



WOLVES REWARDS

PRIVACY POLICY

We protect your information; our business depends on it.

Who we are

This is the privacy statement of Wolves Rewards.

Our privacy promise

Wolves Rewards takes your privacy very seriously, and so should you. We respect your privacy and your rights to know how your personal information is being treated. The interests of our members and the data that we collect helps us provide you with the Wolves Rewards programme services and ensures that you have the best experience when interacting with, and using, the Wolves Rewards programme.

As the operator of the Wolves Rewards programme, R4G Ltd is committed to doing the right thing when it comes to how we collect, use and protect your personal information.

Looking after the personal information you share with us is a hugely important part of this. We want you to be confident that your data is safe and secure with us and understand how we use it to offer you a better, more personalised and more rewarding experience.

Please read through our Privacy Policy to see what we're doing with your personal information and how we're keeping it safe.

Personal information we collect

We may collect, use and store different types of personal information about you, which we have grouped as follows:

Event	Personal information collected
<i>When you register for our services through your Wolves Account</i>	<ul style="list-style-type: none">• Full Name, Email Address, Date of Birth and Address• Your account login details, such as the password that you have chosen and set on your

Event	Personal information collected
	<p>account, so that you are able to gain access to the website and your account.</p> <ul style="list-style-type: none"> Your age or address, or location data when using Wolves Rewards on your mobile device, where you agree to provide that information
<p><i>When you shop with us online or browse our Website, Mobile App or Wolves Cash Reminder</i></p>	<ul style="list-style-type: none"> Information about your purchases with our Programme Partners (for example, what you bought, when you bought it, how much you paid). Information about your online browsing behaviour and information about when you click on one of our adverts (including those shown on other organisations' websites). Information about any devices you have used to access our services (including the make, model and operating system, IP address, browser type and mobile device identifiers)
<p><i>When you contact us or we contact you or you post user generated content on our website or take part in promotions, competitions, surveys or questionnaires about our services</i></p>	<ul style="list-style-type: none"> Information that you provide about yourself any time you contact us about our services (for example, your name, email address and contact details), including by phone, email or post or when you contact us through social media. Details of the user generated posts or content that you upload and share on our website. Details of the emails and other digital communications we send to you that you open, including any links in them that you click on.
<p><i>When you collect Wolves Cash for transactional or engagement activity on any of our partner websites, Apps and through other marketing channels</i></p>	<ul style="list-style-type: none"> Information about your purchases with Wolves (for example, season tickets, matchday tickets, memberships or merchandise that you have bought, when you bought them, how much you paid).

What we use your data for and why we process it

The table below explains how we use your personal information and the reasons that we rely on in doing so. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your data for	Legal Basis for Processing	Legitimate Interests
To provide Wolves Rewards programme services to you	Contractual performance and legitimate interests	<p>To meet our contractual obligations to you</p> <p>To provide programme services to you</p> <p>To comply with laws and regulations that apply to us</p>
To perform the promises that we make to you as a member of the Wolves Rewards programme, including the provisions in the Member Agreement	Contractual performance	
To perform contracts with third parties that are involved with the Wolves Rewards programme (as well as managing the risks and liabilities under those contracts)	Legitimate interests	<p>To run our business efficiently using the services of others to support the programme</p> <p>To ensure that we benefit from the terms of the contracts we have properly entered into and properly managed the risks and liabilities associated with them</p> <p>To enable us to provide the programme services to you</p>
<p>To keep you informed about the benefits of the Wolves Rewards programme, including:</p> <ul style="list-style-type: none"> Wolves Cash collection opportunities with Wolves and other programme partners 	<p>Contractual performance</p> <p>Legitimate interests</p> <p>Soft opt-in rule for marketing to existing customers</p>	<p>To provide efficient member care and services</p> <p>To ensure you maximise the benefits from programme membership</p> <p>To assess which of our benefits interest you and to tell you about them</p>

What we use your data for	Legal Basis for Processing	Legitimate Interests
<ul style="list-style-type: none"> • Recommending offers and promotions that we think you'll like • Checking whether you are entitled to valuable Wolves Cash from our partners • Letting you know about exciting competitions or promotions • Providing exciting news about the club you love 		<p>To develop new products and services and improve existing ones</p> <p>To obtain your feedback</p>
<p>To manage your Wolves Rewards account and to identify and calculate any Wolves Cash entitlement you might have. For more information please see our Member Agreement</p>	<p>Contractual performance</p> <p>Legitimate interests</p>	<p>To operate the programme in a manner that allows us to allocate Wolves Cash for your benefit</p>
<p>To provide financial and account administration in relation to the Wolves Rewards programme, including the calculation of commissions and Wolves Cash collected and spent by members</p>	<p>Contractual performance</p>	
<p>To provide you with Wolves Rewards programme updates and information</p>	<p>Contractual performance</p>	
<p>To provide you with relevant content in relation to the Wolves Rewards programme and Wolves Cash collection opportunities with Wolves and with our partners through relevant targeted advertising on third party</p>	<p>Legitimate interests</p>	<p>To ensure you maximise the benefits of programme membership</p> <p>To assess which of our benefits interest you and to tell you about them</p>

What we use your data for	Legal Basis for Processing	Legitimate Interests
websites, such as Facebook, Google and Twitter.		
To operate the Wolves Rewards programme so that we comply with our legal obligations and to ensure the proper management of the programme and our business	Legal obligation Legitimate interests	To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards
To conduct statistical research and surveys in relation to the Wolves Rewards programme, to help us improve our services to members and to ensure that we present the programme content in the most effective way	Archiving and research Legitimate interests	To develop new products and services and improve existing ones
To develop new products and services linked to the Wolves Rewards programme	Archiving & Research Legitimate interests	To develop new products and services and improve existing ones
To improve the effectiveness of our marketing communications, including online advertising via social media and other channels and through personalisation of content we provide to you to recommend things we believe you'll like	Legitimate interests	To improve the effectiveness of our communications
To assist with the administration of the programme website and for internal purposes, including	Contractual performance and legitimate interests	To provide efficient customer care and services

What we use your data for	Legal Basis for Processing	Legitimate Interests
<p>conducting data and statistical analysis as well as for testing purposes</p>		<p>To ensure that our technology operates efficiently and without error</p> <p>To assess which of our services may be of interest to you and to tell you about them</p> <p>To develop new products and services and improve existing ones</p> <p>To obtain customer feedback</p>
<p>To ensure that records in relation to the Wolves Rewards programme and our business are maintained and kept up to date as well as to protect our business reputation</p>	<p>Legal obligation and legitimate interests</p>	<p>To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders</p> <p>To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards</p>
<p>In the proper management of our business and that of Wolves Rewards generally</p> <p>For corporate activity, such as a sale, transfer, merger or re-organisation of the Wolves Rewards business</p>	<p>Legitimate interests</p> <p>Our legal duties</p>	<p>To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders</p> <p>To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards</p>
<p>To provide information to Wolves on your activity and interaction</p>	<p>Legitimate interests</p>	<p>To allow us and Wolves to understand more about Members</p>

What we use your data for	Legal Basis for Processing	Legitimate Interests
with the Wolves Rewards Programme		and their activities on the Wolves Rewards Programme
To provide information to Wolves on your activity with our Retail Partners and other Programme Partners.	Legitimate interests	To allow us and Wolves to understand more about Members and their activities with our Retail Partners and other Programme Partners.

Where we collect information about you from

The majority of personal information we get directly from you and your activities as a programme member but we may also collect personal information from other sources, namely: 1) Wolves; 2) our Programme Partners; and 3) social media channels such as Facebook, Google and Twitter.

Do you share my data with other organisations?

Our role is to provide you with the services connected to your membership of the Wolves Rewards programme.

The principal party with whom we may share your personal information is Wolves itself. We do this to ensure you get the full benefit of the Wolves Rewards programme and also to enable Wolves to better understand your preferences in terms of engagement with Wolves Rewards and Wolves, including transactional activity and engagement with other Wolves channels e.g. the newsletter, app, social and website. Where we share your personal information with Wolves, it will process your personal information as a controller in accordance with the terms of its own privacy statement which can be found here.

More generally, we only share your personal information with others if:

- you ask us to or give us your permission to share it;
- it is necessary to track the transactions and collection of Wolves Cash through Wolves, our Retail Partners or our other Programme Partners;
- it is necessary to enable us (or trusted third parties, such as Google, Inc. ("Google")) to analyse how our website is being used by members and to optimise and improve the Wolves Rewards website and our services;
- this is necessary for trusted third parties (for example, a data management and profiling organisation such as Experian) to match your personal information against other information they hold about you - such as age, gender, demographic information, and known interests – and provide that information to

us to help us provide the services and improve your experience with the Wolves Rewards programme;
or

- we engage in a corporate activity, such as a sale, transfer, merger or re-organisation of the Rewards4 business (including Wolves Rewards).

In exceptional circumstances, we may share your information without your permission if we reasonably believe you might be breaking the law, for example on hate speech, and such disclosure is allowed under the relevant laws, including Data Protection law.

When we share your data outside of Wolves Rewards we will:

- always share it in a secure way; and
- not permit it to be used for third party marketing purposes.

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 data on your usage of the Wolves Rewards programme to calculate the percentage of members accessing a specific 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.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

How do you personalise the experience that I have with the Wolves Rewards programme?

We may use your online browsing behaviour as well as details of your online transactions and engagement activities with Wolves, with our Retail Partners or with our other Programme Partners which will help us better understand you as a member, provide you with personalised offers and services and help us to better meet your needs as a member.

Will I be contacted for marketing purposes?

Yes. As a member of the Wolves Rewards programme, we will keep you updated by e-mail with Wolves Cash collection opportunities for programme members as well as how to make great savings with our partners. These will include:

- Wolves Cash collection opportunities with Wolves.
- Wolves Cash collection opportunities with our Retail Partners.

- Wolves Cash collection opportunities with our Programme Partners.
- Wolves Cash collection opportunities with other third parties which we think you'll be interested in.
- Exciting and relevant competitions and promotions within the Wolves Rewards programme that we are running for Members.
- Regular newsletters about the Wolves Rewards programme as well as Member exclusive offers.
- Fantastic opportunities to spend your Wolves Cash with Wolves.

As you may expect, we tailor the communications that you receive based on information and preferences that you have previously provided (such as your favourite retailers) and based on your activities on the Wolves Rewards website, or on the Wolves Cash Reminder while signed-in. This is so that we can give you the most relevant and rewarding experience with the programme.

We want to ensure that we provide you with relevant marketing communications relating to the programme and our products and services, as well as those of Wolves, our Retail Partners and other Programme Partners. To achieve this, we may measure the effectiveness of our marketing communications as well as your responses to marketing communications relating to products and services we offer.

It's easy to change your mind in relation to the marketing communications. If you want to stop (or start) receiving them you can let us know in one of three ways:

Online:

- Log-in to your account
- Click on 'Contact Preferences'

By emailing us:

- hello@wolvesrewards.members-services.com

By writing to:

- Head of Member Services , Wolves Rewards, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX

Please allow up to 72 hours before you are unsubscribed from all communications that we may send.

Please note that if you opt out of receiving marketing communications, without cancelling your membership of the Wolves Rewards programme, you will still receive information in relation to your

Wolves Rewards account (for example, in relation to Wolves Cash that you have collected and/or spent).

Advertising

We may also use your information to provide you with targeted advertising through our website or through third party websites based on information we have collected concerning your preferences.

Some third party websites allow you to request not to see messages and communications from specific advertisers on their website. Please contact these third parties directly if you would like to make that request or if you need more information.

Will my information be held outside the United Kingdom?

Your personal information may be transferred internationally. Sometimes we will need to transfer your information out of the United Kingdom, for example, where we work with Google or Facebook to provide you with targeted advertising through our website or through third party websites.

Whenever we do transfer your personal data out of the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want information on the specific mechanism used by us when transferring your personal data out of the United Kingdom.

By emailing us:

- hello@wolvesrewards.members-services.com

By writing to:

- Head of Member Services, Wolves Rewards, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX

Can I change or delete my data?

Absolutely, you can change the data that we hold on your account or ask us to delete that data at any time.

You can amend the information we hold on you by logging into your account and visiting the 'My Profile' page.

To request for your account to be deleted, you can do this by emailing us at hello@wolvesrewards.members-services.com

If you choose to close your account, this will erase any personal information that we hold about you. It will mean that any data about how you've used Wolves Rewards will be made anonymous, and any data that has enabled you to collect Wolves Cash will also be anonymised and archived.

Please bear in mind though, once you request to close your account (and have your details deleted), you will lose any Wolves Cash that you have collected should you wish to re-open your account at a later date.

How long will you keep my data for?

Wolves Rewards will only hold your personal information on our systems for as long as is reasonably necessary for the purposes of providing the services to you (and/or as set out in the Wolves Rewards Member Agreement)

If you ask for your Wolves Rewards account to be closed, then your personal information will be deleted from our systems. Please note that any transactional information relating to your account will be anonymised for analytical and business critical process purposes. This information will be archived for 6 years, until it is no longer necessary for us to retain it.

For further information about closing your Wolves Rewards account, please click [here](#).

Can I see the information you have about me?

Of course. You have the right to request all personal information that Wolves Rewards holds about you (and how we obtained it). This is called a Subject Access Request.

Your other rights

Under data protection law, you have other rights as well. Briefly, these are:

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see 'Withdrawing consent to using your information' below
- You have validly objected to our use of your personal information – see 'Objecting to how we may use your information' below

- Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – you have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Portability – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine-readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

Automated processing – if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

Withdrawing consent using your information – where we use your personal information with your consent you may withdraw that consent at any time, and we will stop using your personal information for the purpose(s) for which consent was given.

Exercising your rights

If you wish to exercise any of these rights you may make a request either:

By writing to:

- Head of Member Services, Wolves Rewards, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX

By emailing us:

- hello@wolvesrewards.members-services.com

To verify that you are the account holder we will need you to provide photocopies of two of the following documents:

- Passport;
- Driving licence;
- Birth certificate;
- Utility bill (from last 3 months);
- Bank statement (from last 3 months).

Changes to our Privacy Policy

We keep this Privacy Policy under regular review and will place any updates on this website. Paper copies of the Privacy Policy may also be obtained:

- By printing a PDF version of this policy here.
- By writing to the Head of Member Services, Wolves Rewards, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX.

This Privacy Policy was last updated on August 2023.

Contact information and further advice

If you have any queries about this Privacy Policy or just wish to chat to our friendly Member Services team or our data protection officer please contact them in any of these ways:

By writing to:

- Head of Member Services, Wolves Rewards, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX

By emailing us:

- hello@wolvesrewards.members-services.com
- dpo@rewards4group.com

Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office:

Online: <https://ico.org.uk/global/contact-us/>

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

R4G Ltd, a company registered in England and Wales (company number 07347585) and having its registered office at 5-6 Faraday Court First Avenue, Centrum One Hundred, Burton-On-Trent, Staffordshire, England, DE14 2WX is the operator of the Wolves Rewards programme.