



ACADEMY REGISTERED PLAYERS - PRIVACY NOTICE

INTRODUCTION

1. The Introduction

This notice applies to Academy players registered with Continental Aspire Soccer, other than players employed under a standard form scholarship agreement or a standard form professional employment contract, who are the subject of a separate privacy notice.

This notice explains the type of information we process, why we are processing it and how that processing may affect you. The notice focuses on players who are registered with Continental Aspire Soccer as part of the Academy.

It also applies to players formerly registered with the Continental Aspire Soccer Academy. The notice is set out in this document (the Core Notice) and Annex 1 - Supplementary Information. In the Supplementary Information we explain what we mean by “personal data”, “processing”, “sensitive personal data” and other terms used in this notice.

2. In brief, this notice explains:

- what personal data we hold and why we process it;
- the legal grounds which allow us to process your personal data;
- where the data comes from, who gets to see it and how long we keep it;
- how to access your personal data and other rights; and
- how to contact us.

PERSONAL DATA – WHAT WE HOLD AND WHY WE PROCESS IT

3. We process data for the purposes of our business, including management, administrative, football-specific, scientific research and legal purposes. The Supplementary Information provides more specific information on these purposes, on the type of data that may be processed and on the grounds on which we process data.

WHERE THE DATA COMES FROM AND WHO GETS TO SEE IT

4. Some of the personal data that we process about you comes from you. For example, as part of the registration process you tell us your name, address and contact details. Other personal data about you is generated in the course of you playing, training and taking part in coaching, academic work and strength and conditioning sessions. Some of this data may come from Fulham’s Academy coaches, medical and sports science staff, scouts and administrators with whom you come into contact during your registration.

Your personal data may from time to time be seen internally by Academy coaches, medical and sports science staff, scouts, administrators, finance staff and HR. We will, where necessary, and as set out in this privacy notice, also pass your data outside the organisation, for example to the Football Association (the “FA”), the Football League (the “EFL”), the Premier League, or other governing bodies which are in charge of the competitions in which you participate. We may also share some of your information with other statutory bodies, where we are required to do so for safeguarding purposes.



HOW LONG DO WE KEEP YOUR PERSONAL DATA

5. We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes. In general, we will keep your personal data for the duration of your registration and for a period afterwards.

TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA

6. We will, where necessary, and as set out in this privacy notice, transfer your personal data outside the EEA to members of the Continental Aspire Soccer academy.

YOU'RE DATA RIGHTS

7. You have a right to make a subject access request to receive information about the data that we process about you.

CONTACT DETAILS

In processing your personal data, we act as a data controller.

PARENT / GUARDIAN

9. It is important that you understand what this notice means and how it applies to you. To this end, because you are under 18 you should make sure that your parent or guardian has read this notice and has explained anything in it that you do not understand. If you or your parent or guardian would like to discuss anything in this notice or if you require any part of it to be explained or translated, we will do our best to accommodate your request.



ANNEX 1- SUPPLEMENTARY INFORMATION

WHAT DO WE MEAN BY “PERSONAL DATA” AND “PROCESSING”?

1. “Personal data” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about or relating to you.

Data “processed automatically” includes information held on, or relating to use of, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV or photographs.

“Processing” means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “sensitive personal data”.

LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

WHAT ARE THE GROUNDS FOR PROCESSING?

2. Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as Contract, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract or registration with you	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe environment in which to work and avoiding unlawful discrimination.
Legitimate Interests	Processing necessary for our or a third party’s legitimate interests	We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data. Your data will not be processed on this basis if our or a third party’s interests are overridden by your own interests, rights and freedoms.



PROCESSING SENSITIVE PERSONAL DATA

3. If we process sensitive personal data about you (for example (but without limitation), storing your health records to assist us in ensuring that we provide you with a healthy and safe environment in which to train and play football or processing personal data relating to diversity monitoring), as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include:
- Processing being necessary for the purposes of your or our obligations and rights in relation to your registration;
 - Processing relating to data about you that you have made public (e.g. if you tell your coach and your team mates that you are injured);
 - Processing being necessary for the purpose of establishing, making or defending legal claims;
 - Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your ability to play or train; or
 - Processing for equality and diversity purposes to the extent permitted by law.

Occasionally, we may process your personal data in order to conduct scientific research into a particular study. This may take place by CAS medical, sports science or psychology staff measuring your performance in matches, training, academic exercises or otherwise, and using the data generated to undertake research in a particular scientific field. Where applicable, in addition to this notice, we will seek your consent in order to process or share this data.

FURTHER INFORMATION ON THE DATA WE PROCESS AND OUR PURPOSES

4. The Core Notice outlines the purposes for which we process your personal data. More specific information on these, examples of the data and the grounds on which we process data are in the table below.

The examples in the table cannot, of course, be exhaustive.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Registration and Administration	Standard data related to your identity (e.g. your name, address, email address, ID information and documents, telephone	Contract Legal obligation Legitimate interests



<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
	numbers, place of birth, nationality, contact details.)	
Contacting you or others on your behalf	Your address and phone number, emergency contact information and information on your next of kin.	Contract Legal obligation Legitimate interests
Supporting and managing your registration and any health concerns	<p>Information connected with your registration and your performance in matches, training or in any other sporting or academic assessments you undertake with the Club, including records of documents and emails created by or relating to you and information on your use of our systems including computers, laptops or other devices.</p> <p>Coaching and management information regarding you including notes of meetings with or about you.</p> <p>Information relating to your compliance with Club rules and policies.</p> <p>Information concerning on or off field disciplinary or conduct issues.</p> <p>Information concerning your health, strength and conditioning profile, physical and mental performance, psychological profiling and any medical or doctors' notes.</p>	Contract Legal obligation Legitimate interests
Physical and system security	<p>CCTV images.</p> <p>Records of you entering or leaving Club premises.</p> <p>Records of your use of our systems including computers, phones and other devices and passwords.</p> <p>Video or still photographic footage of you playing or training.</p>	Legal obligation Legitimate interests



<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age as part of diversity monitoring initiatives. Such data will be aggregated and used for equality of opportunity monitoring purposes. Please note we may share aggregated and anonymised diversity statistics with regulators if formally required / requested.	Legitimate interests
Monitoring and investigating suspicions of misconduct, compliance with policies and rules – both generally and specifically	We expect our registered players to comply with our policies and rules and may monitor our systems to check compliance. We will where necessary and as set out in this privacy notice check systems and other data to look into those concerns. In appropriate cases if we have suspicions of serious wrong-doing, we may make targeted records (e.g. video or sound) in connection with an investigation.	Legitimate interests
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting us.	Legitimate interests Legal obligation
Day to day business operations including marketing	Information relating to your registration with the Club. This may include a photograph of you which we may use for internal purposes or external marketing (including for use on the Club website, Club programme or other marketing or promotional materials). Information regarding your travel arrangements and location.	Legitimate interests
Maintaining appropriate business records during and after your registration	Information relating to your registration, anything you do whilst registered with the Club and your performance relevant to such records.	Contract Legal obligation Legitimate interests
Personal performance or coaching plans	We may film you training or playing in matches with the aim of providing you with individual or team focused coaching or to create individual training or fitness plans.	Contract Legal obligation
Training sessions	We may process your personal data to provide coaches or managers with information to create training sessions.	Contract
Administration of registration	We may process your data and/or share it with the FA or other governing bodies to	Contract



<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
	ensure that you are properly registered and able to take part in matches and training sessions.	
Scientific research	The Club may process your personal data in order to conduct scientific research relating to you or Academy players or players generally.	Legitimate interest

WHERE THE DATA COMES FROM

5. When you start your registration with us, the initial data about you that we process is likely to come from you or your parent or guardian: for example, contact details, bank details and information on your immigration status and whether you can lawfully be registered with the Club. We will where necessary and as set out in this privacy notice also require references and information to carry out background checks.
6. In the course of your registration we may receive personal data relating to you from others. Internally, personal data may be derived from your coaches; externally, it may be derived from governing bodies or any future or former club.

WHO GETS TO SEE YOUR DATA?

INTERNAL USE

7. Where necessary and as set out in this privacy notice, your personal data will be disclosed to your managers, coaches, Club medical and fitness professionals, Academy administrators, HR, Finance and other administrative staff. We will where necessary and as set out in this privacy notice also disclose this to other members of Continental Aspire Soccer.

EXTERNAL USE

8. We will only disclose your personal data outside the Continental Aspire Soccer if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you. In particular, your personal data may be disclosed to the FA or another competent governing body or statutory authority as set out in this policy.

We will disclose your data if it is necessary for our legitimate interests as an organisation or the interests of a third party (but we will not do this if these interests are over-ridden by your interests and rights in particular to privacy). Where necessary, we will also disclose your personal data if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.

9. Specific circumstances in which your personal data may be disclosed include:

Disclosure to external recipients of electronic communications (such as emails) which

- Contain your personal data; Disclosure on a confidential basis to a potential buyer of our business or company for
- The purposes of evaluation – but only if we were to contemplate selling; Disclosure and transfer disclosed to respond to law enforcement agency requests or
- Where required by applicable laws, pursuant to court orders, or arbitral or tribunal orders or rules of procedure, or to government regulations department tribunal orders or rules of procedure, or to government regulations departments or agencies or regulatory bodies (including disclosures to tax and employment authorities), employment and any other regulatory bodies); Disclosure on a confidential basis to our advisers for example to our lawyers for the
- Purposes of seeking legal advice or to further the interests of a company within the Continental Aspire Soccer in legal proceedings and to our accountants for auditing purposes; Disclosure to governing bodies including the Football Association, Football League,
- Premier League, UEFA or FIFA (each as required), where required; Disclosure to the Police, governmental, local governmental or quasi-governmental
- Bodies, as required when it relates to matters involving the safeguarding of children; Disclosure to our insurers;
- Disclosure of aggregated and anonymised diversity data to relevant regulators as part of a formal request; To third parties for the purpose of assessing efficiency of IT or business system device usage. In such cases the data sent to the third party will be anonymised where possible.

RETAINING YOUR PERSONAL DATA – MORE INFORMATION

10. Although there is no specific period for which we will keep your personal data, we will not keep it for longer than is necessary for our purposes. In general, we will keep your personal data for the duration of your registration and for a period afterwards. In considering how long to keep it, we will take into account its relevance to our business and your employment either as a record or in the event of a legal claim.

If your data is only useful for a short period (for example, CCTV), we will delete it in accordance with our Data Retention Policy.

For more information please see our Data Retention Policy.

TRANSFERS OF PERSONAL DATA OUTSIDE THE EEA – MORE INFORMATION

11. In connection with our business and for employment, administrative, management and legal purposes, we will where necessary and as set out in this privacy notice transfer your personal data outside the EEA to members of the CAS.

And on occasion other jurisdictions in which we are established. We will ensure that any transfer is lawful and that there are appropriate security arrangements.

In relation to intra-group transfers, the members of the CAS of companies have entered into an intra-group data sharing agreement ensuring appropriate and suitable safeguards with controllers/processors outside the EEA.

These are in standard terms approved by the European Commission. If you wish to see details of these safeguards, please ask the Continental Aspire Soccer team. A list of data recipients who receive material amounts of personal data and are located outside of the EEA is set out in Annex 2 - Extra-EEA Third Party Processors.

ACCESS TO YOUR PERSONAL DATA AND OTHER RIGHTS

12. We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

You also have a legal right to make a “subject access request”.

If you exercise this right and we hold personal data about you, we are required to provide you with information on it, including: Giving you a description and copy of the personal data

Telling you why we are processing it

- If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller.

This only applies if the ground for processing is Consent or Contract. If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

COMPLAINTS

13. If you have complaints relating to our processing of your personal data, you should raise these with the Academy Manager, Continental Aspire Soccer in the first instance. You may also raise complaints with your statutory regulator. For contact and other details ask HR.

STATUS OF THIS NOTICE

14. This notice does not mean that you have any contract of employment and does not create contractual rights or obligations. It may be amended by us at any time. Nothing in this notice is intended to create an employment relationship between us and any non-employee providing services to us



ANNEX 2 – EXTRA-EEA THIRD PARTY PROCESSORS

As indicated above, we may transfer your personal data outside the EEA in countries which do not have data protection laws equivalent to those applicable in the EEA. This transfer is covered by model clauses approved by the European Commission

PROOF OF RECEIPT		Date:	
Player Name:			
Signed:			
Print:			
Relationship to Player:			