



Privacy Policy

Oxford City Football Club together with its related bodies corporate ("we", "us" or "our") respects your privacy and is committed to complying with the privacy principles contained in the applicable privacy laws and regulations for the places where we do business. This policy sets out the manner in which we collect, hold, process, use and disclose your personal and sensitive information.

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1. Definitions

- **1.1 Personal information:** is any information about you that identifies you or by which your identity may be reasonably determined.
- **1.2 Sensitive information:** is defined as any data covered by the Data Protection Act 2018 (DPA) and General Data Protection Regulation (GDPR).

2. Types of information collected and processes:

The type of information we collect or process from or about you will depend on how you or your organization interacts with us. Generally, we collect or process the following types of information, along with the corresponding basis for collection:

- **2.1 Club staff, internal contractors and potential candidates:** to work for us we collect personal details including name, contact details and information provided to us and collected by us that is relevant and necessary for our engagement with those people and in order to fulfil our obligations.
- **2.2 Athletes using our “PlayerTek” product:** we collect your account details, payment instructions where relevant, and sports performance data during the times when the device is activated including field location, speed and distance covered. Our ability to collect, process and use this information for the reasons stated in this document is a key part of the functionality of the **PlayerTek** product, without it the **PlayerTek** cannot be considered fully functional. In addition, we will be obtaining your specific consent to use the information in this manner.

Due to the ongoing pandemic, the consent form will be provided in an online format.

3. The collection of personal information

When you directly use our products or services, you, or someone on your behalf can enter information about yourself into the **PlayerTek** software. We will always try to collect your personal information directly from you where possible. Regardless of how your personal information is collected – we will deal with it in accordance with this policy.



4. The use of your information

Generally, we use your information for providing and maintaining the services that relate to this product. Using the information we collect, we are able to deliver the services to you and honour our contract with you (in the case of **PlayerTek**). For example, we need to use your **PlayerTek** information to enable you to track your training and game day activity and to give you customer support and for the performance reporting within the **PlayerTek** community.

5. Improve and Develop the Services

We use the information we collect to improve the services and to develop new ones. For example, we use the information to troubleshoot and protect against errors; perform data analysis and testing; conduct research and surveys; and develop new features and services.

6. Communication

We use your information when needed to send you notifications and respond to you when you contact us.

7. Safety and Security

We use the information we collect to promote the safety and security of the Services, our users and other parties. For example, we may use the information to authenticate users, protect against fraud and abuse, respond to a legal request or claim, conduct audits and enforce our terms and policies.

8. Internal Business Purposes

We use the information that we collect from our workers, internal contractors, potential candidates, customers, personnel, suppliers, consultants and contractors for our internal business purposes, including (but not limited to) better operating our business and to communicate with customers and prospects.

9. The Disclosure of Personal Information to Others

In the case of **PlayerTek**, performance data of players in the **PlayerTek** community is shared through features in the app which enable comparisons and rankings of player performance.

In the instances of other individuals (such as employees, customer employees, suppliers, etc.) we do not send your information outside of our company for any reason which is not necessary to further run the operations of the company. We limit these disclosures to those we believe absolutely necessary and limit the scope of such disclosures where feasible. Sometimes we'll need to disclose



your personal information to other people or entities that we collaborate with to provide our products or services (third parties) for the purposes set out in this policy.

We will do not disclose your personal information to a third party, if you have not approved it.

10. The Disclosure of Personal Information to People or Entities Outside of your Region

Your information will only be accessible to persons outside your Region as follows:

- For our **PlayerTek** service, we may disclose personal information outside your region for the purposes of customer service, product support and as part of performance reporting within the **PlayerTek** community, with consistent with agreement terms in place.
- For our customers, potential candidates and personnel, we only allow access of your information outside of your region for reasonable and permitted purposes related to our work with you.

If we do allow access to or transferal of your information to persons outside your region we will take steps designed to ensure that such persons handle your personal information with the same level of protection as set out in this privacy policy and in a manner compliant with applicable laws and regulation.

11. Data Security

We will take all reasonable precautions designed to safeguard personal information that is processed or used by us from loss, misuse, unauthorized access, modification or disclosure.

To ensure that your personal information is secure, we employ several means, including:

1. External and internal premises security.
2. The requirement for all employees to enter into a confidentiality agreement.
3. Computer firewall protection.
4. Restricted access to personal files and information.
5. Computer maintenance to prevent unauthorised access.
6. Document handling and shredding procedures with respect to personal information.
7. Limiting access to your personal information.

12. Rights to Access

- **Accessing and Exporting Information:** In the case of **PlayerTek**, by logging into your account, you (or relevant club personnel) can access your personal information. For all other



individuals: you may access the personal information used, collected or processed by us by contacting club@oxcityfc.co.uk

- **Editing and Deleting Information:** In the case of **PlayerTek**, your settings let you change and delete your personal information. For all other individuals, you may request the editing or deletion of your information by contacting us at club@oxcityfc.co.uk. We also may preserve information for legal reasons or to prevent harm.

- **If you consider use of your information by us is inappropriate:**

You may object to that information use by e-mailing us at club@oxcityfc.co.uk

Further rights:

1. If you live in a Designated Country (European Economic Area, United Kingdom and Switzerland), in certain circumstances, you can object to our processing of your information based on our legitimate interests, including as described in this policy.
2. You have a general right to object to the use of your information for direct marketing purposes.
3. Restricting or Limiting Information Use. In addition to the various controls that we offer, if you reside in a Designated Country, you can seek to restrict our processing of your information in certain circumstances. Please note that you can always delete your account at any time.

To exercise your rights under 1-3 above, please contact us by e-mail at club@oxcityfc.co.uk

If you need further assistance regarding your rights, please contact our Data Protection Officer at club@oxcityfc.co.uk (entitling subject "FAO Data Protection Officer") and we will consider your request in accordance with applicable laws.

13. Direct Marketing

We may use your personal information, such as your address and contact details, to provide you with information about services that we or our commercial partners offer. If at any time you do not wish to receive any information about these services please feel free to contact us and we will not send you any further material.

We will not transfer or allow access to your personal information to any other entity or person for the purposes of allowing them to market their products or services to you.

14. Policy for Children

For the club's definition of child, please see safeguarding children policy. We appreciate the importance of taking additional measures to protect children's privacy. Persons under the age of 16,



or any higher applicable minimum age as directed, are not permitted to create accounts unless their parent or guardian has consented in accordance with applicable law. If we learn that we have collected the personal information of a child under the relevant minimum age without parental or guardian consent, we will take steps to secure the parent or guardian consent or delete the information as soon as possible. Parents who believe that their child has submitted personal information to use and would like to have it deleted may contact us at club@oxcityfc.co.uk.

15. Duration of Data Storage

We store information for the duration and in accordance with any applicable contractual term and retain or delete that data as we are required to do under applicable privacy rules.

We may retain de-identified data for research and product development.

16. Changes to this Privacy Policy

We monitor regulations, policies and procedures to ensure that we are up to date with changes in the law and market practices. As a result, we will change this privacy policy from time to time.

17. Accessing Personal Information

Should you wish to access your personal information, contact us at club@oxcityfc.co.uk.

18. Complaints about Breaches of Privacy

If you believe that we have wrongfully disclosed your personal information or have breached this privacy policy then you may lodge a complaint with us by writing to:

Data Protection Officer,

Oxford City FC,

Court Place Farm,

Marsh Lane,

Oxford,

OX3 0NQ

Or by emailing:

club@oxcityfc.co.uk