

# LFC FOUNDATION PRIVACY NOTICE

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## PRIVACY POLICY

### PRIVACY NOTICE

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

There's a lot of information here, but we want you to be fully informed about your rights, and how Liverpool Football Club Foundation ("LFC Foundation") uses your data; for example, we will explain how we analyse and combine all the data we hold about you to ensure communications are personalised and relevant.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

#### Summary of how we use your data

- We collect personal data in order to allow fans, participants and volunteers (collectively "Stakeholders") of LFC Foundation ("LFC Foundation", "we" or "us") to interact with LFC Foundation – this is done via our website or any other medium which we use to collect your data and we use your personal data in various ways to facilitate this interaction.
- LFC Foundation's use of your personal data allows us to provide products, services and tickets that you have purchased, details of LFC Foundation programmes, sessions and/or fundraising activities you wish to participate in or which you wish to volunteer for, to communicate with our Stakeholders, to provide you with information about us and about the aforementioned products and/or programmes and may also

include, where we are allowed to do so, contacting you about products, services, programmes and events that we think you'll be interested in.

- Our privacy notice describes how LFC Foundation will make use of your personal information when you visit our website, when we communicate with you, when you buy tickets or products from us and when you sign up to participate, or volunteer for, a LFC Foundation programme, session and/or fundraising activity:
- Where we transfer your data internationally, we make sure that it is protected according to the standards required by applicable law.
- You also have various rights over your personal data including a right to object to some of the processing of your personal data that LFC Foundation carries out.
- The Foundation website may include links to third-party websites, plug-ins and applications. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **What information do we collect and why?**

We collect and process personal data about you when you register to use this or our other websites, purchase or express an interest in receiving products or services from us, sign up or express an interest in participating in, or volunteering for, a LFC Foundation programme, session and/or fundraising activity or when you subscribe to our communications. This includes:

#### **Your contact details including your name, postal and email address and telephone number, which we may use to:**

- contact you in order for us to manage, administer and provide our products, tickets, sessions and programmes we deliver to you.
- contact you in order for us to manage, administer and provide details on the programmes and/or sessions which you wish to volunteer for (including fundraising)
- respond to any correspondence and service-related enquiries you send to us in respect of our products, programmes, sessions or fundraising activities.
- provide you with relevant information such as operational updates (including access information, ticket collection information and scheduling changes) relating to our programmes, sessions and/or other events.
- market our programmes, sessions products and services to you where we think this may be of interested to you and/or where you have consented to this.
- market LFC products, programmes, sessions and services to you (including via electronic means) and to inform you about LFC news, competitions, events and other information, to the extent you have not opted-out and to the extent such marketing relates to a product, service, session and/or programme you have previously ordered or purchased or to a product or service you are communicating with us or have expressed an interest in.
- collect payment of debts from you.
- invite you to give feedback (which may be published where we have your consent to do so) and/or take part in market research or surveys to assist us with improving fan experiences and our programmes, sessions products and services.
- If you are representative of a business, to contact you about hospitality, event hosting and partnership opportunities with LFC Foundation (unless you tell us you don't want to hear from us).

In addition to the above, we may also receive this information from:

- the Premier League and/or our charity partners (including, but not limited to, Right to Play) rather than collecting it directly from you ourselves, but only where you have opted-in (e.g. on the Premier League website) to receiving information from us.
- To communicate any updates to you including any changes to our programmes, the terms and conditions of any services which we have provided to you, any changes to this Privacy Notice and to our websites.

**Identity details including your title, name, date of birth, gender, ethnicity, user name, social media handles or other similar identifier.**

- To register you as a Stakeholder, to establish your identity and to ensure that we are corresponding with and providing products and services to the correct person.
- To register you as a volunteer, to establish your identity and to ensure that we are corresponding with and providing information around LFC Foundation programmes and sessions to the correct person.
- To enable your participation in a prize draw or competition which you have entered.
- To market LFC Foundation programmes, sessions, products and/or services to you where you have consented to this. We will also use this information to market LFC Foundation products, programmes and services to you (including via electronic means) and to inform you about LFC Foundation news, competitions, events and other information where you have not opted-out and to where such marketing relates to other products you have received, or programmes and/or sessions you have attended, or where you've expressed an interest in such products, programmes and/or sessions.
- We may use this information to collect payment of debts from you, for example where payments for hospitality are overdue.
- We may collect information about your gender and/or ethnicity for our monitoring and evaluation purposes.

**Financial information including bank account and payment card details.**

We may and/or may use third parties to take payment details from you, including bank account details and/or payment card details, in order to process any payment required for our products, programmes and/or sessions, any donations you may make from time to time or any debts which are owed by you to the Foundation.

**Details of payments to and from you and other details of products and services you have purchased from us including any feedback.**

- To allow us to provide you with any products or services you have purchased from us.
- To administer any refunds that we provide to you.
- To establish whether other products / services that we may wish to contact you about (where we are entitled to do so) are relevant.
- To respond to comments / complaints you or others may send to us.
- To improve and protect our products, platforms, content, services and websites.
- To check your eligibility for tickets and other events which you wish to attend.

**Your preferences in receiving marketing communications from us and any third parties (including any consents you have given us) and confirmation of whether or not we should contact you.**

- To make sure that we only send marketing information to you where we are entitled to do so.
- We receive a 'yes' or 'no' answer at our request from the Telephone Preference Service and as a result of mortality and gambling/betting/financial screening as an indication of whether we should contact you for marketing purposes.

**Your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.**

- We will use this information to show you information that is relevant to you including your account information and history to allow you to administer your account.
- We also use some of this information for analytics purposes, which are described in more detail below under 'Our use of data analytics'.

**Technical data about your access to and use of the website.**

- This is likely to include IP address (from which we may infer your country of location), the type of device you are using, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the device you use to access our website or app and information about whether you open our communications, which content you have viewed and other page interaction information.
- This is primarily to help us better understand how our fans use our digital platforms to enable us to create better content and more relevant communications. For more information on this, please see LFC's [Cookies Policy](#).

**Information relating to any access, health, disability and/or dietary requirements you may have.**

- We will request this information where it is needed, for example where you have bought a ticket to an event, signed up to a programme or wish to volunteer on behalf of the LFC Foundation, so that we can make sure there are suitable accessibility arrangements in place as well as to ensure that we are compliant with our health and safety obligations.
- We may also use certain health information, provided we have received your consent for such use, for our analytical purposes as further explained below.

**Information required by law.**

- This may include, for example, where we need parental consent to provide services or programmes to children under 13 (however please note that most of our websites are not designed for children under 13) or in response to requests by government or law enforcement authorities conducting an investigation.

**Copies of identity documents where you are a volunteer (in which case we may collect details including your place of birth and residential address) which may include a photograph.**

- Where you sign up to volunteer during one of our programmes, we may take copies of your identity documents in order to verify your identity and carry out any necessary security checks (including but not limited to DBS checks).
- We will only keep copies of your identity documents for as long as it takes us to verify your identity and for the period in which you are registered as a LFC Foundation volunteer.
- We use software that analyses the copies of identity documents that you provide to us which may automatically make a decision about your identity. However, where an automatic decision of this kind is made, you will always have the opportunity to challenge it if you disagree with the decision made.
- We will not use the copies we take of your identity documents for any other purpose.
- We may take a photograph of you to confirm your identity during the registration process. This will be deleted following you ceasing to be a registered volunteer for the Foundation.

**Images, video and audio recordings of you**

- We may capture CCTV images and/or film when you visit any location owned or used by LFC or LFC Foundation, including but not limited to via body-worn cameras used by stewards during events at Anfield, and by visiting such sites you acknowledge and agree to the capturing of such media.
- We may take photographs of you taking part in events or at activities at any location owned or used by either LFC or LFC Foundation or with our community and charitable work such as with Red Neighbours. We will always ask for your written consent (which you can withdraw at any time) before using a photograph that identifies you in our promotional or marketing materials.

Please note that we may use any of the data described above to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime (including but not limited to ticketing offences), in accordance with applicable law.

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**Our use of data analytics**

We evaluate, categorise and profile personal data to help us tailor materials, services and communications on our platforms and on third party platforms such as social media. This also helps prevent unwanted communications from filling up your inbox. This also helps us understand and provide a better experience to our fans, improve and protect our organisation and carry out research connected to our aims.

**Internal research and analysis:** We carry out research and analysis on our supporters, members and stakeholders, to determine the success of campaigns, programmes, sessions and appeals, better understand behaviour and responses and identify patterns and trends and to evaluate the success of our programmes, sessions and/or appeals. This research and analysis may include use of data which you provide to us in advance of participating in any programme and/or session, any

information which we may collect during the programme/session (including but not limited to health information) and any information which we collect (either directly or through self-reporting techniques) before, during and/or following the programme/session's conclusion. This helps inform our approach and make LFC Foundation stronger and more effective, as well as helping to improve the programmes and/or sessions which we offer to Stakeholders and other participants. Understanding our Stakeholders, their interests and what they care about also helps us provide a better experience.

**Analysis and grouping:** We analyse the data we collect about Stakeholders to identify common characteristics and preferences. We do this by assessing various types of information including behaviour, for example, previous activity or demographic information, such as age or location. This allows us to ensure you receive the communications, products and information which are most important to you.

**Profiling to help us understand our stakeholders:** We profile our stakeholders on the basis of various criteria including their interests, general geographic location, website/app activity and socioeconomic and age groups. We also use aggregated, anonymised lifestyle data obtained from third parties to supplement our profiles. This information helps us to ensure communications are relevant and timely and to offer new products and services that may be of interest to our fans.

Several of these analytics activities rely on the use of cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website or platforms may become inaccessible or not function properly. For more information about the cookies we use, please see LFC's [Cookies Policy](#).

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## Legal basis for processing personal data

Our legal basis for collecting and using your personal data will depend on the personal data concerned and the specific context in which we collect it.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you or with your explicit consent, we can provide details of this to you on request. We will advise you at the time whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data).

If we collect and use your personal data in reliance on our legitimate interests (or those of any third party), you may request that we provide with you information about what those legitimate interests are by contacting us using the details at 'How do I get in touch with you?' below.

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## Who will we share this data with, where and when?

Data will be shared with third party service providers, who will process it on behalf of LFC Foundation for the purposes identified above. Such third parties include

providers of social media platforms and search engines, providers of services to the club such as website hosting, app developers, software providers, maintenance providers, payment providers, identity verification providers, video streaming companies, mailing companies and marketing services.

Data collected or received from participants in our programmes, sessions and/or campaign may also be shared, in an anonymised format (except where we have a legitimate interest to share in an deanonymized format and inform you as such), with other third parties from time to time, such third parties to include but not be limited to funders and/or research partners, for the research and analytical purposes set out above.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

We will only share your data with a third party for the purpose of them directly marketing to you where you have consented to such data sharing (for example, when entering into a specific competition for which we have partnered with that third party).

We may need to store or transfer your personal information to countries outside the European Economic Area (EEA), some of which do not protect privacy rights as extensively as in the United Kingdom. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. Further details of these safeguards can be provided for your review on request by contracting our Data Protection Officer using the contact information set out under the heading '*How do I get in touch with you or your data protection officer?*' below.

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

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## **What rights do I have?**

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate

interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below:

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us or our data protection officer using the details set out below. If you have unresolved concerns, you have the **right to complain** to an EU data protection authority where you live, work or where you believe a breach may have occurred. This likely to be the Information Commissioner's Office in the UK.

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### How do I get in touch with you or your data protection officer?

We hope that we can satisfy queries you may have about the way we process your data. You can get in touch with LFC's Data Protection Officer if you have any concerns or queries about how we process your data at [DPO@liverpoolfc.com](mailto:DPO@liverpoolfc.com) or by writing to the following address:

FAO: Data Protection Officer

The Liverpool Football Club and Athletic Grounds Limited

10<sup>th</sup> Floor

20 Chapel Street

Liverpool

L3 9AG

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### How do I opt-out of direct marketing?

There are several ways you can stop receiving direct marketing communications from us:

- Where you have agreed to receive marketing communications as part of receiving wider LFC related marketing, you can click the 'unsubscribe' link in any email marketing communications which we send you and make changes in our preference centre
- if you have any account registration on our website or any of our product or service areas, log-in to the 'My LFC' or 'My Account' area and update or change your preferences; or
- contact the LFC Foundation team using our [Contact Us](#) page.



Please note that you may continue to receive communications for a short period after changing your preferences while all our systems are fully updated.

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**Which Liverpool entity is my data controller, and which affiliates might my data be shared with?**

The data controller for your information is The Liverpool Football Club Foundation, except where you have consented to us sharing your data with third party partners for direct marketing purposes where the data controller will be such third party partner.

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**How long will you retain my data?**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.