

GDPR Compliance Concerns

On the 2nd December Partick Thistle Football Club sent out an email to season ticket holders asking them to reply to the email if they wished to opt out of having their details passed to the PFC Trust.

Unfortunately the return address did not work and a link email had the PFC Trust address on it. The club will be resending the email with the correct reply address and link email in place. Any replies sent to the PFC Trust to opt out will be passed to Partick Thistle Football Club.

We have had many questions around our GDPR compliance we wish to answer:

- We have a legitimate interest in requesting this data. The PFC Trust owns 74% of a business with net assets of £14.3 million according to the latest published accounts. It is our duty to try and get details of all beneficiaries who we represent and who in essence own this asset.
- No third party will benefit from the PFC Trust processing the information.
- The amount of data being processed is very small (names and email addresses only)
- Processing the data will allow us to comply with our legal duties.
- The data is not particularly private, there is no children or vulnerable persons data, and there is no data about people in their personal or professional capacity.
- The impact of the processing is very slight, namely only the receipt of emails. Individuals will not lose control of their personal data as they can opt out at any time.
- We chose an opt out rather than an opt in as this typically leads to more than double the subjects agreeing to pass on details and we are trying to reach as many beneficiaries as possible. Recipients will continue to be able to opt out at any time.
- Using this information and more we completed a Legitimate Interest Assessment as recommended by Information Commissioner's Office and are satisfied we can rely on our legitimate interests for processing.

Our full GDPR policy can be seen here <http://www.ptfctrust.com/gdpr/>