



St Johnstone Football Club Ltd

**St Johnstone Football Club
McDiarmid Park, Crieff Road Perth, PH1 2SJ
Club Privacy Notice**

St Johnstone Football Club ("we", "our", "us") take your privacy very seriously.

This Privacy Notice sets out how we use and look after the personal information we collect from you. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

The range of activities conducted by us and for which personal data may be collected are many and varied. Some examples (non-exhaustive) are: the sale of season tickets and match tickets, online shop purchases, membership of the Super J's junior supporters club, the sale of match hospitality, shareholders' invites to AGMs etc, the sale of advertising and sponsorship, participation in football coaching, the sale of conference and private event facilities at McDiarmid Park and the gathering of data from customers who have indicated that they wish to be kept up to date with events at and news from the Club.

What personal data we hold on you

Personal data means any information about an individual from which that individual can be identified. We collect, use, store and transfer some personal data of our participants [and their parents or guardians], and other people who have communication with the Club.

You provide information about yourself when you register with the Club, and by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise.

The information you give us may include your name, date of birth, address, e-mail address, phone number, gender, and the contact details of a third party in the case of emergency. For participation in some events we may also ask for relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, 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 Club responsibilities and you do not provide that data, we may not be able to honour or administer your membership.

What is data processing?

Data processing is the collection, storage, retrieval, use and destruction of personal data.

Why we need your personal data

We will only use personal data for any purpose for which it has been specifically provided.

The reason we need participants' and members' personal data is to be able to run the football club and arrange matches; to administer memberships, and provide the membership services you are signing up to when you register with the club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a participant or member to provide the services you are registering for.



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We have set out below, in a table format, a description of some of the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Category of customer	Reason for retention of data
Season ticket holder records	<p>Management of all aspects of season ticket purchase and renewal as well as potential match ticket printing.</p> <p>Previous season retained for possible information search re lapsed ticket holders.</p>
Individual match ticket purchase records	SPFL Unacceptable Conduct requires retention of records in case of need to identify ticket holders
Super J junior supporter club records	<p>Records required for general management/running of the Super J's club and communications related to that club.</p> <p>Previous seasons retained for possible information search re lapsed ticket holders.</p>
Employee/payroll records	Records required for various current employee issues and then retained for any future queries (payroll, tax etc)
Online store customer records	Records retained purely for future marketing purposes
Club shareholder records	Ongoing management of shareholders (AGM invites etc).
Conference & private event customer records	Invoicing, ongoing communication for promotions, special offers etc
'Opt in' emails from football customers wanting information	Customer requested communication of news from and events at the Club
Football commercial customers (advertisers/sponsors/hospitality guests)	Invoicing and ongoing communication to allow renewals, communication of offers etc
Suppliers & contractors	Invoicing and ongoing customer relationships
Employees	<p>Records required for various current employee issues and then retained for any future queries (payroll, tax etc). Football coaches also have records retained in relation to the Protection of Vulnerable Groups regulations.</p> <p>Registered players have their data shared with the Scottish Football Association and the Scottish Professional Football League for the purposes of football registrations and other football governance issues</p>
Youth Academy Players	Youth Players in the 10-18 age bracket who register to play for the Club have their data shared with the Scottish Football Association and the Scottish Professional Football League for the purposes of football registrations and other football governance issues

Who we share your personal data with

With the exception of players, coaches and volunteers (see the next paragraph) we will NOT share your data we will not share your data with any third party unless you expressly give permission to do so (for example, club partners wishing to offer season ticket holders special offers). We shall always make any opting into such communication clear and unambiguous at the point of data collection.

If you are a player, coach or volunteer we may pass your information to the Scottish FA or Scottish Professional Football League to register participants and the team for matches, tournaments or other events, and for affiliation purposes. We may share your personal data with selected third parties, suppliers and sub-contractors such as referees, coaches or match organisers. Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions.

We may disclose your personal information to third parties to comply with a legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

The Club's data processing may require your personal data to be transferred outside of the UK. Where the Club does transfer your personal data overseas it is with the sufficient appropriate safeguards in place to ensure the security of that personal data.

Protection of your personal data

We 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.

How long we hold your personal data

We keep personal data on our customers, suppliers, participants and members while they continue to be a customer, supplier, participant or member or are otherwise actively involved with the Club. We will delete this data 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.

What is our Data Breach Policy?

A data breach is a breach of security leading to the accidental or unlawful destruction of, alteration of or unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

In the event of a security breach St Johnstone FC will make a report to the Information Commissioner's Office (ICO) without delay and at the latest within 72 hours of becoming aware of it if it presents a risk to the rights and freedoms of the data subjects.

The Club's full Data Breach Policy can be requested by emailing dataprotection@perthsaints.co.uk and can be viewed at www.perthstjohnstonefc.co.uk/policies

Which payment processors do we use?

We use Fidelity Payment (www.fidelitypayment.co.uk/) to process payments by credit and debit cards and Paypal (www.paypal.com) for processing online souvenir payments.

Which communication processors do we use?

We use For Email (www.forthdirectmail.co.uk)

Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your involvement or participation.

We may update this Privacy Notice from time to time, and will inform you to any changes in how we handle your personal data.

If you have any questions about this Privacy Notice then please contact the club on 01738 459090.

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