



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Recruitment Privacy Notice

1. Who We Are

Birmingham City Football Club Limited/Birmingham City Women Football Club Limited (“we”, “us”, “our”) processes personal data relating to external job applicants, candidates, agency workers, and individuals involved in recruitment processes.

This privacy notice applies to all individuals whose personal data we process as part of recruitment and hiring activities.

We are committed to protecting personal data and ensuring compliance with UK GDPR, including fair recruitment, safeguarding, and lawful processing of personal data.

Data Controller: Birmingham City Football Club Limited/ Birmingham City Women 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 as part of our Record of Processing Activities (Article 30 UK GDPR).

a. Identification & Contact Data

- Name, date of birth, nationality
- Address and contact details (email, telephone)
- Right-to-work information

b. Recruitment & Application Data

- CVs, application forms, covering letters
- Employment history, qualifications, and experience
- Skills, competencies, and suitability for the role
- Interview notes and selection decisions
- References and referee details
- Cookies
- IP Address



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c. Assessment & Selection Data

- Interview recordings & interview Notes(where applicable)
- Psychometric or aptitude testing
- Skills assessments and work samples

d. Background & Pre-Employment Checks

- Right-to-work verification
- DBS checks (where required)
- Qualification and employment verification

e. Communication Data

- Emails and correspondence including Whatsapp
- Candidate queries and engagement history

f. Agency & Third-Party Data

- Candidate profiles provided by recruitment agencies
- Notes, recommendations, and availability details

3. Special Category Data (Where Relevant)

Where necessary and proportionate, we may process special category data, including:

- Health or medical information (e.g. reasonable adjustments)
- Equality, diversity and inclusion data (e.g. ethnicity, disability, religion)
- Criminal conviction data (e.g. DBS checks, where required)

Such data is processed only where permitted under UK GDPR and the Data Protection Act 2018 and subject to appropriate safeguards, including:

- Restricted and role-based access
- Data minimisation
- Enhanced security controls



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4. How We Use Your Data

We process personal data for the following purposes:

Recruitment & Selection

- Assess suitability for roles
- Shortlist, interview, and select candidates
- Make hiring decisions

Candidate Evaluation

- Compare candidates against role requirements
- Assess qualifications, experience, and competencies
- Conduct structured interviews and assessments

Pre-Employment & Compliance Checks

- Verify identity, right to work, and qualifications
- Conduct DBS or background checks where required

Equality & Diversity Monitoring

- Monitor fairness and non-discrimination
- Support inclusive recruitment practices

Communications

- Provide updates on applications
- Respond to candidate queries
- Issue outcomes and feedback where appropriate
- To book in interviews, calls or meetings

Compliance & Legal Obligations

- Meet employment, safeguarding, and regulatory requirements



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- Maintain records for audit and legal defence

AI & Profiling

We may use limited automated tools to support recruitment, such as:

- CV screening or candidate matching

Safeguards include:

- Human oversight in decision-making
- No solely automated decisions
- Ability to request explanation or challenge outcomes

5. Lawful Bases for Processing

We rely on the following lawful bases:

- **Article 6(1)(b) Contract** – steps prior to entering employment
- **Article 6(1)(c) Legal obligation** – right-to-work checks, safeguarding requirements
- **Article 6(1)(a) Consent** – optional processing (where applicable)

For special category data:

- **Article 9(2)(b)** – employment obligations
- **Article 9(2)(g)** – substantial public interest (safeguarding)
- **Article 9(2)(h)** – health data (reasonable adjustments)
- **Article 9(2)(a)** – explicit consent (where required)

6. Who We Share Data With

Internal

- HR and recruitment teams



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- Hiring managers
- Safeguarding leads (where applicable)
- Senior management

External

- Recruitment agencies and applicant tracking systems
- Background check providers (e.g. DBS services)
- Legal advisers and auditors
- Regulators or law enforcement where required
- Technology providers supporting recruitment systems

Approved data processors who provide:

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

- ATS & HR systems
- Recruiters
- Reference & Right to Work Platforms
- DBS Checking Platforms
- Finance and Administration Systems

Safeguarding Sharing

Where necessary, data may be shared with:

- Police and law enforcement
- Local authorities (LADO)
- Social services and safeguarding agencies
- Governing bodies

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.



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7. Data Retention

We retain personal data based on our Retention Policy as follows:

- Unsuccessful candidates: up to 12 months after recruitment process
- Successful candidates: transferred to HR records and retained typically for 7 years post-employment
- DBS/safeguarding data: retained in accordance with legal and regulatory obligations

Data is securely deleted or anonymised when no longer required.

8. Data Security

We protect data using:

- Encryption and secure systems
- Role-based access controls
- Restricted access to safeguarding data
- Data minimisation and retention 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”).



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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
- 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:

- Candidates directly
- Recruitment agencies
- Referees and background check providers
- Public professional sources (e.g. LinkedIn)
- Referrals

11. Categories of Individuals

- Job applicants and candidates
- Agency workers and contractors

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.