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**Privacy Notice**

Essex County Football Association Limited ("we", "our", "us") takes your privacy very seriously.

This Privacy Notice sets out how we use and look after the personal information we collect from you. As the organisation who is responsible for, and controls the processing of your personal data, we are the data controller, and sometimes also the data processor, and will take reasonable care to keep your information secure and to prevent any unauthorised access or use of it.

We may update this Privacy Notice from time to time, and will inform you to any changes in how we handle your personal data.

1. **Information we may collect from you**

Personal data means any information about an individual from which that individual can be identified.

We may collect, use, store and transfer some personal data of our participants [and their parents or guardians], and other members. The data we collect from participants may include:

* Name, date of birth and gender.
* Contact information, such as home address, email address and telephone numbers.
* We may hold some health data or other special category data of some of our participants or members for the purposes of their health, wellbeing and welfare and, safeguarding. Where we hold this data it will be with the explicit consent of the participant or, if applicable, the participant’s parent or guardian.

Where we need to collect personal data to fulfil our responsibilities and a participant fails to provide that data, we may not be able honour or administer their participation in football.

1. **How is your personal data collected?**

A participant may give us their personal data by filling in forms or by corresponding with us by post, phone, email, in person, via our website or otherwise. This will typically be provided by a participant, Club, League or Referee inputting details into FA Systems such as Whole Game System or Club Portal.

1. **How the FA uses personal data**

We will use personal information only for the purposes for which we have been provided such with such information.

The reason we need participants and members personal data is to be able to manage the County FA, administer leagues and support football clubs; to administer memberships; to deal with sanctions. Our lawful basis for processing personal data is that we have a legitimate interest to provide the services of a county football association to support, development and govern local football.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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| **Purpose/Processing Activity** | **Lawful Basis for processing under Article 6 of the GDPR.** |
| **GENERAL** | |
| To respond to your Enquiry or Request | **Legitimate Interest:** Includes General Enquiries and Complaints |
| To respond to your Application | **Legitimate Interest**: Includes Benevolent Fund, Small Grants, Long Service Awards, Tickets, and Recruitment (Paid and Volunteer Roles) |
| To respond to your Entry | **Legitimate Interest**: Includes Competitions, tournaments, Events, Courses, Workshops, and CPD.  Where these programmes are provided by third parties, this information will be shared. |
| To administer the relevant competition | **Legitimate Interest**: Includes County Cups, Representative Football, Competitions, tournaments, and festivals, and includes but it not limited to Affiliations and Sanctioning. |
| To administer the Disciplinary Process | **Legitimate Interest:** Includes sharing witness names and statements with involved parties. |
| To make a payment to you | **Legitimate Interest:** Includes both the payment of invoices, awards, and the issuing of refunds. All payments are processed in conjunction with third party banking and accounting partners. |
| **KEEPING YOU INFORMED** | |
| To send County updates and information to you relevant to the role that you hold within football. | **Legitimate Interest:** This includes updates from the County FA, The FA, and other partner organisations. |
| To produce an online and hard copy handbook for Leagues, Clubs and Match Officials | **Legitimate Interest:** Contact details for Leagues, Clubs and Match Officials are made available for the purpose of administering leagues and clubs, along with county competitions. This data is deleted each season and renewed upon affiliation. |
| To publish match and league results | **Legitimate Interest** |
| To publish your views or comments on this Site, any other website operated by us or our subsidiaries or in other media. | **Legitimate Interest:** Where you have posted comments on social media sites, we may re-post them on our website or social media platforms because the information is already in the public domain. If an individual does not want us to do this, they can object to this processing by contacting us via the details in the Contact Us section below.  Where you have liaised with us privately, we will only publish your views with your consent. |
| **IMPROVING OUR SERVICES** | |
| To conduct research | **Legitimate Interest:** This includes but is not limited to FA grassroots surveys, Strategy and programme consultation, improving participation, and Equality Monitoring. Where applicable, this research may be conducted by third parties. |
| To work effectively with partner organisations | **Legitimate Interest:** We will share data with partner organisations in order to effectively develop, support and govern football in the County. These organisations are the FA, Referees Association, Leagues, Clubs, Local Authorities, the University of Essex, and Third-Party Providers. |
| To share anonymised data with a funding partner as condition of grant funding e.g. Local Authority | **Legitimate Interest:** Application for funding is a purpose that benefits the County FA, participants and its members. |
| **OFFERING RELEVANT OPPORTUNITIES** | |
| To send marketing information to you (please see further information below) | **Consent:** We will only send direct marketing if the individual has consented to receive this information. |
| To offer development and progression opportunities. | **Legitimate Interest:** We will send registered Coaches, Referees and Club Officials details of upcoming relevant education opportunities, e.g. training courses and CPD events, as well as paid and voluntary career opportunities where relevant.  When performance data is required in order to determine whether an individual should pass a qualification or progress a level. |
| To assist players to find opportunities within local teams and allowing local teams to find players | **Consent:** Players and teams can register to use the squad booster service and give their consent by registering for their details to be shared with other users of the service. |
| To ascertain eligibility for impairment specific pathways | **Consent:** We will share data with the FA regarding players who may be eligible for impairment specific pathways, with the consent of the player and in the case of youth players, their parents. |
| **MANAGING WORKFORCE** | |
| To support and maintain Workforce | **Contractual;** This includes Recruitment, payments, emergency contact details, medical information, and other requirements detailed in the contract/handbook. |
| **LEGAL OBLIGATIONS** | |
| To safeguard children and adults at risk | **Legal obligation:** For the purpose of safeguarding the welfare of children and adults at risk involved in football across the County.  The includes the sharing information regarding DBS, qualifications and concerns about children with Clubs, Leagues, the FA and statutory agencies. |
| To support with Police Investigations & DBS Requests | **Legal Obligation** |

**Direct Marketing:** We would like to send you marketing information, by post, e-mail, or SMS. In addition, selected third parties (including the FA, FA Partners as shown on the Site, and other commercial partners) would like to send you marketing information, by post, e-mail, or SMS. We will only do this if you have given your consent to your personal data being used in this way (either when you submit your details to us or at a later stage). You can update your marketing preferences by writing to us at the address below.

1. **Sharing your personal data**

Systems including the Whole Game System, the Club Portal and Full time are administered by the FA. Additionally, we supply information to the FA for affiliation and other reporting purposes.

We may share your personal data with our affiliates, suppliers and sub-contractors. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit third parties to process your personal data for specified purposes and in accordance with our instructions.

We may disclose your personal information to third parties if we are under a duty to comply with any legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

1. **International Transfers**

Some of our suppliers or third parties may process our personal data outside the European Economic Area (**EEA**) such as our website and email providers. We review the data protection terms of these suppliers to ensure that your personal data will only be transferred out of the EEA, if sufficient appropriate safeguards are in place.

1. **Protection of your personal data**

We are committed to protecting your privacy and have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, the nature of the Internet is such that the data may in some circumstances flow over networks without full security measures and could be accessible to unauthorised persons.

1. **Data Retention**

We keep personal data on our participants, members and other website users while they are signed up to the County FA or any of our website services.

We use FA sites to store personal data and the FA process this data for as long as the individual is an active user of the sites and for five seasons after this. The data will then be held as inactive for a further 3 months before being deleted. For further information on the FA sites, please see the FA’s Privacy Notice at <http://www.thefa.com/public/privacy> .

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and 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.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for seven years from your last interaction with us or from when the contract ends.

Where we process personal data to meet legal or regulatory requirements, we hold this for as long as is required.

The personal data and sensitive personal data collected through the Equality audit survey is securely retained for one year.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

1. **Cookies**

When you visit our website, the website, we may collect, process and use informing about you which may not personally identify you but which may be helpful for improving the operation of the website. Such information may be collected through "traffic data" and may entail the use of "cookies", "IP Addresses" or other numeric codes used to identify your computer. You can delete cookies or configure your computer to reject them, although this may disable the website’s ability to manage individual sessions.

1. **Third Party Links**

This website may contain links to other sites. Please be aware that we are not responsible for the privacy practices of these sites. We encourage our users to be aware when they leave this website and to read the privacy statements applicable on those sites. This privacy policy does not apply to information collected on third parties’ sites.

1. **Your Rights**

All data subjects have the right to:

* **Request access** to your personal data
* **Request rectification** of the personal data that we hold about you. In the event that there is a change to your personal information for example your contact details, please let us know of this by updating your details online (where this facility is available) or writing to us at the address provided below, so that we can keep your information up to date and accurate.
* **Request erasure** of your personal data where there is no good reason for us continuing to process it.
* **Object to processing** of your personal data for direct marketing, or where we are processing on the grounds of a legitimate interest of that interest is overridden by your rights and freedoms.
* **Request restriction of processing** of your personal data while we establish the data's accuracy, or verify an overriding interest to object to processing; where our use of the data has been unlawful but you do not want us to erase it; where you need us to hold the data to establish, exercise or defend legal claims.
* **Request the transfer** of your personal data to you or to a third party in a structured, commonly used, machine-readable format.
* **Withdraw consent at any time** where we are relying on consent to process your personal data.
* **Complain** at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

1. **Contact Us**

If you have any queries about this Privacy Policy, wish to stop direct marketing by Essex County FA, The FA, its subsidiaries or third parties, or you wish to access or update your information please email [info@essexfa.com](mailto:info@essexfa.com) or write to Essex County Football Association, County Office, 8 Springfield Lyons Approach, Chelmsford, Essex, CM2 5LB.