

## **PRIVACY NOTICE**

## NORTHAMPTON SAINTS FOUNDATION

Northampton Saints Foundation takes your privacy very seriously and is committed to protecting your personal information. This privacy notice sets out the way in which any personal information you provide to us is used and kept secure by Northampton Saints Foundation. It applies whenever we collect your personal data (including when you use our website or other digital platforms), so please read it carefully.

#### About us

This website is the official website of the Northampton Saints Foundation ("the Club", "we" and "us"). If you have any comments or questions about this website or any of our services please contact us by one of the methods shown below.

Telephone: 01604 751543

Email: jordan.letts@northamptonsaintsfoundation.org

Northampton Saints, cinch Stadium at Franklin's Gardens Northampton Saints Weedon Road NN5 5BG

Northampton Saints PLC is a company incorporated in England & Wales with company number 3139409.

## **About this privacy Notice**

This Privacy Notice explains what information we may collect about you, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights.

Please note that our website and other digital platforms may contain links to third party websites / digital platforms where you should refer to their own Privacy Notices

We are only responsible for the privacy practices and security of our own digital platforms. We recommend that you check the privacy and security policies and procedures of each and every other website / digital platform that you visit.

# How to contact us about your personal data or this privacy Notice



If you have any questions about this privacy Notice or about your personal data, please email us at simon@p-m-a.co.uk or write to us at the following address:

#### **DPO**

Northampton Saints Foundation cinch Stadium at Franklin's Gardens, Weedon Rd, Northampton NN5 5BG

## Information we collect and what we use it for

All personal information that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this Privacy Notice. We may supplement the information that you provide with other information that we obtain from our dealings with you or which we receive from other organisations, for example, our sponsors and partners. In broad terms, the data we collect ls:

- 1. Name and address and contact details
- 2. Details of current school and your date of birth
- 3. Your parent or guardian details
- 4. Any safeguarding details
- 5. Any engagements with other authorities such as the police.

Some of this data is classified as special data and as such we will ensure it is held securely with limited access.

We may also record details of any disability or health needs you may have at the time of booking an event or service which will take place at the stadium or any of our other premises to help to ensure your comfort and safety.

When you interact with our digital platforms such as this website, we may also automatically collect the following information about your visit. This is primarily to help us better understand how our fans use our digital platforms to enable us create better content and more relevant communications:

- how you have reached our digital platform and the internet protocol (IP) address you have used
- your browser type, versions and plug-ins, and your operating system
- your journey through our digital platform, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information
- which videos you have watched and for how long
- what content you like or share
- which adverts you saw and responded to
- which pop up or push messages you might have seen and responded to
- your subscription status

• information collected in any forms you complete

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We may also infer your country of location from the IP address you have used to access our digital platforms .

## **Legal Basis for Processing Your Data**

We process your personal data under one or more of the following legal bases:

- Contractual Necessity: To fulfil the contract for products or services you have requested.
- Legitimate Interests: For purposes such as improving our services, fraud prevention, and securing our digital platforms, where our legitimate interests are not overridden by your rights.
- Consent: For direct marketing purposes, where you have given your explicit consent.
- Legal Obligation: To comply with legal and regulatory requirements, such as HMRC regulations.

You can withdraw your consent for marketing communications at any time by contacting us.

## The Rights of Individuals Under UK GDPR

The UK GDPR provides individuals with a set of rights regarding their personal data. These rights are designed to give individuals more control over how their personal information is collected, processed, and used. Below is a explanation of these rights:

## 1. Right to Be Informed

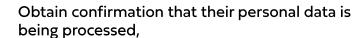
Individuals have the right to be informed about how their personal data is collected and used. This means we must provide clear and concise information about:

- What data is being collected,
- The purposes for collecting the data,
- Who the data will be shared with,
- How long the data will be retained,
- The legal basis for processing the data,
- · Any third parties involved in the processing,
- The individual's rights regarding their data.

This information must be provided at the point of data collection, typically through a privacy notice like this one.

## 2. Right of Access

Individuals have the right to access the personal data an organisation holds about them. This is often referred to as a Subject Access Request (SAR). Under this right, individuals can:





- Receive a copy of the personal data, and
- Receive supplementary information that should be included in a privacy notice (such as the purposes of the processing, categories of data, and any recipients).

Organisations must respond to access requests without undue delay and within one month of receipt. There are some exceptions, for example, when the request is unfounded or excessive, or where disclosing the information would infringe on the rights of another individual.

# 3. Right to Rectification

Individuals have the right to request that inaccurate or incomplete personal data be corrected. If personal data is inaccurate or incomplete, individuals can:

- Request that the data be amended,
- Add a supplementary statement if the data cannot be fully rectified.

Organisations must respond to such requests within one month, although in some cases, this period can be extended by two further months if the request is complex.

## 4. Right to Erasure (Right to Be Forgotten)

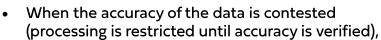
The right to erasure, also known as the "right to be forgotten," gives individuals the right to request that their personal data be deleted or removed when there is no compelling reason for its continued processing. This right applies in the following circumstances:

- The data is no longer necessary for the purpose for which it was collected,
- The individual withdraws their consent (where consent was the legal basis for processing),
- The individual objects to the processing and there is no overriding legitimate interest,
- The data was unlawfully processed,
- The data must be erased to comply with a legal obligation.

However, this right is not absolute and may not apply in cases where the data is required for legal claims, compliance with legal obligations, or public interest purposes.

## 5. Right to Restrict Processing

Individuals have the right to request the restriction or suppression of their personal data in certain circumstances. When processing is restricted, the organisation is still permitted to store the personal data but cannot process it further. This right applies in the following situations:





- When the individual has objected to the processing and a decision on the legitimate grounds is pending,
- When processing is unlawful, and the individual requests restriction instead of erasure,
- When the organisation no longer needs the data but the individual requires it for legal claims.

# 6. Right to Data Portability

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services. This right enables individuals to:

- Receive a copy of their personal data in a structured, commonly used, and machine-readable format,
- Transfer the data directly from one organisation to another, where technically feasible.

This right only applies to personal data provided by the individual, where the processing is based on consent or a contract, and where the processing is carried out by automated means.

## 7. Right to Object

Individuals have the right to object to the processing of their personal data in certain circumstances. This includes situations where:

- The processing is based on legitimate interests or the performance of a task in the public interest or exercise of official authority,
- The data is being processed for direct marketing purposes (this includes profiling related to direct marketing),
- The data is being processed for scientific/historical research or statistical purposes, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

If an individual objects to processing for direct marketing purposes, the organisation must stop processing the data immediately.

## 8. Rights Related to Automated Decision-Making, Including Profiling

The UK GDPR provides individuals with rights related to automated decision-making and profiling, particularly where such processing has a legal or significant effect on them. This includes:

 The right not to be subject to a decision based solely on automated processing, including profiling, unless it is necessary for entering into or performing a contract, is authorised by law, or is based on explicit consent.  The right to obtain human intervention, express their point of view, and contest the decision where decisions are made solely by automated means.





#### **Retention of DATA**

We only hold the data as long as we are legally bound to as a minimum, we destroy securely all data we are finished with and do not hold any data for longer than is required.

## Disclosure of your information

In order to provide our products and services to you or to otherwise fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf. These may include, for example, schools, councils, NHS, social services and the police.

#### **Data Breaches**

We take the security of your personal information seriously and have procedures in place to detect, report, and investigate data breaches. If there is a breach that poses a risk to your rights and freedoms, we will inform you and the Information Commissioner's Office (ICO) without undue delay.

### **Cookies**

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. They are often used as a mechanism for websites to remember things that a website browser has done there in the past, for example, clicking on particular buttons, logging in, or having read pages on that site months or years ago. In common with many other website operators, we use cookies on our website. We use them to enrich your experience of using the website by allowing us to tailor what you see to what we have learned about your preferences during your visits to the site. Our cookies are also used to enable us to develop our website to reflect our fans and customers interests by noting who has seen which pages and advertisements, how frequently particular pages are visited and determining the most popular areas of our website. We and carefully selected third parties also use cookies to show you more relevant advertising online.

In general, we use the following types of cookie:

Strictly Necessary Cookies: These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use the shopping cart feature when buying match tickets etc.

Analytical/Performance Cookies: These allow us to recognise and count the number of visitors and see how visitors move around our website when they are





using it. This helps us to improve the way our website works, for example, by ensuring that users can find what they are looking for easily.

Functionality Cookies: These are used to improve the functional performance of the website and make it easier for you to use. For example, they are used to remember that you have previously visited the website and asked to remain logged in to the website.

Targeting Cookies: These cookies record your visit to our website and your browsing habits, such as the pages you have visited and the links you have followed. They are used to deliver advertising which is more relevant to your interests and also may be used to limit the number of times that you see an advertisement. They may be placed by us or by advertising networks with our permission. Please note, these cookies do not contain any of your personal information. For details on how to manage cookies and how to opt out of targeted marking see below.

By continuing to use our website without choosing to delete/block cookies, you agree that we can place these types of cookies on your device.

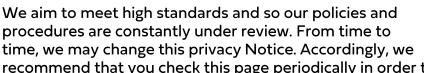
# **Managing Cookies**

You can manage cookies by activating the setting on your internet browser that allows you to refuse the setting of all or some cookies. For further information visit www.aboutcookies.org Please refer to the instructions or the online help files available via your relevant browser if you wish to manage cookies in this way. To manage cookies relating to targeted advertising activities, you can visit www.youronlinechoices.com. To opt-out of being tracked by Google Analytics across all websites you can visit tools.google.com/dlpage/gaoptout.

Please note, if you refuse cookies this may mean that you can't use some of the additional features of our website and may not be able to access certain parts of the website.

## **Changes to this Cookies Notice**

We aim to meet high standards, and our policies and procedures are, therefore, constantly under review. From time to time, we may change how we use and place cookies. Accordingly, we recommend that you check this page periodically in order to review our current policies and practices.





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# Where to make a complaint

If you have a complaint regarding any aspect of your personal data or this privacy Notice, please write to us at the above address. If you are still not satisfied with the outcome of your complaint, you may write contact the Information Commissioner's Office on 0303 123 1113.

You can also contact the Information Commissioner's Office using their online form: https://ico.org.uk/global/contact-us/email/