

When does this policy apply?

This privacy policy explains how The Blackburn Rovers Football and Athletic Ltd ("BRFC") uses personal data that you provide or which BRFC collects and holds about you when you use its official websites and/or other services. BRFC is the data controller of this information for the purposes of this policy. BRFC's Data Protection Officer is contactable using the details set out below.

BRFC's websites and services include:

- The Official Blackburn Rovers FC Website at www.rovers.co.uk
- The Blackburn Rovers Football Club Official Online Store at www.roverstore.co.uk
- The Blackburn Rovers Football Club Online Ticket Office at www.eticketing.co.uk/onerovers
- The official Blackburn Rovers social media pages on [Facebook](#), [Instagram](#) and [Twitter](#) (together the "BRFC Official Websites")
- The Official Blackburn Rovers FC App;
- The Blackburn Rovers Store at Nuttall Street, Blackburn, BB2 4JF; and
- The Official Blackburn Rovers FC Telephone Sales Line, on 01254 372000.

Your personal data – what is it?

"Personal data" is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). Identification can be directly using the data itself or by combining it with other information which helps to identify a living individual (e.g. a list of staff may contain personnel ID numbers rather than names but if you use a separate list of the ID numbers which give the corresponding names to identify the staff in the first list then the first list will also be treated as personal data). The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the "GDPR") and other legislation relating to personal data and rights such as the Human Rights Act.

What types of personal data do we hold?

Information we hold about you may include any one or more of the following types of data:

Account information: When you register to use, purchase or engage with any of BRFC's goods and/or services, the minimum information we will usually ask you to provide is your name, email address, country of residence, telephone number, and year of birth. We may also ask you for additional information depending on the nature of our interaction with you.

Transactional information: When you purchase tickets (including where tickets are purchased through BRFC's official third party ticketing provider from time-to-time), merchandise and other products from BRFC Official Websites or any other official offline sales channels, we will keep a record of your transaction, including what you purchased and when, and any information you provide to us to fulfil the transaction. This may include your name, billing information, telephone number, and delivery address. We will ensure that, when handling any information about you relating to a transaction, we comply with the applicable regulations of the Payment Card Industry.

Information you provide to us in response to a survey: We may occasionally contact you to ask for your feedback on BRFC products, goods and/or services so that we can make them better and more relevant. We will anonymise responses unless you give us specific permission to attribute any comments or responses you make.

Information you provide to us in response to a job advertisement: We regularly advertise open positions on the Recruitment page of our website which you may apply for by sending your CV to the email address provided.

Information you post online: We may hold and use information and/or user generated content which you post on BRFC Official Websites and/or the Official Blackburn Rovers FC Fan App, including information about your IP address, location and click history.

Information from other companies: We may use publicly available postal address lists and the edited electoral roll to ensure that the information we hold about you is accurate or we may use this information, together with general market research information (for example, demographic information), to add to and enhance our fan database.

Online usage information: If you use BRFC Official Websites we may collect your browser type, the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page. In addition, if you use the Official Blackburn Rovers FC Fan App we may collect information confirming your device type and any GPS location data. Online usage information may be linked to a unique identifier but we do not link online usage information to named individuals. In order to collect online usage information we use cookies and other similar technologies.

In most cases, you are not obliged to provide any personal data to us, but in some cases we may not be able to provide goods or services to you unless you provide certain minimum information. By way of example only, where you intend to make a purchase from BRFC, we may need to obtain and process certain information about you in order to enter into and perform the contract of sale with you.

The company will comply with the General Data Protection Regulation 2018. This says that

the personal data we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept and destroyed securely including ensuring that appropriate technical and security measures are in place to protect your personal data to protect personal data from loss, misuse, unauthorised access and disclosure

The purposes for which we use your information:

The legal basis under which BRFC will process your personal data is one or more of the following:

- To allow us to enter into and/or perform our contract with you*;
- To enable us to comply with legal obligations**;
- To pursue legitimate interests of our own or those of third parties (provided that your interests and fundamental rights do not override those interests) ***; and/or
- With your consent. ****.

Further details of how we will process your personal information are listed below. We have indicated by asterisks the legal basis on which we are processing or will process your personal information.

Contract performance* / **: BRFC may use account information and transactional information data, as necessary, to carry out or perform any contract which you may have entered into with us, including contracts for the purchase of tickets, merchandise and other products, but also our contracts with you when we operate competitions, prize draws and promotions and when we administer your online accounts and provide services to you. We also use this information to communicate with you and handle your enquiries regarding these contracts. If you order BRFC goods, products or services for another person (for example, match tickets for family or friends) we may ask you for their personal information and we will use this to provide the services you have ordered. Please ensure that you have their permission for us to process this data before providing it to BRFC.

Legal obligations**: BRFC retains records of all of its financial transactions with you in order to comply with its legal obligations to maintain adequate accounting records. BRFC may use (and disclose) the information it holds about you in order to comply with any investigative demand, court order, or a request for cooperation from a law enforcement or other government agency.

Recruitment***: If you apply for a job with BRFC or if you volunteer with the Club or contact us in relation to potential roles which may arise in the future, we may use your information for the purposes of recruitment and selection, corresponding with you and for equal opportunities monitoring.

Marketing with your consent (where consent is necessary)****: If you have consented to it (where consent is necessary) BRFC may contact you electronically with news and offers from BRFC, its affiliates and its official sponsors and partners which we think may be of interest to you. You have the right to withdraw your consent at any time.

Telephone and postal marketing***Further, we may call you (unless you have registered with the Telephone Preference Service or you have otherwise asked us not to contact you) or send you materials through the post (unless you have registered with the Mail Preference Service or you have otherwise asked us not to contact you) in relation to offers from the Club or its partners.

Other purposes***: BRFC will analyse information it holds about you to identify trends and preferences about its customers and to get a more detailed and informed picture of how its customers are using BRFC's products and services. We do this to make better strategic decisions about BRFC and its products and services so that we can improve the way we market and provide products and services to you and BRFC supporters generally. BRFC may also use online usage information about you to administer and improve the function and content of the BRFC Official Websites and the Official Blackburn Rovers FC App, including to ensure that content is presented in the most effective manner for you and your device and browser, to allow you to participate in interactive features when you choose to do so and to keep our online services safe and secure. BRFC may also use the information it holds about you if required to protect the rights, property, or safety of BRFC, our fans, customers or others.

Other purposes****. Our commercial partner FanLogic (the registered trade name for Fan Data Pools Limited), will process your data and this processing is permissible under the consent you have given relating to our third party / commercial partners mailing list.

FanLogic will process the personal data you have provided us (i.e. your name, email address, telephone number/s, address and date of birth) with other personal data (such as your lifestyle data) that you have already provided to public sources and is publicly available (such as research surveys, open data, government data), to provide you with rewards, special offers and promotions. Your personal data will be used only for these purposes and it will not be shared or disclosed to any anyone other than FanLogic's appointed sub-processors (click [here](#) for the most up to date list).

FanLogic stores your personal data securely using suitable physical, electronic and managerial procedures, security measures and appropriate safeguards to prevent its unauthorised access, use or disclosure. It is stored in the UK and is not transferred to any countries outside the EU. It is kept and used only for as long as is necessary for the stated

purposes and it is deleted when those purposes no longer apply and/or you withdraw your consent. You may withdraw your consent at any time.

You have the right to request access to and rectification or erasure of your personal data; or restriction of the processing concerning it; and, you may object to its processing. You may ask for your data in a portable format, or for it to be transmitted to another company on your behalf. You may also ask that the data is not processed for automated decision making. You may contact us to withdraw your consent to processing by FanLogic at any time. In addition, you have the right to complain to the Information Commissioner's Office, the UK's independent regulatory office dealing with data protection (the ICO's address is below).

If you would like to know what personal data FanLogic holds about you or would like a copy of the data or exercise any of your rights, please contact our Data Protection Officer as shown below.

BRFC will not carry out any automated decision-making using information it holds about you.

Disclosure of your information:

Affiliates: Information held by BRFC may be used by affiliates of BRFC such as the Blackburn Rovers Community Trust for the purposes set out in this policy, where you have consented to this. This may include providing them with your personal information so that they can provide you with information about their products and services that may interest you, where you have consented to this. You may withdraw this consent at any time by letting us know in writing that you wish to do so.

Sponsors and partners: BRFC does not share your personal data with our sponsors and partners, but we may: (i) share aggregate/anonymised information which is based on this information with existing and potential sponsors and partners; and (ii) if you have consented to the same, send you information about the products and services of our partners and sponsors in our marketing communications. You may withdraw this consent at any time by letting us know in writing that you wish to do so.

BRFC suppliers and sub-contractors: BRFC may share your information with suppliers and sub-contractors from time-to-time in order that they can process it on BRFC's behalf for the purposes set out in this privacy policy. However, where we do so we will put in place suitable measures in order to protect your information. These third parties may include (but may not be limited to): (i) call centre providers; (ii) IT service providers (such as hosting providers); (iii) mailing houses or document storage companies; (iv) delivery services; (v) analytics and search engine providers; (vi) credit reference agencies; and/or (vii) payment processing companies. We will take all reasonable measures to ensure that any suppliers and/or sub-contractors have adequate GDPR compliant procedures in place.

Disclosures for legal reasons: BRFC may also disclose the information it holds about you to those persons that have a reasonable need to know such information, if it believes in good faith that this is necessary: (i) to establish, exercise or enforce its legal rights, including contractual rights; (ii) to defend itself against a legal claim; (iii) report a crime or prevent a crime (for example, ticket touting); (iv) to prevent harm to any individual or any property (including intellectual property, for example if you misuse images or videos or any other content BRFC makes available to you); (iv) to satisfy our statutory and/or regulatory obligations relating to safeguarding; or (v) to prevent fraud (for example, payment card fraud) or for credit risk reduction.

Business transfer: If BRFC sells or buys any business or assets, your personal data may be disclosed to the prospective seller or buyer of such business or assets so that they can carry out due diligence in respect of the sale or purchase, but only if BRFC has taken reasonable steps to ensure the security and confidentiality of that information. If BRFC (or substantially all of its assets) is acquired by a third party, personal data held about fans or users of its goods, products or services will be one of the transferred assets.

How do we keep your information secure?

BRFC is committed to ensuring that your information is secure. In order to prevent un-authorized access or disclosure of personal data, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect. We regularly perform testing of these procedures and have an appropriate information recovery and data breach procedures in the event that we encounter any difficulties.

How long do we keep your information?

BRFC will retain your personal data for as long as necessary for the purposes it is collected as set out in this policy and for any longer period necessary for it to comply with statutory retention obligations and/or for the purposes of defending or making legal claims. Examples of some of our retention periods are set out below. This list is not exhaustive:

- its financial transactions with you for seven years in order to comply with its obligations to maintain adequate accounting records;
- its contracts with you for six years so that it has appropriate evidence in place if there is a claim for breach of contract made within the statutory limitation periods;
- job applications and CVs for up to six months, unless you have consented to your details being held on file in case other suitable opportunities arise;
- your account information until you close or delete your account/profile (at which point we would also delete any information from other companies or market research which we have appended to your account/profile);

- any market research we have undertaken (and which is not appended to your user account) for 3 years. Note that we will retain aggregated market research information (by which you cannot be identified) on an ongoing basis for internal purposes; and

- save as set out above, information you post online and/or online usage information for 3 years if it is on BRFC Official Websites.

If any information falls into more than one category then the longer storage period will apply.

Your rights:

You have several rights under applicable data protection laws (unless an exemption applies), which we have summarised below. These rights can be exercised by contacting BRFC using the details given below in this policy.

You have the right to:

- ask us not to process your personal data for direct marketing purposes. We will cease any such marketing as soon as possible and no later than 30 days from the date of your request;
- request access to personal information held about you and a copy of it;
- obtain, within 30 days of your notification to us of an error in the data we hold relating to you, the rectification of inaccurate or incomplete personal data;
- obtain, without undue delay, erasure of your personal data in certain circumstances, for example if BRFC's processing of your personal data is no longer necessary for the purpose for which we collected it;
- restrict the processing of your personal data in certain circumstances rather than having it erased;
- object to the processing of, personal data in certain circumstances;
- receive personal data, which you have provided to BRFC, in a structured, commonly-used and machine-readable format and transmit that personal data to another data controller, or have BRFC do so on your behalf where technically feasible;
- lodge a complaint about the way in which your personal data is being used. In this instance you should contact You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Parental consent / supervision

Our business and the competitions, products and services we provide from time-to-time are not always specifically targeted at children, but we appreciate that many children are fans of football and/or sport generally. We would therefore ask that parents and guardians supervise their children when they are online and that children under 18 do not submit personal information or content to BRFC, make purchases of BRFC goods, products or services, or take part in BRFC promotions or competitions, without the consent of their parent or guardian. BRFC reserves the right to take reasonable measures in order to verify the existence and/or validity of parental consent.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

How you can contact us?

If you would like to contact BRFC about this policy or any of the legal rights outlined in it, you can contact us by email at dataprotection@rovers.co.uk or write to BRFC at Ewood Park, Blackburn, BB2 4JF. In either case, please mark your correspondence for the attention of the Data Protection Officer.

Changes to our privacy policy

Any changes we make to this privacy policy in the future will be posted at <https://www.rovers.co.uk/privacy-policy/> and, where appropriate, may also be notified to you by e-mail. Please check back frequently to see any updates or changes to this privacy policy.

This privacy policy was last updated on 12 September 2019.