



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Ticketing, Membership, Hospitality, Conferences & Events 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 supporters, customers, season ticket holders, members, hospitality guests, conference and event attendees, delegates, corporate clients, visitors, and individuals who purchase, receive, use, transfer, or manage tickets, memberships, hospitality packages, venue bookings, and related services.

This privacy notice explains how we collect, use, store, share, and protect personal data in connection with our ticketing, membership, hospitality, conferences and events operations.

This notice applies to:

- Season tickets
- Match tickets
- Hospitality tickets and packages
- Membership schemes
- Event tickets
- Ticket exchanges and transfers
- Ticket resale services
- Supporter services
- Customer accounts
- Ticketing platforms and digital services
- Accreditation and access control
- Matchday operations
- Fan engagement and communications
- Conferences and Events (C&E)
- Venue hire and event bookings
- Corporate events
- Exhibitions
- Meetings and functions
- Non-matchday events

We are committed to protecting personal data and ensuring compliance with UK GDPR and the Data Protection Act 2018.



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

Address: St Andrew's @ Knighthhead 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 ticketing, membership, hospitality, conferences and events, supporter services, matchday access, and related Club activities.

a. Identification & Contact Data

- Name
- Title
- Date of birth
- Gender (where provided)
- Postal address
- Email address
- Telephone number
- Supporter ID
- Customer reference number

b. Ticketing & Membership Data

- Season ticket information
- Match ticket information
- Membership details
- Booking history
- Ticket ownership records
- Seat allocation information



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- Ticket transfers and exchanges
- Attendance history
- Waiting list information
- Ticketing preferences
- Ticketing account information
- Purchase channel information
- Ticket usage history
- Ticket renewal history
- Membership eligibility information
- Ticket forwarding and sharing records
- Digital wallet ticket information
- Attendance and no-show records

c. Payment Data

- Payment transaction references
- Payment method details
- Fraud prevention information
- Payment verification information
- Refund records

We do not store full payment card details where payments are processed through approved payment providers.

d. Customer Account & Identity Data

- Customer account details
- Account usernames
- Password credentials (stored in encrypted form)
- Login records
- Supporter account identifiers



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- Single Sign-On (SSO) information
- Identity verification information
- Account preferences
- Multi-factor authentication information
- Account recovery information
- Identity verification outcomes
- Account security records

e. Hospitality, Conferences & Events Data

- Hospitality bookings
- Guest information
- Event attendance records
- Package purchases
- Hospitality preferences
- Conference and event bookings
- Venue hire information
- Delegate information
- Event registration records
- Event attendance information
- Seating allocations
- Special arrangements requested by guests or delegates

f. Marketing, CRM & Preferences Data

- Marketing preferences
- Communication preferences
- Survey responses
- Competition entries
- Customer engagement history



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- Fan engagement information
- Loyalty and membership programme information where applicable

g. Website, Technical & Analytics Data

- IP addresses
- Device information
- Browser information
- Operating system information
- Cookie information
- Online identifiers
- Website activity
- User journey analytics
- Account usage information
- Ticket purchasing behaviour
- Information submitted to AI-assisted supporter service tools
- Customer interaction and enquiry data processed through approved AI-assisted systems

h. Customer Services Data

- Customer enquiries
- Complaints
- Support requests
- Correspondence
- Feedback
- Service interactions

i. Security, Access & Monitoring Data

- Ticket validation records
- Access control records



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- Stadium entry records
 - Turnstile usage records
 - Accreditation records
 - Matchday accreditation records
 - Access permissions
 - Entry and exit records
 - SSO authentication records
 - Security audit records
 - CCTV footage
 - Security incident records
 - Fraud monitoring records
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3. Special Category Data (Where Relevant)

The Clubs do not ordinarily process special category data for ticketing purposes. However, where necessary, we may process:

Health & Accessibility Information

- Accessibility requirements
- Disabilities requiring reasonable adjustments
- Wheelchair and accessible seating requirements
- Carer requirements
- Dietary requirements for hospitality, conferences and events
- Medical assistance information required on matchdays or at events

Equality, Diversity & Inclusion Information

Where voluntarily provided through surveys, consultations, or Club initiatives, this may include:

- Ethnicity and racial or ethnic origin
- Disability information



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- Religion or belief
- Other diversity information

Safeguarding Information

Where relevant, we may process:

- Safeguarding concerns
- Welfare information
- Risk assessments
- Incident reports
- Safeguarding referrals

Special category data is processed only where necessary and appropriate safeguards are in place.

4. How We Use Your Data

Ticketing & Membership Administration

- Process ticket purchases
- Manage season tickets
- Manage memberships
- Process ticket transfers and exchanges
- Allocate seating
- Manage waiting lists
- Manage supporter eligibility
- Process renewals
- Administer priority purchase schemes
- Manage seat relocations
- Manage ticket forwarding and sharing functionality
- Provide ticketing services



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Matchday Operations

- Manage access to stadium facilities
- Verify ticket validity
- Verify supporter eligibility
- Manage attendance
- Administer digital ticketing
- Manage accreditation and access permissions
- Support crowd management
- Support venue capacity planning
- Deliver matchday services

Hospitality Management

- Manage hospitality bookings
- Coordinate guest attendance
- Deliver hospitality services
- Manage hospitality packages and experiences

Conferences & Events Management

We process personal data to:

- Manage conference and event bookings
- Administer venue hire arrangements
- Manage delegate registrations
- Coordinate attendance and event logistics
- Deliver conferences, exhibitions, meetings, functions, and corporate events
- Manage event communications
- Support health, safety, security, and safeguarding requirements

Customer Account Management

- Create and administer supporter accounts



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- Manage account information
- Provide online services
- Maintain supporter profiles

Customer Relationship Management

- Manage supporter relationships
- Maintain customer records
- Improve supporter experiences
- Personalise communications where appropriate

Communications & Supporter Services

- Respond to enquiries
- Provide customer support
- Manage complaints
- Communicate service updates and important information

Marketing & Fan Engagement

- Send marketing communications where consent has been provided
- Promote Club events, products, memberships, hospitality, conferences and events
- Manage competitions and promotions
- Conduct surveys and supporter engagement activities

Analytics & Business Intelligence

- Analyse attendance patterns
- Forecast demand
- Improve services
- Support operational planning
- Develop supporter and customer insights

Information Security & Access Management



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We process personal data to:

- Manage supporter authentication and identity verification
- Operate Single Sign-On (SSO) services
- Protect supporter accounts
- Detect unauthorised access
- Manage access permissions and account security
- Protect Club systems and information assets
- Support security investigations
- Maintain business continuity and operational resilience

AI & Copilot-Assisted Processing

The Clubs may use artificial intelligence (“AI”) tools, including Microsoft Copilot and other approved AI-assisted technologies, to support:

- Supporter services
- Ticketing administration
- Membership administration
- Hospitality operations
- Conferences and events administration
- Reporting and analytics
- Customer relationship management
- Business administration
- Operational planning
- Communications support
- Information retrieval
- Service improvement

AI tools support Club personnel and decision-making processes and do not replace human review or oversight.



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The Clubs do not make solely automated decisions that produce legal or similarly significant effects without appropriate safeguards.

Fraud Prevention & Security

- Detect and prevent fraud
- Verify transactions
- Protect customers and the Clubs
- Investigate suspicious activity
- Protect systems and facilities

Governance, Legal & Compliance

- Meet legal and regulatory obligations
- Support investigations
- Respond to disputes and complaints
- Support audits and governance activities

Safeguarding, Welfare & Public Safety

- Protect children and vulnerable individuals
- Support welfare arrangements
- Manage safeguarding concerns
- Maintain public safety and stadium security

CCTV & Security

We use CCTV to:

- 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



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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 depending on the nature of the processing activity being undertaken.

Article 6(1)(b) Contract

Processing necessary to enter into, administer, and fulfil ticketing, membership, hospitality, conference, event, and supporter services requested by individuals, including:

- Processing ticket purchases and payments
- Managing season tickets and memberships
- Administering hospitality bookings
- Delivering matchday services
- Allocating seating and ticket entitlements
- Managing ticket transfers, exchanges, upgrades, and renewals
- Administering supporter accounts
- Providing customer service and support
- Managing ticket collections and digital ticket delivery
- Administering competitions and prize fulfilment
- Managing conference and event bookings
- Managing venue hire arrangements



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- Delivering conference and event services
- Managing delegate registrations and attendance
- Operating account authentication, login services, and Single Sign-On (SSO) functionality
- Managing supporter authentication and account access
- Operating digital ticketing services
- Managing supporter eligibility and priority purchase rights
- Administering ticket forwarding and sharing services

Article 6(1)(c) Legal Obligation

Processing necessary to comply with legal and regulatory obligations, including:

- Financial and accounting obligations
- Taxation obligations
- Consumer protection legislation
- Health and safety requirements
- Safeguarding obligations
- Equality legislation requirements
- Law enforcement and regulatory requests
- Crime prevention obligations where applicable
- Compliance with football regulatory requirements where legally mandated

Article 6(1)(f) Legitimate Interests

Processing necessary for the legitimate interests of Birmingham City Football Club Limited and Birmingham City Women Football Club Limited, including:

- Ticketing administration and operations
- Membership administration
- Hospitality operations
- Conferences and events administration
- Venue management and event operations



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- Delegate management
- Matchday operations
- Customer relationship management (CRM)
- Supporter services management
- Access control and accreditation management
- Attendance management and crowd planning
- Stadium capacity planning
- Venue utilisation analysis
- Fan engagement analysis and supporter insights
- Customer analytics, profiling, and business intelligence
- Demand forecasting and operational planning
- Service improvement and customer experience enhancement
- Business administration and operational management
- Information security and cyber security
- Information security and access management
- Supporter account protection
- Authentication and identity verification
- Account security and fraud prevention
- Fraud detection, prevention, and investigation
- CCTV monitoring and stadium security
- Governance, audit, risk management, and compliance activities
- Operational reporting
- Protection of customers, supporters, staff, players, visitors, contractors, facilities, systems, and assets
- Use of AI-assisted technologies, including Microsoft Copilot, to support supporter services, ticketing operations, reporting, analytics, communications, business administration, information retrieval, and operational efficiency



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- Maintaining the safe, secure, and effective operation of Birmingham City Football Club Limited and Birmingham City Women Football Club Limited

Where we rely on legitimate interests, we ensure processing is necessary, proportionate, and balanced against the rights and freedoms of individuals.

Article 6(1)(a) Consent

Where appropriate, we rely on consent for:

- Email marketing communications
- SMS marketing communications
- Direct marketing communications
- Personalised marketing communications
- Promotional offers and campaigns
- Competitions and promotional activities where consent is required
- Surveys and feedback activities where participation is voluntary
- Cookies and online tracking technologies requiring consent
- Optional engagement activities

Special Category Data

Where special category data is processed, we rely on:

- Article 9(2)(a) Explicit Consent
- Article 9(2)(g) Substantial Public Interest
- Article 9(2)(h) Health or Social Care

6. Who We Share Data With

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

Internal

We may share personal data with:

- Ticketing teams
- Membership teams



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- Supporter services teams
- Hospitality teams
- Conferences and Events teams
- Venue Operations teams
- Marketing and CRM teams
- Matchday operations teams
- Security teams
- Finance teams
- IT and Information Security teams
- Legal and Compliance teams

External

We may share personal data with:

- Payment service providers
- Ticketing platform providers
- Hospitality partners
- Event service providers
- Fraud prevention providers
- Professional advisers
- Auditors
- Insurance providers
- Football governing bodies
- Law enforcement agencies where required
- Emergency services where necessary

Technology Providers (Data Processors)

The Clubs use approved technology providers to support:

- Ticket fulfilment providers



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- Ticketing systems
- Membership systems
- CRM platforms
- Payment processing systems
- Mobile ticketing platforms
- Access control systems
- Accreditation systems
- Event management systems
- Venue booking systems
- Delegate registration systems
- Conference and event management platforms
- Identity verification platforms
- Single Sign-On and authentication platforms
- Stadium access control and attendance monitoring systems
- Business intelligence and reporting platforms
- Marketing platforms
- Website hosting services
- Analytics and reporting systems
- AI productivity and business support platforms, including Microsoft Copilot
- Security monitoring systems
- CCTV systems
- Data storage and document management systems

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

6. International Transfers



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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' Records Retention and Erasure Policy.

- Ticketing records: 10 years from the last transaction or interaction
- Membership records: 10 years from the last transaction or interaction
- Hospitality booking records: 10 years from the last transaction or interaction
- Conference and event booking records: 10 years from the last transaction or interaction
- Venue hire records: 10 years from the last transaction or interaction
- Delegate registration records: 1 year
- Conference and event attendance records: 1 year
- Matchday attendance records: 10 years from the last transaction or interaction
- Accreditation records: 1 year
- SSO and authentication records: retained in accordance with information security, operational, audit, and incident management requirements
- Payment and financial records: 7 years
- Marketing preference records: until consent is withdrawn or no longer required
- Competition records: 1 year after completion
- Customer service and complaint records: 6 months after closure
- Subject access request records: 6 months after closure
- CCTV footage: up to 30 days unless required for investigation
- Access control, security, and monitoring records: retained in accordance with security, operational, safeguarding, employment, and incident management requirements, including role-related access and audit requirements
- Security incident records: retained in accordance with security and incident management requirements
- Safeguarding records: up to 75 years where safeguarding obligations apply



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8. Data Security

- Role-based access controls
- Secure systems and storage
- Encryption where appropriate
- Security monitoring
- Multi-factor authentication where appropriate
- Access management controls
- Staff training and awareness
- Confidentiality obligations
- Information security controls

Additional safeguards apply to safeguarding and accessibility-related information.

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

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.



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• **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 Request Erasure (Where Applicable)**

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



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- 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

• **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.

This typically applies where:

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

• **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):

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



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10. Data Sources

We obtain data from:

- Customers and supporters directly
- Ticketing systems
- Membership systems
- Hospitality systems
- Conference and event booking systems
- Venue management systems
- Payment providers
- Marketing systems
- Customer service interactions
- Website and digital services
- Security and access control systems
- Fraud prevention systems

11. Categories of Individuals

This notice applies to:

- Supporters
- Customers
- Season ticket holders
- Members
- Ticket purchasers
- Hospitality guests
- Conference attendees
- Event attendees
- Delegates
- Venue hire clients
- Corporate clients
- Guests and attendees
- Website users interacting with ticketing services

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.