

Reading Football Supporters' Society Limited, Registered Office: c/o KnightGoodhead, 7 Bournemouth Road, Chandler's Ford, Eastleigh, Hampshire, SO53 3DA.

www.star-reading.org

### THE STAR PERSONAL DATA PRIVACY POLICY

Date of Review	Reason for Review	Amendments	
10/05/2018	New GDPR Legislation	Full Re-Write	
12/12/2019	Regular Process	Minor changes	
11/02/2021	Regular Process	Minor changes and Appendix	
		A incorporated	
10/02/2022	Regular Process	P.2: small change to ECWID	

STAR treats the privacy of members and website viewers very seriously and we take appropriate security measures to protect your privacy. This Privacy Policy explains how we collect, manage and protect your personal data during your STAR membership.

Personal data means any information relating to an identifiable person (e.g. first and last name, address or email) that may be used directly or indirectly to identify any individual.

## How we obtain your personal data

You provide us your personal data during membership renewal and any subsequent interaction during the membership year and subsequent three-month renewal period.

We do not seek or secure any additional information from other sources.

### How we use your personal data

We use your personal data to manage your membership, including communicating relevant information to you (Event Information, STAR Bulletins, Membership Information) during the membership year. We undertake to protect your data and take reasonable measures to protect your personal data in storage.

We do not share or use your personal data for marketing purposes.

We share your Reading FC Customer Number, Name and post code with Reading FC in order to secure your 20 bonus Loyalty Points. Reading FC already hold this data, subject to the Reading FC Privacy Policy between you and them. Reading FC do not make any further use of the data shared by STAR.

#### Information about cookies

A cookie is a small text file on your browser (e.g. Google Chrome). The STAR Policy on management of cookies can be found below in Appendix A – Cookies Policy.

### Providing your personal data to others

STAR uses three third party systems (not relevant to all members) in managing your STAR membership:

MailChimp (used for STAR Bulletins and other email communication). MailChimp have updated their privacy policy to bring it line with the General Data Protection Regulation (GDPR). Mailchimp uses servers located in the United States (and so personal data is transferred outside the EU) but takes steps to protect your privacy in line with the GDPR.

PayPal (used for online membership and online shop payments). PayPal transactions are subject to the PayPal Privacy Policy, which has recently been amended to bring it line with the General Data Protection Regulation.

ECWID (online membership and shop used for online travel booking). Ecwid has followed GDPR guidelines on data collection, storage, processing and sharing personal data. They have many customers in Europe and they work hard to meet all legal requirements. Ecwid uses secure data servers based in Europe and all sensitive data is transferred via secure HTTPS protocol.

## How long do we keep information?

We keep your information as follows:

- During and up to 3 months after the current membership year expires (i.e. to the end of September) for communicating relevant information to you (Event Information, STAR Bulletins, Membership Information).
- For a full 12 months after the current membership year, solely for processing membership renewals.
- If you formally agree on the membership form/renewal ("To continue receiving communication from us after this year's membership expires tick here"), for 24 months after the current membership year expires for communicating relevant information to you (Event Information, STAR Bulletins, Membership Information).
- All STAR Coach Travellers' personal data for a Season, such as coach traveller name lists, contact details and online booking records, will be held until the annual accounts are submitted and made available for independent examination.

### International transfers of your personal data

We do not currently transfer your data outside the EEA, except for your email address, which our email service provider, MailChimp as described above, hosts in the USA. If this changes we will update you and this policy.

# Data subject rights

### Subject access requests

GDPR grants you permission to access the personal data we hold on you.

### Right to rectification

You have the right to have any inaccurate personal data rectified without undue delay.

### Right to erasure

You have the right to have your data erased without undue delay.

### Right to restriction of processing

You have the right to restrict processing of your data without undue delay.

# Notification obligation regarding rectification or erasure of personal data or restriction of processing

We shall secure, where possible, confirmation from all related parties of any requested rectification, erasure or restriction of your personal data.

### Right to data portability

You have the right to receive your data in a commonly used and Machine-Readable format.

### Right to object

You have the right to object to the processing of personal data concerning you. The services we provide to you may be limited from this action.

### Right to not be subject of decisions based on automated processing

We do not carry out any automated processing of your personal data.

## **Important Information**

### Questions, queries and complaints

If you have any questions, queries or complaints on this Policy, or the personal data that we hold, please email us at <a href="mailto:onlinemembership@star-reading.org">onlinemembership@star-reading.org</a>

# APPENDIX A - COOKIES POLICY

### VISITORS TO OUR WEBSITE

When someone visits our website we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Version 1.4 10<sup>th</sup> February 2022

# **USE OF COOKIES BY OUR WEBSITE**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

The table below explains the cookies we use and why.

Cookie	Name	Purpose	More information
Google Analytics	_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	Click here for an overview of privacy at Google
STAR EU Cookie Compliance	eu-opt-in=1	This cookie is used when a visitor agrees to our use of cookies. It allows us to check whether or not to display the Cookies information pop up.	This cookie expires after 12 months.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

To opt out of being tracked by Google Analytics visit <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>.

## **Policy Changes**

This policy will be reviewed annually and updated on the STAR web-site <u>star-reading.org</u>. In addition, the latest version will be provided at the start of every new membership year.