

St Mirren Football Club takes the privacy of all its customers and website users very seriously and takes great care with customer and user information.

This privacy policy explains what information we will collect about you, how we will use it, and the steps we take to ensure that it is kept secure.

By using this website you consent to us collecting and using personal information about you in accordance with the terms set out in this policy.

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

The 'Data Controller' (for the purposes of the Data Protection Act 1998 (the "**Act**") of any personal information that you provide to us through the Website is St Mirren Football Club.

#### WHAT INFORMATION DO WE COLLECT?

In order to provide you with our 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 name, address, delivery address, email address, Telephone number, date of birth and credit card details.

# If you are ordering tickets, you will be asked to provide financial information (Like your account or credit card numbers).

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 our premises to help to ensure your safety.

#### WHY DO WE NEED TO COLLECT AND USE YOUR PERSONAL DATA

The primary legal basis that governs our processing of your data is for compliance with regulatory obligations to which we are subject in terms of the SFA and SPFL Rules. However, we will also obtain your consent to the processing of your data for one or more specific purposes. The information that we collet about you is essential or us to be able to carry out effectively the services that you require from us. Without collecting your personal data we would also be unable to fulfil our legal and regulatory obligations in respect of the SFA and SPFL.

#### HOW DO WE USE YOUR INFORMATION?

Any personal data relating to you will be used and recorded by us in accordance with current data protection legislation and this privacy policy. We will primarily use your personal information to provide our services and products to you. We will also use the personal information that we hold to communicate with you, for example: in the event that the services or products you have requested are unavailable, for record keeping purposes, to recover debt and to help us to prevent fraud, to improve the quality of our service, for market research, or to track activity on our website.

#### WHO MIGHT WE SHARE YOUR INFORMATION WITH?

In order to deliver some of our services to you effectively we may require you to supply your details to third parties such as technology providers that we use to arrange services for you. We may need to store your personal information with other organisations to provide you with the product or service you have chosen. If you have a debit or credit card stored on the Ticketing System/Online Store then the details are held by a third party provider i.e. Stripe, Sagepay.

Where third parties are involved in processing your data we will have a contract in place with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidentiality in processing your data and that they only act in accordance with our written instructions.

## HOW LONG WILL WE KEEP YOUR DATA

We will keep your personal information for as long as you are a customer of St Mirren Football Club. After you stop being a customer, we may keep your data for up to 5 years to respond to any questions or complaints or maintain records according to SPFL and SFA rules that apply to us. We will keep your data for longer than 5 years if we cannot delete it for legal, regulatory or technical reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

You have a right to request deletion of your personal data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests noted above.

#### SECURITY INFORMATION

We take the security of your personal information very 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 customer database from loss and misuse, and only allow access to it when absolutely necessary, and then under strict guidelines as to what use may be made of the personal information contained within it.

We will take all reasonable care to keep the details of your order and credit card information secure but unless we have been negligent, we will not be liable for any losses you may suffer as a result of unauthorised access by a third party to the information transmitted by you when ordering products or services from the club.

This website contains links to other websites. We are only responsible for the privacy practices on this site. We recommend that you check the privacy and security policies and procedures of each nd every other website that you visit.

## WHAT TO DO IF YOU DO NOT WANT TO RECEIVE MARKETING INFORMATION

You have the right to prevent marketing information being sent direct to you. If you prefer not to receive information from us or from any other organisation to which we may disclose your personal information, you can opt out of further marketing by clicking the relevant boxes on the screen upon which you provide information or by writing to us by mail or email.

Please note, however, that if you do opt out, we and/or they 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 may be affected.

# **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to change our security and privacy policies at any time. Accordingly we recommend that you check this page periodically in order to review our current policies. This privacy policy was updated in May 2018.

## **YOUR RIGHTS**

You have a number of rights in relation to the personal data we hold about you. These rights include:-

- Then right to obtain details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you please email us on <u>info@stmirren.com</u> or write to St Mirren Football Club, 75 Greenhill Road, Paisley, PA3 1RU.
- The right to request that we rectify any information we are holding on you if you believe it is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect;
- The right to withdraw you consent to our holding your personal data at any time;
- The right to object to the processing of your personal data for direct marketing purposes; and
- The right to lodge a complaint with the Data Protection Regulator (details provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the 'Contact' section below.

# COMPLAINTS

If you are not satisfied with any aspects of our privacy policy or how we have handled your data, you can contact the Information Commissioner's Office (ICO) in any of the following ways

- By going their website at <u>ico.org.uk</u>;
- By giving them a call on 0303 123 1113 or
- By writing to them at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

# CONTACT

Questions, comments and requests regarding this privacy policy and how we use your personal data are welcomed and should be addressed to <u>info@stmirren.com</u> or write to St Mirren Football Club, 75 Greenhill Road, Paisley, PA3 1RU.