

PARENT PRIVACY NOTICE

1. What is the purpose of this document?

EFL Trust are committed to protecting the privacy and security of your, and your child's, personal information. This privacy notice describes how EFL Trust process personal information about you and your child, in accordance with data protection legislation. EFL Trust are a data controller. This means that we are responsible for making decisions about the personal data that we process. Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

This notice applies to parents of participants on our Talent ID Pathway programme.

2. Why do we want to obtain data?

Your child will have been taking part in a programme delivered by one of your local EFL Club's community organisation, we refer to them as a Club Community Organisation (CCO). EFL Trust support and resource our network of CCOs across the country, and we have a close working relationship with the Football Association (FA). EFL Trust and the FA are working together on an initiative designed specifically for women and girls called the 'Talent ID Pathway'.

The initiative means that our CCOs notify us if they think there is a talented young person on one of their projects, and sometimes we will refer this young player to the FA. Occasionally the FA will accept a referral onto their talent ID pathway, but there are limited places. In some cases, a referral may not be accepted immediately, but your child will be monitored over a period of time (up to 6 years). Due to limited places, in many cases a referral will not be accepted and no further monitoring will take place. In any case, your CCO will notify you and your child of the outcome of the referral and if your child is being monitored this will be made clear at the time by your CCO.

We want to obtain some data about your child in order to make this referral and the FA will inform EFL Trust of the outcome so that we can monitor and review whether the referral process is working successfully and inform any changes to the process. As part of this, we may need your contact details as well as basic information about your child. We have a specific privacy notice for children that you can find on our website.

3. Where do we obtain your/your child's personal data from?

- i. The information we process about your child is obtained from:
 - The CCO that deliver the programme

- Your child
- You
- The FA

ii. The information we process about you is obtained from:

- The CCO that deliver the programme

4. What kind of information do we hold about you and your child, and why?

Information that enables us to refer your child onto the Talent ID Pathway, keep in touch with you and to collect any further details from you:

- Your child's identifying information (such as name and age)
- Your contact details - name, telephone numbers, and email addresses
- Information about your child's football ability

Further information about your child that is more sensitive, in order to monitor the referrals made from different groups of people and/or to make a referral to an appropriate pathway, but not at the initial referral stage:

- Ethnicity
- Disability

Information about the outcome of our referral to the Talent ID Pathway:

- Whether your child progresses any further on the pathway

5. How will this information be processed lawfully?

We will only process personal information when the law allows us to. For information that enables us to refer your child onto the Talent ID Pathway, keep in touch with you, to collect any further details from you we will process this:

- Article 6(1)(f) Where it is necessary for our legitimate interests, your legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests;

The legitimate interest identified is that your child will potentially be able to access the Talent ID pathway, we can review whether our referrals are working and make any changes to this as appropriate.

Where we process any information about your child that is more sensitive, in order to monitor the referrals made from different groups of people, this information allows us to:

- Monitor whether CCOs are making referrals to the FA from a diverse group of players, and to monitor any improvements made by CCOs in reaching a more diverse range of players;
- Encourage players from groups that are currently underrepresented in girls & women's football, particularly minority groups, to play football;
- We will also use this information to ensure that if a referral is passed on to The FA, your child can participate in the appropriate pathway.

We will process this:

- Where we have consent for the processing for specific purposes Article 6(1)(a);

AND

- Where we have gained consent to the processing. Article 9(1)(a).

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Is my personal information or that of my child shared with other organisations?

On occasion, we will share this personal data with other organisations in their capacity as data controllers and will put in place an appropriate data sharing agreement for such sharing.

The organisations or categories of organisations are listed below:

- The Football Association (In order to make a referral to the Talent ID Pathway). You can view the FA privacy notice [here](#).
- The CCO which referred your child to us, in order to let them know the outcome of the referral.

We share this data with third parties who act as data processors on our behalf. Where we employ a data processor, a contract that meets the minimum terms of Article 28 of the GDPR will be in place, to protect the processing of such data. We require third party processors to respect the security of your data and to treat it in accordance with the law. Your information will be shared with the following categories of data processors:

- Website hosts;
- IT service providers (EFL IT systems are currently provided through EFL, Premier League, and Elite IT);

- Secure e-mail services (such as Egress).

In exceptional circumstances, we may also need to share personal information with a regulator, court, dispute resolution service or to otherwise comply with the law (or to law enforcement authorities where we may be legally permitted to do so).

7. Is my personal information and that of my child held securely?

We have put in place measures to protect the security of your information and will review this on an ongoing basis. We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

Third parties will only process your personal information where they have agreed to treat the information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. How long is this personal information retained for?

We will only retain the personal information described in this notice for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will keep your information in a way that you or your child can be identified from it until the FA decide whether to accept a referral. If they do not proceed with your child's referral and undertake no further monitoring, we will not keep information in an identifiable form any longer.

If the FA do proceed with the referral, or if the referral is not immediately accepted but the FA choose to monitor your child, then we will keep this information for as long as your child is engaged with the FA up to a maximum of six years. Your child's CCO coach will let you and your child know if a referral is accepted or if your child is being monitored. Once this time has passed, we will make sure that the information is anonymised (nobody can tell who it belongs to) or deleted completely.

The more sensitive information EFL Trust collect (relating to ethnicity and/or disability), will only be retained in an identifiable format for a maximum of 6 months, for monitoring purposes.

9. What are my rights in connection with my personal information?

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in relation to the processing of your personal data are listed below, however not all rights are absolute, and are only applicable in certain conditions:

- Right to be informed: This privacy notice is designed to ensure you are fully informed about how we will process your and your child's data.
- Right of access: (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You can exercise the right of access by contacting the DPO.
- Right to request correction (also known as rectification): This enables you to have any incomplete or inaccurate data about you and your child corrected. If we cannot correct the information for technical reasons, we will append a supplementary statement to the information.
- Request deletion (also known as right of erasure, or right to be forgotten): This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your and your child's personal information where you have exercised your and your child's right to object to processing (see below).
- Object to processing: this applies where we are relying on a legitimate interest (or those of a third party) and you want to object to processing on this ground.
- Request the restriction of processing: You can ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or reason for processing.
- Request the data is transferred electronically (also known as the right to data portability): You can ask us to transfer your and your child's personal information to yourself and your child or another data controller in a structured, commonly used and machine-readable format, where this is technically feasible.
- Right to withdraw consent: In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. If we require your consent to process any of your and your child's data, this will be made clear at the time we collect it.

Please note, some of the above rights apply only in certain circumstances and/or are subject to conditions. For further information or to exercise any of these rights, please contact our Data Protection Officer.

More information about where these rights apply can be found here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

10. Who can I speak to about my personal information held by EFL Trust?

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your

personal information, please contact the DPO. You can e-mail your questions to DPO@efltrust.com.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113