



ClubNet Limited - Privacy Policy

This notice explains when and why we collect personal information about you: how we use it, the conditions under which we may disclose it to others, and how we keep it secure.

Our clients should read this notice alongside their contracted Terms of Service.

Who are we?

ClubNet Limited is a supplier of software systems to clients. Information about the services we provide is available on our website at <https://www.clubnet.org.uk>. Our services are supplied to companies, clubs, associations and other organisations, but not to individuals.

We collect and process data as a “Data Controller” in relation to clients, prospective clients, employees and other stakeholders.

Additionally, we process data on behalf of our clients for the purpose of delivering contracted services as instructed by them. In this case, our clients are the “Data Controller” and we are a “Data Processor”.

ClubNet Limited is a limited liability company registered in England and Wales under company number 05513757. Any questions regarding this Privacy Policy should be sent to privacy@clubnet.org.uk.

Children

Our website is intended for representatives of clients and prospective clients and is not aimed at children. Children should not make enquiries through our website and if we become aware of an enquiry from a child, we will delete that enquiry promptly upon becoming aware of this fact.

The data we hold for our clients may include personal data of children, such as junior members of sports clubs. If you are a child and need further advice or explanation about how your data is collected and used, please contact the organisation who controls your data (our client) in the first instance.

What personal data do we collect?

There are two types of personal data that we may hold:

- Basic personal data: is the general information that is supplied about yourself – such as your name, address, gender, date of birth, contact details, financial information etc.
- Sensitive personal data: is, by its nature, more sensitive information and may include your racial or ethnic origin, religion, political opinions, health data, philosophical views, biometric and genetic data.

We do not hold any sensitive personal data unless there is a specific reason for doing so. Where we are the Data Controller, we hold sensitive personal data only where it has been freely given by the individual for a specific purpose.

Occasionally, we may process sensitive personal data for our clients where they are the Data Controller.

Visitors

We collect personal data when you use our website, make an enquiry or communicate with us.

- Information about your use of our online content and emails, such as how you came to our website, which pages you visit, how long you remain on a page or view a video, and whether you opened an email or clicked a link. To collect this data, we use cookies and other tracking technologies.
- Information provided when you communicate with us by phone, email, webform or chat, including records of your contact, your country and language, your email address or other contact information, and other information about the reasons for the communication.
- Business information that tells us more about our prospective clients, suppliers and employees, including from public sources such as websites and social media platforms.

Clients and Suppliers / Sub-Contractors

We collect personal data when you enquire about, set up, administer and use ClubNet's services or when you enquire about or become a supplier or sub-contractor of ClubNet. This may include information such as name, email address, phone number for your company or organisation's employees, directors, officers, trustees, volunteers or other stakeholders as required for the purpose of our contract or exploring our prospective contract.

Client Data

In our capacity as a Data Processor, we store personal data supplied to us by clients for the purpose of supplying the contracted services to them. This data varies according to the nature of the services for each client and any questions about the data held for this purpose should be directed to the Data Controller (our client).

Information about other people

If you provide information to us about any person other than yourself, you must ensure that they understand how their information will be used, that you are authorised to disclose it to us, and that they consent to its use on their behalf, before doing so.

How do we use personal data?

Using personal data to provide our services

We use personal data where it is necessary for our business operations, including:

- To deliver services for our clients, on their written instructions
- To communicate with clients, suppliers and sub-contractors

Using personal data for our legitimate interests

We use personal data for our legitimate business interests. Where we do, we make sure we understand and work to minimise its privacy impact. For example, we limit the data to what is

necessary, control access to the data and, where we can, aggregate or de-identify the data. For example, we use personal data:

- To develop and improve our products and services, such as analysing how people engage with our website and services and identifying usage trends
- To promote our services and communicate news and updates
- For fraud prevention
- For network and information systems security.

Using personal data with your consent

- There may be some uses of personal data that may require your specific consent. If that is the case we will contact you separately to ask for your consent which you are free to withdraw at any time.

Using personal data where required by law

We use personal data to comply with the requirements of the law. Under exceptional circumstances, we may be required to provide personal data to law enforcement agencies, courts or others in connection with claims or other litigation.

- For functions such as accounting, statutory reporting etc

How is personal data shared?

We have a data regime in place to oversee the effective and secure processing of your personal data whether ours as data controller or data processor. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

- We use sub-processors in the delivery of services to clients and they may have access to the personal data we hold specifically for the purpose of delivering contracted services.
- We work with service providers who have access to personal data when they provide us with services such as technical infrastructure, IT and server support, customer relationship management, accounting etc.
- In exceptional circumstances, we may share personal data with government agencies and other third parties if we believe it is reasonably necessary to comply with the law or other legal or statutory process; to enforce our agreements, policies and terms; to protect the security of our services; or to respond to an emergency.

In the event any of your information is shared with sub-processors or service providers, we ensure that they comply strictly and confidentially with our instructions and they do not use your personal information for their own purposes unless you have explicitly consented to them doing so.

International transfers

ClubNet is based in the United Kingdom, but we engage some service providers and sub-processors who are located outside the EU, in countries that do not provide the same level of data protection as the EU.

When we work with a sub-processor or service provider, we look for a legal mechanism that requires them to protect data to EU standards. For example, the service provider has signed up to the EU-US

Privacy Shield, operates under EU-approved binding corporate rules, or is in a country that the EU recognises as having adequate data protection laws. Where no other legal mechanism exists, we enact the EU-approved standard contractual data protection clauses in our contracts.

How do we protect your personal data?

We recognise that your information is valuable and we take all reasonable measures to process it securely whilst it is in our care. This includes suitable physical and IT security measures.

How long do we keep personal data?

We retain personal data for as long as necessary to fulfil the purpose for which the information was collected. We also keep personal data for other legitimate business purposes such as complying with our legal obligations, resolving disputes, preventing fraud, and enforcing our agreements. Because these needs can vary for different data types used for different purposes, retention times will also vary. We consider factors such as:

- How long we need the personal data
- Where we are the Data Controller, whether you have asked us to stop using your data or withdrawn your consent
- Whether we are subject to any obligation (e.g. legal or contractual) to keep the data

What are your rights?

Most of the data we collect and the purposes we use it for are necessary for us to operate and improve our services or to comply with our legal obligations. Where you grant a consent, you may withdraw it at any time.

You may have certain rights under data protection law. These include the right to ask us for a copy of your personal data or to correct it if it is inaccurate or incomplete and, under certain circumstances, to delete or restrict processing of it. If you wish to make a request, or to raise a complaint on how we have handled your personal data, please contact the Data Controller – if this is ClubNet, please submit your request in writing to: Data Protection, ClubNet Limited, PO Box 6913, Basingstoke, RG24 4TQ; if this is our client, please consult their privacy policy to obtain the appropriate contact details.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Officer (ICO).

Changes to This Privacy Policy

This policy was published on 19th May 2018. We may update this Privacy Policy to reflect changes to our information practices. We encourage you to review the Privacy Policy on our website at <https://www.clubnet.org.uk/privacy> periodically for the latest information on our privacy practices.