



Gloucester Rugby Limited (**the Company**) is committed to protecting the privacy of your personal information. For the purpose of applicable data protection law, including the Data Protection Act 1998 and, from its entry into force on 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679) (together, **DP Law**), the Company is the data controller. You will see the Company referred to as Gloucester Rugby and the Club on the site.

Our Privacy Notice explains what we do with any personal information which we collect from you, including when you use our website and when you interact with us in other ways offline, for example during the credit application process. If you have any questions regarding our Privacy Notice, please contact us at the Contact Us page on of this site - <https://www.gloucesterrugby.co.uk/club-information/contact/>

This Privacy Notice explains how we collect, use and disclose personal information about you when you visit the site and when you contact us, whether by e-mail, post, fax or telephone using the contact options on the site.

### **Information we may collect from you**

We may collect and process the following information about you:

- Information that you provide by filling in forms on our site [gloucesterrugby.co.uk](http://gloucesterrugby.co.uk) (our site). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion or when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site along with personal information required as part of the contractual process and of the fulfilment of your orders.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access. In order to enhance your future visits through personalisation, details of the pages you've viewed on our site and the content you've accessed on our site, may also be recorded.

### **IP addresses**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

### **The legal basis for our use and other processing of your personal information under DP Law**

This will include (as relevant):

- processing your personal information so that we may perform our obligations under a contract with you ("**Your Contract**");
- processing for legitimate interests provided these are not overridden by your interests and fundamental rights and freedoms. For example, this is relevant when we use and process your personal data to deal with our legal and regulatory and internal governance obligations; and in addition / together with the processing condition described above ("**Legitimate Interests**"),
- processing which is necessary for compliance with our legal obligations laid down by European Union law (where relevant) and by English Laws applicable to us in the United Kingdom ("**Our Legal Obligations**").
- Your consent may also be a lawful reason for processing your personal data in certain cases ("**Your Consent**"). This means your freely given, specific, informed and unambiguous consent which may be collected from you, for instance: when you agree to receive marketing communications from us or when you agree to take part in surveys or market research (as relevant). You should be aware that you are entitled under DP Law to withdraw your consent where you have given it to us at any time. If you do this and if there is no alternative lawful reason for us to rely on to justify our use or other processing on your personal data, this may affect our ability to provide you with some of our services.

In summary, we need certain categories of personal data in order to provide you with our services. Certain other personal data is processed for our Legitimate Interests in cases where this does not result in prejudice to you. We use your personal data for insight analytics purposes to inform our strategic decisions and improve the effectiveness of our marketing activities. Certain other personal data is processed based on a consent.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in GL1). 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.

We share personal data with Premiership Rugby whose privacy policy notice is available [here](#) and third party service providers who assist us with insight analytics.

It is in our legitimate interest to use your personal data to help inform our strategic decisions, define our fans' behavior (in relation to the products and services that may appeal to you) and to inform our marketing strategy, for example to decide what marketing content we think may appeal to our fans. However, we will only send marketing communications to you by email where you have consented to receive such content by email, or where we have another lawful right to send marketing to you using email.

### **Where we store your personal data**

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. 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.

### **Disclosure of your information**

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Gloucester Rugby Limited 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 Terms of Use or Terms & Conditions of Supply and other agreements; or to protect the rights, property, or safety of Gloucester Rugby Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **How long do we keep your personal information for (And the criteria used to determine this)?**

Your personal data will not be kept for longer than is necessary to fulfil the specific purposes outlined in this Notice and to allow us to comply with our legal requirements.

The criteria we use to determine data retention periods includes the following:

- (i) **Retention in case of queries.** We may retain it for a reasonable period (up to 6 months) after you have enquired about one of our products or services in case of follow up queries from you;
- (ii) **Retention in accordance with legal and regulatory requirements.** We will consider whether we need to retain your personal data after the period described in (ii) (above) because of a legal or regulatory requirement. Some or all of these criteria may be relevant to retention of your personal data collected in connection with our products and services.

If you would like further information about our data retention practices please contact us.

### **Access to information**

You have a number of other rights in respect of your personal information under applicable DP Law.

These include the right to access or obtain copies of your personal information and to have inaccurate information about you corrected.

Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you. To exercise your right to access your personal data please write to our Data Controller at Gloucester Rugby Ltd, Kingsholm Stadium, Kingsholm Road, Gloucester. GL1 3AX.

## **Your rights under DP Law**

As well as the right to access the personal information we hold about you, you have a number of other rights in respect of your personal information under DP Law. These may include (as relevant):

- the right to access or obtain copies of your personal information that we hold (see above);
- the right to rectification, including to require us to correct inaccurate personal data;
- the right to request restriction of processing concerning you or to object to processing of your personal data;
- the right to request the erasure of your personal data where it is no longer necessary for us to retain it;
- the right to data portability including to obtain personal data in a commonly used machine readable format in certain circumstances such as where our processing of it is based on your consent;
- the right to object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and
- where you have an option to provide us with your personal data or not in connection with your use of our website or in connection with any of our products or services, you have the right to be informed about the possible consequences of not giving it to us;
- the right to withdraw your consent to any processing for which you have previously given that consent.

Please be aware that some of these rights will only become relevant when changes to DP Law come into force in May 2018.

Please contact us at [admin@gloucesterrugby.co.uk](mailto:admin@gloucesterrugby.co.uk) if you would like to exercise any of your rights explained above in relation to your personal information.

## **Your right to complain to the data privacy supervising authority**

Without prejudice to any other administrative or judicial remedy you might have, you have the right to lodge a complaint with the UK's Information Commissioner if you consider that we have infringed applicable data privacy laws when processing your personal data. In the **UK** the Information Commissioner's Office can be contacted using the following link: <https://ico.org.uk/>.

## **Keeping you informed**

We will keep your details on record until we have completely dealt with your request, enquiry or application and then for a reasonable period afterwards, in accordance with data protection and other applicable legislation.

The Company may keep your details on record for as long as is necessary for the purposes set out above and will then endeavour to delete your details in accordance with data protection and other applicable legislation.

## **Changes to this Notice**

We keep this Notice under regular review. We may change this Notice from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. The date at the top of this Notice will be updated accordingly and we encourage you to check this from time to time for any updates or changes. Where you have provided us with your email address, we may also contact you to let you know that we have updated the Notice. We may also take that opportunity to ask you if you would like to update your marketing preferences.

By using our websites, submitting your personal information to us, registering an account, registering a customer credit account or interacting with us in other ways, you consent to the use of your

personal information as described in this Notice (as amended from time to time).

This Notice does not extend to your use of, provision of data to and collection of data on any website not connected to us to which you may link to by using the hypertext links within our websites.

**Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Data Controller at Gloucester Rugby Ltd, Kingsholm Stadium, Kingsholm Road, Gloucester. GL1 3AX.

