



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Mascot Privacy Notice

1. Who We Are

Birmingham City Football Club Limited and Birmingham City Women Football Club Limited (“we”, “us”, “our”) process personal data relating to children, parents, guardians, family members, and guests participating in mascot experiences and associated matchday activities.

This privacy notice explains how we collect, use, store, share, and protect personal data as part of administering and delivering mascot experiences.

Mascot experiences may include:

- Matchday mascot participation
- Team arrival and player meet-and-greet activities
- Pitch-side activities
- Pre-match and matchday experiences
- Hospitality experiences
- Ticketing and accreditation
- Photography, filming, and media activities
- Safeguarding and welfare arrangements
- Customer service and event administration

We are committed to protecting personal data and ensuring compliance with UK GDPR and the Data Protection Act 2018, particularly where personal data relating to children is processed.

Data Controllers: Birmingham City Football Club Limited and Birmingham City Women Football Club Limited

Address: St Andrew's @ Knighthead Park, Cattell Road, Birmingham, England, B9 4RL

Data Protection Officer: dpo@bcfc.com

2. What Personal Data We Collect

We collect and process personal data as part of our Record of Processing Activities (Article 30 UK GDPR).

We collect and process personal data necessary to administer mascot experiences safely and effectively.

a. Child Identification Data



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- Name
- Date of birth
- Age
- Photograph
- Gender (where provided)
- Team supported (where relevant)
- Shirt size
- Mascot participation history

b. Parent and Guardian Data

- Parent or guardian name
- Contact details
- Relationship to the child
- Emergency contact details
- Booking information
- Payment information where applicable

c. Payment Data

- Where mascot experiences are purchased, booked, or managed through Club systems, we may process:
- Payment transaction references
- Payment method details
- Fraud prevention information
- Payment verification information
- We do not store full payment card details where payments are processed through approved payment providers.

d. Customer Account & Identity Data

- Where mascot bookings are managed through an online account or Club platform, we may process:
- Account usernames
- Password credentials (stored in encrypted form)
- Login records
- Single Sign-On (SSO) information where available
- Account preferences
- Saved booking information
- Purchase and booking preferences



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e. Marketing, CRM & Preferences Data

- Where individuals interact with Club marketing, supporter engagement, or promotional activities, we may process:
- Marketing preferences
- Communication preferences
- Competition entries
- Survey responses
- Customer engagement history
- Loyalty programme information where applicable

f. Website, Technical & Analytics Data

- Where mascot experiences are booked or managed online, we may process:
- IP addresses
- Device information
- Browser information
- Operating system information
- Cookie information
- Online identifiers
- Website activity
- User journey analytics
- User behaviour information

g. Customer Services Data

- We may process:
- Customer enquiries
- Complaints
- Feedback
- Correspondence
- Booking support requests
- Customer service interactions

h. Matchday Participation Data

- Mascot booking details
- Match attended
- Hospitality arrangements
- Guest attendance information



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- Accreditation records
- Matchday itinerary information
- Seating allocations
- Matchday participation records

i. Ticketing & Access Data

- Ticket allocation records
- Ticketing account information
- Accreditation data
- Attendance information
- Stadium access permissions
- Hospitality access permissions
- Access control records

j. Photography, Video & Media Data

- Photographs
- Video recordings
- Broadcast footage
- Matchday media content
- Website content
- Social media content
- Marketing and promotional content

k. Safeguarding & Welfare Data

- Welfare information
- Safeguarding concerns
- Incident reports
- Risk assessments
- Case records where necessary

l. Security & Monitoring Data

- CCTV footage
- Security incident information
- Body-worn video footage where applicable
- Matchday monitoring records



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3. Special Category Data (Where Relevant)

Where necessary and appropriate, we may process special category data.

Health & Medical Data

- Medical conditions relevant to participation
- Accessibility requirements
- Additional support requirements
- Dietary requirements
- Emergency medical information

Equality, Diversity & Inclusion Data

Where voluntarily provided, this may include:

- Ethnicity and racial or ethnic origin
- Disability information
- Religion or belief where relevant to participation requirements

Safeguarding Data

- Safeguarding referrals
- Welfare concerns
- Risk assessments
- Investigation records
- Incident reports

Special category data is processed only where necessary and subject to appropriate safeguards, including restricted access, secure storage, confidentiality requirements, and data minimisation.



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4. How We Use Your Data

We process personal data for the following purposes.

Mascot Experience Administration

- Manage mascot bookings
- Allocate mascot places
- Coordinate mascot participation
- Manage logistics and matchday arrangements

Matchday Operations

- Manage attendance and accreditation
- Coordinate hospitality arrangements
- Facilitate stadium access
- Deliver mascot experiences safely and effectively

Ticketing & Access Management

- Allocate tickets
- Manage accreditation
- Manage access permissions
- Verify attendance
- Support stadium operations

Customer Relationship Management

- Manage customer relationships
- Maintain customer records
- Improve customer experiences
- Personalise interactions and communications

Communications & Customer Service

- Respond to enquiries
- Manage complaints
- Provide booking support
- Communicate updates relating to mascot experiences

Safeguarding & Welfare

- Protect child participants
- Ensure safe participation
- Manage safeguarding concerns
- Meet statutory and football safeguarding obligations
- Support welfare and wellbeing



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Photography, Media & Marketing

- Capture and publish photographs and videos
- Promote mascot experiences
- Produce digital, social media, editorial, marketing, and promotional content
- Maintain historical and archive records
- Support media and broadcasting activities

Marketing & Fan Engagement

- Send marketing communications where permitted
- Promote mascot experiences and Club activities
- Manage competitions and promotions
- Analyse engagement with communications and campaigns

Health & Safety

- Manage medical or accessibility requirements
- Ensure participant safety
- Respond to emergencies
- Meet health and safety obligations

Security & Incident Management

- Prevent and detect crime
- Investigate incidents
- Monitor safety and security
- Protect participants, staff, visitors, supporters, and facilities

Analytics & Service Improvement

- Analyse booking trends
- Improve mascot experiences
- Improve customer services
- Support business planning and reporting

CCTV & Security

We use CCTV to:



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- Ensure safety of players, staff and visitors
- Prevent and detect crime
- Support investigations and safeguarding
- Protect individuals and facilities
- Monitor site access
- Support safeguarding and investigations

Safeguards:

- No cameras in private areas
- Clear signage in place
- Restricted access to footage
- Proportionate use only
- CCTV footage may be shared with law enforcement where required.

5. Lawful Bases for Processing

We rely on the following lawful bases under Article 6 UK GDPR.

Article 6(1)(b) Contract

- Processing necessary to:
- Administer mascot bookings
- Deliver mascot experiences
- Provide hospitality and matchday services
- Manage participation arrangements
- Process payments where applicable

Article 6(1)(c) Legal Obligation

- Processing necessary to:
- Meet safeguarding obligations
- Comply with health and safety requirements
- Comply with legal and regulatory requirements



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Article 6(1)(f) Legitimate Interests

- Processing necessary for:
- Matchday operations
- Ticketing and accreditation management
- Stadium operations
- Customer relationship management
- Customer service management
- Photography and media production
- Marketing and promotion of mascot experiences
- Service improvement and analytics
- Security and incident management
- Protection of participants, staff, visitors, and supporters
- Operation and improvement of Club services

Article 6(1)(a) Consent

- Where appropriate for:
- Certain photography and promotional activities involving children
- Optional marketing activities
- Competitions and surveys
- Other optional activities requiring consent

For special category data:

Where special category data is processed, we rely on:

Article 9(2)(a) Explicit Consent

- For specific health or welfare information where appropriate.

Article 9(2)(g) Substantial Public Interest

- For safeguarding children and individuals at risk.

Article 9(2)(h) Health or Social Care

- For medical, accessibility, welfare, and emergency support requirements.

6. Who We Share Data With

We share personal data only where necessary, lawful, and proportionate.



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Internal

- We may share data with:
- Matchday Operations Teams
- Safeguarding Teams
- Hospitality Teams
- Ticketing Teams
- Marketing and Media Teams
- Content Production Teams
- Communications Teams
- Customer Services Teams
- Stadium Operations Teams
- Security Teams

Access is restricted to individuals with a legitimate operational need.

External

- We may share data with:
- Emergency services
- Medical providers
- Football governing bodies where required
- Broadcasters and media partners where applicable
- Payment service providers
- Professional advisers
- Insurance providers
- Law enforcement agencies where required

Technology Providers (Data Processors)

The Clubs use approved technology providers to support:

- Ticketing systems
- Accreditation systems
- Hospitality management systems
- CRM systems
- Communication platforms
- Marketing systems
- Website and digital platforms
- Photography and media management systems
- Payment processing systems



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- Security and CCTV systems
- Access control systems
- Identity and authentication systems
- Safeguarding and incident management systems

All processors act under written data processing agreements in accordance with Article 28 UK GDPR.

6. International Transfers

Where data is transferred internationally, appropriate safeguards such as UK adequacy regulations, UK IDTA and the Addendum and/or EU Standard Contractual Clauses (SCCs) are in place.

7. Data Retention

We retain personal data in accordance with the Clubs' Global Records Retention and Erasure Policy.

- Mascot booking and participation records: 10 years from the last transaction or interaction
- Parent and guardian records: 10 years from the last transaction or interaction
- Ticketing and accreditation records: 10 years from the last transaction or interaction
- Hospitality and attendance records: 10 years from the last transaction or interaction
- Photography and media records: retained while actively used for promotional, editorial, archive, historical, commercial, or operational purposes
- CCTV footage: up to 30 days unless required for investigation
- Security incident records: retained in accordance with security and incident management requirements
- Safeguarding records: up to 75 years where safeguarding obligations apply
- Complaints records: 6 months after closure
- Subject access request records: 6 months after closure

Personal data will be securely deleted, anonymised, archived, or restricted when no longer required.



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8. Data Security

- Role-based access controls
- Secure systems and storage
- Encryption where appropriate
- Security monitoring
- Staff training and awareness
- Confidentiality obligations
- Safeguarding procedures
- Additional controls apply where children's data or safeguarding information is processed.

9. Your Rights

You have the right to:

Right to Be Informed

You have the right to know how and why your personal data is used.

This privacy notice explains what data we collect, how we use it, who we share it with, and how long we keep it.

Right of Access

You have the right to request a copy of the personal data we hold about you (often called a "Subject Access Request").

This allows you to understand how your data is being used and check that it is being handled lawfully.

Right to Rectification



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You have the right to ask us to correct or update any personal data that is inaccurate or incomplete.

For example, this could include incorrect contact details, medical information, or player records.

Right to Request Erasure (Where Applicable)

You can ask us to delete your personal data in certain circumstances, for example:

- Where the data is no longer needed
- Where you have withdrawn consent (if consent was used)

However, this is not an absolute right. We may need to keep some data, for example for:

- Safeguarding purposes
- Legal or regulatory obligations
- Ongoing academy operations

Right to Restrict or Object to Processing

You have the right to:

- Restrict processing – ask us to limit how we use your data in certain situations
- Object to processing – where we rely on legitimate interests, you can object if you feel your rights outweigh our reasons for processing

We will consider your request and respond in line with data protection law.

Right to Data Portability

Where applicable, you have the right to receive your personal data in a structured, commonly used format and request that it is transferred to another organisation.



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This typically applies where:

- Processing is based on consent or contract
- The data is processed electronically

Right to Withdraw Consent

Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time.

Withdrawing consent will not affect the lawfulness of any processing carried out before consent was withdrawn.

For example, you may withdraw consent for:

- Email marketing communications
- SMS marketing communications
- Direct marketing communications
- Personalised marketing activities
- Participation in surveys or promotional activities
- The use of photographs, videos, or other media content where consent is the lawful basis for processing
- Other optional activities where consent has been provided

Once consent is withdrawn, we will stop processing your personal data for the relevant purpose unless another lawful basis applies.

You can withdraw consent at any time by:

- Updating your communication preferences within your account (where available)
- Using the unsubscribe link included in marketing communications
- Contacting us at dpo@bcfc.com
- Contacting the relevant Club department managing the activity concerned

We will action requests to withdraw consent as soon as reasonably practicable and in accordance with applicable data protection laws.

Right to Challenge Automated Decisions

You have the right not to be subject to decisions based solely on automated processing (including profiling) that have significant effects on you.

Where we use analytics or AI tools (e.g. for performance or scouting):



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- Decisions are not made solely by automated systems
- Human oversight is always applied
- You can request an explanation or challenge decisions

10. Data Sources

We obtain data from:

- Parents and guardians
- Child participants
- Ticketing and hospitality systems
- CRM and booking systems
- Matchday administration systems
- CCTV and security systems
- Medical or welfare information provided by families
- Website and digital services
- Communications submitted to the Clubs

11. Categories of Individuals

- This notice applies to:
- Child mascots
- Parents and guardians
- Family members attending mascot experiences
- Guests accompanying mascot participants

12. Complaints & Subject Access Requests

Complaints will be dealt with by the Data Protection Officer dpo@bcfc.com and will be responded to within 30 days. If you are not satisfied with the response you should refer your complaint to the ICO <https://ico.org.uk/concerns>

13. Do We Use Cookies And Other Tracking Technologies?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

14. Updates

This notice may be updated periodically.