



The Citizens Trust Privacy Notice

Introduction

This policy applies if you have registered to become or are a member of our Supporter's Trust. We value your privacy and are committed to protecting your personal data. As a member-based organisation we also believe that it is important you know how we treat the information the Trust holds about you.

This privacy policy explains how we collect and process your personal data when you visit our website, apply for membership, sign up to the newsletter or interact with us as a member of our supporters' Trust. It will also explain your privacy rights and how the law protects you. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

Controller

The Citizens Trust is the controller and responsible for your personal data (collectively referred to as "The Trust", "we", "us" or "our" in this privacy policy). We have not appointed a Data Protection Officer to oversee our compliance with data protection laws [as we are not required to do so] but our Board is responsible for data protection compliance within the organisation.

The Data We Collect About You

Personal data, or personal information refers to any information about an individual from which that person can be identified. The Data Protection Act 2018 controls how your personal information is used by organisations like The Citizens' Trust. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

We may collect, use, store, and transfer different kinds of personal data about you as follows:

- Identity Data: Includes first name, surname, and date of birth.
- Contact Data: Includes billing address, postal address, email address, and telephone number.
- Demographic Data: Includes gender, disability etc. to better understand and serve our membership. This ensures that our Trust is accessible and inclusive.
- Financial Data: Includes bank account and payment card details.
- Transaction Data: Includes details about payments from you and other details of products and services you have purchased from us.

- Technical Data: 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 our website.
- Profile Data: Includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- Usage Data: Includes information about how you use our website, products, and services.
- Marketing and Communications Data: Includes your preferences in receiving marketing from us and your communication preferences.

We will only use your personal data when the law allows us to.

How will we use your data?

The Trust is obligated to contact you to inform you of the following:

- Information relating to the Annual General Meeting (AGM)
- Information relating to Board elections
- Any other situation arising in relation to the Trust regulatory requirements
- Information about your membership of the Trust

Where possible we would like to do this via email to reduce printing and mailing costs for the Trust. However, in the interest of accessibility, the Trust will be happy to issue this information in hard copy form via a postal address upon request.

In addition, as a member based organisation it is important we are able to contact you about news, campaigns events in order to both grow the Trust and demonstrate full transparency. This will be done so on a legitimate interest basis.

However, we also understand that some members might not necessarily wish to receive this information. As such, should you wish for this contact to cease, or for your preferences to change, please contact us through the website. Please specify whether you wish one, a combination of, or all types of communications to stop.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal data to those members of the Trust Board and other third parties (such as the Football Supporters Association) 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. This is likely only to be required in relation to Board Elections.

Data Retention

We only keep your data for as long as is necessary for the purpose it was collected. In the case of membership of The Citizens' Trust, it is retained as long as the membership remains active.

Disclosures of your information

The Trust uses a software provider called LoveAdmin in order to process your membership, allow you to make bookings for Trust events, to take payments and to communicate with our members.

We will not sell your information to any third parties.

We will not disclose your information to any other third party without either your consent to do so, where disclosure is required by law, where it is necessary to comply with a police request, or it is necessary to protect you or any of our other members from harm.

Transferring data outside the European Union

All countries within the European Union (EU) and the United Kingdom are bound by GDPR. We will not transfer your personal information outside of the UK without gaining your consent to do so.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. This includes the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you have any questions about this privacy policy or the rights outlined above, please contact us by email through the contact us page on the website.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection concerns (www.ico.org.uk/concerns). If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. We would, however, always very much appreciate the opportunity to discuss any concerns with you before you approach the ICO, so would be grateful if you could contact us directly in the first instance.