



PRIVACY POLICY

NEWCASTLE UNITED FOOTBALL CLUB

Season 2021/22



Newcastle United is a group of companies which includes Newcastle United Football Company Limited (together "NUFC", "we" and "us"). For the purposes of the Data Protection Act 2018, the UK General Data Protection Legislation and any successor legislation, Newcastle United Football Company Limited is the data controller in respect of any personal data provided to or collected by us.

Newcastle United takes the privacy of all its supporters, attendees at its events and website users very seriously and takes great care to protect your information. This privacy policy explains what information we collect about you, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights and how to contact us.

Please note this website contains links to other websites which are provided for your convenience. We are only responsible for the privacy practices and security of this website.

We recommend that you also check the privacy and security policies and procedures of each and every other website that you visit.

1. What information do we collect?

In order to provide you with services, we may collect personal information about you from our website, telephone conversations, emails and written and verbal communications. We may, for example, keep a record of your IP address, name, address, delivery address, email address and telephone number.

If you are a supporter and / or attend an event at one of our venues, we will collect the following kinds of personal information about you: name, contact details (and emergency contact details if applicable), birthday, gender, any images we capture on CCTV cameras and other information showing us your movements through our buildings, details of any complaints which are made by or against you or details of incidents you have witnessed at any of our events or locations which are reported under the Premier League Commitment Regarding Discriminatory and Abusive Conduct or otherwise, and, Covid-19 specific information including: recent movements (including travel), information provided by any Covid-19 health questionnaires (travel, wellbeing, concerns or vulnerabilities), Covid-19 status information (NHS Covid-19 Pass, details of medical exemption or evidence of participation in a clinical trial), information for the NHS test and trace regime and any other information provided with respect to Covid-19.

When you contact us we may also record details of any disability or health needs you may have at the time of booking an event or service which will take place at the stadium or any of our other premises to help to ensure your safety.

We may supplement the information that you provide with other information that we obtain from our dealings with you or which we receive from other organisations, for example, our commercial partners.



2. How will we use your information? And our lawful bases

All personal information that we obtain about you will be recorded, used, and protected by us in accordance with current data protection legislation and this privacy policy. We will primarily use your personal information to provide our products and services to you and, for example:

Purpose	Lawful basis
The use of 'cookies' to enable the website to deliver the best possible user experience.	<p>Consent – the User will enable and select these options as desired when using our website.</p> <p>Legitimate interests – as the visitor selects their settings, the data is required to configure the website to the individual needs.</p>
To communicate with you about the services and / or products you have requested	Performance of a contract. If you do not provide us with the information we need to perform our contract with you then we may need to terminate the contract.
To enable you to attend our premises for a sporting or other event as a spectator	Performance of a contract. If you do not provide us with the information we need to perform our contract then we may need to terminate the contract and you may be prevented from entering our premises or spectating at matches.
To carry out our obligations with respect to Covid-19	<p>In substantial public interest for health and social care purposes, the safeguarding of individuals at risk of physical harm, to protect the integrity of a sport and / or sporting event.</p> <p>To comply with a legal obligation (to assess Covid-19 status at our venue) and a non-statutory legal obligation (in professional football we consider that the Premier League Rules fall within this scope).</p>
To investigate any complaints about incidents at any of our venues	<p>Legitimate interests – it is in our legitimate interests as well as those of the complainant to ensure that any incidents are investigated fully and fairly.</p> <p>To comply with a non-statutory legal obligation (in professional football we consider that the Premier League Rules fall within this scope).</p>



Purpose	Lawful basis
	In substantial public interest for health and social care purposes, the safeguarding of individuals at risk of physical harm, to protect the integrity of a sport and / or sporting event.
To communicate with you in the event that any products or services you have requested are unavailable	Performance of a contract. If you do not provide us with the information we need to perform our contract with you then we may need to terminate the contract.
To respond to any enquiries you make	Legitimate interests – that we need to assist you with the enquiry you have made
To enable ‘Recite Me’ accessibility website configuration options	Consent – the User will enable and select these options as desired when using our website. Legitimate interests – as the visitor selects their settings, the data is required to configure the website to the individual needs.
To provide you with information about our offers which may be of interest to you (where you have provided us with consent to do so)	Consent
To provide you with offers from our commercial partners (a list of which can be found here (where you have provided us with consent to do so)	Consent
For record keeping purposes - to improve the quality of our service	This will be done on an anonymized basis
For market research	This will be done on an anonymized basis
To track activity on our website	This will be done on an anonymized basis

You should be aware that if we are requested by the police or any other regulatory or government authority investigating suspected illegal activities to provide your personal details and/or information concerning your activities whilst visiting any of our venues or our website, we may do so if we are obliged by law.



3. How long will we keep your information?

Where you have not registered with us and/or you have no Supporter ID number, we will keep your information in line with the timescales set out below:

Type of information	When will it be deleted
Contact details (for products / services)	6 years after the contract has been satisfied
Contact details (to deal with an enquiry only)	6 months after we have finished dealing with your enquiry
Contact details and other relevant information (regarding complaints about incidents)	Where you are the complainant or a witness or the respondent but no sanctions are imposed – 6 months after we have completed the investigation into the incident. Where you are the respondent and a sanction is imposed – for such time as the sanction is in place and for a period of 1 year afterwards
Contact details (where you have provided your consent to be contacted about offers)	For such time as you have provided us with consent to do so. Please note if we do not hear from you within a period of 12 months, we will get in touch to see if you still want to hear from us
Covid-19 information	For no longer than is necessary and / or for no longer than the validity of your Covid-19 status confirmation (whichever is the longer).

4. Who else might use your information?

We need to share your information internally and with other third parties (details of which are set out in this section). When we transfer your personal data to any third party, we will always ensure that the appropriate safeguards are in place.

Within the Club

Your information will be shared with colleagues within Newcastle United where it is necessary for them to undertake their duties.



With the Premier League and other clubs

For the purposes of compliance with the necessary legal and regulatory measures, the Premier League may have access to certain information about you. Where you have conducted a Prohibited Activity under the Premier League Commitment Regarding Discriminatory and Abusive Conduct, Newcastle United will share your name, date of birth, contact details and photograph with the Premier League who, in turn, will share it with other clubs for the purposes of enforcing any sanctions imposed on you.

To service providers

In order to provide our products and services to you, we may need to appoint other organisations to carry out some of the processing activities on our behalf. These will include, for example, delivery organisations and mailing houses as well as digital service providers. In these circumstances, we will ensure that your information is properly protected and that it is only used in accordance with this policy. We will also make sure that we have appropriate contracts in place with these third parties.

To other third parties

We may also share your information to the following third parties:

- The government and / or our regulators: where the law tells us to do so or to help them with any investigations; and / or
- Police, law enforcement and security services: to help them with any investigation, prevention of crime or matter of national security.

5. Offers and opportunities

Newcastle United teams up with a selection of carefully chosen commercial partners, an up-to-date list of our commercial partners is available by [clicking here](#).

Our commercial partner programme is designed to support the Club and also to bring customers, fans and website users a diverse range of opportunities and offers (including financial services offers) at competitive prices. Newcastle United and/or these commercial partners would like to contact you with details of offers in a number of ways, including post, telephone, text/picture/video message, digital television, fax or by email. Where you have provided us with consent to do so and you express an interest in an offer from one of our commercial partners, that partner may let us know. This enables us to take your views and interests into account when choosing our commercial partners and developing the programme.



6. What to do if you do not want to receive details of offers

Please be assured, we will only contact you with details of offers if you have provided us with express consent to do so. You can also change your mind at any time and withdraw consent.

Please note, if you do withdraw your consent to receive information, we and/or our commercial partners will be unable to keep you informed of new services, products, events or special offers that may interest you and our ability to inform you of ticketing opportunities will be affected.

7. Use of your information outside the United Kingdom

Some of the organisations to which we may disclose your personal information are situated outside of the United Kingdom. In order to provide you with the products and services you require, we may need to transfer your personal information to these countries (including to the European Union) and we will always ensure that the appropriate safeguards and data security measures are in place.

8. Policy for children

We understand that children will visit our website or interact with our content. We encourage all persons under 13 to consult with their parents or legal guardian before interacting with our content or submitting information to us. Parents or legal guardians should supervise children when online.

If you are under the age of 18, you may still participate in competitions and promotions. However, notification of a win, offer or prize should be sent directly to your parent or legal guardian. The contact details of your parent or guardian should therefore be provided in the initial registration process. Any publication of a competition winner's personal details for visitors known to us to be under 18 will require parental or legal guardian consent during registration.

9. Cookies

We use cookies in order to ensure the website functions properly and to improve your user experience. Cookies are usually a string of numbers and/or letters that a website transfers to your hard drive. The cookies enable the website to "remember" you, either for the duration of your visit (session cookies) or for repeat visits (persistent cookies).

We recommend that you visit the websites www.allaboutcookies.org and www.cookiecentral.com if you would like in-depth information about cookies.



On this website, we use the following types of cookies:

	Description
Strictly necessary cookies	These cookies are essential to enable you to navigate around the website securely and to provide you with services you have specifically requested. For instance, they help ensure that payments are processed securely.
Functionality cookies	These cookies enhance the functionality of the website by storing your preferences. For instance, they can remember your name and location, if you provide this information.
Performance cookies	These cookies improve the performance of the website. For instance, they help pages load quicker.
Online behavioural cookies	These cookies store information about your behaviour online, such as your browsing history. For instance, they help us tailor the advertising we show to you to your interests.
Recite Me 'Preferences'	Please refer to the "Users of Recite Me" section below for a full explanation of these cookies. These are used to store information about website configuration preferences to assist with accessibility.

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. You are not obliged to accept cookies and you can adjust your browser's setting to prevent it from accepting cookies on your computer - go to www.cookiecentral.com for instructions on how to disable cookies. However, you may not be able to take full advantage of our website or use certain functions if you disable cookies. If you continue to use our website, you agree to our use of cookies.



10. Users of 'Recite Me'

Our website is supported by Recite Me. Recite Me is a data processor to us, because we are providing the content on the website as the data Controller – and Recite Me processes some of the data collected by our website when requested by the user to provide translation service and to put a voice to the written text.

Use of Recite Me is entirely optional for visitors to our site. Recite is a cloud-based web accessibility solution which allows visitors, if they so choose or require, to customise the site the way they need it to work for them. For example, it includes text-to-speech functionality, dyslexia software, an interactive dictionary, a translation tool with over 100 languages and many other features. We are conscious that up to one in five people who visit our website cannot access the content easily – they might need to adjust the colour contrast settings, make the fonts larger or have the content read out to them.

Recite Me uses cookies for 'Preferences and Persistence'. 'Preferences' are used to allow Recite to remember what accessibility options users chose and allows the toolbar to recall them on multiple visits if cookie history isn't cleared. 'Persistence' is used to ensure the whole website changes to reflect the requests made by the visitor via the Recite Me toolbar.

The only data captured by Recite Me is an IP address. This is captured by Recite in order to provide us with anonymised usage statistics. In addition to this privacy notice, you can also find Recite's Privacy Notice, together with further information, [here](#).

11. Security of Information

We take the security of your personal information seriously. When you submit your credit card details, we use industry standard Secure Sockets Layer (SSL) encryption technology to guard your information. In addition, we have security procedures in place to protect our paper-based systems and computerised databases from loss and misuse, and only allow access to them when it is absolutely necessary to do so, and then under strict guidelines as to what use may be made of the personal information contained within them.

Please note that we cannot guarantee any data transmission over the internet is completely secure.

12. Monitoring

We may monitor or record telephone calls for security purposes and to improve the quality of services that we provide to you. We will always inform you if we are recording a call.



13. Changes to this privacy policy

We aim to meet high standards and our policies and procedures are, therefore, constantly under review. From time to time we may change our security and privacy policies. If and when we have made significant changes to this policy, we will place an alert on our website so that you can see what has changed.

14. Your rights

You have the following rights in relation to data protection:

1. The right to access your personal information
2. The right to have your information updated
3. The right (in certain circumstances) to have your information deleted
4. The right to object to or restrict processing of your information
5. The right to data portability
6. The right to withdraw your consent at any time
7. The right to complain to the Information Commissioner's Office

If you would like to exercise any of your rights with us then please contact us using the contact details set out below.

15. How to contact us

If you would like any further information or have any comments, questions or complaints about our privacy policy, please contact our Data Protection Lead by any of the methods shown below:

Telephone: 0344 372 1892

Email: dataprotection@nufc.co.uk

Mail: Data Protection Lead

Newcastle United Football Club

St. James' Park

Newcastle upon Tyne

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