**Terms of Use and Privacy Policy**

Welcome to the Rugby For Good's Privacy Policy.

Rugby For Good respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you as to how we look after your personal data when you visit our Website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

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

**PURPOSE OF THIS PRIVACY POLICY**

This Privacy Policy aims to give you information on how Rugby For Good collects and processes your personal data through your use of this Website, including any data you may provide through this Website.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of the types of personal information we collect, how we collect it, what we may use it for and who we may share it with. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

**CONTROLLER OF PERSONAL INFORMATION**

This Privacy Policy is issued on behalf of Rugby For Good so when we mention "COMPANY", "we", "us" or "our" in this Privacy Policy, we are referring to Rugby For Good responsible for processing your data. Rugby For Good is the controller and responsible for this Website.

Our data privacy manager is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

**CONTACT DETAILS**

If you have any questions about this Privacy Policy or our privacy practices, please contact our data privacy manager in the following ways:

Rugby For Good

Email: info@rugbyforgood.org

Postal Address:

Room 20, 20F Leighton Centre, Causeway Bay, Hong Kong

Phone: [2504-8311]

**CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES**

We keep our Privacy Policy under regular review.

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.

**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 policy of every website you visit.

**MINORS**

Minors cannot legally grant consent to use their personal data; therefore, parents or guardians of children ages 16 and under must be asked for permission before a company can use the minor’s data.

**2. THE DATA WE COLLECT ABOUT YOU**

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).

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

* **Identity Data**includes first name, last name, username or similar identifier, age/date of birth, gender, and images in video and/or photographic form.
* **Contact Data**includes home address, email address, and phone number.
* **Transaction Data**includes details about payments to and from 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 rugby activity such as club affiliation, the products you have purchased from us, your preferences including any consents you have given us, your subscription or membership status, your responses to customer surveys (where you have given us permission to do so), and records of your attendance at any events or competitions hosted by us.
* **Usage Data**includes information about how you use our Website, products and services including which adverts you viewed and responded to, what content you like or share and 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 emails you have received, opened and clicked on, how you have reached our digital platforms, which videos you have watched and for how long.
* **Marketing and Communications Data**includes your preferences in receiving marketing from us and your communication preferences.
  + apply for our products or services;
  + create an account on our Website;
  + send an enquiry;
  + make a donation;
  + subscribe to our newsletter;
  + enter a competition, or survey;
  + partake in a ballot;
  + give us feedback or contact us; or
  + request marketing to be sent to you.
* Where we need to perform the contract, we are about to enter or have entered with you or process your donation.
* Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
* Where we need to comply with a legal obligation.
* If you want us to establish the data's accuracy.
* Where our use of the data is unlawful, but you do not want us to erase it.
* 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.
* You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **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 Policy.

**IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

**3**. **HOW IS YOUR PERSONAL DATA COLLECTED?**

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

**Direct interactions.**You may give us your Identity and Contact Data by filling in forms. This includes personal data you provide when you:

**Automated technologies or interactions.**As you interact with our Website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [LINK] for further details.

**Third parties**

We will receive personal data about you from various third parties including Technical Data from the following parties:

* analytics providers such as Google Analytics;
* advertising networks such as Google Display Network.

**4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

See GLOSSARY, LAWFUL BASIS below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

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.

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.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Lawful basis for processing including basis of legitimate interest** |
| To sign you up as a newsletter subscriber | (a) Identity  (b) Contact | Performance of a contract with you |
| To respond to your enquiry | (a) Identity  (b) Contact | Performance of a contract with you |
| To acknowledge any contribution that you may make | (a) Identity  (b) Contact  (c) Transaction | Performance of a contract with you |
| To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us | (a) Identity  (b) Contact  (c) Transaction  (d) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary for our legitimate interests to recover debts due to us |
| To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy  policy  (b) Asking you to leave a review  or take a survey  (c) Creating an individual profile for you including marketing and communication preferences  (d) Managing communications that you may consent to receive from us | (a) Identity  (b) Contact  (c) Profile  (d) Usage  (e) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests to keep our records updated and to study how you use our products/services  (d) Necessary for our legitimate interests to personalise and/or tailor any marketing and communication |
| To track your activity on our digital platforms | (a) Identity  (b) Usage  (c) Technical | Necessary for our legitimate interests to develop our business and our Website |
| To enable you to partake in a ballot or complete a survey | (a) Identity  (b) Contact  (c) Transaction  (d) Marketing and Communications | (a) Performance of a contract with you  (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business |
| To administer and protect our business and this Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity  (b) Contact  (c) Technical | (a) 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  (b) Necessary to comply with a legal obligation |
| To send information about Rugby For Good including marketing information and communication you have consented to receive from us | (a) Identity  (b) Contact  (c) Technical  (d) Usage  (e) Profile  (f) Marketing and Communications | Necessary for our legitimate interests to develop our products/services and grow our business |

**MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

**PROMOTIONAL OFFERS FROM US**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

In accordance with the marketing messages you set you will receive marketing communications from us if you have requested information and you have not opted out of receiving that marketing.

**THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase.

**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 Website may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK TO YOUR COOKIE POLICY].]

**5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

* Internal Third Parties as set out in the [Glossary].
* External Third Parties as set out in the [Glossary].
* 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 Policy.

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. DATA SECURITY**

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.

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.

Unfortunately, although we make every effort to create a secure environment for your personal information, we cannot guarantee the safety of any personal information which you transmit to us online.

**7. INTERNATIONAL TRANSFERS**

The personal information we collect may be transferred to and/or stored or processed at a location outside the European Economic Area. By providing your personal information you consent to this transfer, storage and/or processing. We will take steps to ensure that your personal information is kept securely and in accordance with the Privacy Policy.

**8. DATA RETENTION**

**HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

With the exception of job applicants, we will only retain your personal data for as long as you maintain a membership with your rugby club or for as long as reasonably necessary to fulfil the purposes set out in the table [*Purposes for which we will use your personal data*] above or to satisfy any legal, insurance, regulatory, tax, accounting or reporting requirements. All your personal data held by us will be erased permanently or anonymised (see below) when they are not required to be retained and, in any event, no later than 6 months after termination of your membership with your rugby club. Notwithstanding the said retention period, we may retain your personal data for a longer period if the law requires us to do so, a complaint involving you has not been resolved, or we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Regarding job applications, we may hold the personal data of unsuccessful applicants for a period up to 2 years from the date of rejecting the applicants, unless there is a subsisting reason that obliges us to retain the data for a longer period.

In either situation, you can request us to erase your personal data at any time before the expiry of the above-mentioned retention period: see [*your legal rights*] below for further information.

In some circumstances we will anonymise your personal data (so that it no longer contains any information which can identify you) for research or statistical purposes, in which case we may retain and use the anonymised information indefinitely without further notice to you.

**HOW WILL MY PERSONAL DATA BE ERASED?**

Information audit is carried out on a monthly basis, which will enable us to identify all the personal data which have reached the prescribed retention period. Our information audit personnel will ensure that all copies of the data are accounted for and, in the absence of any circumstances justifying a longer retention period, take necessary steps to erase the data permanently. Please refer to [*How long will you use my personal data for?*] above for further information.

We are committed to ensure that all personal data, whether they take the form of paper documents or are stored in electronic storage devices, which should be erased under this clause will be erased, deleted or destroyed in a secure and safe manner. All erasure, deletion and destruction instances will be logged, and the log will not contain any personally identifiable information.

For paper-based personal data which have reached the prescribed retention period, we will usually utilize onsite professional cross-cut shredder for the purpose of destruction. Shredder waste will be collected by waste sacks, which will be properly sealed and thrown away together with normal office waste. If the paper documents to be disposed of are large in quantity, the destruction will be carried out by service providers specializing in classified documents disposal. The contract between such service providers and us will include such covenants as are necessary to impose contractual obligations on the service providers to destroy the paper documents safely and securely.

Information technology is used from time to time in the course of our daily affairs. In the event that the personal data to be erased are stored in electronic storage devices, the deletion of the data will be performed by our trained data protection officer who will utilize specialized software to perform the removal of the data from the medium so that they cannot be subsequently reconstructed. Besides, all disposals of obsolete electronic storage devices must be authorized by our data protection officer, who will ensure that all information are irreversibly wiped from the devices through use of specialized software before disposal. If necessary, our data protection officer will administer physical destruction to the electronic storage devices so that the data stored therein can no longer be accessed electronically by anyone.

**9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data.

**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 hold or process the data, for instance, where the purposes for which your personal data were originally collected have been served or can no longer be served, where you have withdrawn your consent, 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.

Any request to erase personal data will be allocated to our data protection officer and recorded on the Erasure Request Register. Our data protection officer will identify and review all relevant personal data and consider whether there is any good reason for us continuing to hold or process the data. If there is none, your personal data will be erased within 30 days of receipt of the request and you will be notified in writing of details of the information erased and the date of erasure. If your personal data has been disclosed to other parties in accordance with this Policy and erasure is granted, we will take reasonable steps to contact the relevant parties and require them to erase your personal data as soon as practicable.

Note, however, that we may not always be able to comply with your request of erasure for specific legal, insurance, regulatory, tax, accounting or reporting reasons, which will be notified to you within 30 days of receipt of the request. Nevertheless, as soon as the relevant matters are resolved, we will erase your personal data immediately in accordance with the procedure mentioned in last paragraph.

**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. 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:

**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.

You have the **right to make a complaint** at any time to the supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority so please contact us in the first instance.

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

**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 could refuse to comply with your request in these circumstances.

**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.

**TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it could 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**

**LAWFUL BASIS**

**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 obligation**means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**THIRD PARTIES**

**INTERNAL THIRD PARTIES**

Other entities in Rugby For Good who provide IT and system administration services and undertake leadership reporting.

**EXTERNAL THIRD PARTIES**

* Following service providers:
  + Smartabase based in Australia who provides IT and system administration services
  + Jotform based in USA who provides IT and system administration services
  + Donorbox based in USA who provides IT and system administration services for donations
  + Global Payment based in USA who provides IT and system administration services for online credit card payment
  + Stripe based in USA who provides IT and system administration services for online credit card payment
  + Mailchimp based in USA who provides services enable members to send and manage email campaigns and serve advertisements
  + Juven based in Hong Kong SAR who provides IT and system administration services
  + Ticketflap based in Hong Kong SAR who provides IT and system administration services
  + Zkipster based in the Netherlands who provides IT and system administration services
  + Attendium based in Sweden who provides IT and system administration services
  + Cognito Forms based on USA who provides IT and system administration services
  + Google Form based in USA who provides IT and system administration services
  + Paypal based in USA who provides IT and system administration services
* Professional advisers acting as processors or joint controllers including consultants, lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
* Inland Revenue Department, regulators and other authorities.

**COOKIES**

**EU Cookie directive**

From 26 May 2011 a new European Union directive requires us to gain the consent of our users to download cookies on to their machines. There are various methods we could use to gain users consent. For example, we could use pop-ups; prompting users to tick a box to confirm they give permission for us to download cookies on their machine.

Alternatively, we could use an online form that all users must complete before using the website.

We consider both of these solutions as obtrusive. We want our users find information and services quickly.

Therefore, we have taken the decision to promote how we use cookies on our website instead. This will enable users to make an informed decision whether they want to disable this feature.

There are links on our terms and conditions and disclaimer pages which are in the footer of every web page pointing to this information.

**What is a Cookie**

Information may be sent to your computer in the form of an Internet "cookie" to allow our servers to monitor your requirements. The cookie is stored on your computer. Our server may request that your computer return a cookie to it.

These return cookies do not contain any information supplied by you or any personally identifiable information about you.

Such measures are necessary to allow Rugby For Good to measure the usability of the systems, which will help to continually improve user experience of our websites. Your browser software should however enable you to block cookies if you wish to. For more information about cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org/).

**Strictly Necessary Cookies**

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

**Performance Cookies**

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

**Functionality Cookies**

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located.

These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

**Targeting or Advertising Cookies**

These cookies are used to deliver adverts more relevant to you and your interests They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

**Google Analytics**

Rugby For Good uses Google Analytics, a web analytics service provided by Google. Google Analytics collects first party cookies, which are text files placed on your computer to collect standard internet log information and visitor behaviour. This information is sent to Google and is used to evaluate how our website is being used. This enables Rugby For Good to compile statistical reports. A full list of cookies used by Google Analytics and explanations on how these work are available on the Google code website.

Rugby For Good does not collect (nor allow any third party to collect) personally identifiable information of visitors to our site. We will not associate any data gathered with any personally identifying information. We will not link or seek to link an IP address with the identity of a computer user. In short, Google Analytics doesn't identify who you are, but it does track your movements on our websites.

**How to disable cookies**

You can stop cookies being downloaded on to your computer by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website.

There is more information about cookies, including how to delete them on the website aboutcookies.org. You may also opt out of being tracked by Google Analytics.

**Consent**

By using our website you consent to collection and use of any information you provide to us by Rugby For Good for the purposes described above. If we amend our privacy policy, any changes will be published on this web site. If at any time you wish to update the information which we hold about you, or if you wish to stop receiving information from Rugby For Good, please contact us.