

PRIVACY POLICY



About us

In this Privacy Policy, we use the term “Tottenham Hotspur Ladies” or “Spurs Ladies” (and “we”, “us” and “our”) to refer to Tottenham Hotspur Ladies Football Club Limited. Full details about Tottenham Hotspur Ladies Football Club Ltd are provided in the section “Legal notice” below.

Legal notice

This policy has been prepared with due regard to the data protection laws applicable to the data processing activities performed by Tottenham Hotspur in the countries in which we operate (“applicable laws”), including the General Data Protection Regulation (“GDPR”) and any subsequent amendment or legislation passed to enact GDPR into UK law. Although the GDPR applies to EU subjects and processing in the EU, Tottenham Hotspur has chosen to apply the GDPR standard of data protection to all data subjects whose personal information we collect and process irrespective of the place of collection and processing. This notwithstanding, it may still be necessary to apply different standards in response to the laws in different countries and it is possible that we may issue addendums for specific countries in which we operate, and where appropriate.

We are registered as a data controller in the United Kingdom and our registration number are ZA392201 for Tottenham Hotspur Ladies Football Club Ltd. Our Registered Office address is Hotspur Way, Whitewebbs Lane, Enfield EN2 9AP. The English company registration number are 10863537 respectively.

How to contact us about this privacy policy

If you need to contact us regarding our Privacy Policy or have questions about your personal data, please write to:

Data Protection Officer
Tottenham Hotspur Ladies Football Club
Hotspur Way
Whitewebbs Lane
Enfield
EN2 9AP

or email: personal.data@spursladies.co.uk

Information we collect and what we use it for

To access certain areas of the website, you will need to register with us. During the registration process you will be asked to submit personal information about yourself (e.g. name and email address). By entering your details in the fields requested, you enable Tottenham Hotspur Ladies and/or our official partners to provide you with the services you select. When you provide such personal information, you accept that we may retain your personal information and that it may be held by us or any third party that processes it on our behalf for the purposes of providing the information, goods or services which you have requested. Any third parties who process personal information on our behalf are required to maintain the confidentiality and privacy of the personal information that they process for us. When we provide you with products or services we may collect and store any personal information that you provide to us. We may, for example, keep a record of your name, address, delivery address, email address, telephone number and payment card details.

We may record details of any disability or access requirement disclosed at the time of purchasing a ticket for an event or service which will take place at the stadium or any other location used by the company. This is to ensure we have accurate information to allow the provision of a reasonable adjustment to make your visit safe and comfortable and compliant with the Equality Act 2010.

When you submit your CV and/or application for a particular role to us, this will be used solely in connection with your application and will not be shared with third parties other than those engaged by us in connection with the recruitment process, such as recruitment consultants or agencies.

We will use your data for the following purposes:

- to provide products and services you request or have expressed an interest in
- for marketing to you via email, phone, mobile messaging, direct mail, or social media
- to administer any competitions, voting, quizzes, and or other offers/promotions which you enter
- to create an individual profile for you so that we can understand and respect your preferences
- to communicate with you if any products or services you have requested are unavailable
- for fraud screening and prevention purposes
- for record keeping purposes
- to carry out market research so that we can improve the products and services we offer

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- to track your activity on our digital platforms
- to personalise and improve your experience on our digital platforms
- to personalise any communications that we may send you
- to administer courses for which you have enrolled with the Tottenham Hotspur Foundation and/or Soccer Schools
- to respond to your correspondence, so that we can reply to your enquiries and requests in an efficient and effective manner

When you sign up with us for an online account, register to receive marketing communications from us (and/or our official partners), enter one of our competitions, fill in one of our forms (whether online or offline) or otherwise expressly provide us with your personal information, we may collect and store any personal information that you provide to us and may use it to personalise and improve your experience on our digital platforms, provide products and services you request from us, and carry out market research.

When you interact with our digital platforms, we may also automatically collect the following information about your visit. This is primarily to help us better understand how our fans use our digital platforms to enable us to create better content and more relevant communications:

- how you have reached our digital platform, the internet protocol (IP) address you have used, and the MAC address of your device
- your operating system, browser type, versions and plug-ins
- your journey through our digital platform, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information
- photos you share with us
- videos you have watched and the duration
- offers you have redeemed
- what content you like or share
- which adverts you saw and responded to
- which pop up or push messages you might have seen and responded to
- your current subscription status
- information collected in any forms you complete
- location based services
- ticketed access to our venues

We may also infer your country of location from the IP address you have used to access our digital platforms.

We may also generate, use and disclose aggregated and/or anonymised information and statistics about our website and digital platform visitors for marketing and strategic purposes. However, no visitor will be individually identifiable from these aggregated and/or anonymised information and statistics.

If you are under 16

If you are under 16 and register for restricted areas of our digital platforms, we will collect your date of birth and retain that with your name and other details you may provide. This is so we can ensure we treat you in an age appropriate way in line with this policy.

If you have signed up to receive a product or service, we may contact you about this.

Ages 13-15

If you are aged 13-15, you must first tell your parent or legal guardian that you wish to register on our digital platforms and get their consent. You must make sure that your parent or legal guardian knows and agrees each time before you:

- email us or ask us to email anything to you;
- send any information to us;
- enter any competition or game that requires information about you or offers a prize;
- purchase an official membership; or
- offer or agree to buy anything online.

If you are the parent or legal guardian of a user of our digital platforms who is aged 13 to 15 we do not seek your direct consent to their registration, but we expect them to inform you and get your agreement in advance before they register and before each time they do any of the activities listed above.

Aged under 13

If you are under 13, you may only use the restricted areas of our digital platforms if your parent or legal guardian has first told us that you are allowed to do so.

If you are under 13 and wish to register, you must truthfully tell us your name, email address, country and date of birth. We will then ask you for the name and email address of your parent or legal guardian. We will send them an email, so they are aware of your request and will ask them for their consent and to confirm they have authority to give that consent. We need their consent or refusal within 7 days, or else we will assume consent is not granted. Their consent can be withdrawn at any stage.

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Even if your parent or legal guardian gives their consent to your registration, if you are under 13 we still expect you to tell them and get their agreement in advance each time before you:

- email us or ask us to email anything to you;
- send any information to us;
- enter any competition or game that requires information about you or offers a prize;
- purchase an official membership; or
- offer or agree to buy anything online.

If you are the parent or legal guardian of a user of our digital platforms who is under 13, they can access and use unrestricted areas, but we will need your direct consent if they wish to gain access to restricted areas.

Cookies

Our main website tottenhamhotspur.com/spursladies use cookies to collect certain information about our website visitors automatically. Cookies are small text files that store basic information that a website can use to track on-line traffic flows, recognise repeat site visits and record information about your on-line preferences. They often include an anonymous unique identifier that is sent to your browser from our websites, which is then stored on your computer's hard drive. Cookies do not attach to your system and damage your files but observe user behaviour and compile aggregate data that we then use to improve web services. We also use cookies to measure the effectiveness of advertising.

There are two broad categories of cookies – 'first party cookies' and 'third party cookies'. First party cookies are cookies that are served directly by the website operator to your computer and are used only by the website operator to recognise your computer when it revisits that site. Third party cookies are served by a service provider on behalf of the website operator and can be used by the service provider to recognise your computer when it visits other websites. Third party cookies are most commonly used for website analytics or advertising purposes.

For further, more detailed information on how we use cookies, please refer to our Cookie Policy which you can read [here](#)

As part of the First Team association to the FA Women's Super League 2. Our secondary website <http://spursladies.fawsl.com> is run by our Club in partnership with The Football Association Limited ("The FA"). Please note no data will be collected from this secondary site.

Disclosure of your information

In order to provide our products and services to you or to otherwise fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf. These may include, for example, payment processing organisations, delivery organisations, fraud prevention and screening and credit risk management companies, and mailing houses.

We may share your data with advertising networks and/or social media platforms for the purposes of selecting and serving relevant adverts to you via those networks/platforms, and to search engine and analytics providers.

We may share your data with third parties:

- (a) if we are under a legal or regulatory duty to do so
 - (b) if it is necessary to do so to enforce our terms and conditions of sale or other contractual rights
 - (c) to lawfully assist the police or security services with the prevention and detection of crime or terrorist activity
 - (d) where such disclosure is necessary to protect the safety or security of any persons
- and/or (e) otherwise as permitted under applicable law.

Updates and your rights

If you would like to update your records, you can do so by changing your preferences we we send you email communications. We encourage you to promptly update your personal information if it changes.

You have the right to ask for a copy of any personal information that we hold about you in our records, to correct any inaccuracies and to update any out-of-date information. Please write to us at the address listed above should you wish to do so.

We will provide a copy of your information free of charge. However, if the request is deemed manifestly unfounded or excessive then we will charge a 'reasonable fee' covering our administration costs.

Changes to this Privacy Policy

We reserve the right, at any time, to modify, alter, or update this Privacy Policy. When we do so we will publish the changes on the website. If you do not agree to these changes, please do not continue to use the website. If material changes are made to this Privacy Policy, we will notify you by placing a prominent notice on the website. Any queries or comments about this Privacy Policy should be sent to us using the contact details listed above.

Security

Security is very important to us. We use Stripe encryption technology is used for protection of information in transit for any sensitive transactions such as payments. Additional security procedures are in place to protect the confidentiality, integrity and availability of your personal information.

Stripe has been audited by a PCI-certified auditor and is certified to [PCI Service Provider Level 1](#). This is the most stringent level of certification available in the payments industry. To accomplish this, we make use of best-in-class security tools and practices to maintain a high level of security at Stripe.

To enhance the security when purchasing through our online store we currently use 'Verified by Visa' and 'MasterCard SecureCode' as a part of the payment process.

'Verified by Visa' and 'MasterCard SecureCode' are schemes that have been introduced by card issuers to help tackle online fraud. These schemes are known as '3d Secure' and Tottenham Hotspur Ladies, like many other retailers, are committed to fraud prevention. By participating in either scheme, your online experience will be more secure.

To further protect your credit, debit or charge card against use without your consent, we may validate name, address and other personal information supplied by you during the order process against appropriate third-party databases. In performing these checks personal information provided by you may be disclosed to a registered Credit Reference Agency which may keep a record of that information. You can rest assured that this is done only to confirm your identity, that a credit check is not performed and that your credit rating will be unaffected.

In addition, we have security procedures in place to protect our physical records and computerised databases from loss and misuse, and only allow access to them when it is absolutely necessary to do so, and then under strict guidelines as to what use may be made of the personal information contained within them.

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Monitoring

We may monitor or record telephone calls for security purposes and to improve the quality of services that we provide to you.

Please note that for your safety and security, CCTV is in operation in all our premises which are open to the public.

Internet-based transfers

Given that the Internet is a global environment, using the Internet to collect and process personal information may involve the transmission of personal information on an international basis. Therefore, by using our websites and digital platforms and communicating electronically with us, you acknowledge our processing of personal information in this way. However, we will endeavour to protect all personal information collected through our websites and in accordance with strict data protection standards.

Other websites

Our websites and digital platforms may contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

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