE](#)

Complainants

Insurers

HM Revenue & Customs

Local authorities and relevant agencies regarding safeguarding

Police and other law enforcement agencies

Statutory agencies (e.g. Children Services or Adult Services)

Professional advisers

Regulators

Courts or tribunals

Government agencies *(where we have a legal obligation to do so)*

### Location of your personal data

In most cases, we normally keep your personal data within the United Kingdom or the European Economic Area. However, some of our services providers (such as those providing technology services to the Club) use facilities in other countries and this may mean your personal data is held in these other countries.

Wherever we transfer your personal data outside of the United Kingdom, we will take proper care to ensure that it is protected in accordance with this Privacy Notice and applicable privacy laws.

Where we use service providers that provide their services in countries that are not deemed to have an adequate level of protection for personal data, we will normally use the United Kingdom approved 'Standard Contractual Clauses' as the legally accepted mechanism to allow the transfer and protect your data protection rights.

### How long we keep your personal data for

The duration for which we keep personal data depends on your relationship with us. The normal expectation is detailed below.

**General records**

Normally for 6 years after you cease to be involved with the Club or 6 years after our last contact with you (*whichever is longer*)

**Safeguarding and anti-corruption data and sanctions**

At least 7 years after the incident and may be longer, potentially indefinitely, where there is a continued risk or where statutory or other official guidance requires otherwise.

After this time period we will securely delete your personal data or anonymise / pseudonymise it unless we have a legal basis for keeping it.

In the unlikely event that there is a complaint or incident which involves or affects you, we may keep your personal data for 6 years after the matter is resolved.

## Your legal rights in respect of your personal data

You have a number of legal rights over your personal data which are:

Right	Explanation
<b>access</b>	You have the right to receive a copy of the personal data that we hold about you. We will need proof of identity and proof of authority if the request comes from someone other than you. This will ensure we only provide information to the correct person.
<b>withdraw consent to direct marketing</b>	You can exercise this right at any time. Just send an email to <a href="mailto:dataprotection@wbafc.co.uk">dataprotection@wbafc.co.uk</a> and we will take care of this for you.
<b>withdraw consent to other processing.</b>	Where the only legal basis for our processing your personal data is that we have your consent, you can withdraw that consent at any time, and we will have to stop processing your personal data. Please note, this does not mean that processing carried out before you withdrew your consent is unlawful.
<b>rectification</b>	If you think any of the personal data we hold about you is inaccurate – please contact us at <a href="mailto:dataprotection@wbafc.co.uk">dataprotection@wbafc.co.uk</a> and we will check and, if necessary, amend our records.
<b>restriction</b>	In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you think what we hold is inaccurate and we disagree, we may restrict what we do with your personal data until the accuracy has been verified.
<b>erasure</b>	In some circumstances, for example, where we have no legal basis for keeping your personal data, you may be entitled to require us to delete it.
<b>objection</b>	Where our processing is based on it being in our legitimate interests, you may be entitled to object to us processing it.
<b>portability</b>	Where you have provided personal data to us electronically, you may be entitled to require us to provide that data to you electronically or to transmit it to someone else.
<b>complain</b>	If you have any concerns or complaints about how we are handling your personal data we would prefer you to get in touch with us directly so that we can try to resolve the You can also contact the Information Commissioner’s Office at <a href="http://www.ico.org.uk">www.ico.org.uk</a> .

Some of these legal rights are subject to exceptions which means that we may be entitled, or required, to refuse to comply with a request