

# Privacy Policy Notice

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Last Reviewed date: 12/02/2021

Last Reviewed by: Managing Partner

## The policy:

This privacy policy notice is served by HSM Football Consultancy under the website; [[www.hsmfootball.com](http://www.hsmfootball.com)]. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business and while you browse or use this website. If you do not agree to the following policy you may wish to cease viewing / using this website, and or refrain from submitting your personal data to us.

## Policy key definitions:

- "I", "our", "us", or "we" refer to the business, HSM Football Consultancy.
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

## Key principles of GDPR:

Our privacy policy embodies the following key principles; (a) Lawfulness, fairness and transparency, (b) Purpose limitation, (c) Data minimisation, (d) Accuracy, (e) Storage limitation, (f) Integrity and confidence, (g) Accountability.

## Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- **Lawful basis:** Consent  
**Our purpose for processing is:** Ensuring potential employers (professional football clubs) receive necessary candidate (football players/coaches) information to make a judgement regarding potential employment  
**We process your information in the following ways:** We share football player/coach CVs with football clubs and other FIFA player/club intermediaries, which usually includes the following data; Name, DOB, Location, Citizenship Status Photographs/Video Footage and details of Physical Attributes.  
**Data retention period:** We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.  
**Sharing your information:** We do share your personal information with third parties, including; .Semi-professional and professional football clubs and 3<sup>rd</sup> party FIFA registered football intermediaries.

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- **Lawful basis:** Consent  
**Where our purpose for processing is:** Reviewing submitted details via HSM Football Consultancy's 'Contact Us' website form. Data includes; Name, Email, Phone Number, Address and any other personal information volunteered via the 'Subject' and 'Message' fields.  
**We process your information in the following ways:** Information is reviewed internally through our website service portal to establish the best course of action to serve potential or existing clients.  
**Data retention period:** All submitted data will be processed and securely deleted within 21 days.  
**Sharing your information:** We do not share your information with third parties.

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- **Lawful basis:** Legitimate interests  
**Where our purpose for processing is:** Contacting a semi-professional or professional football club to present potential employment candidates with the credentials to enhance organisations(s) athletic or commercial performance.  
**We process your information in the following ways:** We use publicly available email addresses (i.e. sourced from football clubs' websites), to send football player/coach profile marketing communications via our Email Management System (EMS) – see '*Email marketing messages*'.  
**Data retention period:** We will continue to process your information under this basis until you withdraw consent, or it is determined your consent no longer exists.  
**Sharing your information:** We do not share your information with third parties

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If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

## Your individual rights

Under the GDPR your rights are as follows. You can read more about [your rights in details here](#);

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [[www.ico.org.uk](http://www.ico.org.uk)] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

## Internet cookies

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third-party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your

web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

Cookies that we use are;

- XSRF-TOKEN – For security purposes (essential). Duration: session
- SSR-caching – Used to indicate the system from which the site was rendered (essential). Duration: 1 minute

## Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

## Fair & Transparent Privacy Explained

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

## Sponsored links, affiliate tracking & commissions

We ensure that our website does not contain any adverts to ensure that our visitors enjoy a seamless browsing experience.

## Email marketing messages

Under the GDPR we use 'consent' and/or 'legitimate interest as the lawful basis for contacting you. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, secure email marketing service provider. An EMS is a third-party service provider of software / applications that allows marketers to send out email marketing communications to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, opens and clicks. Such data, within its limitations will show the activity each receiver made for that email communication.

Any email marketing messages we send are in accordance with the GDPR and the PECR. HSM Football Consultancy does not operate an email subscription system, however we do provide you with an easy method to withdraw your consent or manage your preferences / the information we hold about you at any time. See any marketing email for instructions on how to unsubscribe or manage your preferences.

Our EMS provider is Hubspot. We hold the following information about you within our EMS system:

- Email address (for contact purposes)
- Country of origin (for sorting purposes)