BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Men's First Team Privacy Notice

1. Who We Are

Birmingham City Football Club Limited ("we", "us", "our") processes personal data relating to first-team players, trialists, loan players, former players where records are retained, coaching and football staff, and other individuals connected with Men's First Team football operations.

We are committed to protecting personal data and processing it lawfully, fairly and transparently under the UK GDPR and the Data Protection Act 2018, particularly where health, biometric, safeguarding, criminal-offence or other sensitive information is involved.

Data Controller: Birmingham City Football Club Limited
Address: St Andrews @ 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 recorded in the Club's Record of Processing Activities. This notice consolidates the Men's First Team activities recorded there, including football administration, analysis, coaching, kit management, medical care, nutrition, performance, player liaison, recruitment, loan management and travel. Depending on your relationship with the Club, this may include:

a. Identification, Contact and Registration Data

- Name, date of birth, nationality, address and contact details
- Player, squad, registration and governing-body identifiers
- Passport, visa, immigration and right-to-work documentation
- Emergency contact and next-of-kin information

b. Football, Match and Performance Data

- Match statistics, appearances, disciplinary and eligibility information
- Training loads, attendance, technical and tactical analysis
- Video and audio from matches, training and coaching sessions
- GPS, heart-rate, physical testing, body-composition and biometric or physiological metrics
- Player profiles, scouting reports, benchmarking, ratings and development assessments

c. Contractual, Employment and Financial Data

- Player, coaching and football staff contracts and employment records
- Salary bands, transfer or loan terms, bonuses, fees and financial administration
- Agent, representative and intermediary information
- Ticket allocation, travel, accommodation and operational records

d. Medical, Health, Nutrition and Wellbeing Data

- Injury and illness history, clinical notes, scans and treatment records
- Physiotherapy, rehabilitation, return-to-play and medical-clearance information
- Concussion, screening, fitness and readiness data
- Nutrition, allergies, intolerances, dietary requirements and body-composition data
- Psychological assessments, counselling, mental-health and wellbeing information
- Anti-doping information, including sample details and test results

e. Recruitment, Scouting and Loan Data

- Career history, current and former clubs, playing position and contract status
- Scouting observations, video, performance comparisons and recruitment assessments
- AI-supported scores, predictions and risk indicators, subject to human review
- Transfer, loan, pre-contract and trial information

f. Coaching and Coaching-Management Data

- Coaching schedules, weekly plans and session planning
- Coach reports, player reviews, action plans and development records
- Video and audio recordings of coaching and training sessions
- Coaching observations, qualifications, competence frameworks and training records
- Health, return-to-play or wellbeing information disclosed or recorded during coaching activities where relevant

g. Safeguarding, Welfare and Conduct Data

- Safeguarding and welfare concerns, referrals and case-management records
- Incident reports, allegations, risk assessments and investigation records
- Conduct, behaviour and disciplinary information
- Relevant health, disability, criminal-offence or other sensitive information required to protect individuals
- CCTV, communications and other evidence connected with a safeguarding or welfare matter

h. Operational, Security and Media Data

- Kit allocation, travel logistics, rooming lists and visa information
- Photographs, squad images, event photography and media footage
- System access, account and audit information
- Safeguarding, conduct, security or incident information where applicable

i. Health & Safety, CCTV and Access-Control Data

- CCTV images and video recordings at Club premises, including stadium, training and operational areas
- Date, time and location information associated with CCTV footage
- Access-control, accreditation, visitor and entry records
- Accident, injury, near-miss, incident and emergency-response records
- Health and safety risk assessments, investigation records and supporting evidence
- Vehicle-registration or site-access information where required for safety and security

j. Player Liaison, Lifestyle and Family Support Data

- Personal and family contact details, addresses, dependants and appointed representatives
- Passports and identification information used for travel, relocation or verification
- Communications and service requests concerning travel, accommodation, relocation, vehicles, security, household services and other lifestyle support
- Invoices, bookings, supplier payments and related financial administration undertaken on a player's behalf
- Health, wellbeing, safeguarding, security-risk or emergency information where relevant and necessary

k. Detailed Football Administration and Competition Data

- Squad submissions, registrations, de-registrations, eligibility and appearance records
- Cards, suspensions, fines, appeals and other disciplinary administration
- Governing-body endorsement, visa, whereabouts and competition-compliance information
- Contract, transfer, loan, salary contribution, fee, bonus and registration information
- Next-of-kin, ticket-allocation, catering and dietary information used for football administration

l. Recruitment, Derived and Background Information

- Playing position, preferred foot, height, weight, performance history, ratings and comparative indexes
- Contract status, transfer value or salary banding, agent information and visa requirements
- AI-generated scores, predictions, availability patterns and recruitment-risk indicators

- Information relevant to player suitability or support, including languages, family circumstances and other background information recorded by recruitment staff
- Where recorded as part of recruitment activity, information relating to racial or ethnic origin and political opinions, together with any associated context recorded by recruitment staff
- Publicly available information, including media reporting and relevant social-media content

3. How We Use Your Data

- Administer and manage players, coaching staff and football operations
- Register players and comply with competition, eligibility, disciplinary, immigration and governing-body requirements
- Manage contracts, transfers, loans, trial arrangements and liaison with agents and other clubs
- Plan coaching, matches and training, analyse performance and support player development
- Manage coaching schedules, session plans, player reviews, coaching development and delivery standards
- Protect children, adults at risk, players, staff and visitors; assess and manage safeguarding, welfare, conduct and behavioural concerns
- Make safeguarding referrals and share information with relevant authorities, governing bodies and professional advisers where necessary and lawful
- Provide medical care, treatment, rehabilitation, psychology, nutrition and wellbeing support
- Manage workload, injury prevention, readiness and return-to-play decisions
- Carry out anti-doping and other regulatory functions
- Identify, assess and recruit players and support long-term squad planning
- Benchmark players against internal players and league competitors and assess performance, availability and development potential
- Identify, negotiate, administer and monitor loans, including sporting, contractual, medical, financial, insurance, payroll and welfare arrangements
- Provide confidential player liaison and lifestyle support, including travel, relocation, accommodation, vehicles, security, household services and support for immediate family members
- Manage nutrition programmes, dietary compliance, body composition, recovery, rehabilitation and performance support
- Respond to medical incidents at matches and training involving players, staff, family members, supporters, contractors or other individuals requiring assistance
- Arrange travel, accommodation, kit, access, photography and operational support
- Maintain safe premises and working environments and comply with health and safety, sports-ground safety and emergency-management obligations
- Use CCTV and access-control information to protect players, staff and visitors, manage entry to restricted areas, prevent or investigate incidents and support safeguarding, security and legal claims
- Protect players, staff and the Club, investigate incidents and establish or defend legal claims
- Undertake appropriately safeguarded research and benchmarking where recorded in the ROPA

AI and Profiling

The Club may use analytics and AI-supported tools in performance analysis and recruitment. These tools may generate scores, comparisons, predictions, availability patterns or risk indicators and may support benchmarking, squad planning and recruitment decisions. Significant football or employment decisions are not made solely by automated means. Appropriate human oversight is applied, relevant information is reviewed for accuracy and relevance, and affected individuals may request an explanation or challenge qualifying decisions.

4. Lawful Bases for Processing

The lawful basis depends on the activity. We may rely on:

- Article 6(1)(a) Consent, including where consent is appropriate for optional photography or particular disclosures
- Article 6(1)(b) Contract, including player and staff management, football operations, loans and transfers
- Article 6(1)(c) Legal obligation, including employment, immigration, tax, safeguarding, health and safety, sports-ground safety and football regulatory requirements

- Article 6(1)(e) Public task, where applicable to anti-doping functions
- Article 6(1)(f) Legitimate interests, including performance analysis, recruitment, security, CCTV, access control, effective operations and competition compliance

Where special category data is processed, including information relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, disability or biometric data, we may rely on:

- Article 9(2)(a) Explicit consent - optional photography; psychology and wellbeing support; sharing medical or performance information with national teams, other clubs or external health providers; and recruitment or loan activities where explicit consent is required
- Article 9(2)(b) Employment and social protection law - player and staff administration; coaching management; travel; fitness and performance monitoring; recruitment, trials and loan management; and processing necessary to meet employment-related obligations
- Article 9(2)(c) Vital interests - urgent or emergency medical treatment where an individual is physically or legally incapable of giving consent
- Article 9(2)(g) Substantial public interest - anti-doping; safeguarding; standards of behaviour and integrity in professional sport; and other activities supported by an applicable Data Protection Act 2018 condition
- Article 9(2)(h) Health or social care - medical diagnosis and treatment; physiotherapy and rehabilitation; injury management; return-to-play decisions; fitness assessment; psychology, nutrition and wellbeing support; and medical assessment for recruitment, transfers and loans
- Article 9(2)(j) Scientific research, where applicable - appropriately safeguarded performance, medical, sports-science and injury-prevention research

Special category data is processed only where a valid Article 9 condition applies and appropriate safeguards are in place. Criminal-offence data is processed only where authorised by law and subject to appropriate safeguards.

5. Who We Share Data With

Internal recipients

- Authorised Club staff

External recipients

- The FA, EFL, Premier League, FIFA, UEFA, anti-doping bodies and other relevant governing bodies
- National teams and national football associations
- Other football clubs in connection with transfers, loans, registrations and medical or performance information where lawful
- Player agents, representatives and intermediaries
- Ownership representatives, authorised football leadership and recruitment decision-makers, on a need-to-know basis
- Player-liaison providers and player-appointed financial, legal or other professional advisers
- Travel, relocation, household, vehicle, accommodation and security providers instructed to support players
- Home Office and other immigration authorities
- Hospitals, NHS bodies, private medical providers, laboratories and external health professionals
- Accredited laboratories, sports-science, body-composition, nutrition, psychology and performance providers
- Insurance providers and finance or payroll teams involved in loan or player administration
- Insurers, legal and professional advisers, regulators, police and public authorities
- Safeguarding authorities and services, including local authorities, the Local Authority Designated Officer, social services, police, emergency services and football governing-body safeguarding teams where necessary
- Travel, accommodation, catering, security, kit and operational suppliers
- Health and safety personnel, stadium control, security and authorised operational management
- Police, emergency services, local authorities, safety regulators, insurers and legal advisers where disclosure is necessary and lawful

- Approved technology, cloud, video, analytics, scouting, medical, performance and football-management system providers

Service providers acting as processors are required to handle personal data only on documented instructions and under appropriate contractual and security obligations.

Technology and Record Locations

- Cloud-based productivity, collaboration, document-management and file-storage systems
- Football administration, player-registration, competition-compliance, governing-body and transfer-management systems
- Performance analysis, match analysis, video, scouting, statistics, benchmarking and business-intelligence systems
- Medical-record, athlete-management, sports-science, fitness-testing, biometric and performance-monitoring systems
- Player-recruitment, scouting, transfer and loan-management systems
- Nutrition, dietary-planning and body-composition systems, together with other approved technology used for Men's First Team operations

6. International Transfers

Football activity may require personal data to be transferred outside the UK, including for international fixtures, training camps, national-team duties, transfers, loans, scouting, travel and the use of global technology providers. Where required, the Club uses an applicable UK adequacy regulation, the UK International Data Transfer Agreement, the UK Addendum to EU Standard Contractual Clauses, or another lawful safeguard. Transfer risk assessments are completed where appropriate.

7. Data Retention

The Club keeps personal data only for as long as necessary for the relevant purpose and in accordance with its retention requirements. The ROPA records different periods by activity, including:

- Player and staff contracts: generally 7 years after termination
- Registration and eligibility records: generally for the duration of the career or engagement plus 7 years
- Disciplinary records: generally 7 years after resolution
- Immigration and work-permit records: duration of engagement plus 7 years, subject to legal requirements
- Performance and training records: generally 7 years after departure, depending on the specific ROPA activity
- Nutrition records: generally for the player's contract plus up to 2 years; injury-linked medical or nutrition records follow the medical retention period; trialist nutrition data may be retained up to 12 months unless the player signs
- Coaching-management records: generally 5 years after the relevant coach or staff member leaves, subject to any longer legal, employment or safeguarding requirement
- Safeguarding case records: retained in line with the Club's safeguarding requirements and, where applicable, up to 75 years from the date of birth of the child concerned
- Adult player data will be retained for 8 years after leaving the Club. Data relating to minors will be retained until the player reaches age 26, or for 8 years after leaving the Club if whichever is later, where the player moves from minor to adult while at the Club.
- Psychology records: up to 20 years after last contact
- Loan contracts and agreements: 7 years after the arrangement ends; registration documents may be retained in line with governing-body requirements; performance and scouting loan data may be retained up to 5 years after the loan; financial records are generally retained for 7 years
- Player liaison records: generally for the player's engagement; related financial or administrative records may be retained for 7 years
- Signed-player recruitment information: for the contract plus up to 7 years; unsigned-player scouting information: up to 6 seasons from the last meaningful review where still relevant
- Unsigned-player scouting data: up to 6 seasons from the last meaningful review where it remains relevant
- Kit records: for the period of involvement and generally up to 12 months after exit

- Travel logistics and similar short-term operational records: generally 1 year
- Routine CCTV footage: generally up to 30 days
- CCTV footage and health and safety records connected with an incident, investigation, safeguarding matter, insurance claim, legal claim or regulatory requirement: retained for the relevant matter and reviewed when it concludes
- Annual individual, squad and event photography: generally 7 years where recorded for Men's First Team football administration, subject to the purpose, contract, consent and archive requirements

A record may be kept longer where required for a legal claim, investigation, regulatory obligation, safeguarding matter or another documented lawful reason. Where ROPA entries prescribe different periods for a specific record, the activity-specific period applies.

8. Data Security

- Encryption and secure transfer arrangements
- Role-based access controls and need-to-know restrictions
- Enhanced controls for medical, psychology, safeguarding and recruitment information
- Confidential handling and identity protection for high-profile players and their families
- Human oversight, accuracy and relevance reviews for AI-supported recruitment and performance analytics
- Data processing agreements, confidentiality obligations and need-to-know sharing with suppliers and player-liaison providers
- Access logging, supplier due diligence and contractual safeguards
- Restricted access to CCTV, incident footage and health and safety investigation records
- Data minimisation, accuracy reviews and secure deletion or anonymisation

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.

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 or where you have withdrawn consent. This is not an absolute right and may be limited by legal, regulatory, safeguarding or operational requirements.

Right to Restrict or Object to Processing

You have the right to restrict processing or object where we rely on legitimate interests.

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.

Right to Withdraw Consent

Where we rely on your consent, you may withdraw that consent at any time by contacting dpo@bcfc.com or the relevant Club department.

Right to Challenge Automated Decisions

You have the right not to be subject to decisions based solely on automated processing that have significant effects on you. Where analytics or AI tools are used, human oversight is applied and you may request an explanation or challenge qualifying decisions.

- Registered and contracted Men's First Team players
- Trialists and prospective recruits
- Players loaned into or out of the Club
- Former players where records are retained
- Coaching, performance, medical, safeguarding, welfare and football operations staff
- Agents, representatives, emergency contacts and relevant family members
- Immediate family members, dependants and individuals supported through player liaison services
- Match-day supporters, contractors, students or other individuals receiving emergency medical assistance
- Prospective, shortlisted, unattached and contracted players assessed for recruitment or loan purposes
- Individuals involved in medical, safeguarding, health and safety, security, disciplinary or operational incidents
- Visitors, contractors and other individuals recorded by CCTV or access-control systems at Club premises

12. Complaints and Subject Access Requests

Please contact the Data Protection Officer at dpo@bcfc.com if you wish to exercise a data protection right or raise a concern. The Club will respond in accordance with applicable data protection law. You also have the right to complain to the Information Commissioner's Office at https://ico.org.uk/make-a-complaint/.

13. Cookies and Tracking Technologies

Where Club websites, portals or digital services associated with Men's First Team activities use cookies or similar technologies, further information and available choices will be provided in the relevant Cookie Policy.

14. Updates

This privacy notice may be updated periodically to reflect changes in the Club's processing activities, legal requirements or football operations.