



Penya Blaugrana London  
Privacy Statement  
and  
Data Protection Procedures

*(valid from Nov 2019)*

# Privacy Statement

- Who are we?
- The information we collect about you
- How we use your personal data
- Who we may pass your data on to
- Location that we may transfer your personal data to
- Your rights
- How to contact us
- Changes to this Policy

## Who are we?

Penya Blaugrana London ('PBL', 'we' or 'us') is committed to the goal of promoting, maintaining and improving the friendship and collaboration amongst the FC Barcelona Socis and other sympathizers of FC Barcelona. This policy explains what your personal data will be used for.

We are committed to protecting your personal data and take the security of your information very seriously. We have strict security measures and procedures in place to protect your personal data. If you have any concerns about the way in which we process or protect your personal data or would like to contact us about any aspect of this policy, please get in touch through the contact details at the bottom of this statement.

This privacy policy should be read in conjunction with PBL's Data Protection Procedures located on the PBL website.

## The information we collect about you

We will collect personal data about you from the following sources:

- When you sign up for membership with us
- When you communicate with us (by email, mail, phone or through social media)

We will collect the following types of information:

Type of Data	Description
<b>Your personal and contact details</b>	Such as your name, date of birth, home address, email address, telephone number, country of origin and signature
<b>Government Identifiers</b>	Such as your passport number

<b>Membership information</b>	Such as information about how long you have been a member with us, how many times you have attended PBL events ('activity points'), your marketing preferences, and if you are a FCB soci, your FCB soci clau (as required by FCB to register FCB socis as penya members)
<b>Visual Images</b>	Such as photographs or videos of events you have attended
<b>Lifestyle and preference information</b>	Such as information about your demography, your favourite football club(s)
<b>Responses to surveys, competitions and promotions</b>	Such as records of any surveys you respond to or your entry into any competitions PBL has run
<b>Advertising and direct marketing preferences and responses</b>	Such as information about how you respond, or interact with, any direct marketing or advertising communications directed to you, including any requests for these communications to stop

Much of the information we collect about you is required to meet our legal obligations, however, where we ask for your consent to process your personal data, you are not required to provide it, however, if you do not do so, you may not be able to take advantage of the services and benefits of PBL.

## *How we use your personal data*

We will use your personal data for the following reasons:

<b>What we use your personal data for</b>	<b>How we justify the use of your personal data</b>
To provide you with member services, answer your questions or address your complaints or concerns	We need to process this data to meet our contractual obligations
To check your or validate your identity and protect your information	We need to process this data to meet our contractual obligations
To invite you to take part in competitions or take up promotions or to keep you informed about events which may be of interest to you	This is in our legitimate business interest to engage with you in this way and measure that such communications are relevant to you  We may also ask for your consent to share your information with 3rd parties for marketing purposes
To provide you with a channel to communicate and engage with other FC Barcelona fans and supporters	We need to process this data to meet our contractual obligations

## Who we may pass your data to

We may need to share personal information with other organisations and members to ensure that we meet your needs and our contractual obligations. We may also share information with other organisations where we consider it to be in the legitimate interest of PBL. These other parties are typically:

- FC Barcelona
- PBL partners who are assisting PBL in hosting events;
- Membership card manufacturer
- Members of the PBL (only specific personal data such as name, surname, PBL activity points information and PBL membership number will be shared);

We may share your personal information with other FC Barcelona affiliates or PBL affiliates for marketing purposes. We will not share your personal information with other 3rd party organisations however unless you have expressly opted-in/consented to the disclosure of your personal data for these purposes.

## How long we retain your personal data

We will retain the below information while you have an active membership, and once your membership ceases, we will retain this information in our databases as per the table below:

Type of Data	Retention while membership active?	Retention Time After membership elapses*	Remarks
Your personal and contact details	Yes	12 months	Ex-members can request to remove this information at any time.
Marketing consents	Opt-out available at anytime	12 months	Unless an ex-member specifically asks to remove this information Active members can also opt-out from marketing communications from PBL
Government Identifiers	12 months	12 months	As soon as we register the member with FCB, we remove the government identifier from our database. If however you request a ticket with us, we will keep all details provided in the ticket request form for up to 12

			months, which will include your Government Identifier.
Membership information	Yes	6 years	Ex-members can request to remove this information at any time.
Lifestyle and preference information	Yes	12 months	Ex-members can request to remove this information at any time.
Responses to surveys, competitions and promotions	Yes	12 months	Ex-members can request to remove this information at any time.
Financial information	Temporary	Temporary	We only need financial information to process refunds (e.g. ticket refunds). Soon after the refund is processed, the financial details are removed from our database.

*\*The above retention times may be extended for example where it is needed to meet a specific legal obligation or investigate a crime.*

## *Locations that we may transfer your personal data*

PBL is located inside the United Kingdom. In most cases if your personal data is being transferred to other parties, these parties will be located inside the European Economic Area ('EEA').

It is possible for event providers to be located outside the EEA, in countries that do not have the same standards of protection for personal data as the UK or other EEA countries ('Third Country' or 'Third Countries'). We will, however, always use every reasonable effort to ensure sufficient protections are in place to safeguard your personal data when it is being transferred to Third Countries.

In the event that a sufficient transfer mechanism is not in place with a Third Country, we will request for your consent to proceed with transferring your data to the relevant Third Country.

## *Security*

We implement technical and organisational measures which take into account the harm that may be suffered, to protect your personal data. All information you provide to us is stored on our secure servers.

## *Cookies*

We use cookies for various purposes including making your experience of our website better. For more information on our use of cookies, please see our Cookie Policy at: <https://www.pblondon.org/cookie-policy>.

## *Marketing Communications and your choices*

When you first signup with us we'll ask you if you would like to receive any communications from us. It will normally be via a tick box on our membership form - you can opt out of receiving these communications at any time.

## *What is Opting Out?*

The term 'opt out' refers to several methods by which individuals can avoid receiving unsolicited product or service information. This ability is usually associated with direct marketing campaigns such as telemarketing, e-mail marketing, or direct mail marketing.

\*Please consider that opting out will prevent you from receiving any information from PBL (this includes information regarding events, matches and promotions).

## *How can I opt out of marketing correspondence?*

If you do not wish to receive any correspondences, promotions and information on events you can request to be made un-contactable by:

Sending an email to [contact@pblondon.org](mailto:contact@pblondon.org) and requesting to opt out of receiving communications from PBL.

## *Your rights*

	<b>DESCRIPTION OF RIGHT</b>
<b>Right 1</b>	A right to access personal data held by us about you
<b>Right 2</b>	A right to require us to rectify any inaccurate personal data held by us about you
<b>Right 3</b>	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below)
<b>Right 4</b>	In certain circumstances, a right to restrict our processing of personal data held by us about you.
<b>Right 5</b>	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products)

# *PBL Data Protection Procedures*

Penya Blaugrana London (“**PBL**”) aims to fully comply with the UK and European data protection legislation.

The Data Protection Act 2018 and the General Data Protection Regulation entered into force on 25th May 2018. The aims of both pieces of legislation is to protect the rights and privacy of individuals, and to ensure that the data of individuals is not processed without their knowledge and consent whenever possible.

There are several principles that must be fulfilled to ensure compliance with the UK and European data protection laws (“**Data Protection Principles**”). PBL will ensure that personal data shall be:

1. Processed **lawfully, fairly and in a transparent** manner in relation to individuals;
2. Collected for **specified, explicit and legitimate purposes** and not further processed in a manner that is incompatible with those purposes;
3. **Adequate, relevant and limited to what is necessary** in relation to the purposes for which they are processed;
4. **Accurate** and, where necessary, kept up to date;
5. Kept in a form which permits identification of data subjects for **no longer than is necessary** for the purposes for which the personal data are processed;
6. Processed in a manner that **ensures appropriate security of the personal data**, including protection against unauthorised or unlawful processing against accidental loss, destruction or damage, using appropriate technical or organisational measures
7. PBL will ensure it remains **accountable** by complying with the above principles and has appropriate processes and records in place to demonstrate its compliance

PBL and its Board Members (also referred to as “**the Board**”) aim to comply with all of the Data Protection Principles explained below.

## **1. Personal data shall be processed lawfully, fairly and in a transparent manner**

PBL needs to collect and store personal data from its members in order to fulfil its obligations.

PBL will store all member personal details electronically in a membership database. This database is securely encrypted and password protected, and only accessible to authorised board members. Membership application forms and other documents will be kept in a file system that will be kept secure on a best effort basis. Some of these

documents may be scanned and stored securely, in encrypted storage, and only accessible to authorised members of the Board.

PBL will only transfer and/or share member personal details with the third parties specified above. PBL will transfer to FC Barcelona the minimum information (name, surname, date of birth, email and identity card/passport details) required to comply with official Penya Regulations. FC Barcelona complies with the Spanish and European data protection laws.

## **2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes**

PBL will only collect the minimum data necessary to achieve the following goals:

- Identify its members
- Contact its members
- Analyse the composition of the association
- Fulfil FC Barcelona requirements
- Complying with regulations set out by FC Barcelona

## **3. Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed**

PBL will not request more information than is necessary to meet our purposes specified in 2.

## **4. Personal data shall be accurate and, where necessary, up to date**

All members have the obligation to provide accurate personal details when joining the association. When their personal details change, members have an obligation to notify PBL so that their records are kept up to date.

PBL will, where necessary, attempt to maintain an accurate and up to date membership database to the best of its abilities.

## **5. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed**

PBL will remove from the membership database the personal details of individuals within one (1) year after they cease to be members. Any individual departing from PBL can request its immediate removal from the database by written request to the PBL Secretary.

PBL will keep the paper membership application form and any other relevant paper documentation for up to three (3) years after the individual has ceased membership (this includes scanned versions securely stored). Any individual ceasing its membership from the association can request the immediate secure disposal of these forms by providing a written request to the Secretary.

**6. Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing against accidental loss, destruction or damage, using appropriate technical or organisational measures**

PBL takes the security of its members personal information very seriously.

Personal details will be stored electronically in a well-known and secure cloud storage database. Only approved members of the Board will have access to this database. The Board reserves the right to change the storage location at any point, without notice, as long as the new storage location meets the above criteria.

As mentioned above, only members authorised by the Board will have access to the personal details of members. The authorised members of the Board are required to sign a form to acknowledge their understanding of PBL Data Protection Procedures and agree to handle personal information securely and with care to the best of their abilities.

PBL will keep the paper version of the membership application forms and any other relevant paper forms in a file system. Effort will be made to ensure these paper forms are kept secure.

**7. PBL will ensure it remains accountable by complying with the above principles and has appropriate processes and records in place to demonstrate its compliance**

PBL maintains responsibility for the personal data it receives and ensures that it will be able to demonstrate compliance with all of the other Data Protection Principles.

## *Changes to this Privacy Policy*

Any changes to this privacy policy in the future will be posted on this page, and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this privacy policy.

This policy was last reviewed and updated: **November 2019**