

**SARACENS FOUNDATION PRIVACY POLICY**

Saracens Foundation (Charity Number 1079316) with registered address at StoneX Stadium, Greenlands Lane, Hendon, NW4 1RL (“we”, “our”, “us”) is committed to protecting and respecting your privacy. We are the data controller for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/279) and any other law applicable to the processing of your personal data. We will take all necessary steps to ensure that your personal data is processed by us in accordance with these data protection laws.

This privacy notice aims to give you information on how we collect and process your personal data through your use of our website, interactions with our programmes or events and your subsequent interactions with us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notice supplements the other notices and is not intended to override them.

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Saracens Foundation, StoneX Stadium, Greenlands Lane, London, NW4 1RL or email foundationinfo@saracens.net

**COLLECTING YOUR PERSONAL INFORMATION**

We will collect and process the following data about you:

* *Information you give us.* This is information about you that you give us by filling in forms on our website, making a donation to Saracens Sport Foundation, signing up for one of our events or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, and when you report a problem with our site. This information that you give us may include:
* Identity Data, including first name, last name, username or similar identifier, title, and date of birth;
* Contact Data, includes billing address, delivery address, email address and telephone numbers;
* Financial Data, including bank account and payment card details;
* Transaction Data, including details about payments to and from you and other details of products and services you have purchased from us;
* Profile Data, including your username and password, your interests, preferences, feedback and survey responses; and
* Marketing and Communications Data, including your preferences in receiving marketing from us and our third parties and your communication preferences.
* *Information we collect about you.*With regard to each of your visits to our site we will automatically collect the following information:
* Technical Data, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, browser plug-in types and versions, operating system and platform.
* Usage Data about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), 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.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. 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 notice.

We may collect Special Categories of Data about you (this includes details about your race or ethnicity, philosophical beliefs and information about your health). We will ask you to provide such special categories of data if we need to know about a dietary requirement or medical condition as part of providing our products and/or services to you, for example allocating you disabled access seating at a game or when registering you/your children for any of our programmes or events.

*Information we receive from other sources.* This is information we receive about you if you use any of the other websites we operate or the other services we provide.

*Cookies:*Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookies Policy.

**IF YOU ARE UNDER 16**

If you are under 16 and register with Saracens Foundation we will collect your date of birth and retain that with your name and other details you may provide. This is so we can ensure we treat you in an age appropriate way in line with this policy.

For so long as you are under 16 we will not send you any marketing communications or share your details with our commercial partners. However, if you have signed up to receive a product or service we may contact you about this.

**HOW WE USE YOUR PERSONAL DATA**

We use information held about you in the following ways:

*Information you give to us.* We will use this information:

* to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
* to provide you with information about other goods and services we offer that are similar to those that you have already browsed or enquired about;
* to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to or negotiations with you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the registration form);
* to notify you about changes to our service; and
* to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you. We will use this information:

* to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
* to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
* to allow you to participate in voting or other interactive features of our site, when you choose to do so;
* as part of our efforts to keep our site safe and secure;
* to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
* to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

*Information we receive from other sources.* We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that 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 using the details set out in the “Contact us” section below if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a website user | (a) Identity(b) Contact | Performance of a contract with you |
| To process a donation or enable you to partake in an event or onr of our programmes including:(a) Manage payments, fees and charges(b) Collect and recover money owed to us | 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) |
| Notifying you about changes to our terms or privacy notice  | (a) Identity(b) Contact | (a) Performance of a contract with you(b) Necessary to comply with a legal obligation |
| Asking you to leave a review or take a survey | (a) Identity(b) Contact(c) Marketing and Communications | Necessary for our legitimate interests (to evaluate how users use our products/services and to receive feedback on the same for the purpose of improving our products/services) |
| To enable you to partake in a prize draw or competition | (a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications | (a) Performance of a contract with you(b) Necessary for our legitimate interests (to study how users use our products/services, to develop them and grow our organisation) |
| To administer and protect our organisation and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)  | (a) Identity(b) Contact(c) Technical(d) Usage | (a) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud)(b) Necessary to comply with a legal obligation |
| 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) Marketing and Communications(e) Technical(f) Usage | Necessary for our legitimate interests (to study how users use our products/services, to develop them, to grow our organisation and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, user relationships and experiences | (a) Profile(b) Technical(c) 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 organisation and to inform our marketing strategy) |
| To make suggestions and recommendations to you about goods or services that may be of interest to you | (a) Identity(b) Contact(c) Profile(d) Marketing and Communications(e) Technical(f) Usage | Necessary for our legitimate interests (to develop our products/services and grow our organisation) |

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.

**MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

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 will receive marketing communications from us if you have requested information from us, purchased from us or if you provided us with your details when you entered a competition, or registered for a promotion and, in each case, you have not opted out of receiving that marketing in accordance with the below opt-out process.

We will get your express opt-in consent before we share your personal data with any organisation outside of Saracens Sport Foundation for marketing purposes.

**OPTING OUT OF MARKETING**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you and unchecking all relevant boxes, or by contacting us at any time at foundationinfo@saracens.net.

**DISCLOSURE OF YOUR INFORMATION**

You agree that we have the right to share your personal information with:

Any member of our group, which means our subsidiaries, our parent companies and our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

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. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers’ wishes by displaying their advertisement to that target audience; and
* analytics and search engine providers that assist us in the improvement and optimisation of our site.

We will disclose your personal information to third parties:

* In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
* If Saracens Sport Foundation or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
* If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our site’s terms of use and other agreements; or to protect the rights, property, or safety of Saracens Sport Foundation, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**WHERE WE STORE YOUR PERSONAL DATA**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

**DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may 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.

**YOUR RIGHTS**

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.

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at foundationinfo@saracens.com

In certain situations, you are entitled to: (i) request access to a copy of your personal data; (ii) request that we correct your personal data; (iii) request that we erase your personal data; (iv) object to processing of your personal data where we are relying on a legitimate interest; (v) request the restriction of processing of your personal data; (vi) request the transfer of your personal data to a third party; or (vii) where you have provided your consent to certain of our processing activities, in certain circumstances, you may withdraw your consent at any time (but please note that we may continue to process such personal data if we have legitimate legal grounds for doing so).

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 each case, where we are legally entitled to take longer to respond). In this case, we will notify you and keep you updated.

Our site 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. Please check these policies before you submit any personal data to these websites.

**CHANGES TO OUR PRIVACY POLICY**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

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