

## Referee Body Camera Trial Privacy Policy

### WHAT DOES THIS POLICY COVER?

This policy describes the purpose, use and management of body worn cameras (“**Bodycams**”) during the Referee Body-Camera Trial.

The Football Association Limited (a company with registered office address at Wembley Stadium, Wembley, London, HA9 0WS and incorporated under company number 00077797) (“**The FA**”) is the Controller of your personal data collected through the Bodycams and determine how and why your personal data is processed.

As part of our role as a Controller, it’s our responsibility to tell you about the different ways we use your personal data.

### WHAT INFORMATION DO WE COLLECT?

The personal data we collect through activated Bodycams includes:

- video recording of your image; and
- audio recording of your voice.

Bodycams will not be operating throughout an entire match but may be activated by a referee at any time (at their discretion) to record any potential or actual misconduct by a match participant, club official or spectator.

### HOW DO WE USE YOUR PERSONAL DATA?

We will only use your personal data to the extent which is permitted by law. The table below sets out how we might use your personal data, and how we have a lawful basis for those uses:

Use	Lawful Bases
To use as evidence of serious misconduct in a discipline case	Legitimate interest (carry out our role as the governing body of English football and enforce our rules and regulations)
To conduct research into the viability of Bodycams within grassroots football and its benefit on refereeing in the grassroots game	Legitimate interest (carry out our role as the governing body of English football and improve the grassroots game)
To assist in training referees	Legitimate interest (carry out our role as the governing body of English football and improve the grassroots game and refereeing)
In connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or	Legitimate interest of The FA or a regulatory/law enforcement body (carry out our role as the governing body of English football, conduct our business, and report/investigation of any actual or alleged crime)  Legal obligation

litigation or to other relevant regulators, or to law enforcement bodies)	
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## HOW DO WE SHARE YOUR INFORMATION?

Footage collected from Bodycams will be accessible by The FA only. Footage cannot be accessed directly from the cameras and the referees will have no access to footage they capture. Recorded images are only viewed by approved members of staff whose role requires them to have access to such data.

We will share your data with relevant third parties for the purposes set out above, in particular we will share footage with other football stakeholders such as a disciplinary commission, clubs of participants and a participant being charged where this is necessary to enforce our rules (for example in a discipline case).

Personal data may also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. Footage shared with third parties will be in a view-only, encrypted format unless the ability to download and store footage is required.

## WHAT ABOUT INTERNATIONAL DATA TRANSFERS?

We may use third party providers to deliver our services, such as externally hosted software or cloud providers, and those providers may involve transfers of personal data outside of the UK. Whenever we do this, to ensure that your personal data is treated by those third parties securely and in a way that is consistent with UK data protection law, we require such third parties to agree to put in place safeguards. This may include specific contracts approved for use in the UK which give personal data the same protection it has in the UK or other equivalent measures as required.

## HOW LONG DO WE RETAIN YOUR DATA FOR?

Footage captured during a match will be stored for a maximum of 180 days after which it will be deleted.

Where footage is required to be held for a misconduct case or lawful request from government authority and/or law enforcement officials as evidence, it will be retained for as long as necessary to complete the disciplinary process or investigation.

## WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR PERSONAL DATA?

Under certain circumstances, you may have the following rights in relation to your personal data:

Right	What does this mean?
1	A <b>right to access</b> personal data held by us about you (commonly known as a "data subject access request"). You can access the personal data we hold about you on The England Football Community by following the guidance here.
2	A <b>right</b> to require us <b>to rectify</b> any inaccurate personal data held by us about you, though we may need to verify the accuracy of the new data you provide to us.

3	A <b>right</b> to require us <b>to erase</b> personal data held by us about you where there is no good reason for us continuing to process it. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below). Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4	A <b>right to restrict</b> our <b>processing</b> of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims or due to having overriding legitimate grounds to use it.
5	A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation.
6	A <b>right to object</b> to our processing of personal data held by us about you where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
7	A <b>right to withdraw your consent</b> , where we are relying on it to use your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
8	A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop.

## HOW CAN YOU CONTACT US?

If you have any questions about this policy or any other data protection queries you can contact The FA's Data Protection Team using [dataprotection@thefa.com](mailto:dataprotection@thefa.com) or by writing to Data Protection Officer, Wembley Stadium, PO Box 1966, London, SW1P 9EQ.

If you wish to make a data privacy request, you can do so via our online form, which can be found [here](#).

You also have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the [complaints section](#) of the ICO's website. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.