

## PRIVACY NOTICE

### INTRODUCTION

Welcome to the BT Sport Fan Forum's **privacy notice**.

BT Sport and Populus Limited respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the [Glossary](#) to understand the meaning of some of the terms used in this privacy notice.

1. **IMPORTANT INFORMATION AND WHO WE ARE**
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### 1 **IMPORTANT INFORMATION AND WHO WE ARE**

#### 1.1 **Purpose of this Privacy Notice**

This privacy notice aims to give you information on how the BT Sport Fan Forum collects and processes your personal data through your use of this site, including any data you may provide through this site when you register as a BT Sport Fan Forum member or complete any survey.

You must be aged 16 or over to register as a BT Sport Fan Forum member. This site is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## 1.2 Controller

Populus Limited is the controller and responsible for your personal data (collectively referred to as “**Populus**”, “**we**”, “**us**” or “**our**” in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights [INSERT AS LINK], please contact the DPO using the details set out below.

## 1.3 Contact Details

Company name: Populus Limited

Name or title of DPO: Emily Weguelin

Email address: [dataprotection@populus.co.uk](mailto:dataprotection@populus.co.uk)

Postal address: Northburgh House, 10 Northburgh Street, London, EC1V 0AT

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 1.4 Changes to the Privacy Notice and your Duty to Inform us of Changes

This version was last updated in May 2018 and can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 1.5 Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2 THE DATA WE COLLECT ABOUT YOU

2.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

2.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.

- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, and the number of points earned by you.
- **Usage Data** includes information about how you use our website, such as page views.
- **Survey Data** includes the responses you give to any surveys we invite you to participate in.
- **Communications Data** includes your correspondence with us and any feedback on our services which you provide.

2.3 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

2.4 We would only collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) or information about criminal convictions and offences with your explicit consent, and only if it were relevant to a survey, as part of the Survey Data.

2.5 You are not obliged to register as a BT Sport Fan Forum member or take part in any survey. However, if you do not provide personal data when requested, we may not be able to accept you as a BT Sport Fan Forum member or provide you with payment or other benefits for taking part in surveys. This is explained in more detail in Sections 3.2 & 4.2 of the BT Sport Fan Forum Member T&Cs.

### 3 HOW IS YOUR PERSONAL DATA COLLECTED?

3.1 We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Profile and Survey Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: create an account on our site by registering to join the BT Sport Fan Forum; take part in our surveys; enter a prize draw; or give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data and Usage Data about your equipment,

browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this site may become inaccessible or not function properly. Please see our [Cookie Policy](#) for further details.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Identity and Contact Data from data brokers or aggregators based inside the EU.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 4 HOW WE USE YOUR PERSONAL DATA

- 4.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 4.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.
- 4.3 View [Clause 10.1](#) to find out more about the types of lawful basis that we rely on to process your personal data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new BT Sport Fan Forum member	Identity Contact	Performance of a contract with you
To decide whether you are a suitable candidate for a survey and to contact you to invite you to participate in surveys	Identity Contact Technical Usage Profile	Performance of a contract with you
To carry out research on behalf of our clients including market research and statistical research	Identity Contact Survey	Consent
To carry out quality control checks in relation to our research projects	Identity Contact Survey	Consent

To recontact you regarding any surveys that you complete (if this is not for quality control purposes we will ask for your further permission within the survey)	Identity Contact Survey	Consent
To process any payments earned by you for taking part in our surveys	Identity Contact Financial Transaction Profile	Performance of a contract with you
To comply with our financial recording keeping obligations	Identity Contact Financial Transaction	Necessary to comply with a legal obligation
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy notice  (b) asking you to provide feedback or take a survey about your experiences being part of the BT Sport Fan Forum	Identity Contact Communications	Performance of a contract with you  Necessary to comply with a legal obligation  Necessary for our legitimate interests (to keep our records updated and to study how users use our products/services, to develop them and grow our business)
Prize Draw	Identity Contact	Necessary for our legitimate interests (to incentivise you to participate in our surveys by providing you with an opportunity to win a prize even if you do not qualify for a particular survey)
To administer and protect our business and this site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, and user experiences	Technical Usage	Consent  Necessary for our legitimate interests (to define types of users for our products and services, to keep our website updated and relevant, and to develop our business)

#### **4.4 Change of Purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **5 DISCLOSURES OF YOUR PERSONAL DATA**

5.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Other companies in the Populus Group based in the United Kingdom acting as processors and providing IT and system administration services. We may also disclose information to the Populus Group based in the United Kingdom acting as joint controllers if a survey is carried out on behalf of a Populus Group company other than Populus Limited.
- Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Geodemographic companies such as Experian acting as processor based in the United Kingdom who provide us with additional analytics and insights for our surveys.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

5.2 Unless we have notified you at the start of the survey or obtained your consent as a part of the survey, we do not disclose Survey Data which is personal data to our clients. Survey Data is anonymised and shared with our clients and other third parties in a generic form that does not identify you. For example: "8 out of 10 people in the UK are happy with their current job".

5.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your

personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6 INTERNATIONAL TRANSFERS**

6.1 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

6.2 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7 DATA SECURITY**

7.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8 DATA RETENTION**

### **8.1 How long will you use my Personal Data for?**

We will only retain your personal data 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.

By law we have to keep basic information about our BT Sport Fan Forum members (including Contact, Identity, Financial and Transaction Data) for six years after they cease being members for tax purposes.

We retain Survey Data which is personal data for no longer than six months after we have completed any quality control checks. We retain anonymised Survey Data for 2 years.

In some circumstances you can ask us to delete your data: see request erasure below for further information.

We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9 YOUR LEGAL RIGHTS**

9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

9.2 If you wish to exercise any of the rights set out above, please contact us.

### **9.3 No Fee Usually Required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **9.4 What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **9.5 Time Limit to Respond**



We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10 GLOSSARY

### 10.1 Lawful Basis

- **Consent** means processing your data where we have obtained your freely given, specific, informed and unambiguous permission. You can withdraw your consent at any time and we will then stop processing your information for that purpose.
- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### 10.2 Your Legal Rights

You have the right to:

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes or if we are processing your personal data for statistical research purposes, unless the processing is necessary in the public interest. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.