
PRIVACY POLICY

1. Background:

Watford FC's Community Sports and Education Trust (WFCCSET) understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits the following website, www.ShapeUpHerts.com, ("Our Site") and (subject to the limited exceptions in section 6, below) We do not collect personal data about you unless you contact us (see section 5, below). Any personal data We do collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

2. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and

"We/Us/Our" means Watford FC's Community Sports and Education Trust (WFCCSET), Watford FC's Community Sports and Education Trust is a registered charity (Charity No: 1102239), having gained charitable status in April 2004. Being registered with the Charities Commission the Trust is governed in accordance with charitable law and applies the Charity Code of Governance in order to develop the highest standards of governance. A board of Trustees exists whose registered office is Vicarage Road Stadium, Vicarage Road, Watford, Herts, WD18 0ER.

3. Information About Us

Our site is operated by WFCCSET, and owned and hosted by Wix.Com, a limited company registered in Israel under company number 51-388117-7, whose registered and trading address is 40 Namal Tel Aviv Street. Tel Aviv-Yafo 6350671.

Our Data Protection Officer is to be confirmed. In the interim our Data Controller is Tamora Burford and can be contacted by email at Tamora.Burford@watfordfc.com, or by post at Vicarage Road Stadium, Watford, Herts, WD18 0ER.

4. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

5. Your Rights

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- 5.1 The right to be informed about Our collection and use of personal data;
- 5.2 The right of access to the personal data we hold about you (see section 8);
- 5.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 3);
- 5.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you;
- 5.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 5.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 5.7 The right to object to Us using your personal data for particular purposes; and
- 5.8 Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 3.

For further information about your rights, please contact the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (<https://ico.org.uk>), or alternatively contact your local Citizens Advice Bureau.

6. What Data Do We Collect?

At times we may request that you voluntarily supply us with personal information. Generally, this information is requested when you register to use our website, purchase tickets, email enquiries, contributions or your views to WFCCSET and enter any promotions or competitions.

Please note that if you choose to participate in any discussion forum on the website, any disclosure of your own personal information to other participants is done so at your own risk.

Our website uses cookies. A cookie is a small file containing an identity code. With your consent, your computer or device accepts the cookie and stores it. When you next visit the website, the code is retrieved, allowing an individual visitor or computer to be recognised.

7. How Do We Use Your Data?

If We do collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see our Data Protection Policy.

We may gather and use information about you in one of the following ways:

- 7.1 If you choose to register to use our website or subscribe to updates on the website we may ask for information such as your name, date of birth, email address and contact details (personal information). We will use this information to administer your user account with us and so that we can tailor and improve the services we offer to you.
- 7.2 If you choose to give us personal information via the internet (for example, in the course of purchasing tickets or merchandising from us), it will be clear how we will use such information. If you tell us that you do not wish to have this information used as a basis

for further contact with you, we will respect your wishes.

- 7.3 Where you have consented to us sending you information we may also use your data for marketing purposes. This may be information that we think may be of interest to you or information about other organisations' goods and services that we think may be of interest to you.
- 7.4 Where you have consented to us passing your data to our official partners, sponsors and/or selected third parties to enable them to send you information, we may pass your data to such partners, sponsors and third parties to enable them to send you such information.
- 7.5 We intend to continue to improve the content and function of the WFCSET website. For this reason, we may monitor customer traffic patterns and site usage to help us improve the design and layout of our site and provide content of interest to you.
- 7.6 If you apply for a job we will use your information for the purposes of recruitment and selection, corresponding with you and equal opportunities monitoring and may hold your information for up to one year in case other suitable opportunities arise.
- 7.7 We may disclose personal data in order to comply with a legal or regulatory obligation.
- 7.8 We do not store credit card details, nor do we share customer details with any third parties.
- 7.9 We will not sell or lease your personal information to third parties not associated with WFCSET, its partners, sponsors and affiliates. If you do not wish to receive marketing and promotional communications from us or our partners, sponsors and affiliates you can choose to opt out when providing your personal information to Us.
- 7.10 The website contains links to websites that are not operated by WFCSET. These third parties may collect data from you and share some of that data with Us. We are careful when choosing Our partners, sponsors and affiliates, but We are not responsible for any misuse of personal information by such third parties. We recommend that you view the Privacy Policy posted on each website that you use to confirm that the policies of these third parties are acceptable to you.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. Please see Our Data Protection Policy for further details on Data Subject Access, Rectification of Personal Data, and Erasure of Personal Data.

8. How and Where Do We Store Your Data?

We only keep your personal data for as long as We need to in order to use it as described above in section 7, and/or for as long as We have your permission to keep it.

- 8.1 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If We do store data outside the EEA (this may be the case, for example, if website server is located in a country outside the EEA), We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure any data We hold about you (even if it is only your email address). Steps We take to secure and protect your data include:

- 8.2 Ensure visitors are received and supervised at all times in areas where personal data is stored.

- 8.3 Ensure computer systems containing personal data are password protected.
- 8.4 Ensure that staff know that passwords must be treated as private to the individual and must not be disclosed to others.
- 8.5 Ensure that only those who need to use the data have access.
- 8.6 Instruct staff to not leave their workstation/PC signed on when they are not using it.
- 8.7 Instruct staff to lock away any hard copies of personal data, or remote storage devices containing personal data, when not in use.
- 8.8 Instruct staff to exercise caution in what is sent via email and to whom it is sent. Instruct staff that any personal data sent by email must be password protected and must be titled 'Confidential'.
- 8.9 Provide the means to securely dispose of information (electronic and on paper).
- 8.10 Ensure that paper files are stored in secure locations and only accessed by those who need to use them.
- 8.11 Instruct staff not to disclose personal data to anyone other than the data subject unless they have the data subject's consent, or it is a registered disclosure, required by law, or permitted by a General Data Protection Regulation (EU) 2016/679 exemption.
- 8.12 Instruct staff not to leave confidential information on public display in any form.
- 8.13 Provide all staff with a copy of the Trust's Data Protection Policy, to provide training on data protection, and to ensure that all staff are aware of their obligations under the GDPR.

9. Disclosure for law enforcement purposes

WFCCSET reserves the right to access and disclose personal information to comply with applicable laws and lawful government requests to operate its systems properly or to protect itself or others. We may attempt to obtain the prior consent of the individual before disclosing the personal information, but We have no obligation to do so.

It may be necessary for us to transfer your information to countries outside the European Union which do not provide the same level of protection as the UK. If we for any reason need to do so we will make sure that the information is transferred in accordance with this privacy statement, the General Data Protection Regulation (EU) 2016/679 and other applicable data protection laws so that your personal data is kept secure.

10. Children and young people

This website is a general audience website. However, we understand that children may visit Our Site and as such, we would encourage all potential users under the age of 16 to talk with their parents or legal guardians before submitting any information to this website, or indeed any other website. Ultimately, We believe that it is the responsibility of parents or legal guardians to supervise children when online and recommends that parental control tools be put in place.

If We actively collect personal information from anyone under the age of 18 We will do so in compliance with the General Data Protection Regulation (EU) 2016/679.

11. How Can You Access Your Data?

- 11.1 You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all

information in response to your request free of charge. Please contact Us using the contact details provided in section 3. Alternatively, please refer to Our Data Protection Policy.

- 11.2 You have the right to see a copy of the data that We hold about you in a form that is acceptable to you. We will provide a copy of the data in one of the following electronic formats: Pdf, docx, xlsx, xlsxm.
- 11.3. When making an SAR, you are required to provide two forms of identification. Acceptable forms of identification include; Passport, Driving Licence, Birth Certificate, Bank Statement and Utility Bill (from last 3 months).

12. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us using the contact details provided in Section 3. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 7, above).

13. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.