



BIRMINGHAM CITY FOOTBALL CLUB
EST. 1875

Official Supporters Club Privacy Notice

1. Who We Are

The Official Supporters Club is independently managed by its appointed representatives. Birmingham City Football Club Limited and Birmingham City Women Football Club Limited (collectively referred to as "we", "us" or "our") only process Official Supporters Club member personal data where that information is provided to, shared with, or otherwise received by the Club.

This Privacy Notice explains how Birmingham City Football Club Limited and Birmingham City Women Football Club Limited collect, use, store, share and protect personal data that is provided to the Club in connection with Official Supporters Club activities.

The Official Supporters Club supports and engages fans of both Birmingham City Football Club Limited and Birmingham City Women Football Club Limited through activities such as supporter communications, match attendance, supporter events, fan engagement initiatives, organised travel. While the Supporters Club may hold and manage member information separately, this Privacy Notice applies only to the personal data processed by Birmingham City Football Club Limited and Birmingham City Women Football Club Limited.

Where the Club receives personal data from the Official Supporters Club, we act as a Data Controller and process that information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation. We are committed to ensuring that personal data is handled lawfully, fairly, transparently and securely.

Data Controllers:

Birmingham City Football Club Limited and Birmingham City Women Football Club Limited

Address:

St Andrew's @ Knighthead Park
Cattell Road
Birmingham
B9 4RL

Data Protection Officer: dpo@bcfc.com



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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

- Full name
- Date of birth
- Address
- Email address
- Telephone number
- Membership number
- Seat number (where applicable)
- Supporter reference number
- Emergency contact details
- IP address and cookie information

b. Membership & Supporter Data where applicable

- Official Supporters Club membership records
- Membership status
- Membership history
- Renewal records
- Membership category



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- Supporter engagement records
- Committee membership records
- Communications preferences

c. Ticketing & Attendance Data

- Ticket purchase history
- Match attendance records
- Hospitality attendance
- Event registrations
- Travel registrations

d. Communications Data

- Email correspondence
- Letters and enquiries
- Complaints
- Surveys and feedback
- Social media interactions
- Customer service records

e. Volunteer & Committee Data

- Committee member details
- Volunteer records
- Role descriptions
- Training records
- DBS information where required
- Governance records

f. Photographs, Images & Media

- Event photographs



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- Supporter group photographs
- Video recordings
- Social media content
- Marketing content

g. CCTV & Security Data

- CCTV recordings
- Site access records
- Incident reports
- Security investigations

3. How We Use Your Data

We process personal data for the following purposes:

Fan Engagement & Communications

- Provide supporter updates
- Distribute newsletters
- Communicate supporter events
- Consult with supporters
- Manage supporter representation

Support for Men's and Women's Football

- Promote supporter engagement activities connected to Birmingham City Football Club and Birmingham City Women Football Club Limited
- Facilitate supporter representation
- Organise supporter meetings and events
- Support fan engagement initiatives

Ticketing & Matchday Activities



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- Administer ticket allocations
- Verify supporter eligibility
- Manage supporter travel activities
- Deliver supporter benefits and services

Events & Community Activities

- Organise supporter meetings
- Arrange supporter travel
- Manage supporter events and competitions
- Administer volunteering activities

Governance & Administration

- Conduct elections and voting activities
- Operate committee functions
- Manage constitutions, memberships and governance requirements
- Maintain compliance and accountability records
- Membership Benefits

Marketing & Supporter Experience

- Improve supporter experiences
- Conduct supporter surveys
- Measure supporter engagement
- Promote supporter activities

CCTV & Security

We use CCTV to:

- Protect supporters, staff and visitors
- Prevent and detect crime
- Investigate incidents
- Support safeguarding activities



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- Protect Club facilities and property

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.

4. Lawful Bases for Processing

We rely on multiple lawful bases depending on the activity:

- **Article 6(1)(a) Consent** – photography, marketing communications, surveys and optional activities.
- **Article 6(1)(b) Contract** – administration of memberships and supporter benefits.
- **Article 6(1)(c) Legal Obligation** – financial records, safeguarding, fraud prevention and regulatory requirements.
- **Article 6(1)(f) Legitimate Interests** – operation of the Official Supporters Club, supporter engagement, governance activities, communications and Club operations.

Where special category personal data is processed, we may rely on:

- **Article 9(2)(a) Explicit Consent**
- **Article 9(2)(g) Substantial Public Interest**
- **Article 9(2)(b) Employment and Social Protection Law (where applicable)**

Where we rely on legitimate interests, we ensure that our processing is necessary, proportionate and balanced against the rights and freedoms of individuals. This approach aligns with the Club's wider GDPR governance framework.

5. Who We Share Data With

Internal

- Official Supporters Club Committee



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- Fan Engagement Team
- Supporter Services Team
- Ticket Office
- Hospitality Team
- Marketing Team
- Finance Team
- Safeguarding Team
- Security Team
- Senior Management

External

- The Football Association (FA)
- English Football League (EFL)
- Payment providers
- Banking providers
- Ticketing platform providers
- Finance systems
- Marketing and communication providers
- Travel providers
- Event providers
- Legal advisers
- Auditors
- Insurers
- Regulatory authorities
- Police and law enforcement agencies where required

Approved data processors who provide:

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

- Membership management systems
- Ticketing systems
- Payment processing services
- Communication platforms
- Marketing platforms
- Cloud storage services
- Event management systems



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- 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.

7. Data Retention

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

- Membership Records: 10 years after membership ends
- Payment Records: 7 years
- Committee Records: 7 years
- Event Records: 10 years from the last transaction or interaction
- Communications Records: 7 years
- Complaints: 6 months after closure
- Photography & Media: 1 year
- Marketing Consents: Duration of consent plus audit requirements
- CCTV Footage: Up to 30 days unless required for investigation
- Safeguarding Records: Up to 75 years where applicable

8. Data Security

We protect data using:

- Encryption and secure systems
- Role-based access controls
- Restricted access to safeguarding data



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- 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”).

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



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- 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
- 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.



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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
- You can request an explanation or challenge decisions

10. Data Sources

We obtain data from:

- You directly
- Membership application forms



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- Ticketing systems
- Event registrations
- Payment providers
- Supporters Club Committee members
- Club systems
- Social media platforms (where you engage with us)
- Publicly available sources where appropriate)

11. Categories of Individuals

- Official Supporters Club Members
- Prospective Members
- Former Members
- Birmingham City Football Club supporters
- Birmingham City Women Football Club Limited supporters
- Committee Members
- Volunteers
- Event Participants
- Competition Entrants
- Supporters contacting the Club
- Individuals involved in complaints, incidents or investigations

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.