



WBA PRIVACY POLICY

INTRODUCTION

WBA respects your privacy and is committed to protecting your personal data. This privacy policy informs you on what personal data we collect and explains your privacy rights and how to contact us.

This privacy policy is applicable to any personal data which is given by you to us through the websites shop.wba.co.uk, wbatickets.co.uk and wbacommercial.co.uk (the “Websites”), post, email, fax, telephone, mobile messaging, face-to-face, online forms, competitions and surveys, social media (together the “Collection Methods”). However, it does not apply to personal data provided via the official Club website (www.wba.co.uk) or via the Official Club mobile application as each have a separate privacy policy governing the use and protection of any personal data you provide via those channels.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY

This privacy policy explains how WBA collects and processes your personal data when you provide it via any of the Collection Methods. It also explains the steps we take to ensure personal data is kept secure.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

WHO WE ARE

West Bromwich Albion Football Club Limited (Company Number 03295063) (the “Club”) with a registered address of The Hawthorns, Halfords Lane, West Bromwich, West Midlands B71 4LF.

The Club is part of a group of companies, including:

- WBA Holdings Limited (Company Number 08528749)
- WBA Group Limited (Company Number 07230595)

This privacy policy is issued on behalf of the Club and the group companies listed above so when we mention the Club, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the WBA Group responsible for processing your data.

CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: West Bromwich Albion Football Club Limited

Email address: dataprotection@wbafc.co.uk

Postal address: West Bromwich Albion Football Club, The Hawthorns, Halfords Lane, West Bromwich, West Midlands B71 4LF

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections 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 statements. We have no responsibility or liability for the content or activities of these linked sites. When you leave our website, we encourage you to read the privacy policy of every website you visit.

CHILDREN'S DATA

We understand that children and young people, including those under 13 years of age ("**minors**"), may visit the Websites or otherwise interact with us. Minors may need their parent or guardian's permission to use or access certain facilities or receive certain information through the Websites. Minors may also be asked to confirm they have that permission, and we reserve the right to verify parental or guardian consent, where required.

We try not to make a minor's participation in activities with us contingent on the minor disclosing any more personal information than is reasonable necessary in order to do so. We do not actively market to minors or use (or pass to any third party) personal information on persons known to be minors for any commercial purposes, without proper consent.

Other age restrictions may apply to certain products, services or opportunities available through our Websites or otherwise.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and/or transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity** includes first name, maiden name, last name, username or similar identifier, social media handles, title, date of birth, gender and your image (including video, film, photos) and sound.
- **Contact** includes billing address, delivery address, email address and telephone numbers.
- **Financial** includes bank account and payment card details.
- **Medical** includes details of medication and/or health issues and/or disability and/or where appropriate health related information / temperature readings in response to an epidemic / pandemic / health emergency
- **Safety/Security/Conviction** includes details of any actual or suspected convictions, orders, arrests, breach of the law, breach of football authority rules and regulations, breach of any terms and conditions of entry to a match and/or any suspected involvement in incidents which may impact on the and/or safety and/or security on match days or other

events the Club takes part in.

- **Transaction** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical** includes internet protocol (IP) address, 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 devices you use to access this website.
- **Profile** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage** includes information about how you use our website, products and services.
- **Marketing and Communications** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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, to ensure your safety and to check validity of any concession being claimed.

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.

When you visit our stadium, offices or other premises we may use surveillance systems to capture CCTV images and sound including for the purposes of public order and the prevention of crime (see Section 5 (Use of Surveillance Systems)).

We may monitor and record telephone calls for security and training purposes and to improve the quality of services provided by the Club.

IF YOU CHOOSE NOT TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you decide not to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us through the Collection Methods or attending one of our properties (including The Hawthorns). This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;

- subscribe to our service or publications;
 - request marketing or other information to be sent to you;
 - enter a competition, promotion or survey;
 - give us feedback or contact us;
 - attend an event; or
 - attend one of our properties and are recorded via one of our surveillance systems.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources, for example credit reference agencies, the Electoral Register, Companies House, the Government, public bodies, local authorities, the Police, data agencies. We may also use specialist data providers to assist with reviewing, segmenting and correcting the data we hold, to make sure it remains accurate and up to date and identify data that we no longer need to retain.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (e.g. we may send you marketing via post and/or marketing that relates to similar products or services to those that you have bought or considered having given you the opportunity to opt out).
- Where we have your consent to do so.
- Where we need to comply with a legal obligation.

You have the right to withdraw consent to marketing at any time by contacting us. If you unsubscribe from marketing communications we will keep a record of this.

We will ensure that personal data is only viewed and/or used by approved members of staff whose role requires them to have access to such data.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of the ways we plan to use your personal data.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Purpose/Activity	Type of data
To register you as a new customer and to create an individual profile / account for you so that we understand your preferences and provide you with a personalised experience	(a) Identity (b) Contact

when using Club services. This may mean personalising communications to you.

- (c) Transaction
- (d) Technical
- (e) Profile
- (f) Usage

To process, administer and deliver any order you make (including merchandise, match day tickets, season tickets, half season tickets) including:

- (a) to provide you with the goods (including tickets) purchased
- (b) Manage payments, fees and charges (including checking the validity of your payment details and taking steps to prevent fraud)
- (c) Collect and recover money owed to us
- (d) Communicate with you during the period of order and delivery of the relevant product or service ordered
- (e) introduce you to finance and credit product providers
- (f) to provide other clubs with details of any away tickets you have purchased to attend their stadium
- (g) to record your purchase history

- (a) Identity
- (b) Contact
- (c) Financial
- (d) Transaction
- (e) Marketing and Communications

To manage our relationship with you

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Marketing and Communications

To enable you to partake in a prize draw, competition, complete a survey or leave a review

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications

To administer and protect our business and our websites

- (a) Identity

(including monitoring the use of our wifi network by guests visiting any of our premises, troubleshooting, data about your equipment, data analysis, testing, system maintenance, support, reporting and hosting of data)

- (b) Contact
- (c) Technical
- (d) Usage

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications
- (f) Technical

To carry out market research and or use data analytics to improve our website, products/services, marketing, customer relationships, experiences, browsing actions and patterns.

To understand how our supporters use our products/services so that the Club can develop its business.

- (a) Technical
- (b) Usage
- (c) Transactional
- (d) Profile
- (e) Marketing and Communication

To alert you to information about events, surveys, competitions, offers, products, services and other exciting updates relating to us and/or our commercial partners

- (a) Identity
- (b) Contact
- (c) Technical
- (d) Usage
- (e) Profile
- (f) Marketing and Communications

To inform you of club news, signings, ticket availability and offerings from the Club's sponsors

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Marketing and Communications

<p>To review, investigate and respond to:</p> <p>(i) a query, comment, complaint or claim; and/or</p> <p>(ii) Any legal, regulatory, governmental and/or compliance investigation / claim (including disclosure of information in respect of such investigations/claims)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Technical</p> <p>(f) Profile</p> <p>(g) Usage</p> <p>(h) Marketing and Communications</p> <p>(i) Safety/Security/Convictions</p>
<p>To maintain records of any accidents or incidents (including any safety or security related incidents) as appropriate under applicable laws and industry practice, for our insurance purposes and to protect the Club in the event of any future claims or legal action. This may include details of relevant witnesses and those people involved in such incidents.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p> <p>(d) Safety/Security/Convictions</p> <p>(e) Medical</p>
<p>To administer the mascot experience</p>	<p>(a) Identity. This will include the identity of the child partaking in the mascot experience. In connection with the mascot experience, we may take photographs, film and video of you / the child. We may also request details of relevant medication and details of your relationship with the child.</p> <p>(b) Medical</p>
<p>If you apply for a job with us, to process your job application</p>	<p>(a) Identity</p> <p>(b) Contact</p>
<p>To 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, to ensure your safety and to check validity of any concession being claimed.</p>	<p>(a) Identity</p> <p>(b) Medical</p>

<p>To record details of any actual or suspected convictions, orders, arrests, breach of the law, breach of football authority rules and regulations, breach of any terms and conditions of entry to a match and/or any suspected involvement in incidents which may impact on the and/or safety and/or security on match days or other events the Club takes part in.</p>	<p>(a) Identity (b) Contact (c) Safety/Security/Conviction</p>
<p>If you attend an event hosted by or at the Club we will record your details and use photograph, video or film recordings of the relevant event in our marketing and coverage of the event or similar events.</p>	<p>(a) Identity</p>
<p>If you attend a Club site during/following an epidemic / pandemic / health emergency, we may have to record information (including health information) and take your temperature (such readings will not be stored) for the purposes of ensuring that those that attend a Club site (Club staff and all persons attending a Club site) are safe and to support any relevant public health emergency.</p>	<p>(a) Identity (b) Medical (c) Contact</p>
<p>To record your image and sound (where recorded via a body worn camera):</p> <p>(a) to prevent crime and disorder (b) to protect buildings and assets from damage, disruption, vandalism and other crime; (c) for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime; (d) to support law enforcement bodies in the prevention, detection and prosecution of crime; (e) to assist in day-to-day management, including ensuring the health and safety of staff and others; (f) to assist in the effective resolution of disputes and to assist in the defence of any civil litigation; (g) to ensure compliance with ticketing conditions.</p>	<p>(a) Identity (b) Safety/Security/Conviction</p>

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can update your preferences at any time via <https://wba-portal-test.azurewebsites.net/login.aspx> or via the option to do so as included in each marketing email sent to you by the Club.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties you have consented to have your personal data shared with through us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time by emailing dataprotection@wbafc.co.uk or updating your marketing preferences at <https://wba-portal-test.azurewebsites.net/login.aspx>.

On receiving your request to update your personal information, we will use commercially reasonable efforts to update or delete your personal information as requested. However, it may not be possible to delete an entry without some delay and without retaining some residual personal information which we may need for legal, tax or audit purposes and in addition for ensuring that we suppress your information from any further communication if this is what you have requested.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

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 this website may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. USE OF SURVEILLANCE SYSTEMS

We may monitor and/or record telephone calls for security and training purposes.

Please note that for your safety and security, and for the reasons set out in the section titled "Purposes for which we will use your personal data", we operate surveillance systems (which includes CCTV and body worn cameras) 24 hours a day. Images are monitored by authorised personnel 24 hours a day, every day of the year. There is signage in and around all sites which operate CCTV.

Individuals using surveillance systems will be given appropriate training to ensure they understand and observe the legal

requirements related to the processing of the relevant personal data. Where data processors monitor and process data on our behalf we will ensure reasonable contractual safeguards are in place to protect the security and integrity of personal data.

We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue. Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.

Nominated stewards may use body worn cameras. The use of body worn video cameras is to act as a deterrent to acts of aggression, verbal or physical abuse, violence or health and safety incidents as well as to provide evidence to support internal or law enforcement agencies, Football Authorities or other football club investigations.

Body worn cameras will only be used in the event that a nominated steward becomes aware that there is potential for a situation to arise resulting in aggression, verbal or physical abuse, violence, health and safety issues, discrimination or breach of the Terms & Conditions of Entry (which includes the relevant Ground Regulations in force at the time of recording).

Body worn cameras will be used in an overt manner (i.e. not hidden or covert) and the nominated stewards will wear identification that there is a video device and, where practicable, provide clear warnings that video and/or audio recordings is being recorded.

6. WHO DO WE PROVIDE YOUR INFORMATION TO?

We may disclose your information to third parties as follows:

- to other companies within our corporate group, including WBA Holdings Limited (Company Number 08528749) and WBA Group Limited (Company Number 07230595).
- in order to provide our products and services to you or to otherwise fulfil contractual obligations that we have with you, we may need to appoint other third party organisations to carry out some of the data processing activities on our behalf. These may include but without limitation, payment processing organisations, customer relationship management, delivery organisations, fraud prevention and screening and credit risk management companies, police authorities and mailing houses.
- to third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- with advertising networks and/or social media platforms for the purposes of selecting and serving relevant adverts to you via those networks/platforms, and to search engine and analytics providers.
- with third parties (a) if we are under a legal or regulatory duty to do so, (b) if it is necessary to do so to enforce our terms of use or other contractual rights, (c) to lawfully assist the police, security services, football authorities and other football clubs with (1) the prevention and detection of crime, anti-social behaviour and/or terrorist activity and (2) maintaining safety and security at the Club's premises or such other premises where the Club is partaking in an event, (d) where such disclosure is necessary to protect the safety or security of any persons, (e) Courts or other dispute resolution forums, or other legal or regulatory authority if we are under a duty to disclose or share your personal data to comply with any legal obligation, or are enforcing or protecting our rights, or lawfully cooperating in the protection of third party rights (f) if required to do so to deal with or in connection with any complaint or claim received, (g) to ensure that any issues with or had by the Club travelling fans can be efficiently resolved (h) that the Club uses to provide products and services to you, (i) that offer finance products where you have indicated that you wish to apply for a finance product supplied by one of those third parties and/or (j) otherwise as permitted under applicable law.

- with our selected partners (as may change from time to time) but we will only do this if you have consented to receive marketing relating to our sponsors and partners.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law.

7. TRANSFER OF DATA OUTSIDE OF THE EEA

Some organisations to which we may disclose your personal information may be situated outside of the EEA. Whenever we transfer your personal data out of the EEA, we take reasonable steps to ensure that your information is still properly protected. This may include safeguards such as checking the relevant countries have been deemed to provide an adequate level of protection for personal data by the European Commission, or using contractual provisions to ensure your information is properly protected.

8. DATA SECURITY

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.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

When you place orders or access your personal information through the Websites, this will be through a secure server. All sensitive/credit information you supply shall be encrypted into our databases.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Websites or apps, you are responsible for keeping this password confidential. Please do not share your password with anyone.

9. HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available on your request by contacting us.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. UPDATING YOUR INFORMATION

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

On receiving your request to update your personal information, we will use commercially reasonable efforts to update or delete your personal information as requested. However, it may not be possible to delete an entry without some delay and without retaining some residual personal information which we may need for legal, tax or audit purposes and in addition for ensuring that we suppress your information from any further communication if this is what you have requested.

11. AUTOMATED DECISION MAKING

The Club does not currently operate any automated decision-making. However, the third party companies that offer (1) a Club branded credit card or (2) a finance solution to those supporters that wish to purchase a season or half season ticket via a loan may use automated decision-making when deciding whether or not to offer you credit. Please see the privacy policy of V12 Retail Finance Limited (who introduces interested customers to Secure Trust Bank plc which in turn offers loans in respect of Season Ticket purchases (subject to acceptance, status and based on individual circumstances)) at www.v12retailfinance.com/privacy-policy, Secure Trust Bank plc's privacy policy can be found at www.SecureTrustBank.co.uk/privacy-statement and the privacy policy of the Club branded credit card provider Creation Financial Services Ltd at <https://www.creation.co.uk/about-us/data-protection-notice>. As per the section (Third Party Links) we take no responsibility or liability for third party websites.

12. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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. Where we are using your information based on your consent you can withdraw your consent at any time.

In order for us to locate relevant footage from a surveillance system, any requests for copies of recorded surveillance system images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual. We reserve the right to obscure images of third parties when disclosing surveillance system data as part of a subject access request, where we consider it necessary to do so. Where this is not possible we may refuse to provide you with CCTV footage whilst acting in accordance with data protection legislation.

If you wish to exercise any of the rights set out above, please email us at dataprotection@wbafc.co.uk.

Whilst we hope you would contact the Club first, you have the right to contact the Information Commissioners Office at any time. Please see www.ico.org.uk for contact details.

FEE, INFORMATION REQUIRED 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 could refuse to comply with your request in these circumstances.

For security reasons, we may need to request specific information from you to help us to confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). We may also ask you for further information in relation to your request.

We try to respond to all legitimate requests within one month. Occasionally it could 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.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on 17 June 2020.

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