

HEREFORD UNITED SUPPORTERS SOCIETY LTD (HUST)

PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information you give us. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we, our, us** or **the Society** in this privacy notice are to the **Hereford United Supporters Society Ltd** which is a registered society under the Co-operative and Community Benefits Act 2014. Registered number IP032131R (England and Wales).

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but the Board of Directors of Hereford Supporters Society Ltd has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

We may collect **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- membership 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;

2. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the Society, when you purchase any services or products we offer, when you participate in one of our fundraising activities, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

3. USES MADE OF THE INFORMATION

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

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments, Society business, and any 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 send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on the	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.

Society, Hereford Football Club, or any related matter		
To administer your participation in a fundraising activity organised by the Society	Contact details, transaction and payment information and records of your interactions with us	Where this is necessary to enable us to administer your participation in a fundraising activity organised by the Society
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 run the Society and in some cases we may have legal or regulatory obligations to retain records.
To conduct data analytics studies to better understand event attendance and trends	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
To contact lapsed members in respect of renewal of Society Membership	Contact and membership details	We have a legitimate interest in doing so to maintain and promote membership of the Society
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.

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 membership. 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 the "Contacting us" section 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.

4. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post 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 emailing us at

privacy@hufctrust.co.uk. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **Service providers:** for example, email marketing specialists, payment processors, and IT services (including CRM, and website services);
- **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.

6. **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 notice 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 the "Contacting us" section below.

7. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

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 or the end of your membership.

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 can contact us by using the details set out in the "**Contacting us**" section below.

8. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

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 notice 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/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email via the page <http://www.hufctrust.co.uk/contact-us/>

Version 1 dated 22 May 2018