



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Retail 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 customers, supporters, website users, purchasers, gift recipients, account holders, competition entrants, and individuals who interact with our retail and e-commerce services.

This privacy notice explains how we collect, use, store, share, and protect personal data in connection with the purchase of products and services through our retail operations.

This notice applies to:

- Online retail sales
- In-store retail sales
- Matchday retail purchases
- Stadium retail kiosks and concessions
- Pop-up and event retail sales
- Merchandise purchases
- Product fulfilment and delivery
- Customer accounts
- Gift cards and vouchers
- Marketing and promotional activities
- Competitions and prize draws
- Customer services and support
- Website and e-commerce services
- CRM and supporter engagement activities
- Media Channels and Club TV
- Fan Stones purchases and commemorative products
- Fan Stones customer accounts, warranties and aftercare services



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

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 provide retail products, services, customer support, and related Club activities.

a. Identification & Contact Data

- Name
- Title
- Date of birth (where required)
- Billing address
- Delivery address
- Email address
- Telephone number
- Customer account details

b. Transaction & Order Data

- Products purchased
- Order history
- Transaction references
- Basket information
- Order values



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- Refund and exchange records
- Gift card and voucher records
- Promotion and discount redemptions
- Matchday purchase records
- Stadium kiosk transactions
- Event and pop-up retail purchases
- Purchase location information
- Point-of-sale transaction records
- Fan Stones purchase records
- Fan Stones installation records
- Guarantee and warranty records
- Customer service records relating to Fan Stones products

c. Payment Data

- 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

- Account usernames
- Password credentials (stored in encrypted form)
- Login records
- Single Sign-On (SSO) information where available
- Account preferences
- Saved baskets



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- Wish lists
- Purchase preferences

e. Marketing, CRM & Preferences Data

- Marketing preferences
- Communication preferences
- Competition entries
- Survey responses
- Customer engagement history
- Loyalty programme information where applicable

f. Website, Technical & Analytics Data

- IP addresses
- Device information
- Browser information
- Operating system information
- Cookie information
- Online identifiers
- Website activity
- Shopping journey analytics
- User behaviour information
- Information submitted to AI-assisted retail support tools
- Customer interaction and enquiry data processed through approved AI-assisted systems
- Usage data relating to AI-supported customer services where applicable

g. Customer Services Data

- Customer enquiries
- Complaints



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- Returns and exchanges
- Feedback
- Correspondence
- Fan Stones enquiries
- Fan Stones complaints and support requests

h. Security & Monitoring Data

- CCTV footage
- Fraud monitoring information
- Security incident records
- Website security monitoring records
- Access and audit logs where applicable

3. Special Category Data (Where Relevant)

The Clubs do not ordinarily collect special category data through retail activities.

However, where necessary, we may process:

Health & Accessibility Information

- Accessibility requirements
- Additional support requirements
- Information necessary to assist disabled customers
- Special assistance requests

Equality, Diversity & Inclusion Data

Where voluntarily provided through surveys, competitions, research, or inclusion programmes, this may include:

- Ethnicity and racial or ethnic origin
- Disability information
- Religion or belief



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- Other diversity information

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

4. How We Use Your Data

We process personal data for the following purposes.

Retail Sales & Order Fulfilment

We process personal data to:

- Process purchases
- Manage orders
- Take payments
- Fulfil and deliver products
- Process returns and exchanges
- Manage warranties where applicable
- Process matchday retail purchases
- Administer point-of-sale transactions
- Operate stadium retail outlets and kiosks
- Process event and pop-up retail sales
- Club Media Outlets, Club TV channels

Customer Account Management

- Create and administer customer accounts
- Maintain account information
- Facilitate repeat purchases
- Manage preferences and settings



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Customer Relationship Management

- Manage customer relationships
- Maintain customer records
- Improve customer experiences
- Personalise customer interactions where appropriate

Customer Services

- Respond to enquiries
- Handle complaints
- Resolve issues
- Provide customer support

Marketing & Fan Engagement

- Send marketing communications where consent has been provided
- Promote Club products and services
- Manage promotions and competitions
- Conduct surveys and engagement activities
- Measure campaign effectiveness

Fan Stones

Where supporters purchase commemorative Fan Stones products, we process personal data to:

- Manage Fan Stones orders and fulfilment;
- Create and administer customer accounts where applicable;
- Arrange installation and maintenance services;
- Manage guarantees and warranties;
- Respond to enquiries, complaints and support requests;
- Comply with legal and contractual obligations relating to the provision of Fan Stones products and services.



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This processing may be undertaken by Birmingham City Football Club Limited and approved service providers

Retail Analytics & Business Intelligence

- Analyse purchasing trends
- Forecast demand
- Manage stock levels
- Improve products and services
- Understand supporter purchasing behaviour
- Analyse matchday purchasing trends
- Monitor stadium retail performance
- Forecast matchday stock requirements
- Support business reporting and planning

AI & Copilot-Assisted Processing

The Clubs may use artificial intelligence (“AI”) tools, including Microsoft Copilot and other approved AI-assisted technologies, to support retail operations, customer service, business administration, reporting, and operational efficiency.

These tools may assist with:

- Customer service administration and enquiry handling
- Drafting and reviewing customer communications
- Retail reporting and business analysis
- Customer relationship management activities
- Sales and purchasing trend analysis
- Stock management and demand forecasting
- Marketing content development
- Website and customer experience improvements



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- Information retrieval and operational support
- Internal productivity and administrative activities

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

Where AI-assisted technologies are used, the Clubs implement appropriate safeguards including:

- Human oversight and review of outputs
- Access controls and security protections
- Data minimisation principles
- Confidentiality requirements
- Appropriate governance and monitoring arrangements
- Compliance with applicable data protection laws

The Clubs do not make solely automated decisions about customers that produce legal effects or similarly significant effects without appropriate safeguards and lawful justification.

Fraud Prevention & Security

- Detect and prevent fraud
- Verify transactions
- Protect customers and the Clubs
- Investigate suspicious activity
- Protect retail systems and digital services

Website & Digital Services

- Operate online retail services
- Monitor website performance
- Maintain website security
- Improve website functionality
- Analyse visitor engagement



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Governance, Legal & Compliance

- Meet legal and regulatory obligations
- Respond to complaints and disputes
- Manage investigations and claims
- Support audits and compliance activities

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

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



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Processing necessary to enter into, administer, and fulfil transactions and services requested by customers, including:

- Processing purchases and payments
- Managing customer accounts
- Fulfilling and delivering orders
- Administering gift cards, vouchers, and promotional redemptions
- Processing returns, refunds, and exchanges
- Providing customer support and customer service interactions
- Managing competition entries and prize fulfilment
- Processing matchday retail purchases
- Administering point-of-sale transactions
- Providing products and services through stadium retail outlets, kiosks, and event retail locations
- Providing retail products, services, and related customer experiences
- Managing account authentication, login services, and Single Sign-On (SSO) functionality where available

Article 6(1)(c) Legal Obligation

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

- Taxation and HMRC obligations
- Financial and accounting record-keeping requirements
- Consumer protection legislation
- Fraud reporting obligations where required by law
- Responding to lawful requests from regulators, courts, and law enforcement agencies
- Compliance with legal, regulatory, governance, and audit obligations

Article 6(1)(f) Legitimate Interests



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

- Retail operations and retail administration
- Customer relationship management (CRM)
- Customer service management
- Product fulfilment and stock management
- Customer analytics, profiling, and insight generation
- Retail analytics and business intelligence
- Demand forecasting and commercial planning
- Customer experience improvement
- Website administration, optimisation, and performance monitoring
- Information security and cyber security
- Website security and fraud prevention
- Fraud detection, prevention, and investigation
- Business administration and operational management
- Governance, risk management, and audit activities
- Service improvement and operational efficiency
- Use of AI-assisted technologies, including Microsoft Copilot, to support customer service, retail operations, business administration, analytics, reporting, marketing support, information retrieval, and operational efficiency
- Protection of customers, staff, systems, facilities, property, and assets
- CCTV monitoring and security management
- 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 that processing is necessary, proportionate, and balanced against the rights and freedoms of individuals.

Article 6(1)(a) Consent



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Where appropriate, we rely on consent for:

- Email marketing communications
- SMS marketing communications
- Direct marketing communications
- Personalised marketing communications
- Promotional offers and retail campaigns
- Competition and promotional activities where consent is required
- Surveys and customer feedback activities where participation is voluntary
- Cookies and online tracking technologies that require consent
- Optional promotional and engagement activities

Special Category Data

Where special category data is processed, we rely on one or more of the following conditions under Article 9 UK GDPR:

Article 9(2)(a) Explicit Consent

For specific accessibility, support, or inclusion-related information where appropriate.

Article 9(2)(g) Substantial Public Interest

Where required to protect individuals or comply with legal obligations.

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

Where health information is provided to support accessibility requirements.

6. Who We Share Data With

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

Internal

We may share data with:

- Retail teams



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- Customer services teams
- Marketing and CRM teams
- Finance teams
- IT and information security teams
- Legal and compliance teams
- Commercial teams
- Senior management where necessary

Access is restricted to individuals with a legitimate business need.

External

We may share data with:

- Payment service providers
- Delivery and courier providers
- Fraud prevention providers
- Banking providers
- Marketing providers
- Professional advisers
- Media Providers
- Auditors
- Insurance providers
- Regulators
- Football governing bodies where required
- Law enforcement agencies where required

Technology Providers (Data Processors)

The Clubs use approved technology providers to support:

- E-commerce platforms



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- Retail management systems
- Point-of-sale systems
- Customer relationship management systems
- Payment processing systems
- Marketing automation platforms
- Customer service systems
- Website hosting services
- Analytics platforms
- Security monitoring systems
- Media providers
- Fraud prevention systems
- Identity and access management systems
- Data storage and document management platforms
- BCFC Fan Stones provider for the administration, fulfilment, installation, customer support, warranty management and maintenance of Fan Stones purchases
- Fan Stones service delivery partners supporting fulfilment and customer services where required
- AI productivity and business support platforms, including Microsoft Copilot and other approved AI-assisted technologies

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 Retention Policy.

- Retail transaction records: 7 years
- Customer account records: 10 years from the last interaction
- Fan Stones purchase, warranty and installation records: 10 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
- CCTV footage: up to 30 days unless required for investigation
- Security incident records: retained in accordance with security and incident management requirements
- Fraud prevention and security records: retained in accordance with legal, financial, security, and incident management requirements
- Website and technical logs: retained in accordance with information security and operational requirements
- Subject access request records: 6 months after closure

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

8. Data Security

- Role-based access controls
- Secure systems and storage



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- Encryption where appropriate
- Security monitoring
- Staff training and awareness
- Confidentiality obligations
- Information security controls
- Access management and authentication controls

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.

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



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- 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.

This typically applies where:

- Processing is based on consent or contract



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- 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):

- Decisions are not made solely by automated systems
- Human oversight is always applied



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- You can request an explanation or challenge decisions

10. Data Sources

We obtain data from:

- Customers directly
- Online retail platforms
- Customer account registrations
- Matchday point-of-sale systems
- Stadium retail systems
- Event and kiosk retail systems
- Payment providers
- Delivery providers
- Customer service interactions
- Marketing platforms
- Competition and promotion entries
- Website and digital services
- Fraud prevention systems

11. Categories of Individuals

- This notice applies to:
- Customers
- Supporters
- Online shoppers
- Retail store visitors
- Matchday retail customers
- Customer account holders
- Gift recipients
- Competition entrants
- Website users interacting with retail 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.