



PRIVACY POLICY

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1. Introduction

We at the Hull Kingston Rovers Football Club Limited (Company number 00085808, registered office KCOM Craven Park, Preston Road, Hull, HU9 5HE) (“we”, “our” or “us”) are committed to respecting your privacy and want to make sure all the personal information we have collected about you is safe and secure.

This Policy set outs our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the “GDPR”) and explains how we collect, store and use your personal information.

Although we are not required to appoint a Data Protection Officer, we have chosen to do so to ensure the highest level of commitment to your personal information. If you have any questions about this Policy or what we do with your personal information, their contact details are set out in section 17 below.

Collecting specific, relevant personal information is a necessary part of us providing you with an excellent service. When we hold or use your personal information, we will provide you with details covering what information we hold, how your personal information may be used, the basis for this use and details of your rights.

Where we collect personal information from you directly, we will provide or signpost you towards this information at the time we collect the personal information from you. Where we receive your personal information indirectly, you will either receive this information at the time your personal information is collected, or when we first contact you.

2. HOW DO WE PROCESS YOUR PERSONAL INFORMATION?

In most cases we will be a data controller of your personal information. A data controller controls how personal information is processed and used. We will use your personal information as described in section 6 below.

A data processor processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller. In any case where we are not a data controller, this means that you cannot exercise your rights against us directly, but you can do so against the data controller (i.e. the person who controls how we process the personal information). In these cases we will inform you who is the data controller of your personal information so that you can direct any such requests to them.

3. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you sign up to become a Hull Kingston Rovers Season Pass member or otherwise sign up to access services that we provide, either through www.hullkr.co.uk (our “Site”) or otherwise, you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details which allow us to contact you directly, such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;

- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, IP addresses, user names and other IT system identifying information;
- records of your participation and/or attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

4. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation; and
- information about your health, including any medical condition, health and sickness records, medical records and health professional information.

It may be that we do not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

5. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information when you sign up to become a Hull KR season pass member, sign up to receive services or products provided through our Site or other methods, purchase any services or products we offer online, make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you sign up to become a Hull KR season pass member through our Direct Debit scheme the Data Controller is Debit Finance Collections Plc and we are Data Processors as they collect your personal information and share this information with us so we can process your membership.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this Privacy Policy with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in section 11 below.

6. HOW WE USE THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and the lawful basis for being able to do this.

Purpose	Personal Information Used	Lawful Basis
To administer any membership account(s) you have, manage the relationship with you and dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any merchandise, products and/or services.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services.
To send you information which is included within a membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on the Club.	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information you might find useful or which you have requested, including newsletters, information about Membership, events, participation products and information about commercial partners	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases,

		we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above. We have specific retention policies in relation to compliance and have a legitimate interest in retaining such records for varying lengths of time.
The security of IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your participation and/or attendance at any events or competitions.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so except where such is not possible (i.e crowd photos from events, where you will be notified of such as part of your ticket purchase).
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member.

For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in section 17 below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

7. DIRECT MARKETING

From time to time, we may contact you by email, post, phone or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by updating your preferences within your site or emailing us at DPO@hullkr.co.uk.

You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

8. DISCLOSURE OF YOUR PERSONAL INFORMATION

Generally we share information where we need to do so in order to run our organisation (e.g. where other people process information for us). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

We share personal information with the following parties:

- Any party approved by you or notified to you at the point of data collection;
- To our governing body to allow them to properly administer Rugby League on a local, regional and national level;
- Other service providers: for example, email marketing specialists, payment processors, data analysis, promotional advisors, contractors or suppliers and IT services (including CRM, website, video and teleconference services);
- Our supply chain partners and sub-contractors, such as couriers, import/export agents and shippers;
- Our commercial partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners either as part of your membership package or where you have given your express for us to do so;
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives;
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security;
- Certain parties who act as joint Data Controllers or Data Processes in relation to services that we provide. You will be notified where this is the case;
- Those who we are required to share your personal information with for the purpose of monitoring betting for the purposes of compliance cases.

We do not disclose personal information to anyone else except as set out above.

9. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in.

We will take all reasonable steps to ensure that your personal information is only used in accordance with this Privacy Policy and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in section 17 below.

10. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

We will only hold your information for as long as is necessary. Where you ask us to delete records, we may delete it earlier, subject to any retention requirements.

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us.

Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked with us;
- Where we have specific internal policies relating to the retention of data for compliance matters;
- Where we have specific internal policies relating to the retention of medical data.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You will be able to update some of the personal information we hold about you through Ticket Hour database. Alternatively, you can contact the relevant department or by using the details set out in section 17 below.

11. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in section 17 below. You can also unsubscribe from any direct marketing by clicking on the unsubscribe link in the marketing messages we send to you.

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this Privacy Policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

If you are unhappy with the way we are using your personal information, we are here to help and would encourage you to contact us to resolve your complaint by using the contact details set out in section 17 below.

12. LINKING WITH THIRD PARTY SITES

Our Site may, from time to time, contain links to and from the websites of our commercial partners, Rugby League Bodies and clubs. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

13. SECURITY

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

14. COOKIES

Certain parts of our Site use "cookies" to keep track of your visit and to help you navigate between sections. For more details please see our Cookie Policy.

15. LOG FILES

In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.

16. CHANGES TO THIS POLICY

You are encouraged to check back regularly for updates to our Privacy Policy, as we may make changes at any time. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in section 17 below.

17. CONTACT

In the event of any query or complaint in connection with the information we hold about you, our Data Protection Officer can be contacted by email on DPO@hullkr.co.uk or in writing to Data Protection Officer, Hull Kingston Rovers Football Club Limited, KCOM Craven Park, Hull, HU9 5HE.