**Notes to County FAs:**

This Privacy Notice needs to be populated (where highlighted) and posted on your website before 25 May 2018. [Here](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/) is a link to ICO guidance.

Additional GDPR resources, including a series of Frequently Asked Questions (FAQs), online training modules and fact sheets, are available on [Muckle’s web-site](https://www.muckle-llp.com/what-we-do/sports/the-football-association/gdpr-factsheets/).

**Draft County FA Privacy Notice**

[NAME] 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’s club by inputting participant details into Whole Game System. Other participants, such as referees, may input their own data into Whole Game System

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 is that we have a contractual obligation to individuals as participants or members to provide the services of a county football association.

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.** |
| to respond to your enquiry; |  |
| to administer the relevant competition; | Contractual |
| to send information to you; | Contractual |
| to fulfil any contract that we may enter into with you; | Contractual |
| for research purposes; | Legitimate interest - *what is the FA’s legitimate interest [why you no longer play/referee, how could improve your experience, FA Grassroots survey]* |
| to send marketing information to you in accordance with the provisions set out below; or | Consent – we will only send direct marketing if the individual is an existing member, participant or other user of the site and the individual has not previously objected to this marketing, or, has actively provided your consent. |
| to publish your views or comments on this Site, any other website operated by us or our subsidiaries or in other media. | Legitimate interest – *what is the FA’s legitimate interest* (?) If a participant and / or member 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. |
| If you submit your views to us via our contact form we will circulate them internally for training and management purposes | Legitimate interest – *what is the FA’s legitimate interest* (?) If a participant or member 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. |
| sending out county football association information and updates  | Performance of a contract |
| sharing data with coaches, to run educational courses, training sessions or enter events | Performance of a contract |
| sharing data with leagues, county associations and other competition providers for entry in events | Performance of a contract |
| sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority | The County FA has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the County FA, participants and its members. |
| publishing match and league results | [Consent. We will only publish your personal data in a public domain, including images and names, if you have given your consent for us to do so.] in the case of children, only with written consent of parent/guardian |
| Publishing club and league contact details in our annual handbook and/or App | For the purpose of administering leagues and clubs, along with county competitions. This data is deleted each season and renewed with your annual consent |

**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 (here) or alternatively write to the Data Protection Officer at the address below.

1. **Sharing your personal data**

A club enters participant and / or member details onto Whole Game System which is administered by the FA. Referees will also add their details onto Whole Game System. We pass 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 will delete this data [ ] after an individual has ended their membership or affiliation, or sooner if specifically requested and we are able to do so. We may need to retain some personal data for longer for legal or regulatory purposes.

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.
* **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 the FA, its subsidiaries or third parties or you wish to access or update your information please email [ ] or write to [ ].