

Hull FC

| DOCUMENT CONTROL | | | | |
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| CHANGE CONTROL | | | | |
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| 14 th March 2011 | Antony Sutton | 1.2 | Annual Review | |

1. ABOUT US

Hull FC is part of an organistion which includes but is not limited to Hull Super League Limited, Hull FC Youth in the Community Lottery, and Hull FC Rugby Community Sports and Education Foundation together referred to in this privacy policy as being "Hull", "we" and/or "us".

We take the privacy of all of our fans, supporters, customers, web site users, and employees ("customers" / "you") very seriously and take great care to protect their personal information.

2. PRIVACY POLICY

This privacy policy explains what information we collect about customers, how we may use it, and the steps we take to ensure that it is kept secure. It also explains the rights of our customers and how to contact us.

3. CHANGES TO THIS PRIVACY POLICY

Our privacy policy is maintained by us and updated from time to time to ensure that it meets changes in the law and good practice.

4. What information do we collect?

We may collect personal information about customers from a variety of sources including, but without limitation: (i) visits to our stadium, websites, retail outlets; (ii) purchasing goods or services via our websites, retail outlets, stadium, or ticket office; (iii) emails, written and verbal communications and telephone conversations; (iv) participating in competitions or lotteries; and (v) attending matches or coaching sessions. We will use our reasonable endeavours to ensure that people providing us with personal information are aware that it is being

collected and for what purpose it is being collected at the point of collection.

5. Examples of the information that we may collect

We may, for example, keep a record of your name, address, email address, date of birth, and telephone number. We may also keep a record of the purchases that you have made from us, the dates and times that you attend our stadium, and details of any correspondence we have entered into with you.

We may supplement the information that we collect with other information that we obtain from our dealings with customers or which we receive from other organisations, for example, our commercial partners.

6. WHY WE COLLECT YOUR INFORMATION

We collect information about you to help us to understand about our customers generally, and also to help us to understand more about each individual customer specifically. For example, we would like to know the average age profile of our customers, and how far our customers travel to support us. These are examples of general information which are not only useful for us, but also for the governing bodies of rubgy league and our commercial partners.

We also would like to know about individual customers to help us to understand about their preferences and to help us to provide goods and services to them that they might find appealing. For example, we may record details of any disability or health needs that our customers may have to help to ensure their safety when they attend an event at our stadium or any of our other premises.

7. How we will use your information

All personal information that we collect and/or obtain about customers will be recorded, used, and protected by us in accordance with current data protection legislation and this privacy policy. We will use personal information for the following purposes:

- to administer transactions and provide products and services and or details of products and services to customers who request them:
- to record, handle and respond to enquiries and complaints;
- for general record keeping purposes;
- to carry out market research and/or to improve the products and services we offer;

- to track activity on our website;
- to create an individual profile of each customer so that we can:-
 - understand and respect their preferences and privacy,
 - offer products and services (including those of our commercial partners and third parties) that we think might be of interest to them, and
 - customise our communication with them. For example, we may customise our website and marketing communications according to their interests.

8. DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to third parties:

- In order to ensure that we manage your data effectively and efficiently, in which case we may need to appoint other organisations to carry out some data processing activities on our behalf. This might, for example, include checking your details against the telephone preference service. We may also need to appoint other organisations to carry out data processing activities such as mailing services and mail order fulfilment.
- If Hull FC or substantially all of its assets are acquired by a third party, in which case personal data held by us about customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply of any of the services provided by us (for example our ground regulations or web site terms and conditions) and other agreements; or
- to protect the rights, property, or safety of Hull FC, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In these circumstances we will use our reasonable endeavours to ensure that personal information relating to customers is properly protected and processed under strictly controlled conditions.

9. HULL FC'S COMMERCIAL PARTNER PROGRAMME

From time to time we choose to work with a selection of carefully selected commercial partners. A list of these is available from us on request and includes our sponsors and partners, and affinity programme providers.

Our commercial partner programme is designed to support Hull FC and also to bring customers a diverse range of offers that we think might be of interest to them.

10. Sharing Information

Occasionally, we and/or our commercial partners would like to contact you to tell you more about the offers available to you and about a range of other initiatives through a number of different ways including by post, telephone, text/picture/video message, fax or by email. If you express an interest in an offer from one of our commercial partners we have asked that our commercial partners let us know. This enables us to take your views and interests into account when choosing our commercial partners and developing our commercial partner programme.

11. What to do if you do not want us to contact you

We will assume that people who support Hull FC, contact us, or use our website, wish to know more about us and we will communicate with them accordingly. We will use our reasonable endeavours to communicate with them according to the preferences that they share with us. We will use our reasonable endeavours at the point of data collection to provide customers with sufficient means to enable them to opt out of contact by us or any third parties. This will be through tick boxes on paper forms, and electronic tick boxes on digital media such as the internet.

Customers can change their mind at any time either to opt in or to opt out of receiving communications from us or third parties by contacting us as set out in this privacy policy.

12. CONTACTING PEOPLE WHO HAVE OPTED OUT

In order to accurately maintain the data in our data systems we may on occasions (usually once per year) contact those customers who have asked us **not** to contact them to ensure that the data we hold is correct. This will normally be in the form of a letter or email stating that our records indicate that they do not wish to be contacted by us and that they we will not contact them unless they grant us their consent. It is important that we retain this right to ensure that we provide good service.

13. Use of your information outside the European Union

Some of the organisations to which we may disclose your personal information are situated outside of the European Union. In order to

provide you with the products and services you require, we may need to transfer your personal information to these countries some of which do not have laws that protect privacy rights as extensively as in the United Kingdom. If we do transfer your personal information to other territories, we will take proper steps to ensure that your information is protected in accordance with this privacy policy.

14. Personal Information and the Internet

Hull FC operates a number of websites including but not limited to www.hullfc.com ("the Hull FC websites"). The Hull FC websites contain links to other websites which are provided for the benefit of our customers.

This privacy policy only applies to the collection of data by us and the use of that data by us and those we authorise. It does not cover third party websites to which the Hull FC websites may provide links, nor does it cover advertisers and content partners who may also collect your personal information.

We recommend that customers check the privacy and security policies and procedures of each and every website that they visit including those of our commercial partners, some of which may be branded in Hull colours or with the Hull FC crest.

The Hull FC websites include certain chat rooms, forums, message boards, and/or news groups on which customers can post information. Any information that customers chose to post in these areas becomes public information and you should always be careful when deciding to disclose your personal details as part of that information.

15. Cookies

In common with many other website operators, we may use standard technology called 'cookies' on the Hull FC websites. Cookies are small pieces of information that are stored by the browser on a computer's hard drive and they are used to record how people use and navigate websites.

Our cookies are used to enable us to develop our website to reflect our fans and customers interests and by noting who has seen which pages and advertisements, how frequently particular pages are visited and determining the most popular areas of our website. We may use cookies to enrich your experience of using the website by allowing us to tailor what you see to what we have learned about your preferences during your visits to the Hull FC websites.

Most browsers automatically accept cookies, but you can usually change your browser to prevent cookies being stored. Please note, if you do turn cookies off this will limit the service that we are able to provide to you and may affect your visitor experience.

For further information on cookies and how to switch them off see www.allaboutcookies.org.

16. SECURITY OF INFORMATION

We are firmly committed to data security. When customers place orders via the Hull FC websites, we use or offer the use of a secure server. The secure server software encrypts all information before it is sent to us. We take steps to guard against unauthorised access to customer data and have security procedures in place to protect our paper based systems and computerised databases from loss and misuse. We only allow access to them when it is absolutely necessary, and then under strict guidelines as to what use may be made of the personal information contained within them. Although we make every effort to create a secure environment for your personal information, we cannot guarantee the safety of any personal information which you provide to us.

17. MONITORING

We may monitor or record telephone calls and we may also use CCTV at or near our premises. The primary reason for this monitoring is for training and/or security purposes and also to improve the quality of services that we provide to you.

18. What do we do with your financial information

We will use your financial information to enable payment authorisation and billing including any online, mail order, or telephone purchases. When you purchase any products from us, your consent is given to provide your financial information and personal information to those third parties necessary to process your transactions with us, such as credit card companies, banks and companies that handle delivery and shipping on our behalf. This includes exchanging information with other companies and organisations for fraud protection and credit risk protection. We will not share your financial information with third parties without your consent for any other reason.

19. YOUR RIGHTS TO ACCESS YOUR PERSONAL INFORMATION

You have the right to receive a copy of the personal information that we hold about you and we are entitled to charge a fee towards the cost of administering any request that you make. The current fee is £10.

20. How to contact us

If you wish to contact us about our Privacy Policy please either:

Telephone the Finance Director on 01482 327200; or

Email privacy@hullfc.com; or

Write to:

The Finance Director
Hull FC
KC Stadium
West Park
Hull

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