Oxford Rugby Football Club Ltd

Privacy Policy

Updated August 2026
Review Date August 2028

Summary of how we and the RFU use your data

- Oxford Rugby Football Club (ORFC) uses your personal data to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes, and to inform you of events at the Club or events for the benefit of the Club. Some data is shared with the RFU, who use your data to regulate, develop and manage the game.
- Data is also shared where required with external suppliers of rugby related training courses.
- Where we or the RFU rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time.
- Amongst the data we collect from you may be medical (including injury) information. We will hold this where you (or your parent) have given consent, so that we can ensure we are aware of your condition and can ensure that you are supported appropriately.
- Where you work in a particular role within the game, you may be required to undergo a Disclosure & Barring Service check using the RFU's eDBS system. The result of this check will be input into your Game Management Service (GMS) record.

What does this policy cover?

This policy describes how ORFC (also referred to as "the Club", "we" or "us") will make use of the data we handle in relation to our members and players, including our use of the Game Management System ("GMS") provided by the Rugby Football Union ("RFU"). The policy also describes the RFU's use of data on GMS.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

What information do we collect?

We collect and process personal data from you or your parents when you join and when we carry out annual renewals of your membership. This includes:

- your name

- your gender,
- your date of birth,
- your RFU ID (as assigned in GMS)
- your home address, email address and phone number;
- your passport and NI details, where we have to check your eligibility or ability to work for us;
- your type of membership and involvement in particular teams, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.;
- your payment and/or bank account details, where you provide these to pay for membership;
- your marketing preferences, including any consents you have given us;
- your medical conditions or disability, where you provide this to us with your consent (or your parent's consent) to ensure we are aware of any support we may need to provide to you.

Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

What information do we receive from third parties?

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from the RFU through GMS. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and RFU on the status of any DBS check you have been required to take.

Your data will not be passed to third party organisations for marketing purposes.

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

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for your membership and any merchandise, or enter a competition. This includes:
    - taking payments;
    - communicating with you;
    - providing and arranging the delivery or other provision of products, prizes or services;
- As required by the Club to conduct our business and pursue our legitimate interests, in particular:
    - we will use your information to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes;
    - we will also use data to maintain records of our performances and history, including match reports, score lines and team sheets;
    - we may in future use CCTV cameras to maintain the security of our premises, and may use this video to investigate incidents at the Club or its premises

    - we may choose to send you promotional materials and offers by email where we want to send you offers relating to similar Club related products and services that you have already bought
    - we use data of some individuals to invite them to take part in market research;
- Where you give us consent:
    - we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;
    - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
    - we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
    - we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.
    - where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;
    - we may respond to requests by government or law enforcement authorities conducting an investigation.

How does the RFU use any of my information?

The RFU provides GMS, but make its own use of the following information:

- your name;
- your gender;
- your date of birth;
- your RFU ID (as assigned in GMS);
- your home address, email address and phone number; and
- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.

The RFU uses this information as follows:

- As required by the RFU to conduct its business and pursue its legitimate interests, in particular:
    - communicating with you or about you where necessary to administer Rugby in England, including responding to any questions you send to the RFU about GMS;
    - administering and ensuring the eligibility of players, match officials and others involved in English rugby – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;
    - maintaining records of the game as played in England, in particular maintaining details of discipline and misconduct;
    - monitoring use of GMS, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about GMS;

- maintaining statistics and conducting analysis on the make-up of rugby's participants;
- ensuring compliance with the current RFU Rules and Regulations including those on the affiliation of clubs, referee societies, constituent bodies and other rugby bodies, and registration of players; and
- communicating with you to ask for your opinion on RFU initiatives.

- For purposes which are required by law:
  - The RFU will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is also carried out with your consent.
  - The RFU may respond to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the "**How do I get in touch with you or the RFU?**" section.

Who will we share this data with, where and when?

In addition to sharing data with the RFU, we will share your data with: [[***name specific types of third party controller***] for [***insert purposes***]]

Some limited information may be shared with other stakeholders in rugby, such as other clubs, Constituent Bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the RFU's legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the RFU as the provider of GMS and Pitchero as providers of website, where for example, images and match reports will be posted.

No data is currently sent to a country outside the EEA. Should this change this policy would be updated to identify where data is sent and the following would apply.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request.

What rights do I have?

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**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with us– or, as appropriate, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

How do I get in touch with you or the RFU?

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, or would like to opt out of direct marketing, you can get in touch at kevin.honner@ntlworld.com or by writing to Oxford RFC, North Hinksey Village, Oxford OX2 0NA

If you have any concerns about how the RFU process your data, you can get in touch at legal@rfu.com or by writing to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

How long will you retain my data?

We process the majority of your data for as long as you are an active member and for 2 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data for 2 years unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU's privacy notice to be set out on www.englandrugby.com.

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by us and the RFU in order to maintain a record of the game.