



**SWANSEA CITY ASSOCIATION FOOTBALL CLUB
LIMITED**

PRIVACY POLICY

Privacy Policy

In this Privacy Policy, any use of the words “you”, “yours” or similar expressions shall mean any user of our website and digital platforms whatsoever. Terms such as “we”, “us”, “our” or similar expressions shall mean Swansea City Association Football Club Limited.

Your privacy is of the highest importance to us, and we promise not to release your personal details to any outside company for their mailing or marketing purposes.

This Privacy Policy explains what information we collect about you, how we may use it and the steps we will take to ensure it is kept secure.

Please read the following carefully.

Controllers of Information

Any personal information provided to or gathered by www.swanseacity.com is controlled by us. Details of our Data Protection Officer can be obtained by emailing dpo@swanseacity.com or write to us at the following address:

Data Protection Officer
Swansea City Association Football Club Limited
Swansea.com Stadium
Swansea
SA1 2FA

What information do we collect about you?

We collect information that you provide to us, including your contact details, preferences and associated information when you visit and/or register for any of our online products and services, make a purchase through our websites or via our telephone or other sales outlets, or when you participate in club events, competitions and promotions.

When you visit our stadium, offices or other premises we may collect CCTV images including for the purposes of public order and the prevention of crime.

We may also collect information about your use of our websites and App as well as information about you from third parties.

What information do we collect about you?

When you purchase products and services, we may collect personal information from you, such as your name, address, delivery address, email, telephone number and payment card details. We will use this information to supply you with products and services, to recover debt, to help us to prevent fraud, and keep records about your purchases.

You may need to register an account to use certain parts of our websites or App. When you register an account you will need to provide basic information about yourself. This will vary depending on which part of our websites or App you are registering for,

but will usually include your email address and may also include other relevant information such as your name, date of birth and/or location. If you do not want us to record this information about you, please do not register.

You may also be given the opportunity to provide additional personal information, such as your postal address to send you a prize if you win a competition that you enter or the ability to upload an avatar (which could for example be a photograph of you). It is entirely your decision as to whether you provide more information to us and you should only provide this information if you are comfortable with us storing it and using it to provide services, content and information to you as described in this privacy policy.

When you sign up to be kept informed about exciting promotions, news, features and activities we may collect your personal information, such as your name, email address, date of birth and country of residence.

If you log in using social media depending on how you log in we may collect your profile name/user name, profile picture, email address and date of birth. The social media information you consent to share with us will be combined with the other information you provide to us or that we collect about you. We will also collect information about your comments, posts and 'likes'.

As you move around our website we will collect information about your visit, such as which pages you visit, how often you visit and which competitions you enter.

We will also automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our sites (including date and time); products you viewed or searched for; page response times, download errors, 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.

You can exercise control over some of this information, for example by adjusting your preferences for an App in your smartphone, or adjusting your settings via your website browser. Please see our Cookies Policy.

From our commercial partners and other third parties, we may collect information including your name, date of birth and contact information, when you enter into jointly conducted competitions and promotions, or purchase our products or services via a third party site.

We use specialist data enrichment providers to assist us with enriching the data we hold on you. This includes helping us to review, segment and correct the data we hold, to make sure it remains accurate and up-to date and help us to identify and delete data we no longer need. This also helps us to understand your interests and preferences, so we can provide you with information which is likely to be most relevant to you and

improve your experience of our products and services. You can visit their websites by clicking on links within our website and view their Privacy Policies.

The Official Swans App (developed by Swansea City AFC, designed and built by Other Media, powered by Clubcast)

You are able to browse the Official Swans App anonymously or by signing in using your Swans user account for more features/services. When you download the App to your mobile device it collects the following information automatically:

- The type of mobile device you are using;
- A unique identifier (like the device ID or IP address);
- Information about how you use the App.

This enables the App to remember you and provide you with the content you have asked for. We also use this information to personalise your content. The legal basis we rely on to process this data is article 6(1)(f) of the GDPR, which allows us to process personal data for our legitimate interests.

The App may also collect additional information or perform certain actions but only where you have given permission. The lawful basis we rely on for all of the processing activities listed below is article 6(1)(a) of the GDPR which requires us to obtain your consent.

Push notifications

The App may ask you to permit push notification so we can notify you of things we believe you would want to know.

Stadium Wi-Fi

When you attend the Stadium we provide an open Wi-Fi network for your use. We do not ask you for any personal information, such as your name or email address, when you connect to the Wi-Fi but we have to collect your device's IP address and MAC address in order to facilitate your connection. We retain these two pieces of information for the duration of a season. At the end of each season we delete all such data from the Wi-Fi system.

We also operate a web filtering system which blocks access to indecent or malicious websites that could pose a security threat to our Wi-Fi network. The filtering system will collect information about the websites you visit whilst you are using our Wi-Fi network. We retain this information for 1 month in order to assist us with any investigations into the misuse of the Wi-Fi network or any security incidents.

The legal basis we rely on to process this data is article 6(1)(f) of the GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

This information is not personally identifiable and we do not combine it with other data you may have provided us through your other interactions with us. Consequently, this data remains.

What special category information do you collect about me?

We may record details of any disability or health needs you may have at the time of booking an event or service to help us make reasonable adjustments for you and to

ensure your safety. We will usually ask your consent to do this, unless there are other legal grounds on which we need to use the information.

In some limited circumstances, we may process information about criminal convictions, where this is necessary for public order and the prevention of crime, and there are adequate protections in place.

Why do we collect and use this information and what are the legal grounds for us doing so?

We collect this information to (i) provide you with products and services you request; (ii) make our website available and improve its performance and presentation; (iii) to improve and enhance our services and make them more personal to you; (iv) to provide consistency when using the services offered to you by companies in our group; (v) to administer competitions and prize draws you enter; (vi) for the purposes of undertaking our business; and (vii) safety and public order and the prevention of crime.

The legal grounds for this processing are:

- our legitimate interests (in carrying on our business, making our website available, and providing our customers with content which is appropriate for them);
- for the performance of our contract with you (where you purchase goods or services from us or via a third party partner or one of the members of our group);
- to comply with our legal obligations (for example, where we are required to record information in relation to health and safety, or safety and public order at match days as well as age sensitive content).

In respect of limited categories of data we may record and use this with your consent (for example, in relation to sending you direct marketing). You can withdraw your consent at any time but this will not affect any processing undertaken before that point.

Where we develop a new feature or product (such as an updated ticketing website), if a separate account is required to access this we may for your convenience automatically create a new account for you using the details associated with your existing account. In this case we will email you to let you know.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	a. Identity b. Contact	Performance of a contract with you
To register you as a new customer a. Manage payments, fees and charges	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to recover debts due to us)

<p>b. Collect and recover money owed to us</p>		
<p>To manage our relationship with you which will include:</p> <p>a. Notifying you about changes to our terms or privacy policy</p> <p>b. Asking you to leave a review or take a survey</p>	<p>a. Identity</p> <p>b. Contact</p> <p>c. Profile</p> <p>d. Marketing and Communications</p>	<p>a. Performance of a contract with you</p> <p>b. Necessary to comply with a legal obligation</p> <p>c. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>a. Identity</p> <p>b. Contact</p> <p>c. Profile</p> <p>d. Usage</p> <p>e. Marketing and Communications</p>	<p>a. Performance of a contract with you</p> <p>b. Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>a. Identity</p> <p>b. Contact</p> <p>c. Technical</p>	<p>a. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>b. Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>a. Identity</p> <p>b. Contact</p> <p>c. Profile</p> <p>d. Usage</p> <p>e. Marketing and Communications</p> <p>f. Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a. Technical b. Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To communicate suggestions and recommendations to you about goods or services that may be of interest to you	a. Identity b. Contact c. Technical d. Usage e. Profile f. Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

When can we send you marketing and how can you change your mind?

We can send you updates and newsletters if you sign up to any of our products and services. We can also send you marketing communications in relation to our products, services and partnerships with sponsors, promotions and other initiatives.

You can change your mind at any time, either by logging in to your preference centre: <https://login.swanseacity.com/Auth/Login?successredirecturl=https%3A%2F%2Fwww.swanseacity.com%2Fsso%2Flogin%3Ffinally%3Dhttps%253A%252F%252Fwww.swanseacity.com%252Fterms-conditions&returnvisitorurl=https%3A%2F%2Fwww.swanseacity.com%2Fterms-conditions&tenantid=Sb2TPD1vn0al-oSLohNJOA> (which allows you to control what communications you receive and how you receive them). You can also opt out by selecting the link or following the instructions sent with each communication.

When can we send you marketing and how can you change your mind?

There are many exciting promotions, news, features and activities we and our commercial partners want to keep in touch with you about. When you register with us, or provide us with your personal information, there will be a consent box that allows you to indicate your preference in this respect.

If you opt-in it means that we will let you know about exciting promotions, news, features and activities of the Club and/or our commercial partners.

Providing this consent means you get the following fantastic promotions, news, features and more:

- Swans Newsletter, Matchday, Post Match Videos, Ticket Alert, Hospitality & Events and Retail, as well as exclusive offers, products and services on behalf of our commercial partners.

Just to make sure you are happy with your preferences we will get in touch once a year by email to check you are happy with what you are (or are not) receiving from us and that the information we hold about you is up to date.

You can also change your mind at any time via your preference centre: <https://login.swanseaacity.com/Auth/Login?successredirecturl=https%3A%2F%2Fwww.swanseaacity.com%2Fsso%2Flogin%3Ffinally%3Dhttps%253A%252F%252Fwww.swanseaacity.com%252Fterms-conditions&returnvisitorurl=https%3A%2F%2Fwww.swanseaacity.com%2Fterms-conditions&tenantid=Sb2TPD1vn0al-oSLohNJOA> You can update your personal information if it changes by logging into your account or taking the specific steps to opt-out set out at the end of each digital marketing communication.

Our sites and apps 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 or their use of your data. Please check these policies before you submit any personal data to these websites.

Who may we share your information with or disclose it to?

We may share your information with our service providers who help us to provide goods and services, help us to operate our website, provide us with support in communicating with you or administering and delivering our prize draws and promotions, or help us to ensure our data remains accurate and relevant.

We may also share your information with regulatory bodies and other similar bodies and associations (such as the Premier League and the Football Association).

We may share your information with our professional advisors and with any potential purchaser of part or all of our business or assets. We may also share it with law enforcement organisations.

When we share your data we will always take reasonable steps to ensure that there are adequate safeguards in place.

Our commercial partners

For a current list of our sponsors, licensees and partners please visit <https://www.swanseaacity.com/main-sponsors-partners> These may change from time to time, so please come and check the list regularly.

By opting in it means that we will let you know about exciting promotions, news, features and activities of the Club and/or our commercial partners.

We may also use the personal information we collect about you to create statistics and anonymised information to then share with third parties including ad networks, search engines and analytics providers.

We may share your information with business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

We may disclose your personal information to third parties in the following circumstances:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets.
- If the Club or substantially all of their assets are acquired by a third party, in which case personal information held by them about their customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order: to comply with any legal obligation, court or police request, or in order to enforce or apply our terms of use <https://www.swanseaclub.com/terms-conditions> or terms and conditions of sale: <https://www.eticketing.co.uk/swanstickets/Common/CustomNotice/TermsAndConditions> and other agreements; or to protect the rights, property, or safety of the Club, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.
- Analytics and search engine providers that assist us in the improvement and optimisation of our sites and apps.

Will we transfer your data outside of the EEA?

We may sometimes have to transfer your data outside of the European Economic Area (EEA). However, we will only do so where there are adequate safeguards in place or it is otherwise lawful.

In some circumstances, we may need to transfer your personal information to countries outside the EEA, some of which do not protect privacy rights as extensively as in the United Kingdom. In order for the transfer to be lawful, we must ensure adequate safeguards are in place.

Where we transfer your data to a third party outside of the EEA (such as another company in our group) we will either:

- do so where there has been a finding of adequacy in respect of that territory, including under a recognised scheme (such as the US Privacy Shield); or
- implement model contract clauses governing the transfer, as approved by the European Commission.

The only circumstances in which we may transfer data outside of the EEA outside of the above circumstances are:

- where you have given your explicit consent (having had the risks explained to you);
- where the transfer is necessary for the performance of a contract with you, or with a third party in your interest;
- the transfer is necessary for the establishment, exercise or defence of legal claims;

For more information please contact us.

Will your information be used for profiling and automated decision taking?

We may sometimes have to transfer your data outside of the European Economic Area (EEA). However, we will only do so where there are adequate safeguards in place or it is otherwise lawful.

We may use your data for profiling and limited automated decision taking, for example matching unique identifiers in our database (e.g. email address) with the same unique identifiers on social media platforms. In practice, the personal data is anonymised. Additionally, there are a variety of web analytics tools that we use (e.g. Google Analytics and Facebook Analytics). These platforms use a level of processing unique identifiers (e.g. IP address, Mac address, user ID, social handle, cookies) to track digital behaviours.

Will your information be secure?

We take the security of your personal information seriously and take steps (including the implementation of appropriate technical and organisational measures) to ensure your personal information is treated securely and in accordance with this privacy policy.

Your information is kept on secure servers and we implement a range of measures to try to ensure the security and integrity of our digital products, services and databases. We take steps to ensure that only authorised persons have access to your data.

When you submit your payment card details, we use industry standard secure sockets layer (ssl) encryption technology to guard your information. However, we cannot guarantee that any data transmission over the internet is completely secure.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites or apps, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Our websites and apps may contain links to other websites. We are only responsible for the privacy practices on our websites and in our apps. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit.

How long will you keep my information?

We will keep your information for as long as reasonably necessary to fulfil the purposes that we collected it for. However, we take steps to regularly review our information

ensure that we are not holding excessive personal information for longer than is necessary or required.

The factors which influence how long we hold onto specific information for include (i) legal requirements; (ii) managing our legal risks; (iii) management of our business; and (iv) the nature of our relationship with you (and the services we provide you with).

Where you enter into a contract with us (such as for the purchase of goods or services) we will generally keep your information for six years after the end of our contract with you.

Details of retention periods for different aspects of your personal data are available in our retention policy. You can find out more by contacting us.

What rights do you have in relation to your personal information?

Under data protection legislation you have a range of rights. You have a right to ask us for a copy of the information we hold about you. You can also ask us to correct or update your personal data, or to erase it or transfer it to a third party. You can object to processing of your personal information by us, including to object to any direct marketing. Where we are using your information based on your consent you can withdraw your consent.

The way some of your rights apply may depend on the circumstances. To exercise your rights please contact us. Further information about your rights is set out below.

Making a request

To make a request, please contact us via dpo@swansea-city.com

More about your rights

Right of access	You have a right to access the personal information we hold about you and be told why we use it.
Right of rectification	You can ask us to correct or update your information to ensure it is accurate and complete.
Right to erasure and right to restrict processing	You can ask us to stop processing and to delete your data in certain circumstances (for example where it is processed with your consent, or it is no longer necessary for us to process it).
Right to object	You have a right to object to our processing of your information.
Rights: profiling and automated decisions	You have a right not to be subject to automated decisions which have a legal effect and to be protected by safeguards in respect of any profiling.
Right to object to direct marketing	Where you have consented to receive direct marketing you can change your mind at any time as described in

	the marketing section above. Please allow a few days for us to action your request.
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You can find out more or exercise the above rights by contacting us. Further information is also available from the ICO's website (<https://www.ico.org.uk>).

Fees, information requirements and time limits

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Contacting us and Complaints

Our Data Protection Officer can be contacted via dpo@swanseacity.com if you have any questions, would like to exercise any of your legal rights or you would like to make a complaint.

You also have a right to complain to the Information Commissioner's Office by writing to them at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, or by telephone 0303 123 1113. More information is available on the ICO's website <https://www.ico.org.uk>

Children and Privacy

It is important to us that children can enjoy our website in a responsible fashion. We encourage parents and guardians to supervise their children's online activities by, for example, adopting parental control tools available from online services and software developers to help provide a child-friendly online environment. These tools can also prevent children from disclosing online their name, address, and other personal information without parental permission.

Your child's privacy is important to us. We are committed to safeguarding children's personal information collected online, and to helping parents and guardians and their children learn how to exercise control over personal information while exploring the internet.

Preference options are restricted when a date of birth is recognised to be under 16 years of age.

For those under the age of 13, there will be no preference centre available.

However, if an individual does wish to receive communications, a request may be sent to accountquery@swanseaclub.com

The Club will review each request and if appropriate seek the consent of the parent or guardian before updating the individual's preference centre.

If you are a parent or guardian and would like to review any personal information that we have collected online from your child, have this information deleted, and/or request that there be no further collection or use of your child's personal information or if you have any questions about our Privacy Policy or practices, you may contact us at dpo@swanseaclub.com

Changes to this Policy

Changes to how we use your information will be published on this page, so you should check back periodically. If we are making a significant change to how we will be using your information we will normally contact you to let you know.

We will change our practices from time to time as we continue to develop our products and services. We may also change our privacy policy at any time, so we recommend that you visit this page occasionally to check what has changed.