

Manchester United Privacy Policy – Frictionless Retail Units

How your data is processed when you use one of our frictionless units

As a data controller, Manchester United has obligations to explain to you how we use your personal data. When you use one of our frictionless units, we will capture and use your personal data in order to enable you to purchase products. This policy explains how we collect and use that information.

The kind of information we use

In 'frictionless' retail units, your image is captured and processed to create a pseudonymised avatar and associate a unique ID. Machine learning is used to infer over 30 joints (or key points) on the body. We monitor the movements and gestures of this avatar to determine the products that you choose and will charge your account for those goods. If you select goods and leave the unit with those goods, you will be charged for those goods. Please refer to the Specific Terms and Conditions for full details.

We also process payment information to receive payment for the goods or services you buy from us.

If you use an app to access the unit, we may also collect technical and usage data including internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform.

We also collect, use and share aggregated data such as statistical data that may be derived from your personal data but does not reveal your identity. For example, we may aggregate usage data to calculate the percentage of users buying a product.

How is your personal information collected?

We collect personal information directly from you. We capture your image from equipment installed in the unit.

Your information is held only for as long as required to process your transaction and to respond to any complaints you may have.

What lawful basis do we use to process your data?

We will only use your personal information when the law allows us to. When you use the frictionless units, we process your data to fulfil a contract with you, which is formed when you purchase a product.

We also rely on the lawful basis of our legitimate interests, to develop and improve the technology used in the units.

Who do we share your personal data with?

Our frictionless units are supplied by a third party, who use your data on our instruction. We require our third-party processors to respect the security of your data and to treat it in accordance with the law. We do not allow third parties to use your data for their own purposes, other than the development of their technology (for which only anonymous data is used).

We partner with several payment providers to process card payments. We carry out due diligence on our partners to ensure their PCI compliance and we have standard contractual clauses in place with them. Our systems do not process any payment information or card details. Your payment is processed by our payment provider and the pseudonymised transaction data is then shared with us.

What rights do I have?

Under data protection laws, you have certain rights that we have set out below.

- You have the right to ask us for copies of your personal data.
- You have the right to ask us to rectify personal data you think is inaccurate.
- You have the right to ask us to erase your personal data.
- You have the right to object to, or ask us to restrict, the processing of your personal data.

Where to make a complaint

If you have any complaints or concerns about the way we handle your personal data, please let us know via email to privacy@manutd.co.uk. We will respond to any concerns within one month.

You also have the right to lodge a complaint with the Information Commissioner's Office who can be contacted via their website at: <https://ico.org.uk/>

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