

# EFL in the Community Privacy Notice

EFL in the Community is committed to protecting the privacy and security of your personal data. 'Personal data' is any information relating to an identified or identifiable living person.

This privacy notice ("**Notice**") describes how and why we collect and use personal data in a range of circumstances. Alongside information on retention and your rights in respect of the data we hold about you. The Notice applies to personal data provided to us, both by you directly and by others. We may use personal data provided to us for the purposes described in this Notice or as made clear to you before collecting your personal data.

This Notice describes the types of personal data collected and used by EFL in the Community through:

- your visit and use of EFL in the Community websites ([www.eflinthecommunity.com](http://www.eflinthecommunity.com), [www.officialsoccerschools.co.uk](http://www.officialsoccerschools.co.uk) (collectively the '**Websites**'));
- your participation in a programme ran by your local Football Club charity ('**Club charity**') in conjunction with us;
- your interaction with us as a service provider; and
- through any other contact with us.

Where personal data is collected and used for the purposes set out in this notice, EFL in the Community is a 'data controller' under the UK GDPR and other applicable data protection legislations. This means that we decide the purposes and manner in which your data is used- as set out in this Notice.

You should read this Notice together with any other privacy information which is supplied to you on specific occasions. This notice supplements any other notices and is not intended to override them.

This Notice does not cover personal data collected by EFL in the Community where another specific privacy notice exists. For example, our Staff Privacy Notice applies if you are applying for work with us and/or acting in a volunteering capacity.

## Who are we?

The Football League (Community) Limited, trading as EFL in the Community. EFL House 10-12 West Cliff, Preston, Lancashire, PR1 8HU.

EFL in the Community is the charitable arm of the EFL. We use the power of sport to improve people's lives and make a positive contribution to communities across the country. We resource the group of 72 Club charities linked to each Football Club in the league.

## What information do we collect and use

We may collect, use, store and transfer different kinds of personal data. For the purpose of this Notice, we have grouped these together as follows:

- **Identity data**- such as your name(s), title, marital status, date of birth, gender, employment status, national insurance number, username, imagery (including CCTV if you visit our premises) and marital status
- **Contact data**- such as your address (including postcode), email address, telephone numbers and any of the above for any parent, guardian, carer or other persons connected to you where applicable.
- **Photographic data**- EFL in the Community and/ or its affiliates may take and use your photo and/ or video for purposes relating to documenting case studies, marketing exercises, and programme and organisational publicity. Using your image in various channels and forms, such as in print and digital media formats including, publications, websites, e-marketing, poster banners, advertising, film, social media, teaching and research purposes.
- **Opinion data**- storytelling, case studies and survey responses, including but not limited to, your opinions and personal journey relating to information about employability, personal wellbeing, mental wellbeing, loneliness, self-efficacy, self-esteem, activity levels, social cohesion.
- **Technical data** such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types, versions and statuses, operating system and platform and other technology on the devices you use to access the Websites.
  - The Websites use cookies, which are small files with a code that is stored on your device, with your consent, and is retrieved when you next visit the Website. This allows information about your use and browsing to be recognised. Full information on which cookies we use is available here <https://eflinthecommunity.com/privacy/>, along with guidance about how you can set your browser to refuse all or some cookies..
- **Financial data**- such as details about payments to and from you and other details of products or services you have purchased from or via us, or accessed on the Websites
- **Transaction data**- such as details about payments to and from you and other details of products, services or other that you have purchased from or accessed through us (if any).
- **Communications data**- includes information you provide when communicating with us, your marketing preferences and any other communication preferences.
- **Aggregated Data**- such as statistical or demographic data for any purpose. Aggregated Data may be generated from your personal data but does not directly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly identify you, we treat the combined data as personal data which will be used in accordance with this Notice.

**Special categories** of personal data are provided with extra protection under data protection legislation. Whilst EFL in the Community do try to limit our collection of this information, it can be a requirement of your participation in certain programmes. We will only process special categories of data only where the law allows. Where possible, EFL in the Community will

pseudonymise or anonymise this data. Data in this category could include- information about race or ethnicity, religious or philosophical beliefs, sex life and sexual orientation, political opinions, trade union membership, and genetic, biometric and health data (includes disability and/or long-term illnesses, weight data).

**Children's data-** Personal data belonging to children and young people (those under the age of 13) is always requested from and given by a parent or guardian. We try not to make a child's participation in any activities or programmes, ran directly or indirectly by us, contingent on the disclosure of any more information than is reasonably necessary to deliver the activities or programmes.

**Photography** (continued)- Wherever possible, we will ensure you know when photography or videography is taking place in the following ways: • Advance notice of our intention to photograph / film within event/ programme booking forms, event invitations, event/ programme information etc. • Comprehensive signage at prominent locations, entry and exit points to the event • Our photographers / videographers / staff will be clearly identifiable and approachable during the event/ programme.

In some of the instances mentioned above, you may be supplied with additional privacy information, including but not limited to privacy statements and consent forms, at the point of collecting your data.

Not all of the categories above will be applicable to you; it will depend on your particular interaction and communications with us.

### **Where we get your personal data from and why do we use this data?**

We use different methods to collect data about you, including direct interactions with us, interactions with your local Club charity, our shared platforms, websites and databases, others in the charity sector or football industry, relevant third parties and publicly available sources.

We use the data we collect for a range of purposes, but in summary this can be; to deliver or receive services, products or opportunities to or from you or your organisation; run any events and/or competitions; take or make payments; make relevant publications or announcements; manage and improve our operations; communicate with you; protect and enforce our legal rights or those of others; marketing (only where you have agreed for electronic direct marketing); administer, analyse and improve our operations.

The instances below, explain further how and why we use certain personal data about you.

- Your personal data collected, in conjunction with your local Club charity, during a programme you engage with, is first and foremost used to enable the delivery of the programme or provision to you by your local Club charity. Your local Club charity shares this data with us and we use it to manage the wider programme and to meet reporting requirements with the funding organisation of that programme. In addition, we also use

the data in various formats for our research and evaluation purposes, during and post engagement. \*Please refer to your local Football Club charity Privacy Notice for further information about their collection and use of your personal data.

- For data collected on our website ([www.eflinthecommunity.com](http://www.eflinthecommunity.com)) when you submit an enquiry via our contact form on the website. We receive an email along with the data you submit on the form. We use this data to contact you about your enquiry, and once your enquiry is deemed complete, we will delete this data.
- Data collected on our website ([www.officialsoccerschools.co.uk](http://www.officialsoccerschools.co.uk) "OSS") when you make a booking with your local Club charity on the OSS website. Both the Club charity and EFL in the Community will have access to the personal data you provide. EFL in the Community use this data, firstly for the purpose of maintaining the website and your account (should you create one), alongside responding to any issues and data corrections. Dependant on receiving your consent, we may use some of the personal data you provide here to issue marketing communications. Finally, we may use this data in an anonymised format for statistical and evaluation purposes.
- Our social media accounts may process your data- where you reach out to us with a query.
- In connection to events and competitions, with your accreditation or attendance at and/or fulfilment of obligations relating to relevant events we organise and other competitions we may administer from time to time. This may include service users, corporate attendees and/or those requiring accreditations such as members of the press and/or photographers. This will usually be necessary (i) to perform any contract with you for your attendance or participation (ii) to comply with legal obligations where applicable or (ii) for our and/or our Club charities' legitimate interests in ensuring proper and effective governance, regulation and administration of our events and competitions.
- We collect and process personal data about our network of Football Club charities, suppliers, contractors, subcontractors, events partners and other business partners (as well as any individuals associated with them). The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide services to service users and include holding events. We will always have processing agreements in place with our processors and sharing agreements with our third-party partners.
- Finally, we may also process your personal data to comply with any requirement of law, regulation or professional body of which we are a member.

We take our obligations to safeguard vulnerable people seriously, including vulnerable adults and children. We do this by collecting/accessing and analysing records of incidents and allegations of abuse, exploitation or inappropriate conduct, and preventative measures by reference to the law and applicable internal policies. We may collect and process personal data (including from public sources) without your knowledge where this is required and/ or permitted by law.

### **What lawful bases do we use?**

We will only process personal information when the law allows us to. Depending on the processing activity, we rely on the following lawful bases:

- Article 6(1)(a), Where you have given explicit consent to process your data for a specific purpose
- Article 6(1)(b), Where we need to perform the contract we have entered into with you
- Article 6(1)(c), Where we need to comply with a legal obligation
- Article 6(1)(d), Where we need to protect your vital interests, or those of somebody else, and you are incapable of providing consent.
- Article 6(1)(f) Where it is necessary for our legitimate interests, your legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests

### **Who we share your data with?**

We will only share your personal data with others when we are legally permitted to do so. When we share data with others, we put security mechanisms in place to protect the data and to comply with all data protection, confidentiality and security standards.

As detailed throughout this notice, EFL in the Community and your local Club charity (with whom you are engaged with) share data with each other in their joint pursuit in delivering and evaluating community initiatives and programmes. We may also share your data either in an identifiable, pseudonymised or anonymised format to the funding organisation linked to that programme. As stated above, any sharing of personal data will be agreed and put in writing between EFL in the Community and the funding organisation. With all the necessary legal and security mechanisms being considered and adhered to.

EFL in the Community may also share data with other EFL group companies; legal bodies; selected service providers who help us provide the Websites; affiliates in the football industry; and other selected third parties. Where necessary we will ensure contractual arrangements are in place to ensure the security and confidentiality of your data.

Further information on what data and with who it is shared with will be detailed to you in addition to this Notice where applicable.

### **How do we store your data**

We are committed to protecting the security of your personal data, which we generally hold in secure data centres in the UK and European Union (EU).

Some organisations to which we may disclose your personal information may be situated outside of the UK and EU. Whenever we transfer your personal data out of the UK and EU, we take reasonable steps to ensure that your information is still properly protected by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the Information Commissioner's Office (ICO) in the UK and the European Commission. <https://commission.europa.eu/law/law->

[topic/data-protection/international-dimension-data-protection/rules-international-data-transfers\\_en](#)

- Where we use certain service providers, we may use contractual provisions to ensure your information is properly protected. For example, certain contracts are approved by the ICO and the European Commission and give personal data the same protection it has in the UK and EU.

We have put in place appropriate operational, technical and security measures to reduce the risk of your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **How long do we keep your information?**

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and to establish, exercise or defend our legal rights.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means. This is in addition to any applicable legal requirements. Details of specific retention periods for different aspects of your personal data are available on request by contacting us at [eflitc.dpo@efl.com](mailto:eflitc.dpo@efl.com).

In some circumstances you can ask us to delete your data: see the "Your data protection rights" section below for further information.

In most circumstances relating to data collected in conjunction with your local Club charity programme delivery, EFL in the Community will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. In the case in which your data is anonymised, we may use this information indefinitely without further notice to you.

### **Your data protection rights**

Under data protection law, you may have the following rights in certain circumstances:

- **Your right of access** - You have the right to ask us for copies of your personal information. This is known as data subject access request.

- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

All requests set out in this section or other queries relating to this Notice should be addressed to EFL in the Community, see the section below for contact details. Please note we may not always be able to comply with your request due to our legitimate interests or other legal reasons. If applicable, these will be notified to you in response to a relevant request.

You will not usually have to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive (or we may refuse to comply with your request in these circumstances).

For security reasons, we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). We may also ask you for further information in relation to your request.

All requests set out in this rights section or any other queries relating to this notice should be addressed to the Data Protection Officer (“DPO”).

- Our DPO can be contacted at [eflitc.dpo@efl.com](mailto:eflitc.dpo@efl.com) or alternatively the address at the beginning of this Notice. Please include your name, address, and/or email address when you contact us.

You also have the right to lodge a complaint with us the UK data protection regulator, the Information Commissioner's Office (“ICO”). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

We may need to update this Notice from time to time. Should we make any significant changes, we will notify you.

This Notice was last updated October 2025.