Milton Keynes Dons

Privacy Policy.

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Role in Organisation	Director
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1. Introduction

MK Dons ("we", "us", or "our") is committed to protecting and respecting the personal data that we hold on our employees, service users, affiliated sports and community organisations, suppliers and other business partners. This privacy statement describes why and how we collect and use personal data and provides information about data subjects' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data. We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below. We do not engage in any form of profiling and we obtain

consent for all marketing activities. The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual (parents on behalf of their children, affiliated sports club/ schools/community organisations on behalf of young users etc.), or from publicly available sources (such as internet searches, Companies House). Most of the time, MK Dons obtains personal data through the contracts it signs with affiliated sport and community organisations and other business partners, as well as with young service users and suppliers or contractors. The legal basis for processing is required for contract and in some limited instances we will process personal data under legitimate business interest (such as business development).

Where we receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

1.1 Data we collected on our website and how we use it.

If you want to receive our Newsletter: You submit your name and email address to us request a newsletter. We store this information in a secure database and use the information to email you our newsletter every month. The information

is used for no other purpose and each edition will give you the option to unsubscribe if you no longer want the information.

If you want to book a ticket: You request more information by submitting your name, email and phone number. We either take a booking direct or signpost you to our booking portal.

We receive an email and the data you submit is stored in a database. Once your enquiry is deemed complete we will delete this data unless you opt-in to receive further information.

2. Security

We take the security of all the data we hold seriously. Relevant employees are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers either on our premises or with secure external providers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

3. Date that we hold

3.1 Service Users, Affiliated Sports and Community Organisations and Business Partners

We are affiliated with various sports and community organisations, and other business partners that collect personal data. We have contracts with all the sport and community organisations or other business partners we work with. We also hold some information on their respective service users. The exact data held is dependent on the information we record in our contracts' requirements, events registration forms, expression of interest form, general registration or membership forms, and any other documents or financial information we may require in order to fulfil our contractual obligations, including compliance checks and audits.

Where we engage with individuals, we may collect and process personal data in order to satisfy a contractual or operational obligation. We request that individuals only provide the personal data that is required for us to fulfil our contractual or operational obligation and for us to complete the order.and no communication or reason is provided by a Parent/Guardian.

3.1.1 Why do we process data?

Where data is collected, it is used for a number of purposes, as follows;

- Providing services to affiliated organisations and their service users. Data is processed in accordance with the purpose which we have collected it. We collect personal data in order to deliver services, to complete governance checks and compliance audits and ensure all contracts are properly fulfilled. The different reasons why we may process your data include;

- Affiliated organisations' needs. When communicating with and assessing the needs of our partners and affiliated organisations including their service users, personal data may be processed in order to ensure that their needs are appropriately satisfied. This may include (but is not limited to) assessing whether the services are adequately provided to service users, and if organisations are complying with their contracts. We may hold personal data such as email addresses (personal or professional), and service users' name, address, health information, financial information, disability and ethnicity.

Data That We Hold

- In order to manage and administer our business and services, we may collect and process personal data. This may include (but is not limited to) maintaining internal business records, managing partners' relationships, and maintaining internal operating processes.
- In order for MK Dons to do what it does, we may from time to time be required to collect and process personal data in order to fulfil regulatory, legal or ethical requirements. This may include (but is not limited to) the verification of identity of individuals and compliance checks.
- MK Dons may collect and record information about a child and their family on a secure system, which may be shared with other organisations and agencies (including for example the EFL). The club also use a secure portal (MyConcern) to record safeguarding incidents and low level concerns.

3.1.2 Why data is processed?

The data that is processed is dependent on the service that is being provided and on the recipient of this service.

- Services to individuals and/or organisations. Personal data may include name, contact details, banking information, address and other information relevant to a complete a contract or necessary for you to attend our events / activities or receive other benefits fromus.

3.1.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected, there may also be occasions which will require data to be kept for longer, however this will typically be for legal purposes. We keep any financial document, including invoices and banking information for 7 years. Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights. In general we hold this information for 10 years. We hold some data indefinitely for our own records and business development purposes.

In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it. We will periodically review this data, to ensure that it is still relevant and necessary.

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In addition, personal data may be securely archived with restricted access and other appropriate safeguards where there is a need to continue to retain it. We will periodically review this data, to ensure that it is still relevant and necessary.

3.2 Our People

We collect personal data for our people as part of the administration, management and promotion of our business activities.

Our staff handbook explains further how personal data is held for our staff and partners.

3.2.1 Applicants

Where an individual is applying to work for MK Dons, personal data is collected through the application process.

There are a number of purposes that personal data for applicants are collected.

- We process an applicant's personal data in order to assess their potential employment at MK Dons.
- Administration and management. We may also use this personal data in order to make informed management decisions and for administration purposes.

Personal data collected for applicants is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of 10 years where those purposes no longer become necessary.

3.3 Suppliers Contractors & other Business Partners

We collect and process personal data about our suppliers, contractors, subcontractors, sponsors, 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, including holding sport events, and providing membership-related benefits. We will always have processing agreements in place with our processors and sharing agreements with our third party partners.

3.3.1 Why do we process data?

- Receiving goods and services. We process personal data in relation to our suppliers and their staff as necessary to receive the services and deliver the goods and services.
- Providing services to service users. Where a supplier is helping us to deliver professional services or products to our service users, we process personal data about the individuals involved in providing the services or products in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our service users.
- Administering, managing and developing our businesses and services. We process personal data in order to run our business, including:
    - i. Managing our relationship with sponsors, suppliers vendors or other business partners; - developing our business, including
    - ii. Maintaining and using IT systems; and
    - iii. Administering and managing our websites, database, CRMs and other systems

- Security, quality and risk management activities. We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.
- Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

3.3.2 What data do we hold?

We will hold supplier's names, contacts names, and contact details of suppliers, sponsors, affiliated organisations, vendors or business partners as well as banking and other financial information. We also keep invoices, financial information and contracts.

3.3.3 How long do we hold data for?

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 in order to establish, exercise or defend our legal rights. In general we hold this information for 10 years. Some data is held indefinitely for our business development purposes.

4. Sharing Personal Data

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards. When sharing data we will always put in place a sharing agreement and ensure data adequacy.

Personal data held by us may be transferred to:

Third party organisations that provide applications/functionality, data processing or IT services to us

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems and other systems and applications.

Third party organisations that otherwise assist us in providing services or information Law enforcement or regulatory agencies or those required by law or regulations

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

5. Location of Processing

European Economic Area (EEA).

We have also updated our cookies policy.

6. Individual's Rights

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email **dataprotection@stadiummk.com**

7. Complaints

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to our data protection officer via **dataprotection@stadiummk.com**

We will look into and respond to any complaints we receive. You also have the right to lodge a complaint with 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

8. Data Controller & Contact Information

The data controller for MK Dons is **Ryan Gawley.**

If you have any questions about this privacy statement or how and why we process personal data, please contact us at: **dataprotection@stadiummk.com**

9. Changes to our Privacy Statement

Our privacy policy is available to all of our data subjects and is available on this website. This privacy statement was last updated January 2023.