

Morpeth RFC - Privacy Policy (rfu.club)

This Policy applies as between you, the User of this Website and this RFU Club, the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Data”	means collectively all information that you submit to the RFU Club via the Website, including all personal data as defined in the Data Protection Legislation;
“Data Protection Legislation”	all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR (the General Data Protection Regulation ((EU) 2016/679) as it forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018); the Data Protection Act 2018; the Privacy and Electronic Communications Directive 2002/58/EC (as updated by Directive 2009/136/EC) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended.
“Cookie”	means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in paragraph 15;
“RFU Club”	means the owner and or administrator of this website which is a Rugby Football Union (RFU) affiliated club;
“User”	means any third party that accesses the Website and is not employed by an RFU Club and acting in the course of their employment; and
“Website”	means the website that you are currently using and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of RFU Club and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

3. Data Collected

Without limitation, any of the following Data may be collected by this Website from time to time:

- name;
- date of birth;
- gender;
- job title;
- profession;
- contact information such as email addresses and telephone numbers;
- demographic information such as post code, preferences and interests;
- video footage (as described at paragraph 6 below);
- health data (in limited circumstances only)
- financial information such as bank account or credit / debit card numbers;
- IP address (automatically collected);
- web browser type and version (automatically collected);
- operating system (automatically collected); and
- a list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected).

4. Our Use of Data

- Any personal Data you submit may be retained by the RFU Club.
- Unless we are obliged or permitted by law to do so, and subject to paragraph 7, your Data will not be disclosed to third parties. This does not include our suppliers or affiliates including the RFU and First Sports International Ltd.
- All personal Data is stored securely in accordance with the principles of the Data Protection Legislation. For more details on security see paragraph 13 below.
- Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website and/or delivering our services to you. Specifically, Data may be used by us for the following reasons:
 - internal record keeping;
 - improvement of our products / services;
 - improvement of players performance;
 - transmission by email of promotional materials that may be of interest to you;

5. Lawful Basis for Processing

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also process your personal data where we need to comply with a legal or regulatory obligation.

Generally, we do not rely upon consent as a legal basis for processing your personal data. However, where we collect video recordings of our players as described in paragraph 6 (below), we will seek members (or parental) consent before processing this type of personal data.

6. Video Recordings of Players

We record our 1st Team and Colts players during matches and training sessions to analyse, enhance and improve player performance. This is done through the engagement of a third party supplier, VEO Limited. Such recordings may inadvertently capture images of players from other teams, match officials and spectators. The audio setting for these recordings will remain switched off. We will not process other personal data to identify any individuals (other than our players) captured from these recordings. We will not disclose or share any recordings with third parties without your consent and process this data generally for the purposes of using to analyse, enhance and improve player performance. Should you object to the RFU Club capturing your image, then please contact us by email at mail@morpethrfc.co.uk or by telephone on 01670 512508 and we will take such reasonable steps to delete any identifiable images from our video recordings.

7. Third Party Websites and Services

RFU Clubs may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to:

- GMS (Game Management System – England Rugby – see paragraph 8 below);
- payment processing, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services have access to certain Data provided by Users of this Website;
- third party credit card payment processing suppliers to collect payment information, including your credit card number, billing address and phone number. The security of your information is important to us. When you enter sensitive information (such as a credit card number) as part of our service, we encrypt the transmission of that information using industry-standard encryption; and
- VEO Limited to record matches to enhance player performance.

Personal Data collected by GMS (as a separate data controller) will be processed in accordance with the GMS Privacy Notice. In all other cases, Personal Data used by

the above third parties is used only to the extent required by them to perform the services that MRFC requests, and any use for other purposes is strictly prohibited. Furthermore, any Personal Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the Data Protection Legislation.

MRFC does not share Personal Data of its members with any sponsors of the Club.

8. GMS

MRFC uses GMS Game Management System which is the site recommended and used by RFU (England Rugby). The GMS is a cloud-based software platform which enables rugby clubs nationally to use its system. This significantly reduces the risk to MRFC of a data breach incident arising as it provides a robust IT security infrastructure to guard against unauthorised access to members' personal data. MRFC operates a strict policy for access controls in relation to the GMS platform and applies a "need to know" approach to those MRFC personnel who require access to information held on the GMS platform. For further information about this, please contact us by email at peter.owens@morpethrfc.co.uk or by telephone on 07785 510123.

GMS is a separate data controller and has its own requirements to meet under the Data Protection Legislation. For further details about how GMS uses MRFC member personal data, please see the GMS Privacy Notice which can be found using this link: [RFURegulatoryandGovernanceNotice.pdf \(englandrugby.com\)](#)

9. Criminal Offence Data

In limited circumstances and with a focus on MRFC's safeguarding policy, information about criminal convictions and offences may be disclosed by the Disclosure and Barring Service (DBS). It is important that such checks are carried to protect the wellbeing and safety of our members. This process is managed on the GMS platform within its secure platform. For further details about this, please contact Ken Fraser by email at ken.fraser@morpethrfc.co.uk or by telephone on 07794 366061.

10. Links to Other Websites

This Website may, from time to time, provide links to other websites. RFU Clubs has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

11. Your Right to Withhold Information

You may access certain areas of the Website without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.

You may restrict your internet browser's use of Cookies. For more information see paragraph 15.

12. Accessing your own Data

You have the right to ask for a copy of any of your personal Data held by RFU Clubs (where such data is held) and you should contact the RFU Club where such personal Data will be made available within one calendar month.

13. Security

Data security is of great importance to RFU Clubs and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected by MRFC in accordance with the Data Protection Legislation.

14. Our Communications with You

In most cases, our communications with you will be sent electronically via the GMS platform. This will provide you with important information that we think you need to know (for example, about fixtures, timings etc.) and about MRFC events and activities which members (and their parents) may be interested in attending.

You can restrict or limit the information that is made available to you by setting your preferences on the GMS platform. Please contact us if you have any questions about this.

15. Cookies

- 15.1. This Website may place and access certain first party Cookies on your computer. First party cookies are those placed directly by RFU Clubs via this Website and are used only by RFU Clubs. RFU Clubs uses Cookies to improve your experience of using the Website and to improve our range of products and services. RFU Clubs has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
- 15.2. By using this Website you may receive certain third party Cookies on your computer. Third party cookies are those placed by websites and/or parties other than RFU Clubs. Third party cookies are used on this Website for analytical reporting purposes and are detailed in below. These cookies are not integral to the services provided by the Website.
- 15.3. All Cookies used by this Website are used in accordance with current UK Data Protection Legislation.
- 15.4. Before Cookies are placed on your computer, subject to paragraphs 13.5 and 13.8, you will be prompted to request your consent to set those Cookies. By giving your consent to the placing of Cookies you

are enabling RFU Clubs to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies.

- 15.5. Certain features of the Website depend upon Cookies to function. UK Data Protection Legislation deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies. You may still block these cookies by changing your internet browser’s settings as detailed below.
- 15.6. This Website uses analytics services provided by Google analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website. This, in turn, enables us to improve the Website and the products and services offered through it. You do not have to allow us to use these Cookies, as detailed below, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our Websites.
- 15.7. The analytics services used by this Website use Cookies to gather the required information. Certain of these Cookies may be placed immediately when you decide to visit the Website and it may not be possible to obtain your prior consent. You may remove these Cookies and prevent future use of them by following the steps set out below.
- 15.8. The analytics services used by this Website uses, but is not limited to, the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	Third	Google Analytics	Used to distinguish users.
_gat	Third	Google Analytics	Used to throttle request rate.
__utma	Third	Google Analytics	Used to distinguish users and sessions.
__utmt	Third	Google Analytics	Used to throttle request rate.
__utmb	Third	Google Analytics	Used to determine new sessions/visits.
__utmz	Third	Google Analytics	Stores the traffic source or campaign that explains how the user reached this site.

__utmv	Third	Google Analytics	Used to store visitor-level custom variable data.
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- 15.9. You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
- 15.10. You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

16. Changes to this Policy

RFU Clubs reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.

Updated 16 November 2023