



Premier League Club GDPR Case Study

ASSURANCE COMPLIANCE DPOaaS (DATA PROTECTION OFFICER)

DATA MANAGEMENT

PTI Consulting are helping an established Premier League football club to drive organisational change across their customer data management policy to better align to the GDPR guidelines and improve the way the club communicates with their fans.

Following an initial data management audit process, it was apparent there was a general lack of structure, alongside a lack of implemented policies and procedures, all of which resulted in a low level of appreciation of the spirit and implications of GDPR.

The club had previously implemented a very draconian one size fits all response to a fan requesting that they "didn't want to receive marketing messages" and then applied this across all forms of communication, which resulted in all communication being halted, including informing season ticket holders of key renewal dates.

PTI Consulting have been contracted to help deliver a clear vision of best practice and help deliver change across the club to help drive commercial opportunities. **Adrian Jolly**, the acting DPO is excited to help the club move forward with better data management practice;

"In this moment we can quite quickly implement new data management policy change and get the organisational awareness up. This will quickly get to a point where people understand what they are doing and what they are not doing...and what they need to be doing."

“ PTI Consulting are helping the club understand how we fully manage our data. This has hugely helped us with two key areas of business intelligence and GDPR compliance. The team have been instrumental in helping us structure, utilise and monetise our data. Their pragmatic approach allow us to understand what we need to do to comply and put the optimal processes in place. PTI's unrivaled experience in the sports and event market was a great fit for the club. ”

Senior Management Team at Premier League Football Club



First Step

The Club previously engaged with a Data Protection solution provider before GDPR came into enforcement in May 2018. However, when a new Head of Legal was appointed and reviewed the area they were unsure as to the quality of the works completed. Turning to industry experts PTI Consulting, we completed a Data Management Audit which highlighted serious shortcomings in the Clubs standing.



Challenge

During the Data Management Audit, PTI Consulting discovered some serious issues with the current data policy and procedure. Mistakes had been made in the capture and recording of customer data, the management of this data and the understanding of how this data should be used. This had resulted in a much smaller marketing database of fans the internal marketing team could engage with.



Solution

PTI Consulting have set about fixing these problems quickly by delivering a thorough Data Management Audit and then moved to commence a DPOaaS engagement. Providing a hands on approach alongside the internal team over the next year, PTI will deliver a roadmap that will turn a series of red lights to green.

PTI have been quick to discover and unlock a large segment of customer data that can be re-engaged with by the marketing team to drive new commercial opportunity. Data protection doesn't always start and end with 'no'!



Understanding the spirit of GDPR

The PTI specialist Data Protection and Cyber Security team provided the club with the knowledge needed to deliver a matured level of data management, assurance, compliance and governance.

PTI helped the club with a wide data policy assessment and then enable the club to better understand the implications of GDPR, alongside the risks of cyber threats.

Helping the senior management team fully understand the spirit of GDPR was a key milestone to help create the momentum to initiate change. The current set up was significantly hurting the commercial opportunities the club have, all due to an over reaction to the new GDPR guidelines in 2018.

The impact of this for the marketing team and the commercial opportunities has hampered fan engagement strategies.

Adrian Jolly says, "There was very little guidance or defined structure for the marketing team, so they were only delivering some types of activity because they thought it was good practice. There was nothing to help them from a corporate perspective, such as, this is how long you should keep data and this how long you shouldn't keep data."



As part of PTI Solutions DPOaaS the club have been able to begin their revised marketing process with a much clearer understanding of how best to manage individual fan engagement and set policy that reflect the desired level of communication.

Understanding the implications and working to the spirit of GDPR

Adrian Jolly explains "The type of people in the club data base are fans that are very receptive to marketing emails from them, so it's a big loss having such a badly implemented process and ultimately a missed opportunity.

It's about opening up and enabling what they do in a controlled fashion. On the operational side its around guidance of how they behave and what they do and what they don't do, and from a promotion point of view enabling them to promote content to a wider group of people. Everyone looks at the collection of data in the realms of consent, so you could click on a link to say you approve, but then have a process that supersedes this and opts people out of all communication. There are some other methods you could use which is called 'legitimate interest' where if you bought a season ticket last year then you may want one this year, so irrespective of a contact saying 'I don't want to be marketed to' you may be able to contact them regarding season ticket renewal.

You can absolutely defend that, and people will understand even if there was complaint. I think you would struggle to get somebody to say that's not a legitimate email to send to an existing season ticket holder.

That's keeping within the guidance that GDPR offers its not meant to be there to restrict the legitimate activities, it meant to stop the fact that you take that data and the you are passing that data onto the local car dealership and then that organisation blasting everyone on your database."

GDPR | A year of data opportunity

The EU General Data Protection Regulation (GDPR) is the most important change in data privacy regulation in 20 years. Football Clubs need to be quick to understand how the regulation will fundamentally reshape the way in which data is handled across their organisation.

- GDPR reshapes the way in which clubs manage their fan and customer data, as well as redefines the roles for key leaders across the organisation. The CIO must ensure that they have watertight consent management processes in place, whilst the club CMO require effective data rights management systems to ensure they don't lose their most valuable asset – data.
- Data plays a critical part in club marketing strategies and therefore club marketers must ensure they have demonstrated clear compliance and consent. The club marketing team must demonstrate consent and they intend to process personal data. GDPR applies to all organisations holding personal data relating to EU citizens, whether they are inside the EU or not.

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PTI have unlocked the benefits of compliance for us. Often, compliance and legal reviews can feel like a negative piece of work or a 'telling off' exercise for staff. PTI were quick to talk on "unintentional malpractice" and take away any staff fears to provide a practical delivery that has had a positive impact from the off. Their knowledge of compliance in the sporting space provides them with a speed of change that cuts across the club; be it the playing or commercial side.

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Senior Management Team at Premier League Football Club