



**Albion in the
Community**
Giving people a chance

PRIVACY POLICY

Version Number	Purpose/Change	Author	Date
1.0	Initial draft	ASB law	14/3/13
2.0	First version	Sue Burchett	4/12/14
3.0	Revised version to include additional uses	Sue Burchett	15/1/15
4.0	Regular review	Sarah Byrne	2/8/16



Albion in the Community is a company limited by guarantee registered in England and Wales (Company No: 5122343) and is a charity registered with the Charity Commission (Charity No: 1110978) whose registered address is American Express Community Stadium, Village Way, Brighton BN1 9BL (“AITC”; “We”; “Us”; “Our”; “They”). AITC is the data controller and takes your privacy very seriously. We ask that you read this privacy policy carefully as it contains important information about what to expect when AITC collects personal information about you and how AITC will use your personal data.

AITC needs to keep certain information about users of its services and website to allow it to perform services and supply goods to you, to monitor performance and satisfy health and safety obligations, for example. It is also necessary to process information so that AITC can satisfy its legal obligations to funding bodies, government agencies and in respect of its operational issues. Data includes information held in written records and not just data held on computers. It is a legal requirement that personal data as defined in the Data Protection Act 1998 (“the Act”) must be used fairly, stored safely and not disclosed to any other person unlawfully. To do this, AITC must comply with the eight Data Protection Principles to ensure that personal data held is:

- obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met;
- obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose;
- adequate, relevant and not excessive for those purposes;
- accurate and kept up to date;
- not kept for longer than is necessary for that purpose;
- processed in accordance with the data subject's rights;
- kept safe from unauthorised access, accidental loss or destruction, or damage;
- not transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

AITC and all staff or others who process or use any personal information on AITC's behalf must ensure that they follow these principles at all times.

1. The information we collect about you

Personal Information

When you do business with us/register for our service or contact AITC, we collect the following personal information from you:

- Name, postal address, email address and telephone number, and (if collecting funds from you) your payment details.

Sensitive Personal Data

AITC also collects the following sensitive personal data (as defined under the Act), (e.g. from course booking forms), which requires **express consent** to be obtained: a person's health (such as allergies to particular forms of medication, or any conditions such as asthma or diabetes), school attending, criminal convictions, age, gender, disability, learning difficulties, sexual orientation, ethnicity, religion or faith.

AITC asks you to give express consent to us to use sensitive personal data for the protection of your health and safety and in the event of a medical emergency. Sometimes your consent to AITC processing sensitive personal data is a condition to the provision of our services, for example, the acceptance of a student onto a course. Course places and our services may be withdrawn if you refuse to provide express consent to AITC, without good reason.

2. How AITC may collect information from you

AITC may collect and process personal data about you and members of your family from a number of different sources:

- Information that you provide by manually filling in forms.
- Information that you provide by filling in forms on the relevant section of the website www.albioninthecommunity.org.uk ("the Website"). This includes information provided at the time of registering to use the Website, subscribing to an AITC service, posting material or requesting further services.
- Information you supply to AITC when discussing matters over the telephone.
- If you contact AITC, they may keep a record of that correspondence (including emails).
- Details of transactions you carry out either through the Website, by email, over the telephone or by post and of the fulfilment of your orders or request for services / courses.
- Details of your visits to the Website and the resources that you access.
- Via your individual IP location and through cookies – see point 5 for more information.

3. How we will use the information about you

AITC may use information held about you in the following ways:

- To ensure that content from the Website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from AITC or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out AITC's obligations arising from any contracts entered into between you and AITC, or between AITC and any other third party to allow AITC to provide its services to you.
- For monitoring and evaluation purposes using third party software.
- To allow you to participate in interactive features of any AITC service, when you choose to do so.
- To notify you about changes to an AITC service or goods.
- We will use sensitive personal data to ensure that we provide you with services appropriate for your needs and in the case of administering first aid in the event of a medical emergency. Details about ethnicity are collected in order to report back to funding or governing bodies about target participant groups and inclusivity. This information will be held in accordance with the Act.
- We may disclose your personal data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

4. Marketing

We may also wish to provide you with information about special features of our Website or any other services or products we think may be of interest to you. If we have provided services to you in the past, then we will only send such information to you (by email) that is similar to the services which were the subject of a previous service or arrangement with you, although you will be given the opportunity to opt-out of receiving future emails from us by clicking on the relevant link in that email. If you would like to receive information and you are not an existing user of our services, then, please tick the relevant consent box to receive such communications where required to do so. If you agree to us providing you with marketing information, you can always opt out at a later date by sending an email to: dataprotection@albioninthecommunity.org.uk.

5. Our use of cookies and other information-gathering technologies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve the Website and to deliver a better and more personalised service. Some of the cookies we use are essential for the Website to operate. You may delete and block all cookies from the Website, but parts of the Website may not work.

You block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit the Website.

6. How we protect your information

AITC will use all reasonable efforts to ensure that:

- Any personal data (including any sensitive personal data) which we hold about you is kept securely;
- Personal information is not disclosed, either orally or in writing, or accidentally or otherwise, to any unauthorised third party.

We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the internet.

7. Overseas transfers

The information you provide may be transferred to, and stored at, a destination outside the European Economic Area ('EEA') (although this is unlikely). Your information may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. Again, although this is unlikely, we will take all steps reasonably necessary to ensure your information is treated securely and in accordance with this privacy policy. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. By submitting your information you consent to these transfers for the purposes specified above. Page 6 AITC Privacy Policy V3

8. Access to your information and updating and correcting your information

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please send an email to dataprotection@albioninthecommunity.org.uk or send a letter to Data Protection Officer, Albion in the Community, Brighton & Hove Albion FC, American Express Stadium, Village Way, Brighton, BN1 9BL. We may make a small charge of up to £10 to meet our costs in providing you with details of the information we hold about you.

We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to AITC changes, for example if you change your email address, name or payment details, or if you wish to cancel your registration, please let us know the correct details by sending an email to dataprotection@albioninthecommunity.org.uk or by sending a letter to Data Protection Officer, Albion in the Community, Brighton & Hove Albion FC, American Express Stadium, Village Way, Brighton, BN1 9BL. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which you believe to be inaccurate.

9. Links to other websites

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

10. Your consent

By submitting your personal information you consent to the use of that information as set out in this policy.

11. Changes to privacy policy

We keep our privacy policy under regular review. If we change our privacy policy we will post the changes on our Website, so that you may be aware of the information we collect and how we use it at all times.

12. How to contact AITC

We welcome your views about our Website, services and our privacy policy. If you would like to contact us with any queries or comments please send an email to dataprotection@albioninthecommunity.org.uk or send a letter to Data Protection Officer, Albion in the Community, Brighton & Hove Albion FC, American Express Stadium, Village Way, Brighton, BN1 9BL

13. Review

This policy will be reviewed on an annual basis.