

# **Privacy policy**

# Summary of how Jersey Rugby Football Club ("Jersey Reds") and the RFU use your data

- Jersey Reds (also referred to as "the Club", "we" or "us") uses your personal data to manage
  and administer your membership and your involvement with its Jersey Reds' teams and club,
  and to keep in contact with you for these purposes. Up and coming matches, club events,
  private functions and room hire.
- Some data is also shared with the RFU for membership purposes, including eligibility for the purchase of Twickenham debentures and international tickets.
- Data is also held on our membership club system in Jersey.
- Where we or the RFU rely on your consent, such as any consent we seek for mailing and/ or Email usage, for membership related and/or non-member super season ticket holders matters, such as; member meeting notices, newsletters, ticketing, in addition to the general marketing of Jersey Reds related products and events (both rugby and non-rugby). You can withdraw this consent at any time.

#### What does this policy cover?

This policy describes how Jersey Reds will make use of the data we handle in relation to our members and non-member super season ticket holders, including our use of the Game Management System ("GMS") provided by the Rugby Football Union ("RFU"). The policy also describes the RFU's use of data on GMS.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

#### What information do we collect?

We collect and process personal data from you or your parent when you join and when we carry out annual renewals of your membership. This includes:

- your name
- your gender,
- · your date of birth,
- your RFU ID (as assigned in GMS)
- your home address, email address and phone number;
- your type of membership and involvement in particular teams, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.;
- your payment and/or bank account details, where you provide these to pay for membership;
- your marketing preferences, including any consents you have given us;

#### What information do we receive from third parties?

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and RFU on the status of any DBS check you have been required to take.

#### How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for your membership and any merchandise, or enter a competition. This includes:
  - taking payments;
  - o communicating with you;
  - providing and arranging the delivery or other provision of products, prizes or services;
- As required by the Club to conduct our business and pursue our legitimate interests, in particular:
  - we will use your information to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes;
  - we use CCTV cameras to maintain the security of our premises, and may use this video to investigate incidents at the Club or its premises;
  - we may choose to send you promotional materials and offers by post or by phone, or by email where we want to send you offers relating to similar Jersey Reds related products and services that you have already bought
  - we use data of some individuals to invite them to take part in market research;
- Where you give us consent:
  - o we will send you direct marketing or promotional material by email and or post;
  - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
  - we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
  - we may respond to requests by government or law enforcement authorities conducting an investigation.

#### How does the RFU use any of my information?

The RFU provides GMS, but make its own use of the following information:

- your name;
- your gender;
- your date of birth;
- your RFU ID (as assigned in GMS);
- · your home address, email address and phone number; and
- your type of membership and involvement with any particular teams at the Club

The RFU uses this information as follows:

- As required by the RFU to conduct its business and pursue its legitimate interests, in particular:
  - communicating with you or about you where necessary to administer Rugby in England, including responding to any questions you send to the RFU about GMS;
  - monitoring use of GMS, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about GMS;
  - maintaining statistics and conducting analysis on the make-up of rugby's participants;
     and
  - o communicating with you to ask for your opinion on RFU initiatives.
- For purposes which are required by law:
  - The RFU may respond to requests by government or law enforcement authorities conducting an investigation.

# Withdrawing consent or otherwise objecting to direct marketing

Wherever Jersey Reds and/or the RFU rely on your consent, you will always be able to withdraw that consent, although each may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, Jersey Reds and/or the RFU are able to send you direct marketing without your consent, where both rely on its legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting either Jersey Reds and/or the RFU using the details set out below in the "**How do I get in touch with you or the RFU?**" section.

#### Who will Jersey Reds share this data with, where and when?

The RFU as the provider of the GMS membership system

Some limited information may be shared with other stakeholders in rugby, such as other clubs, Constituent Bodies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of Jersey Reds or the RFU's legitimate interests in compliance with applicable laws.

# What rights do I have?

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with us—or, as appropriate, the RFU or its data protection officer—using the details set out below. If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office.

### How do I get in touch with Jersey Reds or the RFU?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch with either <a href="mailto:vicki.perchard@jerseyreds.je">vicki.perchard@jerseyreds.je</a> / <a href="mailto:nicola.dando@jerseyreds.je">nicola.dando@jerseyreds.je</a> or by writing to The Jersey Reds Rugby Club, Rue Des Landes, St Peter, JE3 7BG

If you have any concerns about how the RFU process your data, you can get in touch at legal@rfu.com or by writing to; The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

# How long will Jersey Reds or the RFU retain my data?

We process the majority of your data for as long as you are an active member or super season ticket holder.

Where we process personal data for marketing purposes or with your consent, we process the data for as long as you're a member or super season ticket holder unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS for such period as is set out in the RFU's privacy notice to be set out on www.englandrugby.com.

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