

# Privacy Notice Policy

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Policy Owner	Head of Governance and Assurance
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Approved by	Data Protection Officer
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Privacy Notice explains how Cardiff City FC Community Foundation ("the Foundation") collects, uses, and protects personal data provided by you or obtained through your use of our official websites and related services. The Foundation acts as the **Data Controller** for the purposes of this Privacy Notice, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

If you have any questions or concerns regarding how your personal data is handled, please contact:

**Veronica Moreno**

Head of Governance and Assurance

Email: [veronica.moreno@cardiffcityfc.org.uk](mailto:veronica.moreno@cardiffcityfc.org.uk)

or by post to DPO (Head of Governance & Assurance)

Cardiff City FC Community Foundation

Cardiff City House of Sport

Clos Parc Morgannwg

Cardiff

CF11 8AW

### **What Types of Personal Data Do We Collect and Process?**

We are committed to protecting your privacy and ensuring the responsible handling of your personal data. In accordance with the UK GDPR and relevant data protection laws, we may collect and process the following types of personal information:

#### **Categories of Personal Data Collected**

The Foundation collects and processes a range of personal data depending on your interaction with our services. This may include:

- **Identity information** – such as name, date of birth, and gender
- **Contact details** – such as postal address, email address, and telephone number
- **Digital identifiers** – such as IP address, browser type, and cookies (where applicable)
- **Usage data** – including details about how you use our website and services
- **Communication records** – including correspondence and enquiry history
- **Event participation data** – such as registration details for Foundation programmes or events

- **Health and safeguarding information** – where necessary for specific programmes or events (collected with explicit consent or where legally required)

We will only collect and process special category data (e.g. health or ethnicity data) where it is necessary, and with your explicit consent or where legally required.

### **Account Information**

When you register to use, purchase, or engage with any of The Foundation's services, we may collect the following personal data:

- Full name
- Email address
- Telephone number
- Country of residence
- Year of birth

Depending on the nature of our interaction, we may also collect additional information you choose to provide. This may include data submitted via our "Contact Us" form, application forms (e.g. for vacancies), or details provided when registering for one of our programmes or services.

### **Transactional Information**

When you purchase services via The Foundation's official websites, we may process information such as:

- Purchase details (items or services bought and the date of purchase)
- Name and billing address
- Contact details (email address and telephone number)

Please note that we do **not** retain full payment card information. Only the last four digits of your card may be stored, and solely for purposes such as resolving disputes or processing refunds. We comply fully with applicable Payment Card Industry Data Security Standards (PCI DSS) when processing this data.

If you register to take part in events or fundraising activities, we may also collect:

- Postal address
- Age or date of birth
- Relevant health information (only where necessary for assessing suitability or safety of participation in an activity)

### **Third-Party Information (e.g. Participants)**

Where you purchase or book services on behalf of others (for example, enrolling a participant in a soccer school or youth program), we may also collect the following data about the participant:

- Full name
- Age or date of birth
- Contact information
- Any necessary health or accessibility information

This information is used to properly manage the service being provided and to ensure participant's safety. Your details and those of participants may also be used in accordance with the purposes set out in our full Privacy Policy.

### **Information We Collect and Process**

We are committed to protecting your personal data and ensuring compliance with the UK General Data Protection Regulation (UK GDPR). Below is an overview of the types of personal information we may collect, the purposes for which we use it, and the sources from which we obtain it.

### **Survey Responses**

We may contact you to request feedback about The Foundation's services or services provided on our behalf by third-party affiliates. Your responses help us improve and tailor our offerings.

### **Job Applications and Volunteering**

When you apply for a role or express interest in volunteering with The Foundation, we collect the information you provide as part of the recruitment or onboarding process. Vacancies are advertised at: [www.cardiffcityfcfoundation.org.uk/vacancies](http://www.cardiffcityfcfoundation.org.uk/vacancies)

### **Third-Party Information Sources**

We may supplement our records with publicly available sources, including postal address databases and the edited electoral register, to maintain accurate contact information. We may also receive relevant data from trusted partners including:

- Cardiff City FC
- Cardiff & Vale College
- Careers Wales
- Partner primary and secondary schools

This data helps improve our communications and ensure our services are accessible and relevant.

## Online Usage Data

When you use our websites, we may collect technical and interaction data such as:

- Browser type and IP address
- URL clickstream, page response times, and session duration
- Interaction metrics (e.g., scrolling, clicks, and navigation patterns)

We use cookies and similar technologies to enhance user experience. Usage data may be tied to a unique identifier but not to a named individual.

## Cookie Policy

### What Are Cookies?

Cookies are small text files placed on your device (computer, tablet, or mobile) when you visit a website. They help the website remember information about your visit, which can make your next visit easier and the site more useful to you.

### How We Use Cookies

The Foundation's website uses cookies and similar technologies to:

- Improve website functionality and performance
- Analyse how visitors use our website to help us improve our services
- Personalise content and ads
- Measure the effectiveness of our marketing campaigns

### Types of Cookies We Use

- **Strictly Necessary Cookies:** These are essential for the website to function properly and cannot be turned off in our systems. They enable basic functions like page navigation and access to secure areas.
- **Performance Cookies:** These collect anonymous information on how visitors use our website (e.g., which pages are visited most often) to help us improve the user experience.
- **Functionality Cookies:** These allow the website to remember choices you make (such as your username, language, or region) to provide more personalised experience.
- **Targeting/Advertising Cookies:** These cookies are used to deliver ads more relevant to you and your interests. They may also limit how many times you see an ad and help measure the effectiveness of advertising campaigns.

### Third-Party Cookies

We may also allow third-party service providers (such as Google Analytics, social media platforms, or advertising networks) to place cookies on your device through our website. These

providers may collect information about your online activities over time and across different websites.

### **Managing Cookies**

Most web browsers automatically accept cookies, but you can usually change your browser settings to remove or reject cookies if you prefer. Please note that if you disable cookies, some parts of our website may not work properly.

For more information about managing cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org).

### **Your Consent**

By continuing to use The Foundation's website, you consent to the use of cookies as described in this policy. You can withdraw your consent at any time by adjusting your browser settings.

### **Donations and Gift Aid**

When you support The Foundation financially or participate in fundraising, we may collect:

- Personal details (e.g., name, title, gender, date of birth)
- Contact information (postal/email addresses, phone, social media)
- Employment, interests, and family relationships
- Donation history and Gift Aid status (as required by HMRC)
- Communication history and volunteer activity
- Wealth indicators and media mentions
- Legacy giving details, including next of kin (if provided)
- Engagement data from events and campaigns
- Marketing effectiveness data (e.g., email opens, link clicks, website/social media interactions)

All data is processed with your privacy and rights in mind, and we ensure appropriate legal bases (such as consent or legitimate interests) are established for each processing activity.

### **Additional Information We May Collect**

#### **Sensitive Personal Data (Health and Fitness)**

On occasion, we may need to collect sensitive personal data—such as health or fitness information—when relevant to your participation in an event or activity. This ensures we can provide a safe and suitable environment tailored to your needs. Such information is processed only where necessary and in accordance with Article 9 of the UK GDPR, under appropriate lawful bases (such as explicit consent or vital interests).

## Payment and Financial Data

- **Credit/Debit Card Information:**

The Foundation does **not store** any credit or debit card details. We are fully compliant with the Payment Card Industry Data Security Standard (**PCI-DSS**).

- **Third-Party Payment Processors:**

When you make a donation through our secure online platforms, your payment is processed by a specialist third-party provider authorised to securely handle credit/debit card transactions. For queries regarding secure payments, please contact us directly.

## Fundraising via Third Parties

If you fundraise or donate through a third party—such as JustGiving or an affiliated volunteer group—we may receive personal data about you from them. The collection and initial processing of your data in such instances are subject to the privacy policy and disclosures of that third party. Once received by The Foundation, your data is processed in accordance with this Privacy Notice.

## Participation in Foundation Activities

To take part in our programs or services, we may collect and process personal data such as:

- Full name, date of birth, and contact information
- Address and demographic information (e.g., ethnicity, gender)
- Relevant medical or accessibility information
- Attendance records and performance-related data

This information helps us manage participation, monitor progress, ensure safety, and meet safeguarding or legal obligations.

## Provision of Services

In general, you are not obliged to provide personal data to us. However, in some instances, certain information is necessary for us to deliver services effectively. For example, if you intend to make a purchase, we will need to process specific personal data to fulfil our contractual obligations to you.

## The Purposes for Which We Use Your Information

We process your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The lawful bases upon which we process your information include:

- **Contractual necessity** – where processing is necessary to enter into or perform a contract with you.
- **Legal obligation** – where we are required to comply with a legal obligation.

- **Legitimate interests\*** – where it is in our or a third party's legitimate interests, provided these are not overridden by your rights and interests.
- **Consent** – where you have given clear and informed consent (e.g. for certain marketing activities).

Below is further detail on how your data may be used, along with the associated lawful basis for each processing activity:

### ***Contract Performance / Legal Obligations***

We may process your information to:

- Manage purchases of products, services, or bookings (e.g., courses or events).
- Communicate with you in relation to your contract or order.
- Respond to enquiries and provide customer support.
- Fulfil orders placed on behalf of others, where you provide their personal data (you must ensure you have their permission to share this data).

We also retain financial transaction records in compliance with accounting and tax regulations.

### **Legal Compliance**

We may disclose your information:

- To comply with legal or regulatory obligations.
- In response to lawful requests from courts, law enforcement agencies, or other authorities.

### **Recruitment, Volunteering, and Engagement**

If you apply for a job, volunteer, or work placement with The Foundation, we will process your personal data to:

- Manage applications and communicate with you throughout the process.
- Conduct recruitment screening and assessment.
- Monitor equal opportunities and diversity, in accordance with applicable laws and good practice.

### **Marketing Based on Legitimate Interests**

We may contact you with:

- News and updates from The Foundation.
- Fundraising appeals or events.
- Surveys and opportunities to provide feedback.



- Analytics to help us understand supporter engagement.

This applies only where your interests and fundamental rights do not override our legitimate interest. You may object to this processing at any time. To request more information, including a copy of our Legitimate Interests Assessment, please contact us using the details provided below.

### **Marketing Based on Consent (Where Required)**

Where required by law, we will only contact you for marketing purposes via email or telephone if you have explicitly consented. This includes communications about:

- Fundraising initiatives.
- Promotional offers.
- Events and activities hosted by The Foundation or our affiliates.

You may **withdraw your consent** at any time by contacting us at:  
[veronica.moreno@cardiffcityfc.org.uk](mailto:veronica.moreno@cardiffcityfc.org.uk)

### **Supporter Profiling and Research**

#### **Legal Basis: Legitimate Interests**

As part of our fundraising activities, The Foundation may build profiles of existing or potential supporters where it is in our legitimate interest to do so. These activities are essential to help us:

- Identify individuals, companies, and charitable trusts with the capacity and likelihood to support our work.
- Make informed decisions about how and when to engage potential donors and partners.
- Develop appropriate and tailored fundraising strategies.

To achieve this, we may carry out research using credible, publicly available sources such as:

- **Companies House**
- **The Electoral Register**
- **Media articles and news outlets**
- **Public social media platforms (e.g., LinkedIn)**
- **Charity Commission and trust databases**

We only use information that individuals or organisations have deliberately made public. The information gathered is proportionate, relevant, and used solely to support our fundraising objectives while respecting your right to privacy.

## Wealth Screening and Third-Party Research Partners

In some cases, we may engage contractually bound, reputable third-party providers to carry out *automated research and wealth screening*. This supports the efficient identification of potential high-level donors and partners. These organisations are required to process your data in accordance with UK GDPR and only under our written instructions.

You can **opt out of this type of processing at any time** by contacting us at:  
veronica.moreno@cardiffcityfc.org.uk

## Due Diligence

In line with our **Gift Acceptance Policy** and in compliance with **Anti-Money Laundering regulations**, we may use publicly available information to conduct due diligence on individuals and organisations making significant donations to The Foundation.

## Analytics and Other Legitimate Uses of Personal Information

### Legal Basis: Legitimate Interests

We analyse the personal data we collect to:

- Identify patterns in supporter behaviour and engagement.
- Improve the effectiveness and relevance of our communications, services, and fundraising activities.
- Inform strategic planning across the Foundation and ensure our services align with supporter needs.
- Enhance the design, security, and functionality of our digital platforms.

Online usage data (e.g. device type, browser type, session duration, clicks, and page views) helps us:

- Optimise website functionality across devices and browsers.
- Enable access to interactive features.
- Monitor and enhance cybersecurity.

We may also process your data where necessary to:

- Protect the rights, property, or safety of The Foundation, its stakeholders, or the general public.

**Please note:** The Foundation **does not use your data for automated decision-making** that produces legal or similarly significant effects.

## Processing Special Categories of Personal Data

### Legal Basis: Explicit Consent

We may collect and process *special category data* only where **explicit consent** has been provided by you. This may include:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation
- Health or medical information
- Mental or physical health status

Such information is gathered:

- To understand the diversity of our supporter base.
- To improve accessibility and inclusivity in our programmes and communications.
- To uphold our commitment to **equality, diversity, and inclusion (EDI)** across all stakeholder groups.

Where possible, special category of data is **anonymised** immediately and handled in accordance with strict internal data protection protocols.

### Special Category Data and Stakeholder Groups

Special Category of Personal Data	Purpose of Collection	Relevant Stakeholder Groups	Lawful Basis
Racial or Ethnic Origin	To monitor and promote equality, diversity, and inclusion across our programs and activities	Participants, Supporters, Staff, Volunteers	Explicit Consent (UK GDPR Art. 9(2)(a))
Religious or Philosophical Beliefs	To ensure inclusive practice and accommodate cultural and religious needs	Staff, Volunteers, Program Participants	Explicit Consent (UK GDPR Art. 9(2)(a))
Data Concerning Physical or Mental Health	To ensure participant safety, provide appropriate adjustments, and improve service delivery	Program Participants, Event Attendees	Explicit Consent; Vital Interests (UK GDPR Art. 9(2)(a) & (2)(c))

<b>Special Category of Personal Data</b>	<b>Purpose of Collection</b>	<b>Relevant Stakeholder Groups</b>	<b>Lawful Basis</b>
Sexual Orientation	To monitor and improve the inclusivity of our services and organisational culture	Staff, Volunteers, Program Participants	Explicit Consent (UK GDPR Art. 9(2)(a))
Disability Status	To ensure accessibility and reasonable adjustments in programmes, activities, and employment practices	Staff, Volunteers, Program Participants	Explicit Consent; Employment Law (UK GDPR Art. 9(2)(a) & (2)(b))
Gender Identity	To ensure inclusive engagement and monitor representation	Staff, Volunteers, Program Participants, Supporters	Explicit Consent (UK GDPR Art. 9(2)(a))
Health Conditions Related to Participation (e.g., fitness, allergies)	To ensure safe participation in physical activities and events	Program Participants, Event Attendees	Explicit Consent; Vital Interests (UK GDPR Art. 9(2)(a) & (2)(c))

### **Special Categories of Personal Data**

Under Article 9 of the UK GDPR, The Foundation may collect and process *special categories of personal data*—with your explicit consent—for the purpose of understanding the diversity of our stakeholders and ensuring our services are inclusive and accessible.

We process this information only where it has been provided voluntarily and for legitimate purposes related to equality, diversity, inclusion, and safeguarding.

### **Categories and Relevant Groups**

<b>Category of Special Personal Data</b>	<b>Associated Groups of People</b>
Personal data revealing racial or ethnic origin	Individuals of different racial or ethnic backgrounds
Personal data revealing religious or philosophical beliefs	Individuals with different religious or philosophical beliefs
Data concerning health	Individuals with different physical or mental health conditions

## Category of Special Personal Data

## Associated Groups of People

Personal data concerning sexual orientation Individuals of differing sexual orientations

**You can opt out of The Foundation's processing of special category data at any time by:**

- Using the opt-out option in any communication sent to you; or
- Contacting our Data Protection Officer, Veronica Moreno directly:

[veronica.moreno@cardiffcityfc.org.uk](mailto:veronica.moreno@cardiffcityfc.org.uk)

*Data Protection Officer, Cardiff City FC Foundation, Cardiff City Stadium, Leckwith Road, Cardiff CF11 8AZ*

### Notes:

- All data is anonymised or pseudonymised wherever feasible and retained only as long as necessary.
- Individuals may withdraw their consent at any time by contacting:  
**DPO@cardiffcityfc.org.uk**
- Where data is used for statistical reporting, it is aggregated and non-identifiable.

### Lawful Basis Table (GDPR Transparency Requirement)

Under the UK GDPR, we must have a **lawful basis** for processing your personal data. The table below outlines the main categories of data we collect and the lawful basis on which we rely:

Type of Data	Purpose of Processing	Lawful Basis (UK GDPR)
Account Information	To register you for services, programmes, or activities	Performance of a contract / Consent
Contact Details	To communicate with you and provide updates	Legitimate interests / Consent
Transactional Information	To complete your purchases and issue receipts or refunds	Performance of a contract / Legal obligation
Payment (last 4 digits only)	For dispute resolution and refund processing	Legitimate interests
Event/Fundraising Info	To register you for participation and ensure suitability/safety	Performance of a contract / Vital interests

Type of Data	Purpose of Processing	Lawful Basis (UK GDPR)
Health Information	To assess risk and ensure safety in events or activities	Explicit consent / Vital interests
Third-Party Participant Info	To enroll participants in services (e.g. youth programs)	Performance of a contract / Legitimate interests

**Note:** Where we rely on your **consent**, you can withdraw it at any time.

We want to explain how we use your information in a way that's easy to understand:

### What We Collect About You (in simple terms)

If you sign up for something with us, like a game, program, or event, we may ask you for:

- Your name
- Your email or phone number
- Where you live (your country)
- Your birthday or age

If someone else signs you up (like a parent or carer), we might also ask for their details and a few more things to keep you safe, like:

- Health info (e.g. allergies or things we need to know if you need help)
- Emergency contact (someone we can call if needed)

### Why We Need This Info

We collect this information to:

- Let you take part in our activities
- Keep you safe while you're with us
- Let your parent/carers know what's happening
- Help us improve what we do

We **never sell your information**. And we only keep it as long as we need to.

### Legal Basis for Processing

The Foundation processes personal data in accordance with the lawful bases set out under Article 6 of the UK GDPR. Depending on the nature of the interaction, we rely on one or more of the following legal bases:

- **Consent** – where you have given clear consent for us to process your personal data for a specific purpose.

- **Contractual necessity** – where processing is necessary for the performance of a contract with you, or to take steps at your request prior to entering into a contract.
- **Legal obligation** – where we are required to process your data to comply with a legal obligation.
- **Legitimate interests** – where processing is necessary for the purposes of our legitimate interests or those of a third party, provided those interests are not overridden by your fundamental rights and freedoms.

We will inform you of the specific legal basis applicable to the data processing activities relevant to your interaction with the Foundation.

### **Disclosure of Your Information**

We are committed to handling your personal data responsibly and securely. We do not sell your personal data to third parties. However, in limited and controlled circumstances, we may share your data with trusted third parties, as set out below:

#### **Affiliates**

We may share your personal data with our affiliates—such as **Cardiff City Football Club**—only where you have provided **explicit consent**. This may include sharing your information so that they can provide you with details about their products, services, events, or offers which may be of interest to you.

#### **Sponsors and Partners**

- We **do not share** your personal data directly with sponsors or partners.
- We **may share aggregated or anonymised data** (which cannot identify you) with existing and potential sponsors or partners to demonstrate the impact and reach of our program.
- Where you have **provided consent**, we may contact you with marketing messages that include products or services from our partners or sponsors.

#### **Suppliers and Sub-contractors**

We may disclose your personal data to carefully selected third-party service providers who help us operate, maintain, and support our services. These may include:

- IT and web hosting providers
- Mailing houses and document management services
- Delivery and logistics companies
- Data analytics and search engine providers
- E-commerce and payment processing platforms

- Credit reference agencies (where necessary)

These third parties are contractually bound to use your information only in accordance with our instructions and to maintain strict data confidentiality and security standards, in accordance with UK GDPR Article 28.

## **Funders**

If you participate in a program funded by an external body, we may be required to share your data with the relevant **funder** as part of reporting obligations. This will always be done in line with our contractual, safeguarding, and data protection responsibilities.

## **Legal and Statutory Disclosures**

We may disclose your information where necessary to:

- Comply with a legal obligation or court order
- Report or prevent a crime
- Protect an individual's vital interests or prevent harm
- Fulfil safeguarding responsibilities
- Exercise or defend legal claims
- Prevent fraud or reduce credit risk

Disclosures may be made to **regulatory authorities, law enforcement, or professional bodies**, where justified.

## **Business Transfers**

If The Foundation undergoes a **restructuring, merger, acquisition, or asset sale**, we may disclose your personal data to the relevant party or parties as part of the transaction, provided:

- Appropriate confidentiality and data protection safeguards are in place.
- The data will be used only for the same purposes for which it was originally collected.

In the event that The Foundation or substantially all of its assets are acquired by a third party, personal data held will be among the transferred assets.

## **How Do We Keep Your Information Secure?**

The Foundation is committed to protecting the personal data you entrust to us. To prevent unauthorized access, loss, misuse, or disclosure of your personal information, we have implemented appropriate technical, physical, and organisational security measures. These include:

- Secure IT infrastructure and encryption technologies
- Access controls limiting data access to authorised personnel only



- Regular security testing and vulnerability assessments
- Staff training on data protection and confidentiality
- Incident response and data breach management procedures to quickly address and mitigate any security events

We continuously review and enhance our security measures to ensure they remain effective and in line with best practices and regulatory requirements.

### How Long Do We Keep Your Information?

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, comply with legal obligations, resolve disputes, and enforce our agreements. The specific retention periods vary depending on the type of information, including but not limited to:

Type of Data	Retention Period
Financial transaction records	At least 7 years, to comply with accounting and tax obligations
Contracts and related documentation	6 years after the end of the contractual relationship, in line with statutory limitation periods
Job applications and CVs	90 days after receipt, to consider candidates for other suitable roles
User account information	Until you close or delete your account/profile, after which associated data (including appended data) will be deleted
Market research data (not linked to accounts)	At least 3 years; aggregated and anonymised data may be retained indefinitely for internal analysis
Online postings and usage data on Foundation websites	3 years

Where information falls under multiple categories, the longer retention period will apply. Upon expiry of the retention period, personal data will be securely deleted or anonymised.

If you have any questions about our data retention practices or wish to request the deletion of your personal data, please contact our Data Protection Officer at [DPO@cardiffcityfc.org.uk](mailto:DPO@cardiffcityfc.org.uk).

### Parental Consent and Supervision

The Foundation is committed to engaging responsibly with children and young people in the community. To ensure the safety and privacy of participants under the age of 18, we kindly ask that parents or guardians supervise their children's online activities when interacting with The Foundation.

Participants under 18 should **not submit personal information**, purchase products or services, or participate in Foundation events without the **prior consent of a parent or guardian**. The Foundation reserves the right to take reasonable steps to verify parental consent where necessary.

Where it is essential for us to collect and process personal data of individuals under 18—for example, to perform a contract related to participation in an activity or service—we will only do so **with explicit parental or guardian consent**.

If you have any questions about how we handle the data of young people or wish to provide or withdraw consent, please contact our Data Protection Officer at [DPO@cardiffcityfc.org.uk](mailto:DPO@cardiffcityfc.org.uk).

### **Sharing of Data**

The Foundation will not sell or rent your personal data to third parties. However, we may share your data with trusted third parties under the following circumstances:

- **Service providers** – who process data on our behalf to deliver our services (e.g., IT support, event facilitators, marketing platforms)
- **Partner organisations** – where collaboration is necessary for delivering community program or services, and where appropriate data-sharing agreements are in place
- **Legal and regulatory authorities** – where required to comply with applicable laws or enforce legal rights
- **Professional advisors** – such as auditors, insurers, and legal representatives, in accordance with our legitimate interests

All third-party processors are contractually obligated to handle your data securely and only for the purposes instructed by the Foundation.

### **International Transfers**

The Foundation aims to store and process personal data within the UK or the European Economic Area (EEA) whenever possible.

Where data must be transferred outside the UK or EEA, we ensure that appropriate safeguards are in place to protect your personal data. These may include:

- Transfers to countries deemed to provide an adequate level of data protection by the UK government or European Commission
- Use of standard contractual clauses (SCCs) or other approved mechanisms to ensure lawful and secure data transfer

### **Security Measures**

The Foundation takes the security of your personal data seriously. We implement appropriate technical and organisational measures to protect your data against unauthorised access, disclosure, alteration, or destruction. These measures include:

- Access controls and role-based permissions
- Data encryption and secure storage
- Regular security audits and assessments
- Staff training on data protection and information security
- Secure data disposal procedures

Despite our efforts, no system can guarantee absolute security. We therefore encourage you to report any concerns or suspected breaches by contacting our Head of Governance and Assurance.

### **Data Retention**

The Foundation retains personal data only for as long as is necessary to fulfil the purposes for which it was collected, including satisfying any legal, regulatory, accounting, or reporting requirements.

The specific retention periods depend on the nature of the data and the context in which it is processed. Once the applicable retention period expires, we will securely delete or anonymise your data in accordance with our Data Retention Policy.

### **Your Data Protection Rights**

Under the UK GDPR, you have the following rights regarding your personal data:

- **Right to access** – You have the right to request copies of your personal data.
- **Right to rectification** – You have the right to request correction of any inaccurate or incomplete data.
- **Right to erasure** ("right to be forgotten") – You may request the deletion of your data under certain circumstances.
- **Right to restrict processing** – You may request that we limit how we process your data.
- **Right to object to processing** – You may object to the processing of your data where we rely on legitimate interests.
- **Right to data portability** – You have the right to request that we transfer your data to another organisation or to you, in certain cases.
- **Right to withdraw consent** – Where processing is based on your consent, you may withdraw this at any time.

To exercise any of these rights, please contact our Head of Governance and Assurance at [veronica.moreno@cardiffcityfc.org.uk](mailto:veronica.moreno@cardiffcityfc.org.uk)

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** if you believe your data has been handled unlawfully. Further information can be found at [www.ico.org.uk](http://www.ico.org.uk).

### **How Can You Contact Us?**

If you have any questions or concerns about this Privacy Notice or wish to exercise any of your legal rights regarding your personal data, please contact our Data Protection Officer (DPO) using the following details:

**Email:** [veronica.moreno@cardiffcityfc.org.uk](mailto:veronica.moreno@cardiffcityfc.org.uk)

**Postal Address:**

Cardiff City FC Community Foundation  
Cardiff City House of Sport  
Clos Parc Morgannwg  
Cardiff  
CF11 8AW

Please mark your correspondence **“For the attention of the Data Protection Officer, the Head of Governance & Assurance.”**

### **Your Right to Access Your Personal Data (Subject Access Request)**

Under the General Data Protection Regulation (GDPR), you have the right to request access to the personal data that The Foundation holds about you. This is known as a Subject Access Request (SAR).

When you make a SAR, we will provide you with:

- Confirmation that we are processing your personal data;
- A copy of the personal data we hold about you;
- Information about the purposes for which your data is being processed;
- Details of the categories of personal data concerned;
- Information about the recipients or categories of recipients to whom your data has been or will be disclosed;
- The expected retention period for your data or the criteria used to determine that period;
- Details of your rights to rectify, erase, restrict, or object to the processing of your data;
- Information about the source of your data, if it was not collected directly from you;
- The existence of any automated decision-making, including profiling, and meaningful information about the logic involved.

**How to Make a Subject Access Request:**

To make a SAR, please contact our Data Protection Officer by email at [veronica.moreno@cardiffcityfc.org.uk](mailto:veronica.moreno@cardiffcityfc.org.uk) or by post to:

Cardiff City FC Community Foundation  
Cardiff City House of Sport  
Clos Parc Morgannwg  
Cardiff  
CF11 8AW

Please provide sufficient details to help us identify the information you require.

**Verification:**

We may need to verify your identity before responding to your request to protect your privacy and ensure that personal data is not disclosed to unauthorized individuals.

**Response Time:**

We aim to respond to your request within one month of receipt. In some complex cases, we may extend this period by a further two months, but we will inform you if this is necessary.

**No Fee:**

Generally, we will not charge a fee for handling your SAR. However, if your request is manifestly unfounded, excessive, or repetitive, we may charge a reasonable fee or refuse to respond.

**Complaints in relation to data protection**

If you are dissatisfied with how we have handled your personal data, please contact us first by email at: [\*\*veronica.moreno@cardiffcityfc.org.uk\*\*](mailto:veronica.moreno@cardiffcityfc.org.uk)

Should you remain unsatisfied after contacting us, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). For more information, please visit the ICO website: <https://ico.org.uk/your-data-matters/>.

As a commitment to transparency, ethics, and responsibility in our fundraising efforts, The Foundation is a member of the Fundraising Regulator and adheres to its Code of Practice. If you have any complaints regarding our fundraising activities, please also contact us at [\*\*veronica.moreno@cardiffcityfc.org.uk\*\*](mailto:veronica.moreno@cardiffcityfc.org.uk).

**Changes to Our Privacy Notice**

We may update this Privacy Notice from time to time. Any changes will be posted on this page, so please check back regularly to stay informed about how we protect your personal data.

**This Privacy Notice was last updated in June 2025**