

**PRIVACY policy**

**Updated February 25, 2021**

**Compiled using guidance from the**

**Information Commissioner’s Office (“ICO”)**

Our contact details

Name: Wycombe Wanderers Trust

Address: Wycombe Wanderers FC, Hillbottom Road, High Wycombe, HP12 4HJ

Phone Number: 01494 472100

E-mail: igo@4everblues.com

Website: [www.4everBlues.com](http://www.4everBlues.com)

**1) Introduction**

1. This Privacy Policy applies to Wycombe Wanderers Supporters Group Ltd also known as Wycombe Wanderers Trust (“the Trust”). It also applies to the Trust’s subsidiary, Frank Adams Legacy Limited (“FALL”).
2. Your confidence and trust is very important to us, so Wycombe Wanderers Trust is committed to protecting the privacy and security of your personal information.
3. It is important that you read this Privacy Policy so that you know how and why we are using such information. This Privacy Policy describes how we collect and use personal information about you in line with data protection law.

**2) The type of personal information we collect**

We currently collect and process the following information:

\* name;

\* email address;

\* postal address;

\* financial information (eg. banking details).

**3) Your right to remove your consent**

1. Under the General Data Protection Regulation (“GDPR”), the lawful basis we rely on for processing your personal information is your consent.
2. You are able to remove your consent at any time. You can do this by contacting the Trust’s Information Governance Officer (“IGO”) at **igo@4everblues.com****.**

**4) How we get the personal information and why we have it**

1. Most of the personal information we process is provided to us directly by you, for one of the following reasons:

\* Trust membership and subscriptions;

\* Trust fundraising initiatives aimed at protecting the 25% share of WWFC owned by the Trust;

\* Purchases of Trust merchandise;

\* Purchase of admission to Trust events.

1. We may share this information with Wycombe Wanderers FC, for example in relation to Trust membership benefits and discounts.
2. We will also use your details to respond to your queries or comments, send you newsletters, correspondence, updates from the Chair, event invitations, and generally to develop and enhance our services to Trust members.
3. If you would prefer not to receive any or all emails from the Trust, you can unsubscribe at any point, either via the link, included in all correspondence from the Trust, or by emailing: **igo@4everBlues.com****.**

**5) How we store your personal information**

1. Your information is stored securely on a dedicated cloud server provided by Microsoft.
2. Personal information for all Trust members will be retained securely on an ongoing basis, until their membership expires or is terminated.
3. We delete all your personal information within one calendar month of termination of your membership.
4. Deletion of personal information from the Trust’s server will be processed using secure deletion software, as laid out in the ICO’s guidance.
5. We shall delete Community Share Scheme information six years after repayment of monies to investors.
6. We delete 500 Club data, a maximum of one year after the termination of each 500 Club campaign.
7. All personal information for non-Trust members will be retained for a maximum of five years, at which time it will be deleted.
8. All hard copy personal information is securely destroyed (shredded) immediately after it has been entered in the Trust’s electronic database.

**6) Your data protection rights**

1. Under data protection law, you have rights including:

**\* Your right of access** - You have the right to ask us for copies of your personal information.

**\* Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**\* Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances\*.

**\* Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances\*.

**\*Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances\*.

**\* Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances\*.

1. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.
2. Please contact us at **igo@4everBlues.com** if you wish to make a request.

\* Your rights under data protection are not absolute, and different rights can apply in different circumstances. You can find detailed guidance on your individual rights here:
<https://ico.org.uk/your-data-matters/>
And there is further guidance here:
<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

**7) How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at igo@4everblues.com. Please include the word ‘COMPLAINT’ in the subject line of your email.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Wycombe Wanderers Trust

The trading name of

Wycombe Wanderers Supporters Group Limited

Registered society no. 32456R under the Co-operative and Community Benefit Societies Act 2014

 Adams Park, Hillbottom Road, Sands, High Wycombe, Bucks. HP12 4HJ

www.4everBlues.com