

PUBLIC

Kilwinning Rangers Football Club – Privacy Policy (Reviewed January 2026)

Kilwinning Rangers Football Club

Bufs Park

Pennyburn Road

Kilwinning



Privacy Policy

KILWINNING RANGERS FOOTBALL CLUB

BUFFS PARK,

PENNYBURN ROAD,

KILWINNING

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EMAIL: - info@kilwinningsportsclub.co.uk

WEBSITE: www.kilwinningrangers.com

Last updated: [22nd January 2026]

This Privacy Policy explains how we collect, use, store and protect personal data when you interact with our WhatsApp-based AI agent (“the AI Agent”). We are committed to protecting your privacy and handling your data transparently and securely, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

1. Who We Are Data Controller. Kilwinning Rangers Buffs Park, Pennyburn Road, Kilwinning, KA13 6LF Buffs.media@gmail.com If you have any questions about this policy or how your data is handled, you can contact us using the details above.

2. What the WhatsApp AI Agent Does. Our AI Agent interacts with users via WhatsApp to provide automated responses, information, and support. Conversations are processed using artificial intelligence to generate replies. The AI Agent is not intended to provide legal, medical, or financial advice.

3. What Data We Collect. When you interact with the AI Agent, we may collect and process the following personal data:

- Your WhatsApp phone number
- Message content you send to the AI Agent
- Metadata related to messages (such as timestamps)
- Any personal information you choose to include in your messages

We do not intentionally collect special category data (such as health, political opinions, or religious beliefs). Please do not share sensitive personal data unless strictly necessary.

4. How We Use Your Data. We use your data to:

- Respond to your messages and provide the AI Agent service
- Improve the accuracy, quality, and performance of the AI Agent
- Monitor usage for security, troubleshooting, and misuse prevention
- Comply with legal and regulatory obligations

We do not use your data for automated decision-making that produces legal or similarly significant effects.

5. Lawful Basis for Processing Under UK GDPR, our lawful bases for processing your personal data are:

- Consent – by messaging the AI Agent, you consent to your messages being processed
- Legitimate interests – to operate, maintain, and improve the AI Agent
- Legal obligation – where we are required to retain or disclose data by law You may withdraw your consent at any time by stopping use of the AI Agent.

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6. Data Sharing and Third Parties. Your data may be shared with:

- WhatsApp / Meta Platforms Inc. as part of message delivery and platform operation
- AI service providers used to generate responses
- Technical service providers (e.g. hosting or analytics), where necessary

All third parties are required to handle data securely and in accordance with data protection laws. We do not sell your personal data.

7. International Transfers. Some of our service providers may process data outside the UK. Where this occurs, we ensure appropriate safeguards are in place, such as:

- Adequacy regulations
- Standard contractual clauses
- Equivalent data protection measures

8. Data Retention. We retain personal data only for as long as necessary to:

- Provide the AI Agent service
- Improve system performance
- Meet legal, regulatory, or security requirements

Conversation data may be anonymised or deleted after a defined retention period.

9. Your Rights. Under UK GDPR, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data
- Restrict or object to processing
- Withdraw consent at any time
- Lodge a complaint with the Information Commissioner’s Office (ICO)

To exercise your rights, contact us using the details in section 1.

10. Security. We implement appropriate technical and organisational measures to protect your data, including access controls, encryption, and monitoring.

However, no system is completely secure, and you use the AI Agent at your own risk.

11. Children’s Data. The AI Agent is not intended for use by children under 13. We do not knowingly collect data from children.

12. Changes to This Policy. We may update this Privacy Policy from time to time. Any changes will be communicated by updating the “Last updated” date above

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This Policy has been reviewed and updated on Thursday 22nd January 2026 by:

| <u>Name</u> | <u>Role</u> | <u>Club</u> | <u>Date</u> |
|---------------|----------------|-----------------------|-------------------------------|
| Alan McAlpine | CWPO | Kilwinning Rangers FC | 22 nd January 2026 |
| Lauren Grant | Club Secretary | Kilwinning Rangers FC | 22 nd January 2026 |