

# Premier League – Privacy Policy



In this Privacy Policy, terms such as "**we**", "**us**", "**our**" or similar expressions shall mean the Football Association Premier League Limited.

We take your privacy very seriously and are committed to protecting your personal data (meaning any information about you from which you can be identified). This Privacy Policy explains what personal data we collect when you: access the Premier League websites at <https://www.premierleague.com>, use the Premier League's official app; play the Fantasy Premier League game, or contact the Fanzone (the **Services**) or engage with the Premier League on social media platforms (including the our Facebook, Twitter and Instagram pages); and/or when you otherwise interact or communicate with us. It also explains how we may use this data, and what rights you have in relation to such data.

For information on how we collect, use and store personal data relating to players (including English Football League (**EFL**) players) and other people associated with them and the Premier League (for example, coaches and scouts) please refer to our [Player Privacy Policy](#).

If you are aged 12 or under (a **child**), or you are reading this on behalf of a child for whom you have parental responsibility, please refer to [11. CHILDREN AND PRIVACY](#).

We keep our privacy practices under review and may change this Privacy Policy from time to time by posting changes on the Services or otherwise notifying them to you. This version of the Policy is dated 25 May 2018.

Please read this Privacy Policy carefully:

1. **BACKGROUND**
2. **PERSONAL DATA WE COLLECT ABOUT YOU**
3. **HOW WE COLLECT YOUR PERSONAL DATA**
4. **HOW AND WHY WE USE YOUR PERSONAL DATA**
5. **DISCLOSURE OF YOUR PERSONAL DATA**
6. **TRANSFERRING YOUR PERSONAL DATA OUTSIDE OF THE EU**
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## 1. Background

We are a "controller" under the General Data Protection Regulation (the GDPR) and other applicable data protection legislation (**Data Protection Law**). This means we are responsible for deciding how we use the personal data that we collect about you and, in accordance with the Data Protection Law, we will ensure that the personal data we hold about you is, at all times:

1. used fairly, lawfully, and transparently;
2. collected for limited, specific purposes only;
3. adequate, relevant to and limited to what is necessary for those purposes;

4. kept accurate and up-to-date;
5. not kept for longer than is necessary; and
6. held securely.

We shall be accountable for and able to demonstrate our compliance with our obligations under the Data Protection Law, and this Privacy Policy is one of the ways in which we do that.

We have appointed a Data Protection Lead to oversee compliance with this Privacy Policy and our data protection compliance activities. The Data Protection Lead has also established a dedicated data protection team to provide the necessary support.

## 2. Personal Data We Collect About You

Personal data means any information about an individual from which that person can be identified. We may collect and use various types of your personal data:

- **Registration Data:** To access and use some elements of the Services you must create a Premier League account, by providing us with the information which is identified on the relevant registration page: name, email, date of birth, and country. We will also collect a username and password. Please note that some elements of the Services will not be available if you do not provide the required information. We may also ask or allow you to submit other optional information, including your gender, phone number, UK post code.
- **Identity Data:** We also ask you to provide identification information when we provide other elements of the Services: name, age, gender and social media handles/ usernames.
- **Contact Data:** When we want to communicate with you, or you with us, we use your email address, telephone numbers, social media handles/ usernames and location (country/ place of residence).
- **Media Data:** We use images from photographs and video footage of crowds and fans and other media content created by us (or on our behalf) at Premier League matches and events or provided by you for our use.
- **User Data:** We collect your usage and preference details related to your use of the Services such as language, game-play statistics, scores, rankings, time spent playing, game profile, preferences (including favourite Clubs), survey responses, feedback and other data that you provide to us as part of your account.
- **Marketing and/ or Communications Data:** We retain your preferences in receiving marketing messages from us and our Clubs and commercial partners, and your communication preferences.
- **Technical Data:** Certain data is automatically generated and collected by us when you use the Services such as your IP address, MAC address and other device identifiers; your clickstream to, through and from the Services (including date and time); pages you viewed or searched for; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); methods used to browse away from the page.

Not all of the list above will necessarily apply to you - it depends on your use of the Services and your particular interaction and communications with us. Please refer to [4. HOW AND WHY WE USE YOUR PERSONAL DATA](#) below.

## 3. How We Collect Your Personal Data

You provide us with your personal data when you:

- access, use or play the Services;
- create a Premier League account for the Services;
- request information, marketing and other communications to be sent to you;
- enter a competition, promotion or survey;
- complete surveys or provide us with your feedback; and

- otherwise interact or correspond with us (including via email, social media or telephone).

In connection with some elements of the Services we also receive additional personal data about you from other organisations who have collected personal data from you, such as our member football clubs (**Clubs**), other footballing organisations (such as the FA or FIFA) and our commercial partners (like EA) and data collected on our behalf at Premier League events. We may also receive personal data as part of the legal processes we undertake to protect our Services and our intellectual property, such as our brand or media rights, or those of our licensees/commercial partners.

We collect the Technical Data automatically as you interact with our Services by using cookies and other similar web technologies. Please refer to our [Cookie Policy](#) for more information.

We also use third party tools to help us manage and analyse our social media presence, and report on comments, mentions and other content that is posted about us on social media sites and other public channels and forums. These third parties' activities, and their information collection and sharing practices, are subject to the terms of the relevant social media site, channel or forum. We will use this information in accordance with this Privacy Policy.

We use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to certain parts of the Services. This information is only used by us in a way which does not identify you. We do not make, and do not allow Google to make, any attempt to find out the identities of anyone visiting our website.

## 4. How and Why We Use Your Personal Data

We will only use your personal data where Data Protection Law allows us to. Data Protection Law says we can collect and use personal data on the following bases:

1. it is necessary for us to be able to **perform an agreement** with you.
2. it is necessary for our **legitimate interests** (and your interests and fundamental rights do not override those interests);
3. if we have your **consent** (which you can withdraw at any time); or
4. to comply with a **legal obligation** i.e. rules laid down by courts, statute or regulation.

Accordingly, we lawfully use your personal data in the following ways:

**Delivering the Services:** We use the Registration Data, User Data and Communications Data so that we can deliver the Services to you in an effective, efficient and accurate way. Without it we would not be able to deliver a tailored service to you or respond to issues with these Services that are identified by us or you, or ensure you get the most out of your experience. Therefore, we use this data on the basis that it is necessary for us to be able to perform our agreement with you (i.e. the terms and conditions of the relevant Services) and for our legitimate interests of delivering the Services in this way.

**Operating the Services:** We use the Technical Data in order to operate and administer the Services including as necessary for testing, analysis, maintenance, support, reporting and hosting of data. Therefore we use this data on the basis that it is necessary for our legitimate interests of operating the Services in this way. We also use Technical Data together with certain Identity Data and Contact Data to assist in security and fraud prevention, system integrity (such as preventing hacking, cheats and spam) and/ or to facilitate our response to a legal process. Therefore we use this data on the basis that it is necessary both for our legitimate interests in protecting the Services in this way and in order that we can comply with a legal obligation.

**Competitions and promotions:** We use Identity Data and Contact Data and any other personal data related to the entry (for example, a photograph) in order that we can administer

contests, prize draws or other promotions including selecting the winners, delivering the prizes and publishing the results (as required by UK advertising regulations). Therefore, we use this data on the basis that it is necessary for us to be able to perform our agreement with you (i.e. the terms and conditions of the relevant promotion) and in order that we can comply with a legal obligation. If we want to use the personal data for any other purpose we will notify you and, if necessary, seek your consent at that time.

**Marketing communications:** We use the Identity Data and Contact Data to inform you of news, offers, events, competitions and promotions by specified media (including, if requested, by way of calendar notifications) which may be of interest to you and/ or we provide such data to our Clubs and/ or our official commercial partners so that they can do this. We give you the option of providing opt-in consent to receive different kinds of direct marketing communications from us or these third parties or deciding not to do so.

**OPT-ING OUT:** You can withdraw your consent and opt-out of marketing communications from us at any time by updating your [Email Preferences](#) (where you have signed up to our website) or by following the instructions provided to you in the relevant communication (for example, the 'unsubscribe' link in an email). Alternatively, you may contact us at [info@premierleague.com](mailto:info@premierleague.com). We may still need to send service emails to you from time to time.

If you have chosen to receive communications directly from a particular Club or commercial partner, you will be consenting to us passing the data to them to use in accordance with their privacy policy, to which we provide links on our website, so you should contact them directly if you no longer wish to receive their communications.

Our fixtures and calendar communications function is delivered by ECAL and you should contact ECAL directly, if you want to stop receiving these communications. Instructions on how to unsubscribe from ECAL can be seen [here](#) and a copy of ECAL's privacy policy is available [here](#).

**Media coverage:** We use the Media Data together with Identity and Contact Data for Premier League-related publishing and media coverage. Except where you are not the subject of the Media Data, for example in general crowd shots, we will seek your consent and provide you with information about our intended use of such information.

**Fanzone callers:** The Premier League delivers the Fanzone Programme in conjunction with IMG Studios. We use the Identity Data, Contact Data and Communications Data along with any other information you share with us (for example, which Club you support) when you contact us via your chosen means (a "caller") in connection with our operation, administration and distribution of the Fanzone audio-visual programme. We then keep a record of this information so that we can contact you in the future if we would like to hear from you again or reuse your comments. By providing this information to us you are consenting to our use of the data for these purposes and you can withdraw that consent at any time by contacting us at [dataprotection@premierleague.com](mailto:dataprotection@premierleague.com). Note that we also keep a record of caller details to ensure we don't use the same callers each time and to prevent repeat of abusive callers so we are using this data on the basis that it is necessary for our legitimate interests in providing interesting, inclusive and responsible programming.

**Premier League Fan Panel:** If you provide your opt-in consent we will use basic Identity and Contact Data to send you links to [Fan Panel](#) research surveys to gather opinion from football fans on a range of issues that affect the Premier League and the information submitted is used to help shape the future of the Premier League. These surveys may ask you to submit additional personal data (including age and gender), however, all entries are anonymous. The information is gathered by leading research agency Populus and we only receive aggregated (non-identifiable data). All responses are held by Populus in complete confidence. Please refer to the Fan Panel [terms and conditions](#) and Populus' [privacy policy](#) for more information.

**Other purposes:** We could have to use your personal data which we hold to protect your or someone else's vital interests for example to make contact in rare emergency situations. We

could also have to use your personal data in connection with legal and regulatory matters such as our maintenance of business records, compliance with external reporting requirements and internal policies and procedures and responses to requests by government, law enforcement, regulators, courts, rights holders or other third parties including in respect of the use or misuse of intellectual property, such as our brand or media rights, or those of our licensees/commercial partners or their parties. Therefore we use this data on the basis that it is necessary both for our legitimate interests in protecting, defending and enforcing rights and interests in this way and also so that we can comply with legal obligations.

We will only use your personal data for the purposes for which we collected it as described above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **What if you do not want to share your personal data?**

Unless otherwise specified above, generally we collect your personal data on a voluntary basis. However, please note that if you decline to provide certain mandatory personal data, you may not be able to access certain Services and we may be unable to fully respond to any inquiries you make.

## **5. Disclosure of Your Personal Data**

We may disclose or share your personal data in the following circumstances:

**Third Party Service Providers.** We engage third party businesses to provide services to us or to you on our behalf, such as support for the internal operations of our Services (and related services), communications, data storage and delivering communications (including calendar notifications).

In providing their services, they may access, receive, maintain or otherwise use personal data on our behalf. Our service providers only use your personal data in accordance with our strict instructions to provide the relevant services and are not permitted to use your personal data for their own purposes, unless authorised by us to do so. Where this is the case you will be notified by us and provided with their privacy policies so you can understand how they will treat your personal data.

**Commercial Partners.** We may also disclose your personal data to our commercial partners where you have consented or requested that we do so. For example, when you enter a competition or sweepstake which is a joint promotion, or you request to receive certain marketing communications. You will be given clear information in each case before we disclose share your personal data.

**Publicity and media.** We may disclose your personal data publicly via the media, social media or on the Services. For example, when sharing a comment or opinion you have provided such as when you contact the Fanzone, or if you win a competition or promotion we may disclose your name online. In such cases, we will clearly notify you of the sharing, and you will have the choice not to participate or to otherwise object to such sharing, subject to our other legal obligations.

**Clubs.** Where you allow us to, we will share your personal data with your favourite Clubs to help our Clubs interact with their fans. This Privacy Policy applies to our use of your personal data only, and you should refer to the relevant privacy policy of each relevant Club to understand how they use your personal data. All of which are available [here](#).

**Legally Required.** We may also disclose your personal data if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes or in the event of a re-organisation of the legal or ownership structure of the Premier League.

Notwithstanding anything else in this Privacy Policy, we may share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual and the individual cannot be re-identified.

## 6. Transferring Your Personal Data Outside the EU

Some countries outside of the European Union (**EU**) do not have laws that protect privacy rights and personal data as extensively as the UK and other countries within the EU. We do not generally or routinely transfer personal data outside of the EU but some of the organisations to which we may disclose personal data may be situated outside of the EU. If we do transfer your personal data outside of the EU, we will ensure that your personal data is protected to a similar degree, in accordance with Data Protection Law. We do this by ensuring one of the specific safeguards approved by the European Commission is in place. You can find further information about these safeguards at [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en).

If you would like further information on the specific mechanism used by us when transferring your personal data out of the EU you can [contact us](#) using the details provided below.

## 7. Security of Your Personal Data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed (a **Data Security Breach**). In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to know. They will only use your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Data Security Breach and will notify you and any applicable regulator where we are legally required to do so.

Where we have given you or you have chosen a password which enables you to access certain Services, you are responsible for using reasonable care in keeping this password confidential.

## 8. Links to Other Sites

The Services may contain links to other websites, applications and environments that are not owned or controlled by us (the **Other Sites**). The owners and operators of those Other Sites are responsible for their collection or use of your personal data and you should check their respective privacy policies. Unless specifically referred to otherwise, this Privacy Policy applies to the Services only and not the Other Sites.

## 9. Data Retention

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for (see [4. WHY WE USE YOUR PERSONAL DATA](#)), including for the purposes of satisfying any accounting, reporting or other legal requirements, in accordance with our Data Retention Policy.

To determine the appropriate retention period, we review - in addition to the purposes of use and how we can achieve them - other relevant factors such as the nature and scope of the personal data, the potential risks to data subjects from a Data Security Breach, and the applicable legal requirements, for example the limitation period for which legal claims can be made in court.

For example, all non-activated Premier League accounts are deleted after 21 days and all non-authorized child accounts are deleted immediately if a parent withholds consent and after 21 days if a child's account is not verified.

## 10. Your Rights

Under Data Protection Law, you have certain rights (depending on the circumstances) in connection with your personal data, which include:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are using it lawfully, provided always that this does not adversely affect the rights and freedoms of other people;
- **Request correction** of the personal data that we hold about you. Where any of the information we hold about you is incorrect or incomplete we will act promptly to rectify this, including where you have requested us to do so. Users of the Premier League website can update their information any time via their account preferences;
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to our use (see below);
- **Object to use** of your personal data where we are relying on our legitimate interests (see [above](#)) and there is something about your particular situation which makes you want to object to our use on this ground;
- **Withdraw your consent** to our use of your personal data where we do so in reliance on your consent. Once we have received notification that you have withdrawn your consent, we will no longer use your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law;
- **Request the restriction** of use of your personal data. This enables you to ask us to suspend the use of personal data about you, for example if you want us to establish its accuracy or the reason for using it; and
- **Request the transfer** of the personal data you have provided, on the basis of consent or for a contract with us, to you or a third party where technically feasible.

We are committed to respecting your rights. You may action your rights (as may be applicable) by [contacting us](#) using the details provided below and we will comply with your requests within a reasonable period unless we have a lawful reason not to do so.

Requests should be made in writing and to ensure that personal data is dealt with carefully and confidentially we will require the requestor to provide verification of their identity and all applications must be accompanied by copies of at least two official documents, which show your name, date of birth and current address (for example, driving licence, birth/ adoption certificate, passport, recent utility bill).

In responding to such requests, we will explain the impact of any objections, restrictions or deletions requested.

We will not charge you a fee to exercise your rights unless your request is clearly unfounded or excessive, in which case we may charge you a reasonable fee. Alternatively, we may refuse to comply with the request in such circumstances.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK data protection authority. The ICO's contact details as are follows: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Tel: 0303 123 1113 (local rate) or 01625 545 745; <https://ico.org.uk/global/contact-us/>

## 11. Children and Privacy

It is important to us that children can enjoy our Services in a responsible manner. We encourage parents and guardians to supervise their children's online activities by, for example, adopting control tools available from online services and software suppliers that help provide a child-friendly online environment including by preventing children from disclosing their personal data online without parental permission.

We are committed to safeguarding children's personal data collected online, and to helping parents and guardians and their children learn how to exercise control over personal data while exploring the Internet.

If you are aged 12 or under (a **child**), we will require permission from your parent, carer or person with parental responsibility in order for you to register for a Premier League account. If you are a child, you will be asked to give the name and email address of the person with parental responsibility for you. A confirmation email will then be sent to them. Your Premier League account will only become active once that person has responded to that email confirming their parental responsibility and providing their consent. We may take other reasonable steps to confirm parental responsibility.

All personal data in respect of non-authorized child accounts is deleted immediately where parental consent has been refused and after 21 days if a child's account is not verified.

If you have parental responsibility and would like to review any personal data that we have collected online from your child, have this information deleted, and/or request that there be no further collection or use of your child's personal data or if you have any questions about our Privacy Policy or practices, you may contact us at [dataprotection@premierleague.com](mailto:dataprotection@premierleague.com).

## 12. Contact Us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us using the following contact details:

Premier League Data Protection Lead  
The Football Association Premier League Limited  
30 Gloucester Place,  
London, W1U 8PL

[dataprotection@premierleague.com](mailto:dataprotection@premierleague.com)

(0)207 864 9000