



The Reading Football Club Limited

## Staff (non-player) privacy notice

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### About us

Reading Football Club Limited (**RFC**) is the data controller in respect of all personal data collected about you in relation to your employment with us. This means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

This Privacy Notice explains what information is collected about you, how it is used, and the steps taken to ensure that it is kept secure. We also explain your rights.

### The information we collect and its sources

When you apply for a position at RFC we will obtain some personal data from you, your representative (such as your recruitment agent) if you have one or your representative to enable us to make recruitment decisions.

Typically we will record:

- name
- date of birth
- contact details
- qualifications and experience
- information about your right to work in the UK
- ethnicity and other equality and inclusion information
- information about your criminal record (if applicable)

If you are successful and accept an offer of work with us, we will obtain additional information which will form part of your personnel records. This may come from you, your previous employer(s) or social media or from RFC directly. This will normally include:

- working location
- department and role(s)
- security pass details
- national insurance number
- pay and benefits
- assets provided (eg laptop, phone)
- details of your bank account and national insurance number
- medical information (allergy / disability information and medical needs)
- doctor and contact details
- next of kin and emergency contact details
- details of periods of leave taken by you, including holiday, sickness absence, family leave, and the reasons for the leave

During the course of your employment we will add:

- appraisal records
- training details
- details of any disciplinary or grievance procedures in which you have been involved

We will also add supplementary information such as any medical or occupational health reports.

## Information about other people

If you provide information to us about any person other than yourself (such as next of kin), you must ensure that they understand how their information will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf, before doing so.

## How we will use your information

We will primarily use the personal information:

- **selection.** For making recruitment and promotion decisions
- **communication.** To communicate with you or your nominated representative
- **records keeping.** For record keeping purposes such as keeping details of any equipment we provide to you such as laptop computers
- **administration.** For internal administration, including payment of remuneration and expenses, obtaining insurance, making travel and accommodation arrangements
- **security.** To ensure security of our premises and assets
- **health and welfare.** Addressing any medical or other specific needs you may have
- **equal opportunities.** To enable us to monitor and ensure compliance with anti-discrimination policies or to comply with our legal obligations relating to social inclusion
- **compliance.** Ensuring compliance with your contract of employment and our legal obligations
- **appraisals and training.** Monitoring your suitability for your role or any other role and assessing your needs for and provision of training and support
- **disciplinary matters**
- **RFC welfare and reputation management**
- **health and safety.** To ensure a safe environment for you and your colleagues

## Consent and lawful processing of personal data

The legal basis for the collection and processing of your personal data is:

- **for selection.** that it is necessary to fulfil the contract that you wish to enter into with us and it is necessary to carry out obligations in the field of employment or relates to personal data that is manifestly made public by you
- **for dealing with medical needs:** that you have given your explicit consent or, in serious cases that it is in your vital interests to help you

- **for equality and inclusion and health and safety:** that it is necessary for us to comply with our legal obligations
- **for RFC welfare and reputation management** that it is necessary for our legitimate interests which are to maintain our reputation and this does not prejudice or harm your rights and freedoms
- **Safeguarding:** that it is necessary for the purposes of protecting the Player from neglect or physical, mental or emotional harm
- **in all other cases:** that it is necessary for the performance of the contract of employment that you have entered into or are taking steps to enter into

## Disclosing your personal information

We will limit who, within RFC, has access to your personal data such that it will be accessible on a need to know basis. This will include members of the Human Resources department and your line manager with relevant information (such as bank account details) being provided to the Finance department so that they can pay your expenses (where appropriate).

We may disclose relevant personal data to third parties:

- **RFC owners**
- **DBS.** Where your role requires you to have a Disclosure and Barring Service (DBS) check, we will provide details to the relevant agency in order to obtain a DBS certificate for you.
- **HMRC.** We will provide relevant personal data to HM Revenue & Customs for tax and payroll purposes.
- **Insurers**
- **Medical / occupational health practitioners.** We may provide relevant details to enable you to receive treatment or support.
- **Disciplinary panels / your representative(s).** if you are involved in a disciplinary matter or other legal or similar process.
- **Law enforcement,** the Independent Safeguarding Authority, relevant local authorities (including the Local Authority Designated Officer (also known as 'LADO')), and /or the police
- **Legal or other professional advisers** including panel members who deal with issues relating to DBS checks
- **Reference requests.** If you require us to provide a reference for you, we will disclose relevant personal data to the third party to fulfil your request.

We may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, payroll service providers and printing companies. In these circumstances, we will ensure that personal information is properly protected and that it is only used in accordance with this Privacy Policy.

## Data retention

We will normally keep your principal records for as long as you are a member of staff with RFC and for 7 years afterwards.

After this time, we will keep historical records of your achievements and any incidents at RFC and will anonymise the other information and keep it for analysis of roles and trends.

## Transfers of your personal data outside the UK

We may disclose some relevant information (including your contract details) to RFC's owners who are based in China. We will ensure that, if we do so, we will take proper steps to ensure that it is protected in accordance with data protection law.

Other than this, we do not currently transfer personal data outside of the United Kingdom. If this changes and we do need to transfer your personal data to other territories, we will take proper steps to ensure that it is properly protected

## Updating and correcting your information

We encourage you to inform your line manager or the Human Resources department of any updates to your personal information as soon as possible.

If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

## Your rights

Where you have given your consent to any processing of personal data, you have the right to withdraw that consent at any time. If you do, it will not affect the lawfulness of any processing for which we had consent prior to your withdrawing it.

You have the right of access to your personal data and, in some cases, to require us to restrict, erase or rectify it or to object to our processing it, and the right of data portability.

If you want to exercise any of your rights, you should contact the Human Resources department.

## Complaints

If you have any complaints about how we process your personal data, you are entitled to your complaint to the Information Commissioner. However, we would prefer you to contact our Privacy Officer in the first instance who will try to resolve the matter.

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