

## **Rugby4cast Privacy Policy**

The <https://Rugby4cast.co.uk> website (the “Website”) is operated by Rugby4cast, a sole-trading company operating in London, UK.

We take the privacy of our users and their data extremely seriously and we ask that you read this Privacy Policy carefully as it contains important information on:

- the personal information we collect about you,
- what we do with your information, and
- who your information might be shared with.

### **Data Controller**

Rugby4cast are a “data controller” for the purposes of the General Data Protection Regulation EU 2016/679 (the “GDPR”), (i.e. we are responsible for, and control the processing of, your personal information).

### **What information do we collect?**

#### **Your personal information:**

We may collect personal information about you (such as your name and email address) when you use our Website, register with us or purchase services – including a Membership package - from us. We may also collect personal information when you contact us, send us feedback or post material to the Website or Members area.

We may also collect information that your browser sends us whenever you visit our Website. This data may include information such as your computer’s IP address, browser type, browser version, the pages of our Website that you visit and other statistics relating to your use of the Website. This information may be collected in conjunction with third party services such as Google Analytics.

#### **Use of cookies:**

We use cookies on the Website to:

- recognise you whenever you visit this Website (this speeds up your access to the Website);
- carry out research and statistical analysis to help improve our content and services and to help us better understand our visitor and customer requirements and interests;

The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your computer or other electronic device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you—but only where you voluntarily provide it (e.g. by completing an online form) or where you purchase services from us.

In most cases we will need your consent in order to use cookies on this Website, except for where the cookie is essential in order for us to provide you with a service you have requested (e.g. to enable you to purchase services from us).

There is a notice on our home page which describes how we use cookies and which also provides a link to this Privacy Policy. If you use our Website after this notification has been displayed to you, we will assume that you consent to our use of cookies for the purposes described in this Privacy Policy.

We may work with third party suppliers who may also set cookies on our Website. These third-party suppliers are responsible for the cookies they set on our Website. Further information can be obtained on the third-party website.

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this Website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

### **How will we use the information about you?**

#### **We collect information about you so that we can:**

- identify you and manage any membership account you hold with us;
- process your membership or carry out obligations arising from any contract(s) entered into between you and us;
- conduct anonymous statistical analysis on usage of the Website and Dashboard;
- if you agree, let you know about other products or services that may be of interest to you—see 'Marketing' section below;
- detect and prevent fraud;

### **Marketing**

Only where you have provided us with specific, informed and unambiguous consent shall we communicate with you by the mechanism(s) you have consented to (e.g. email). We will only provide you with communications and marketing materials relating to features that you have explicitly consented to.

If you have consented to such receive marketing from us, you can opt out at any time.

### **Who your information might be shared with**

We may disclose your personal data to:

- our clients as part of the service offered, but only with your explicit consent or pursuant to another legal basis under the GDPR;
- our service providers (e.g. Mailchimp, Memberpress or other such e-marketing company with whom we contract in order to carry out the Service) pursuant to strict data processing agreements that protect your personal data to the same or higher standards than we treat it;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity; and
- a court of law or regulator where we are under a duty to disclose or share your personal data in order to comply with a legal or regulatory obligation.

Rest assured that we will never pass your information to a third party outside of the categories above without your explicit consent.

### **Keeping your data secure**

We will use technical and organisational measures to safeguard your personal data, for example:

- access to your membership account is controlled by a password and username that are unique to you;
- we store your personal data on secure servers; and
- information transfer is encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

### **Payment details**

We do not process or store payment details. This is done by a third-party platform (PayPal or Stripe).

### **Safeguarding your data**

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How can you contact us?' below).

Our Website may contain links to other websites of our partners, suppliers, advertisers or other approved third parties. If you follow a link to any of these websites, please note that these websites have (or should have) their own privacy policies. We do not accept any responsibility or liability for these policies or the way in which your personal data may be treated by these third parties. We recommend you check the privacy policy of any third party before you submit any personal data to their website.

### **Transfers of your information out of the EEA**

We may need to transfer your personal data to countries which are located outside the European Economic Area (“EEA”), for the purpose of providing the services to you. You may be located in a country outside of the EEA and therefore we may have no choice but to transfer your data outside of the EEA. Any transfer of your personal data outside of the EEA will be subject to a GDPR-compliant guarantee (such as the EU-US Privacy Shield or a Model Contract Clause approved by the European Commission) that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

### **How long do we hold your data for?**

We only keep your personal data as long as necessary for the purpose for which it was obtained. Usually, this is for a period of 6 months after the end of your Membership, and where you have not expressed an interest in extending your Membership (via email or phone). After that period, we either: (1) anonymise the data if we still wish to use it for analytical purposes, or (2) pseudonymise the data if believe in good faith that we may need to process the data in the future for a legitimate purpose, or in all other cases (3) delete it completely from our servers.

### **What rights do you have?**

#### **Right to request a copy of your information:**

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or it, please:

- email, call or write to us (see ‘How can you contact us?’ below),
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill will suffice), and
- let us know the information you want a copy of, including any account or reference numbers, if you have them.

We will acknowledge receipt of your request and will respond within thirty (30) days. We will not charge you for providing the information.

#### **Right to correct any mistakes in your information:**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below),
- let us have enough information to identify you (e.g. membership number, user name, registration details), and
- let us know the information that is incorrect and what it should be replaced with.

We will acknowledge receipt of your request and will respond within thirty (30) days.

**Right to ask us to stop contacting you with direct marketing:**

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below). You can also click on the 'unsubscribe' button at the bottom of emails from us,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill will suffice), and
- let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

We will acknowledge receipt of your request and will respond within thirty (30) days.

**Right to erasure:**

You can request that we delete all personal data relating to you free of charge. If you would like to do this, please:

- email, call or write to us (see 'How can you contact us?' below), and
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill will suffice), and
- provide us with the justification for the erasure request (e.g. you are withdrawing your consent, you no longer believe that we should be processing the personal data for the original purpose for which it was obtained, the personal data is being unlawfully processed, there is a legal reason for erasure etc.).

We will acknowledge receipt of your request and will respond within thirty (30) days.

**Right to complain to the supervisory authority:**

If you are unhappy with the way in which we have dealt with a request you have made or you feel that we are not complying with this Privacy Policy in any way, you have the right to complain to the supervisory authority in the country in which you live. The supervisory authority in England and Wales is the Information Commissioners Office and details of how to contact them are available on their website: [www.ico.org.uk](http://www.ico.org.uk).

### **How to contact us**

Please contact us via [support@Rugby4cast.co.uk](mailto:support@Rugby4cast.co.uk). If you have any questions about this Privacy Policy or the information we hold about you, we will be delighted to assist.

### **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this Website.