This privacy policy explains how The Dons Trust uses personal data.

**The Dons Trust is the data controller** of this information for the purposes of this policy.

**Personal data** is defined in Data Protection law and is essentially data by which an individual can be identified.

Any changes we make to this privacy policy in the future will be updated here.

Keeping your personal data safe and secure is one of the top priorities of The Dons Trust and we ensure we give it the respect and security it deserves. This statement makes it easier for you to find out how we use and protect your information.

If you think our policy falls short of your expectations or that we are failing to abide by our policy, please tell us.

**When does this policy apply?**

This policy applies to the personal data that The Dons Trust collects and holds about you when you become a member of The Dons Trust, create a website account or when interacting with this site or (referred to in this policy as the “website(s)”.

**What types of personal data do we hold?**

Information we hold about you may include any one or more of the following types of data:

**Account information:**

When you register to use or engage with any of The Dons Trust’s activities, goods and/or services, the minimum information we will usually ask you to provide is your **name, email address, contact mail address, telephone numbers, year of birth** and ask you to confirm that you meet The Dons Trust’s membership criteria. We may also ask you for additional information depending on the activity, goods or service you are registering to use or purchase.

**Transactional information:**

When you register or purchase tickets for activities or events, or purchase merchandise and other products from The Dons Trust and any other official offline sales channels, we will keep a **record of your transaction**, including **what you purchased and when**, and any information you provide to us to fulfil the transaction. This may include your **name, billing information, telephone numbers and delivery address**. Our payment provider is one of the highest security methods available. Our staff and contractors never have access to your full card details and we will not keep payment card information.

If you apply to loan money to The Dons Trust via our crowdfunding platform, we will also keep a record of your financial information, such as your bank details, so that we can, if applicable, make loan repayments and interest payments to you.

**Information from you:**

If you contact us (by email, telephone or letter) **we may keep a record of that correspondence**. Your e-mail address is recorded when you send e-mail to us. We shall use it only to correspond with you or otherwise strictly in accordance with your instructions. We shall not under any circumstances divulge your email address to any person who is not an officer, a volunteer, an employee or contractor of ours and who does not need to know, either generally or specifically.

**Information you provide to us in response to a survey:**

We may occasionally contact you to ask for your feedback on The Dons Trust activities, products, goods and/or services so that we can make them better and more relevant. We may also contact you to ask for your feedback on matters related to the wider interests of The Dons Trust, including issues related to the ownership and oversight of AFC Wimbledon and the governance of football in this country.

**Information you provide to us in connection with formal Dons Trust business:**

We periodically contact members of The Dons Trust to invite them to meetings of the Trust and to participate in formal votes of the Dons Trust. These votes include voting on formal resolutions submitted to members at Annual and Special General Meetings and voting for elections to the board of The Dons Trust.

**Information from other companies:**

We may use publicly available postal address lists and the edited electoral roll to ensure that the information we hold about you is accurate or we may use this information, together with general market research information (for example, demographic information) to add to and enhance our database of members.

**Online usage information:**

If you use our website(s) we may collect your **browser type, the full Uniform Resource Locators** (URL, clickstream to, through and from our site (including date and time), **products you viewed or searched for, page response times, length of visits to certain pages, page interaction information** (such as scrolling, clicks and mouse-overs) and **methods used to browse away from the page**. In addition, online usage information may be linked to a unique identifier but we do not link online usage information to named individuals. In order to collect online usage information we use cookies and other similar technologies.

Although we do not disclose your personal information to any third party (except as set out in this notice) we do receive data which is indirectly made up from your personal information, from software services such as Google Analytics and others. No such information is identifiable to you.

Your browser software provides help on how to manage and disable cookies. We recommend that you allow the use of cookies in order to take advantage of the features of our website(s) that rely on their use. If you prevent their use, you may not be able to use all the functionality of our website(s).

**Where do we hold your information?**

The data that we collect from you is stored at a destination inside the UK or EU. It is processed by volunteers and/or staff operating inside the UK, who volunteer or work for The Dons Trust. Such staff may be engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this storing or processing. We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. You must not share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

**For what purposes does The Dons Trust use your information?**

**Contract performance:**

The Dons Trust may use account information and transactional information data, as necessary, to **carry out or perform any contract which you may have entered into with us**, including contracts for the purchase of event tickets, merchandise and other products, contracts which govern the basis on which you loan money to The Dons Trust, and when we administer your online accounts. We also use this information to communicate with you and handle your enquiries regarding these contracts. If you order The Dons Trust activities, goods, products or services for another person (for example, membership or event tickets for family or friends) we may ask you for their personal information and we will use this to provide the services you have ordered. Please ensure that you have their permission before providing this information to The Dons Trust.

**For recruitment:**

If you apply for a volunteer position and/or office or job with The Dons Trust we may use your information for the purposes of recruitment and selection, corresponding with you and equal opportunities monitoring.

**Legal obligations:**

The Dons Trust retains records of all of its financial transactions with you in order to comply with its legal obligations to maintain adequate accounting records. The Dons Trust may use (and disclose) the information it holds about you in order to comply with any investigative demand, court order or a request for cooperation from a law enforcement or other government agency.

**Marketing with your consent:**

If you consent to it, The Dons Trust may contact you with **news and offers from The Dons Trust and its official sponsors and partners** which we think may be of interest to you. You have the right to withdraw your consent at any time. If you would like to unsubscribe, please **log into your online account on the official website (www.thedonstrust.org) and change your preferences, or contact the Membership Secretary at the address above or email** **membership@thedonstrust.org****.**

**Third party advertising:**

Third parties may advertise on our website(s). In doing so, those parties, their agents or other companies working for them may use technology that automatically collects your IP address when they send an advertisement that appears on our site to your browser. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

**For other legitimate purposes:**

The Dons Trust analyses information it holds about you to **identify trends and preferences and to get a more informed picture** of how The Dons Trust members and non-members are using its products and services. The Dons Trust does this to make better strategic decisions about The Dons Trust, its activities, and its products and services so that it can improve the way it markets and provides products to you as an individual and to The Dons Trust’s membership and client base generally, in particular by delivering content and services which are customised and relevant. The Dons Trust may also use online usage information to administer and improve the function and content of The Dons Trust website(s) including to ensure that content is presented in the most effective manner for you and your device and browser, to allow you to participate in interactive features when you choose to do so and to keep our online services safe and secure. See more under ‘how we use cookies’ at the bottom of this page.

**To whom, and in what circumstances, would The Dons Trust disclose your information?**

**Group companies:**

Information held by The Dons Trust may be used by The Dons Trust and all current and future Dons Trust Subsidiaries (for example, AFC Wimbledon plc) for the purposes set out in this policy.

**To sponsors and partners:**

The Dons Trust does not sell, rent or share your personal identifiable data with our sponsors and partners, but we may:

1. share aggregate/anonymised information which is based on this information with existing and potential sponsors and partners

2. if you have consented to the same, send you information about the products and services of our existing partners in our marketing communications.

**To Dons Trust suppliers and sub-contractors:**

The Dons Trust may share your information with appointed suppliers and sub-contractors from time-to-time in order that they can process it on The Dons Trust’s behalf for the purposes set out in this privacy policy. For example, payment processing, mailing services and hosting service providers. However, where we do so we will put in place suitable measures in order to protect your information. These third parties may include:

1. Direct debit providers
2. IT service providers (such as hosting providers)
3. Delivery services
4. Analytics and search engine providers
5. Credit reference agencies
6. Payment processing companies.

**For legal reasons:**

The Dons Trust may also disclose the information it holds about you to those persons that have a reasonable need to know such information, if it believes in good faith that this is necessary to:

1. Establish, exercise or enforce its legal rights, including contractual rights
2. Defend itself against a legal claim
3. Report or prevent a crime
4. Prevent harm to any individual or any property (including intellectual property, for example if you misuse images or videos or any other content The Dons Trust makes available to you)
5. Prevent fraud (for example, payment card fraud) or for credit risk reduction.

**How long do we keep your information?**

The Dons Trust will keep your information **for as long as necessary for us to fulfil that we describe in this policy**. As a general rule it will keep:

* **Its financial transactions with you for six years** in order to comply with its obligations to maintain adequate accounting records
* **Its contracts with you for six years** so that it has appropriate evidence in place if there is a claim for breach of contract made within the statutory limitation periods
* **Job applications for up to six months** in case other suitable opportunities arise
* **Your account information until you close or delete your account/profile** (at which point we would also delete any information from other companies or market research). To close/delete your account, please contact the membership secretary via membership@thedonstrust.org.
* Any **market research** we have undertaken (and which is not appended to your user account) for **3 years**
* **Any other information you post online for 3 years** if it is on our website(s)
* **Online usage information for 3 years**

If any information falls into more than one category then the longer storage period will apply.

**What are your rights?**

You have several rights under applicable data protection laws, which we have summarised below.

To better safeguard your information, we will also take reasonable steps to verify your identity before granting access or making corrections to your information.

These rights can be exercised by contacting The Dons Trust using the details given below in this policy.

You have the right to:

* Ask us not to process your personal data for direct marketing purposes
* Request access to personal information held about you and a copy of it
* Obtain, without undue delay, the rectification of inaccurate or incomplete personal data
* Obtain, without undue delay, erasure of your personal data in certain circumstances, for example if The Dons Trust processing of your personal data is no longer necessary for the purpose for which we collected it
* Restrict the processing of your personal data in certain circumstances rather than having it erased;
* Object to the processing of, personal data in certain circumstances, for example, where The Dons Trust processes personal data for legitimate purposes but you do not feel that your interests or fundamental rights and freedoms have been protected;
* Receive personal data, which you have provided to The Dons Trust, in a structured, commonly-used and machine-readable format and transmit that personal data to another data controller, or have The Dons Trust do so on your behalf where technically feasible
* Be informed about any use of your personal data to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of this processing
* Lodge a complaint about the way in which your personal data is being used to a supervisory authority.

**Children**

We appreciate that many children have access to the Internet and are fans of football and/or sport generally. We would therefore ask that parents and guardians supervise their children when they are online and that children under 16 do not submit personal information or content to The Dons Trust, make purchases of The Dons Trust activities, goods, products or services, or take part in The Dons Trust promotions or competitions, without the consent of their parent or guardian.

We encourage children under 16 to consult with their parent or legal guardians before submitting or requesting any content or information to/from us. Any users of our online services who indicate they are under 16 will be asked for a contact details of their parent/legal guardian so we can verify legal consent.

We will not pass on personal information to third parties for commercial purposes.

**How we use cookies**

A cookie is a small file which is placed on your computer’s hard drive. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website(s) in order to tailor it to members’ needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website(s). If you want to learn about cookies and your privacy you can visit the About Cookies website.

**How you can contact us**

This policy has been compiled to comply with current GDPR legislation as far as we are aware and from directives currently available from the Information Commissioner’s Office as at the date stated at the end of this policy.

Should you wish to contact The Dons Trust about this policy or any of the legal rights outlined in it, you can email The Dons Trust’s Data Protection Officer at dataprotection@thedonstrust.org or write to:

The Data Protection Officer, The Dons Trust at:

Plough Lane Stadium,

Plough Lane,

London SW17 0NR

*This privacy policy was last updated January 2020*