

# Preston North End Community and Education Trust Privacy Policy

Last updated: 16<sup>th</sup> August 2018



## 1 Introduction

- 1.1 We are the Preston North End Community and Education Trust ("PNECET", "us", "our" or "community") and we operate within the local and wider community areas of Preston. We run a number of key programmes including the National Citizen Service (NCS), Premier League Primary Stars, Premier League Kicks amongst other community initiatives.
- 1.2 We are a company registered in England with company number 6627591 and registered charity, number: 1130773 whose registered offices are at Preston North End FC, Sir Tom Finney Way, Deepdale, Preston PR1 6RU. We are registered as a data controller with the Information Commissioner in the United Kingdom with registration number: 2A122487. This registration covers the uses of personal information set out below.
- 1.3 This privacy notice explains what personal information we collect about you, how we use it, and the steps we take to ensure that it is kept secure. It also explains the rights you have in respect of the personal information we hold about you and how to contact us.
- 1.4 This privacy policy is subject to periodic review. The date at the top of this page reflects when it was last updated. We will notify you by email if we make any substantial changes to this policy.

## 2 What is Personal Information

- 2.1 Personal information is any information which we collect about you that can be used to identify you and is stored either electronically or in a usable filing system.
- 2.2 Personal information will include any information, such as your name, date of birth and address, that is collected about you by us for any reason, whether it be in connection with the delivery of our services, marketing or when you contact us.
- 2.3 It also includes any personal information that we collect about you that is in the public domain, such as information made public on social media that is available to us when you connect with us on social media.
- 2.4 It is our intention to provide you with as much information as possible about what we do with your personal information, so that when you provide personal information to us, you do so with an awareness of how it will be used.

### **3 Information we collect and what we do with it**

3.1 We collect a wide variety of personal information from a wide range of sources in order to run our business activities. In order to provide the services that we are engaged to provide to our participants we collect, store and use personal information disclosed to us via emails, our website, telephone conversations, our premises or partner's premises:

- (a) when you take part in any of our activities (online or in person);
- (b) if you purchase one of our services (online or in person)
- (c) when you contact us;
- (d) if you purchase tickets for PNECET activities (whether online or in person);
- (e) if you apply for a PNECET membership;
- (f) if you attend events on our grounds; and
- (g) when you visit our website(s).

3.2 We use personal data for the purposes of delivering activities and tracking participant's progress in those activities. This may fall within the legitimate interest basis or potentially the public interest basis. In addition we will obtain consent from participants where sensitive personal data is collected. We have implemented appropriate security measures, to give our partners confidence that the personal data will be protected. We aim to only collect information that is necessary for us to perform our business operations efficiently and effectively, such as

- (a) Full name;
- (b) Date of birth;
- (c) Health and medical details;
- (d) Disability;
- (e) Gender;
- (f) Ethnicity;
- (g) Address;
- (h) Contact details including phone and E-mail;
- (i) Emergency contact details;
- (j) Payment details to take payment for services (if applicable);
- (k) School name (if applicable);
- (l) Social media (optional); and
- (m) Refer a friend (optional).

### 3.3 Contacting us

When you contact us, all communications are handled, reviewed and responded to internally by us.

Please note, however, that:

- (a) email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law;
- (b) we use Elite Group PLC for our main call system, which provides caller ID services, we will only use this information for the purposes of handling your call and contacting you in relation to the purpose of your call.

As part of communicating with us, you will also submit personal information about you that we require in our legitimate interest. This includes your full name, date of birth, health and wellbeing details, address and additional contact details.

Any personal information that is provided in and during communications is used only for the purpose of reviewing the communications and conducting the ongoing administration and management of communications.

Please note that we may need to contact you by post, email or telephone in order for us to deal with your communication. Please make sure that you keep us updated of any changes or inaccuracies in your contact details.

We will delete all communications that are more than 7 years old.

### 3.4 Personal information collected when you engage in our community activities

When you take part in activities with us, whether online, at our premises or a partner's premises, we will need to collect information from you.

When enrolling you to our activities, we will collect your salutation, first name and surname, date of birth, address, contact details, health and medical details and in some cases payment details (explained in [section 3.2](#)). We collect this information about you for purposes of delivering activities and tracking participant's journeys, progression and impact in those activities. If you do not provide this information, we cannot allow you to take part in our activities. If you are purchasing a service for a recipient we will require the recipient's salutation, first name and surname, date of birth, address, health and wellbeing details and contact details, in order to register them to take part in our activities.

It is in our legitimate interests to collect your contact details in order to manage and run the activities and our relationship with you; for example, we will need to contact you if an activity for which you have signed up to has been postponed or cancelled.

All hard copy files containing your personal information will be destroyed after 7 years and all electronic records will be deleted after 7 years.

### 3.5 Personal information collected when you take part in a S.E.N.D session or event

In order to take part in our S.E.N.D sessions or events, we will need to collect personal information about you. We will collect your name, address, contact details and date of birth. We will also require information related to your disability, condition or illness.

Where you provide us with this information, you will have explicitly consented to our use of that information and you will have the right to withdraw consent (explained in [section 5.1](#)). This information includes the following personal information, which we refer to as **special categories of data**:

- (a) a description of your disability, condition or illness;
- (b) confirmation of whether you have the disability, condition or illness;
- (c) the name, if any, of any organisation that supports you, if the name by itself, would help identify that there is a disability, condition or illness;
- (d) proof of additional support required, if any, due to your disability, condition or illness;
- (e) any other information relating to your disability, condition or illness that you may provide at the request of PNECET.

We understand how important special categories of data are, so we will not share the special categories of data for any other purposes other than ensuring your safety at our sessions and events. Where you require additional support, we may need to share the details of your disability, condition or illness with the school/coach/teacher who may liaise with the relevant managers to provide you with support and assistance. We do this to ensure that you are well looked after. Even though you may be in a familiar environment i.e. at your school, college or community centre etc. we want to make sure that you are always safe when at our session or event and we need to be aware of any disability, condition or illness that may require special attention. For example, if you are taken ill during a session, our staff members will need to know that you have a condition or illness so that they can help you efficiently and safely. We will of course ensure that the information disclosed to staff members for this purpose is minimised to the maximum extent possible.

We will destroy the special categories of data when your session or event has expired or if you haven't participated with us for three years.

### **3.6 Personal information collected when you attend events on our grounds**

We operate CCTV at our stadium which collects data to help us to maintain a safe environment within the stadium and or offices during events. We also use the CCTV information for the purposes of security and crime prevention.

TG Baker Limited supply and maintain the CCTV systems around the stadium and Vuetek in the PNECET offices.

We employ photographers on a contractual basis to take photographs of crowd scenes during matchdays. These are used to promote PNECET, in our legitimate interest, on various platforms including the local newspaper, social media and the [www.pne.com/pnecet](http://www.pne.com/pnecet) website.

We will ensure that there are appropriate safeguards in place with these third party contractors to protect your personal information and to ensure that they abide by this privacy policy.

### 3.7 Our marketing activities

If you have made a purchase from us, or have made an enquiry, we will have given you a clear opportunity to object to or opt-out of receiving marketing communications at the time of collecting your personal information. If you have not objected to opt out of receiving the marketing communication, we will contact you by email or telephone in our legitimate interests to promote our products and services that are relevant to your purchase or enquiry. **You have the right to object to receiving these communications at any time by contacting us using the details listed in section 6.**

If you are not an existing customer of ours but are interested in PNECET, we will provide you with a clear choice to consent to receiving marketing promotional material, updates, reminders and communications by giving you an opt-in to receiving such communications. If you have provided your consent we will collect your salutation, first name and surname, date of birth, address and contact details to provide you with such communications. **You have the right to withdraw your consent at any time. For full details on how to withdraw consent please see section 5.1.**

We will either collect your personal information, in a hard copy form or in electronic form on our website. If we use a hard copy form, one of our personnel will within seven days manually input the information into our electronic system and destroy the hard copy. All electronic files are stored securely on our remote desktop maintained and hosted by Elite, our IT system provider. Elite Group PLC in England is a provider of industry standard software solutions.

We will also give you the option to consent to your personal information being shared with PNECET partners and the English Football League Trust (EFLT) partners so that they can market products and services to you that you may be interested in based on your interest in PNECET. A full list of PNECET partners and the EFLT partners are available below and listed on our website at [www.pne.com/PNECET](http://www.pne.com/PNECET). We recommend that you review each of the partners' privacy notices.

#### PNECET Partners

- Preston North End Football Club - <https://www.pnefc.net/website-privacy-policy/>
- Premier League Charitable Fund - <https://www.premierleague.com/privacy-policy>
- EFLT - <https://www.efltrust.com/our-policies/>
- National Citizen Service - <http://www.ncsyes.co.uk/privacy-policy>
- Inspira - <https://www.inspira.org.uk/privacy-policy>
- Preston's College - <https://www.preston.ac.uk/privacy/>
- Lancashire FA - <http://www.lancashirefa.com/public/privacy-policy>
- Places for People - <https://www.placesforpeople.co.uk/support-pages/privacy/>
- Lancashire Future U – [www.lancashirefutureu.org.uk](http://www.lancashirefutureu.org.uk)
- University of South Wales - <https://www.southwales.ac.uk/privacy-and-cookies/>

If you ever decide you no longer wish to receive our marketing communications, you can opt out at any time by unsubscribing from the mailing list, using the link provided in the marketing communications email, or by using the contact details in **section 6**. If you do unsubscribe, please note that we will still keep your email in a separate secure list

so that we can make sure that you do not receive our marketing communications again in the future.

### 3.8 Visiting our Website

We operate two websites, [www.pne.com/PNECET](http://www.pne.com/PNECET) which has information on all the latest PNECET news, [www.mypne.com](http://www.mypne.com) is our website for purchasing tickets. Our websites are managed by the English Football League Digital (EFL) and Intascope.com respectively. As part of the service provided by the EFL Digital and Intascope.com, they will help to maintain the security and the performance of our website by (i) encrypting data in transit and protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors using third party New Relic and (iv) providing secure hosting services through Microsoft Azure.

The EFL Digital privacy notice can be found at [www.pnefc.net/privacy-policy/](http://www.pnefc.net/privacy-policy/).

The Intascope.com privacy policy will be updated shortly.

#### 3.8.1 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our website for our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our website, which allows us to provide you with a better experience and also allows us to improve our website.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. However, if you do block cookies there may be parts of our website that you will be unable to access or that will not function properly.

The cookies that we use for [www.pne.com](http://www.pne.com) can be found by clicking on the following link:

<https://www.pnefc.net/privacy-policy/>

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent them.

#### 3.8.2 Third party services

- (a) Whenever you visit our websites, [www.pne.com/PNECET](http://www.pne.com/PNECET) and [www.mypne.com](http://www.mypne.com), the website developers EFL Digital and Intascope.com will use a third party service, Google Analytics and Hotjar on our behalf and for our legitimate interests to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is so that we can find out how many people visit the website and the various parts of the website. This information helps us to find out how our websites are working and how to improve them. We do not identify anyone and we do not make or allow Google Analytics or Hotjar to (or attempt to) identify anyone visiting our website.

The privacy policy for Google Analytics can be located using the following link;

<https://policies.google.com/privacy?hl=en>

The privacy policy for Hotjar can be located using the following link;

<https://www.hotjar.com/legal/policies/privacy>

- (b) We have YouTube video content embedded on our website. YouTube controls any information that is collected by viewing their content.

YouTube's privacy policy can be located at <https://www.google.co.uk/intl/en-GB/policies/privacy/>.

### 3.8.3 Turning cookies off

- (a) You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies. The "Help" function within your browser should tell you how.
- (b) Alternatively you can visit <http://www.attacat.co.uk/resources/cookies/how-to-ban> or [www.allaboutcookies.org](http://www.allaboutcookies.org), which provide general information about cookies and how you can manage cookies on your computer.
- (c) Please be aware that switching off cookies is likely to limit the functionality of our websites as far as you are concerned.
- (d) It may be that if you have concerns around cookies they in fact relate to so called "spyware". Rather than switching off cookies in your browser you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive.

## 3.9 Social Media

Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the relevant social media network.

We recommend that you read their privacy notices and contact them directly if you have any concerns regarding their use of your personal information.

Our website contains links to our social media pages and we currently use:

- 3.9.1 Twitter, whose privacy notice can be found at <https://twitter.com/en/privacy>
- 3.9.2 Facebook, whose privacy notice can be found at <https://en-gb.facebook.com/privacy/explanation>
- 3.9.3 Instagram, whose privacy notice can be found at <https://help.instagram.com/155833707900388>
- 3.9.4 YouTube, whose privacy notice can be found at [https://www.youtube.com/static?template=privacy\\_guidelines](https://www.youtube.com/static?template=privacy_guidelines)
- 3.9.5 Snapchat, whose privacy policy can be found at <https://www.snap.com/en-GB/privacy/privacy-center/>

## 4 Disclosure of personal information

- 4.1 We will not usually disclose your personal information other than as already explained in **section 2 and 3** above. However, there may be circumstances where we need to

share personal information other than as anticipated in **Section 2 and 3** above. These include:

4.1.1 Anonymised statistics relating to the children who participate our sessions are made available to Premier League Charitable Fund (PLCF) through the Views system. In order for PLCF to regularly report back to its funders on the impact and reach of their funding, we are required to submit details relating to the participants that take part in the sessions funded by PLCF, including the levels of engagement of those participants. These details are recorded through the Views system, and PLCF may analyse these details on a statistical, anonymised basis only. This information is used in order to feed back to partners and funders in the same way, through statistical, anonymised analysis only. This enables PLCF and its funders to evaluate their programmes, their reach and impact and return on investment, which can be used to make a case to continue funding our work and that of other CCOs. Not having access to this statistical data would mean that an appropriate evaluation of our work could not be carried out, which could lead to a reduction in funding for our work.

The privacy policy for Views can be located using the following link;

<http://www.viewsapp.net/assets/docs/Views%20website%20privacy%20policy.pdf>

4.1.2 where we are legally required to disclose the information. This includes sharing the personal information with tax authorities and law enforcement agencies for the purposes of the prevention and detection of crime;

4.1.3 where we need to disclose the personal information for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;

4.1.4 disclosure is required to protect PNECET interests, or someone else's interests (for example, to prevent fraud);

4.1.5 disclosure is necessary in the legitimate interests of a third party for the purposes of crime prevention and the prosecution of offenders (for example, where the police request to view CCTV footage around the time of an incident or crime);

4.1.6 disclosure is necessary to protect your vital interests (for example if you are unwell at our premises, we may need to seek medical assistance);

4.1.7 it is to a third party for the purposes of providing administrative or processing services on our behalf. If such disclosure is required we will take steps to ensure that the third party protects the personal information in the same way that we do and notify you of any changes to this privacy notice; and

4.1.8 to any prospective purchaser of our business assets or organisation.

## 5 Your rights

You have rights in respect of your personal information and this section explains a bit more about those rights that are applicable to you, what we do with your personal information and when you can exercise them. If you would like more information about any of your rights, please contact us on the details set out [section 6](#).

### 5.1 Withdrawing consent

Where you have explicitly consented to us processing special categories of data, you can withdraw consent to our processing the special categories of data at any time during the application process. If you wish to withdraw consent, please do so by sending your request in writing to our contact details in [section 6](#).

### 5.2 Accessing your personal information

We want you to fully understand and be comfortable with how we use your personal information. You can contact us at any time to ask whether we process any personal information about you. If we do hold or use your personal information in any way, you have the right to access that personal information.

All we ask is that:

- 5.2.1 you make your request to access in writing to the contact details in [section 6](#);
- 5.2.2 you verify your identity; and
- 5.2.3 you are fair and reasonable with how often you make this kind of request.

Please allow us up to one month from receipt of your request in order to provide a response.

### 5.3 Requesting more information

We hope that you can understand that it is very difficult to cover all the possible ways in which we collect and use personal information. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal information develops. However, if you have any questions regarding our use of your personal information, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any specific questions, or need anything explaining, please get in touch on the contact details in [section 7](#).

### 5.4 Additional rights

You also have some additional rights that you may exercise as set out here. We may publish a policy from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it here. In each instance we may ask you to make your request in writing to the contact addresses in [section 6](#) and provide verification of your identity.

- 5.4.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address)

- 5.4.2 You have the right to request that we erase your personal information. Please be aware that we can only comply with such a request if
- (a) your personal information is no longer required for the purposes it was collected for (for example, we need your personal information to respond to a communication);
  - (b) the collection, storage or use of the personal information by us is not required by law;
  - (c) your personal information is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings;
  - (d) we have no necessary overriding legitimate interest in continuing to process your personal information.
- 5.4.3 You have the right to request that we restrict or refrain from processing your personal information:
- (a) for the time it takes us to verify the accuracy of your personal information where you have disputed its accuracy;
  - (b) where the collection, storage or use of the personal information by us is unlawful but you decide not to ask for erasure;
  - (c) where, we no longer need your personal information but you need them for the purposes of establishing, exercising or defending a legal claim;
  - (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal information, where you have exercised your right to object to processing.
- 5.4.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.
- 5.4.5 You have the right to object to our use of your personal information:
- (a) where we are using that information based on our legitimate interests, and where we do not have compelling overriding grounds to continue to use your personal information; or
  - (b) at any time, where we use your personal information to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

## 6 How to contact us

Please contact us using the details below if you have any questions or queries in relation to any aspect of this privacy notice:

6.1 **Andy Haythornthwaite**  
Head of Community  
Preston North End Community and Education Trust  
Sir Tom Finney Way  
Deepdale  
Preston  
PR1 6RU  
Email: [Andy@pne.com](mailto:Andy@pne.com)  
Telephone: 01772 693309

**Tom Drake**  
Assistant Head of Community  
Preston North End Community and Education Trust  
Sir Tom Finney Way  
Deepdale  
Preston  
PR1 6RU  
Email: [Tom.Drake@pne.com](mailto:Tom.Drake@pne.com)  
Telephone: 01772 693309

**Harriet Creighton-Levis**  
Head of Education and Health  
Preston North End Community and Education Trust  
Sir Tom Finney Way  
Deepdale  
Preston  
PR1 6RU  
Email: [Harriet@pne.com](mailto:Harriet@pne.com)  
Telephone: 01772 693309