



BRISTOL CITY FOOTBALL CLUB

Bristol City Football Club Limited (the "Company" or "we") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the GDPR and Data Protection Act 2018. This privacy notice applies to all employees, workers and contractors as well as interns and volunteers ("you").

Bristol City Football Club Limited, Company Number 03230871, whose registered office is at Ashton Road, Bristol, BS3 2EJ is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees, workers, contractors, interns and volunteers. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

What personal data do we collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation. Information about criminal convictions also warrants this higher level of protection.

We collect and process a range of information about you as follows:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the Company and references for your former employers;

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Club President: Marina Dolman MBE, DL, D.St.J.,JP

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- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- employment records (including employment contract, job titles, work history, working hours, holidays, training records and professional memberships);
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, training you have participated in, performance improvement plans and related correspondence;
- leaving date and your reason for leaving;
- CCTV footage and other information obtained through electronic means such as swipe card records;
- information about your use of our information and communications systems; and
- photographs.

We may also collect, store and use the following more sensitive types of personal information:

- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
- information about your health, including any medical condition, health and sickness records, including:
 - details of any absences (other than holidays) from work including time on statutory parental leave and sick leave; and
 - where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes.
- Genetic information and biometric data.
- Information about criminal convictions and offences (where such checks are required due to the nature of your role).

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made.

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- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We will collect information about your criminal convictions history if we are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular we are required by the English Football League to carry out criminal record checks for roles that involve interaction with children and vulnerable adults and is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI/1975/1023).

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

How does the Company collect information about you?

We collect this information in a variety of ways. For example, data is collected from documents that you provide (such as your CV, your passport or other identity documents such as your driving licence), from forms completed by you at the start of or during employment (such as benefit nomination forms), from correspondence with you including emails or through interviews, meetings or other assessments. We also collect personal data about you from third parties, such as references supplied by former employers, information supplied by any recruitment company you may have used and Disclosure Scotland (where applicable).

How will you use my personal data?

We need to process data to enter into any contract with you and to meet our obligations to you. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit and pension entitlements.

In some cases, we need to process data to ensure that we are complying with our legal or regulatory obligations. For example, to check an employee's entitlement to work in the UK, to deduct tax from payments made to you, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, we have a legitimate interest in processing personal data before, during and after the end of our relationship. Processing data allows the Company to:

- maintain accurate and up-to-date records and contact details (including details of who to contact in the event of an emergency), and records of contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;

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- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the Company complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where the Company relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by your rights and freedoms and has concluded that they are not.

What if you do not provide personal data?

You have some obligations under your contract to provide the Company with data. For example, if you are an employee, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the Company with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the Company to enter into a contract with you. If you do not provide other information, we may not be able to enter into a relationship with you.

Automated decision making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

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Why might you share my personal information with third parties?

We will only share your personal information during the recruitment or engagement process with recruitment agencies, Disclosure Scotland, former employers for reference purposes and other entities within the Bristol Sport group of companies for whom you may provide services.

We may share your personal information with other third parties on an ongoing basis as follows:

- to other group companies within the Bristol Sport group to whom you may be providing services;
- to third party service providers, such as our external payroll providers for the purpose of providing payroll services;
- to our legal and accountancy advisers for the purpose of obtaining professional services; and to regulatory bodies such as the English Football League and the Rugby Football Union (as applicable) where we are required to do so as a condition of our membership or if required to do so by law.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information 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 of a suspected breach where we are legally required to do so.

Transferring information outside the EU

We will not transfer your data outside the European Economic Area. For how long do we Company keep data?

We will hold your personal data for the duration of your employment or your contract with us as applicable, and for the periods as set out below:

- Right to work documents: Two years post employment
- Payroll records: Six years after the end of the income tax year to which the records relate.
- Personnel and training records: Six years post employment
- Statutory sick pay records, calculations and sick certificates: Six years post employment

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- Accidents at work and work-related illness information: Three years from the date on which the record was made.
- Maternity Leave and Pay records: Three years after the end of the tax year in which the employee's maternity pay period ended.
- Risk assessments – significant findings of any risk assessments: No time limit specified.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (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 lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact your HR Administrator in writing.

Data protection manager

We have appointed a data protection officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy officer. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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