



Privacy Policy

1. Introduction

This "Privacy Policy" has been issued by Bolton Wanderers Football & Athletic Company. ("we/us/our").

This policy is to comply with the new "General Data Protection Regulation" ("GDPR") which came into effect on the 25th May 2018.

The purpose of this Privacy Policy is to fulfil your rights to be informed about the use of your personal data.

As part of that undertaking, we are committed to safeguarding the privacy of the personal information that we gather.

2. About us

Bolton Wanderers Football & Athletic Company., is registered at the University of Bolton Stadium, Burnden Way, Lostock, Bolton, BL6 6JW registered in England and Wales - 12090433. VAT Number: 328 9255 76

This privacy Policy only applies to "Bolton Wanderers Football & Athletic Company".

Bolton Whites Hotel & Events is registered at the University of Bolton Stadium, Burnden Way, Lostock, Bolton, BL6 6JW registered in England and Wales - 12086161 Vat Number: 328 7066 85.

Bolton Whites Hotel "Privacy Policy" can be found on their website www.boltonwhiteshotel.co.uk.

3. Privacy Policy

This Privacy Policy sets out details of the personal information that we collect from you and how we use that data. We also explain your rights and how to contact us.

Please read this Policy in conjunction with our Terms and Uses as detailed in **Section 6.1**

This policy applies to personal information regarding fans and other individuals with whom we do business or who buy tickets, products, or services from us and to the use of that personal information in any form.

As we are situated in the United Kingdom, when you submit your details regardless of whichever country you are based, you agree to the data being transferred to the United Kingdom and processed under the UK legislation. If you have given your consent you may receive email and other communications which are compliant with the UK Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, (as updated) which may differ from regulations in the country in which you are based. If you are not in agreement to these terms of use, please do not give your consent for your personal information.

4. What is classed as Personal Information?

When you use the BWFC website, or contact us by post, telephone, fax, email, mobile messaging or verbal communication we may collect, store and use certain personal information that you disclose to us. The personal information in this policy refers to information that does or is capable of identifying you as an individual. The type of personal information that we may collect from you includes, but is not limited to the following:

- your name, gender, personal and work contact details, date and place of birth, image/photos, nationality,
- your credit card details, and your account details such as customer reference number or customer ID and credentials,
- information, feedback or content you provide regarding your marketing preferences;
- information collected whilst you access an app or the BWFC website

Much of the personal information we process is information that you or someone acting on your behalf knowingly provides to us. However, in other instances, we process personal data that we are able to gather about you based on other information you provide to us or during our interactions with you, or personal information about you that we receive from a third party. This Policy also applies to the information about you that we receive from a third party, unless specifically covered by such third party's privacy policy.

Sensitive Personal Information

There may be instances in which the personal information that you provide to us or that we collect is considered "Sensitive Personal Information" (SPI) under the privacy laws of some countries.

These laws define the following “SPI” to mean personal information from which we can determine or infer an individual’s; racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership in a trade union or professional association, physical or mental health or condition, medical treatment, genetic data, sexual life.

Judicial data (including information concerning the commission or alleged commission of a criminal offence).

Financial records may form part of SPI. We will only process SPI to the extent permitted or required by applicable law.

5. How we use personal information

Subject to applicable laws, we may collect, use and disclose relevant portions of your personal information in order to:

- provide and charge for products and related services;
- provide you with a better or more personalized level of product, service, and/or experience including information and services from a third party (such as other products, or offers related to your preference for a given product);
- respond to requests for information and services, including services from a third party (such as a companies who make and transport products, provide services, and research product buyers);
- fulfil contractual obligations to you;
- conduct market research, customer satisfaction and direct marketing and sales promotions;
- administer general record keeping;
- meet legal and regulatory requirements;

Bolton Wanderers Football & Athletic Company., uses and retains your personal information for as long as is necessary to fulfil the purpose.

6. Disclosures of your personal information

On occasion, we may disclose your personal information. We would always ensure that disclosure was made in line with the relevant law.

Where necessary we may make disclosure (in addition to those described above) these include:

6.1 Service providers and suppliers

Due to the needs of the business we may call on the services of market research companies to assist us. When this occurs we oblige those third parties to protect

your personal information in accordance with the terms and uses <https://www.bwfc.co.uk/terms-of-use/> of this policy.

6.2 Business transfers

Any personal information collected about you is regarded as a business asset. As such if the business transferred its assets then your data could be regarded as one of those assets.

6.3 Legal requirements

We reserve the right to disclose any personal information if any of the following apply:

- we are compelled to do so by law
- lawfully requested to do so by a government entity
- to protect or defend our rights or property in accordance with applicable laws
- compliance with accounting/tax rules and regulations
- any specific record retention laws.

7. Information we collect when you visit us online

If you access the Bolton Wanderers Football & Athletic Company. website, you may wish to know the following:

7.1 Our Website

You can browse our website and log on without revealing your identity.

7.2 Usage information

We collect information about how you use our website.

Examples of such information include the Internet Protocol address automatically assigned to your computer each time you browse the Internet;

- the date;
- the time of your visit;
- the pages you access;
- the amount of time you spend on each page;
- the type of Internet browser you use;
- your device's operating system;
- the URL of any websites that you visited before and after visiting our website.

This information is not linked to you as an individual unless you create a user profile, but we may keep records of the device being used.

7.3 Cookies and other similar technology

We use cookie technology on our website to allow us to evaluate and improve the functionality. Cookies by themselves cannot be used to reveal your identity. They identify your browser, but not you.

For information about how Bolton Wanderers Football & Athletic Company, uses cookies, please visit our website <https://www.bwfc.co.uk/website-privacy-policy/>

If you do not want to accept cookies, you can block them by adjusting the settings on your Internet browser. However, if you block them, you will not be able to use all of the features of our website, including the customization features associated with creating a user profile.

Further information about cookies and other similar technology and how they work is available at allaboutcookies.org.

7.4 Social media

Our website may also contain plug-ins and other features that integrate third party social media platforms into our website. You will be able to activate them manually. If you do so, the third parties who operate these platforms may be able to identify you, they may be able to determine how you use this website and they may link and store this information with your social media profile.

Please consult the data protection policies of these social media platforms to understand what they will be doing with your personal data. **If you activate these plug-ins and other features, you will be doing so at your own risk.**

7.5 Creating a user profile

You can create a user profile on Bolton Wanderers Football & Athletic Company website to, among other things, facilitate your online transactions, and to tailor your experience on our websites to your interests. This allows us to make more appropriate recommendations to you. We may use the information you provide in your user profile to populate other databases maintained by us and our service providers, as applicable. By creating a user profile, you are agreeing that we may use the personal information you provide for these purposes.

You can view, update or remove any personal information that you have provided to us for inclusion in your user profile by amending your user profile online or emailing dpo@bwfc.co.uk. If you subsequently elect to remove your user profile, we reserve the right to use any personal information previously provided by you for inclusion in your user profile for record keeping and quality assurance purposes (unless we are required by law to delete or cease to process or use your personal information). Even if you choose not to create a user profile, you can still use our websites to search for and purchase services.

7.6 Security

Because the security of your personal information is important to us, we use Secured Socket Layer ("SSL") software in order to encrypt the personal information that you provide to us. If your browser is SSL enabled (which most are), your transmission of personal data to us online will be encrypted. You can verify whether this

information is transmitted using SSL encryption by confirming the symbol of a closed lock or solid key on the bottom bar of your browser window.

You can also verify that your personal information will be encrypted using SSL encryption by making sure that the prefix for the web address listed for that page has changed from “http” to “https”. If you do not see the appropriate symbol and the “https” prefix, you should not assume that the personal data that you are being asked to provide will be encrypted prior to transmission.

The information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Where required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you so that you can take the appropriate actions.

7.7 Minor children

Our website does not sell products or services to children under the age of 18. If you are under the age of 18 (or a minor in the jurisdiction in which you are accessing our website), you must involve a parent or guardian.

8. Apps

If you download our “Bolton Wanderers Official App” or digital product you will be governed by the Privacy Policy. <https://www.bwfc.co.uk/website-privacy-policy/>

9. Consent for Information

You may always choose what personal information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected (for example, we cannot deliver a product without an address).

If you provide us with your contact details (e.g. postal address, email address, telephone number or fax number), we may contact you to let you know about the products, services, promotions and events offered that we think you may be interested in. You can always choose whether or not to receive any or all of these communications by contacting us as described in **Section 11** below or following the “unsubscribe” instructions contained in the communications.

In some jurisdictions, in addition to you agreeing to this Policy, data privacy laws may require us to obtain a separate consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g. where communications are required in order to fulfil your requests

and/or where you have volunteered information for use by us). In other cases, we may seek your consent expressly in accordance with applicable laws (e.g. where the information collected is regarded to be SPI under local regulations).

We will abide by any request from you not to send you direct marketing materials.

When such a request is received, your contact details will be “suppressed” rather than deleted. This will ensure that your request is recorded and retained unless you provide a later consent that overrides it.

10. Updating or Accessing Your Personal Information

According to current law:

- you have a right of access to a copy of the information comprised in your personal data;
- a right to object to processing that is likely to cause or is causing damage or distress;
- a right to prevent processing for direct marketing;
- a right to object to decisions being taken by automated means;
- a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed;
- a right to claim compensation for damages caused by a breach of the Data Protection Act.

If you want to inquire about any personal information we may have about you, you can do so by sending us a written request by letter or email to the addresses set out in **Section 11** below. Please be sure to include your full name, address, and/or email address and phone number so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information we may require to make that determination.

You may request that we correct, cancel, and/or stop processing or using personal information that we hold about you. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree, explain our refusal to you and record the fact that you consider that personal information to be incorrect in the relevant file(s).

11. Request for Access to Personal Information/Questions or Complaints

If you have any questions about this Policy, or any concerns or complaints with regard to it, or if you would like to submit a request (in the manner described in **Section 10** above), please contact us by any of the following means:

- by calling 0844 871 2932 (Option 1) Home football Ticketing, (Option 2) Bolton Central, (Option 3) for Match day Hospitality, Advertising and our

Sponsorship Team, (Option 4) for Bolton Whites Hotel or (Option 5) to speak to a member of staff

- by calling our reception at Bolton Wanderers Football & Athletic Company. on 01204 673673
- by post at Bolton Wanderers Football & Athletic Company., University of Bolton Stadium, Burnden Way, Lostock, Bolton, BL6 6JW
- by email: dpo@bwfc.co.uk

If you are not satisfied with the response that you receive, you can escalate your concern to the Data Protection Office by sending an email to dpo@bwfc.co.uk.

You may request that we correct, cancel, and/or stop processing or using personal information that we hold about you. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree, explain our refusal to you and record the fact that you consider that personal information to be incorrect in the relevant file(s).

All requests for access to your personal information must be submitted in writing by letter to the Data Protection Office, Bolton Wanderers Football & Athletic Company., University of Bolton Stadium, Burnden Way, Lostock, Bolton, BL6 6JW or email to dpo@bwfc.co.uk. We may respond to your request by letter, email, telephone or any other suitable method.

What forms of ID will I need to provide in order to access this?

BWFC accepts the following forms of ID when information on your personal data is requested:

- Passport
- Driving licence
- Birth certificate
- Utility bill (dated within the last 3 months)

Upon seeing any form of ID, a representative from the Club will sign to say they have seen it, on what date and that any photo ID is a true likeness of the person requesting their data.

Where you make more than one request in quick succession, we may respond to your subsequent request by referring to our earlier response and only identifying any items that have changed materially.

Please note that if requests are found to be manifestly unfounded or excessive, we reserve the right to charge a fee of £20.00, as permitted or refuse to respond.

The purpose of the fee is to cover administrative costs.

Where we refuse to respond to a request, we will explain why to you, informing you of your right to complain to the supervisory authority.

12. Changes to this policy

This policy may change due to business needs or changes in legislation. To assist you, this Policy has an effective date set out below.

Effective date: 23rd May 2018 – Updated: September 2019

In the event of any inconsistencies between the English version of this policy and any version of this policy in any other language, the English version shall prevail (to the fullest extent permitted under applicable law).