



England Rugby Privacy Notice

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2. Background

2.1 The purpose of this Privacy Notice is to give you a better understanding of:

- what information we collect;
- how we use that information;
- how this information is shared;
- your data protection rights; and
- other useful privacy and security related matters;

and this Privacy Notice applies to you if you have interacted with England Rugby through our various channels, or if you have visited Twickenham Stadium or other locations at which we operate, you have contacted us to purchase something from us and/or signed up to receive updates about upcoming events, offers and ways to get involved further with England Rugby or we have contacted you for these reasons.

2.2 Certain parts of www.englandrugby.com uses "cookies" to keep track of your visit and to help you navigate between sections. For more details please see our [Cookie Policy](#).

2.3 The RFU Regulatory and Governance Privacy Notice may also apply if you are a participant in rugby in England, including players, coaches, agents, referees, representatives of clubs/schools/colleges/universities/constituent bodies/ representative bodies (including members, officials and owners), spectators, parents, volunteers and/or such other individuals who may be under the jurisdiction of the RFU.

2.4 You can find additional information about privacy and your rights on the [Information Commissioner's website](#).

2.5 References to **we**, **our** or **us** in this privacy notice are to the RFU, a society registered under the Co-operative and Community Benefit Societies Act 2014 with Register No. 2798IR and whose registered office is at Rugby House, 200 Whitton Road, Twickenham, TW2 7BA, and other companies and entities in the RFU's group (the "RFU").

2.6 References to 'you' or 'your' in this privacy notice are to you in your personal capacity as an individual and/or in your capacity as a representative for a third party (such as a club/school/college/university representative).



- 2.7 We have appointed a Data Protection Officer to oversee our compliance with data protection laws.
- 2.8 This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of RFU's collection and use of personal information. However, we are happy to provide any additional information or explanation needed.
- 2.9 Should you wish to contact us in relation to this Privacy Notice, our contact details are set out in the "How do you get in touch with us?" section at the end of this Privacy Notice.

3. What Personal Information Do We Collect About You?

3.1 We may collect, store and process the following personal information about you, whether you are an adult or a child:

- your name, username and password;
- your gender;
- your age/date of birth;
- your home address, email address and phone number;
- your payment and delivery details, including billing and delivery addresses and credit card details, where you make purchases from us (all through our 3rd party agents);
- your marketing preferences, including any consents you have given us;
- the products you have purchased from us;
- your rugby activity such as your role, club affiliation, and courses undertaken;
- which emails you have received, opened and clicked on;
- how you have reached our digital platforms and the internet protocol (IP) address you have used;
- your device, browser type, versions and plug-ins, and your operating system;
- your journey through our digital platforms, including which links you click on and any searches you made, how long you stayed on a page, and other page interaction information;
- which videos you have watched and for how long;
- what content you like or share;
- which adverts you viewed and responded to;
- which pop-up or push messages you have seen and responded to;
- your subscription or membership status;
- information collected in any forms you complete;
- your responses to customer surveys (where you have given us permission to do so);
- CCTV footage and other information obtained through electronic means;
- records of your attendance at any events or competitions hosted by us; and
- images in video and/or photographic form and voice recordings.

4. How do we use this information, and what is the legal basis for this use?

4.1 The RFU uses your personal data to:

- respond to your enquiry;
- acknowledge any contribution that you may make;



- o administer the relevant competition;
- o send information to you about England Rugby and the activities of the RFU more generally;
- o fulfil any contract that we may enter into with you;
- o conduct research;
- o send marketing information to you in ways set out in this Privacy Notice;
- o to track your activity on our digital platforms;
- o to create an individual profile for you so that we can understand and respect your preferences;
- o to personalise and improve your experience on our digital platforms;
- o to personalise and/or tailor any communications that we may send you;
- o for profiling purposes to enable us to personalise and/or tailor any marketing communications that you may consent to receive from us;
- o to personalise digital advertisements to you on 3rd party platforms; or
- o other reasonable purposes for which you have provided such information.

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this. For the purposes of this policy, please note that the purposes and lawful basis set out below apply equally if you are a child or an adult.

Purpose	Personal information used	Lawful basis
To administer any membership account(s) you have with us and managing our relationship with you, and dealing with payments and any support, service or product enquiries made by you.	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any merchandise, products and/or services.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of merchandise, products and services.
To send you information which is included within your membership benefits package, including details about ticket information, competitions and events, commercial partner offers and discounts and any relevant updates.	All contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have	All contact and membership details and marketing preferences.	Where you have given us your explicit consent to do so.



requested from us, including our news items, information about membership, events, participation products and information about our commercial partners.		
To answer your queries or complaints.	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you.
Retention of records.	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
The security of our IT systems.	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport.	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so (save for the capturing of large crowd scenes where personal images are incidental and it is not practicable to do so).
To comply with health and safety requirements.	Records of attendance.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.



Monitoring the security of Twickenham Stadium and other venues utilised by the RFU.	Images captured via CCTV and records of attendance.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment whilst visiting Twickenham Stadium and other venues utilised by the RFU.
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5. Direct Marketing

- 5.1 From time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.
- 5.2 We will only send marketing messages to you in accordance with the marketing preferences you set.

Withdrawing consent or otherwise objecting to direct marketing

- 5.3 We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by <https://www.pages06.net/rfu/PrivacyPolicyUnsubscribe/>. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you. Please note that you may continue to receive non-marketing communications from us, for example, in some cases, we may send you direct communications without your consent, where we rely on our legitimate interests.

6. What information do we receive from third parties?

- 6.1 We may receive information about you from third parties and in particular we may combine your information with other information that we obtain from our dealings with you or which we receive from other organisations, including information from constituent bodies, representative bodies, clubs, schools, colleges, universities, other sports, other rugby union governing bodies, other rugby stakeholders (such as the Rugby Players' Association, the Association of Rugby Agents, Premier Rugby Limited), law enforcement, regulatory bodies (such as the Gambling Commission, UK Anti-Doping, World Anti-Doping Agency) and such other reputable third parties with whom we have relationships.
- 6.2 We may receive information about you from our group companies, subsidiaries or associated (joint venture) companies in which we have an interest including: World Rugby, European Professional Club Rugby, England Rugby Travel Limited, Twickenham Experience Limited, British & Irish Lions DAC, Six Nations Rugby Limited, Rugby Reflink Limited, RFU Hotel Limited and RFU Health and Leisure Limited, as well as commercial entities more widely such as from the Compass Group PLC, Ticketmaster UK Limited, Fanatics (International) Limited, Engage Sport Management Limited.
- 6.3 We may receive information about you from the rights owner(s) of event(s) you have attended at Twickenham Stadium (or other locations utilised), if we have been informed that you have provided the necessary consent.

7. With Whom Do We Share Your Information?

- 7.1 We share personal information with the following parties:



- **Any party approved by you.**
- **Other service providers:** for example, email marketing, market intelligence, market research, mail houses, print facilities, third party marketing platforms, merchandising services, payment processors, data analytics service providers, CCTV contractors, promotional advisors, contractors or suppliers and IT services (including Customer Relationship Management, website, video and teleconference services).
- When someone visits England Rugby digital platforms we use a third party service, **Google Analytics**, to 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. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.
- **Our Commercial Partners:** for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners where you have given your express consent for us to do so.
- **Where we are required to do so by law** or to assist with investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

7.2 We do not disclose personal information to anyone else except as set out above or as set out above or in the [RFU Regulatory and Governance Privacy Notice](#).

8. International Data Transfer

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We require third parties to respect the security of your data and to treat it in accordance with the law, and if we do share your personal information outside the European Economic Area, you can expect a similar degree of protection in respect of your personal information.

9. What rights do you have?

9.1 You have the right to **ask us for a copy** of your personal data; to **correct, delete** or **restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**. **These rights may be limited**, for example if fulfilling your request would reveal personal data about another person or if there is a legal or regulatory reason for not providing data, or if you ask us to delete or restrict the use of information which we are required by law to keep or have legitimate interests in keeping or using. Further details on such limitations are set out in the [RFU Regulatory and Governance Privacy Notice](#).

9.2 For more detailed information on the rights you have as an individual which you can exercise in relation to the information we hold about you, please refer to the Information Commissioner's Office website <https://ico.org.uk/>.

9.3 To exercise any of these rights, you can get in touch with us – or our data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to**



complain to an EU data protection authority where you live, work or where you believe a breach may have occurred. This is the Information Commissioner's Office in the UK.

10. How long will we retain your data?

- 10.1** The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 10.2** In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.
- 10.3** It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "How do you get in touch with us?" section below.

11. How do you get in touch with us?

- 11.1** The RFU tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.
- 11.2** We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch at legal@rfu.com or by writing to Data Protection Officer, Rugby Football Union, Rugby House, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

12. Changes to this Privacy Notice?

- 12.1** This Privacy Notice may be updated from time to time. The date of the most recent revisions will appear on the bottom of the page.