

## PRIVACY NOTICE

### 1. ABOUT US

- 1.1 **WE, FOOTBALLNET GLOBAL LIMITED** (the “App”), are a company registered in England and Wales under company number 11949373. Our registered offices are at York House, 1 Seagrave Road, London, SW6 1RP (“FNG”). Any references to “we”, “us” or “our” shall be taken as references to FNG.
- 1.2 **THIS PRIVACY NOTICE IS DESIGNED TO HELP YOU UNDERSTAND WHAT KIND OF PERSONAL DATA WE COLLECT IN CONNECTION WITH OUR PRODUCTS AND SERVICES AND HOW WE WILL PROCESS AND USE THIS DATA. THIS PRIVACY NOTICE DESCRIBES HOW WE COLLECT, USE, SHARE, RETAIN AND SAFEGUARD PERSONAL DATA. THIS PRIVACY NOTICE ALSO HELPS YOU TO UNDERSTAND YOUR LEGAL RIGHTS TO YOUR PERSONAL DATA AND EXPLAINS OUR LAWFUL BASIS FOR PROCESSING PERSONAL DATA AND WHO TO CONTACT SHOULD YOU HAVE A QUERY ON THE COLLECTION AND USE OF YOUR PERSONAL DATA.**
- 1.3 We are committed to protecting your personal information when you use our App and we want you to be confident that your personal information is safe and secure with us. This Privacy Notice explains how we use your personal information including the following:
- 1.3.1 Where we collect your personal information from;
  - 1.3.2 What personal information we collect;
  - 1.3.3 How we use your personal information;
  - 1.3.4 Who your personal information is shared with; and
  - 1.3.5 The rights and choices you have when it comes to your personal information.
- 1.4 We are data controllers under data protection law.
- 1.5 The App is provided in connection with a Club. The “Club” is the company whose name and logo, events and content are featured in the App. This Privacy Notice does not apply where the Club collects your personal data for its own use without any involvement of FNG. This may be on other web-based facilities of the Club such as its own separate website for merchandise or ticket sales etc. For further information about how the Club uses your data in these circumstances, please visit the Club’s website.
- 1.6 We are not responsible or liable for the content, privacy notices or services offered by websites other than the App. We encourage you to read those notices. This includes websites and apps which link from the App.
- 1.7 If you have any questions about your personal data please chat with us via email at [dataprivacy@footballnetglobal.com](mailto:dataprivacy@footballnetglobal.com).

### 2. WHAT INFORMATION DO WE COLLECT?

2.1 By way of example, we may collect the following types of information:

- 2.1.1 **Identity information;** such as your name(s), username or similar identifiers, date of birth, title, gender, Club supporter or associated information, and job title (where relevant).
- 2.1.2 **Contact information;** such as your address, billing address (if applicable), email address, preferred language and telephone numbers.
- 2.1.3 **Financial information;** such as your bank account, PayPal account and/or payment card details and/or your Google Pay or Apple Pay details (for in-app purchases across the platform).
- 2.1.4 **Transaction information;** such as details about payments to and from you and other details of products or services you have purchased from us or accessed on the App.

- 2.1.5 **Technical information;** such as your internet protocol (IP) address, your login data, browser or smart device type and version, time zone setting and location, browser plug-in types versions and statuses, operating system and platform, related software and hardware, and other technology on the devices you use to access the App.
- 2.1.6 **Location information;** such as location data sent from your device. You may stop us collecting this information at any time by turning off the location services settings in the App.
- 2.1.7 **Profile information;** Online profile and activity, based on your interaction with us and our websites (“**Website**”) and applications, including your login information, supported team or Club, your interests, preferences, posts or comments on interactive features (if any), feedback and/or survey responses.
- 2.1.8 **Social media;** If you connect or integrate any social media services with services we provide, you may receive social notifications either from us or from third party companies providing social media services on our behalf. You can manage these social notifications through changing your privacy settings on the relevant social media site or discontinuing any interaction. If you register and provide information to a forum or blog on our Website or App, the information you provide will be published and will be publicly available on our Website or App. It may also be used to address any concerns or complaints about our services directly with you if you are an account holder.
- 2.1.9 **Usage information;** such as information about how you use the App and services provided through them (including marketing emails and advertisements). This may include information about page views, length of visit or use, timing, frequency and patterns of your use, along with navigation paths when using the App – this information should not directly identify you.
- 2.1.10 **Communications information;** includes information you provide when communicating with us, your preferences in receiving marketing from us and our third parties and (where relevant) any other communication preferences.
- 2.1.11 **Aggregated information;** such as statistical or demographic data for any purpose. Aggregated information may be generated from your personal information but does not directly reveal your identity. However, if we combine or connect aggregated information with your personal information so that it can directly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Notice.
- 2.2 **Special categories of personal information;** includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We generally do not collect this information, and where we do we will endeavour to hold it in an anonymised form detached from your other information so as not to reveal your identity. We do not collect any information about criminal convictions and offences.
- 2.3 **Children’s information;** we understand that children under 16 years of age may visit the App or otherwise interact with us. The App will ask each user to confirm that their age is above 16 years of age, or to confirm that they have their parent or guardian’s permission to use the App.

### **3. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

- 3.1 We may collect your personal information using the following methods:
  - 3.1.1 **From you** – most of the personal information we collect will be direct from you when you use the App;
  - 3.1.2 **From our partners** – for example we may collect personal information about you from the Club in order to allow us to improve the App. Or, if you purchase a product from one of our partners whose products are shown on the App, then they may send us information they hold relating to the products or services you have purchased.

- 3.1.3 **Automated interactions** – as you interact with the App, actions and patterns may be collected or generated, along with profile and communications data. We collect this using cookies and other similar technologies.
- 3.1.4 **From third parties** – we may receive personal information about you from various third parties, for example analytics providers, IT service providers, social media platforms, credit reference agencies, or information from lawfully available sources such as regulators.

#### 4. **WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?**

4.1 We use your personal information for the following purposes:

- 4.1.1 **Products & Opportunities** – to allow you to access or otherwise receive products, services and other opportunities at the Club or its partners.
- 4.1.2 **Payments & Finance** – to collect payments from you for any paid for products or services.
- 4.1.3 **Participation and Interactive Features** (if applicable) – to enable you to participate in message boards, forums and/or news groups on or associated with the App.
- 4.1.4 **Promotions** – to enable us to include you in any relevant communication where you win a promotion we, the Club, or one of the commercial partners carries out.
- 4.1.5 **App improvement** – to manage and improve the App, notify you of applicable changes where required and allow you to use the features offered by the App.
- 4.1.6 **Marketing** – to alert you to information about events, surveys, competitions, offers, products, services and other exciting updates relating to us, the Club, and/or commercial partners.
- 4.1.7 **Administration** – to administer and protect our business, the App, and rights of FNG or other associated third parties. This may include routine tasks such as data analysis, testing, system maintenance and support.
- 4.1.8 **Research** – we may contact you to ask you to assist us with market research and may use the information to help us review and improve the App.

#### 5. **WHAT ARE THE LEGAL GROUNDS WE RELY ON FOR PROCESSING YOUR INFORMATION?**

5.1 We will only collect and use your personal information in accordance with data protection laws. Our legal grounds for processing your personal information in the ways described in this Privacy Notice are as follows:

- 5.1.1 **Performance of a contract** – in order to provide you with access to the App we will use your personal information to manage, run and administer the App. This processing is necessary to perform the contract that we have in place with you to provide you with access to the App.
- 5.1.2 **Consent** – we may send you certain marketing emails if you have confirmed that you are happy to receive this material. Where we have asked for your consent, we will only collect and process your personal information if you have given your consent for us to do so.
- 5.1.3 **Legitimate interests** – we may use and process some of your personal information where we have legitimate business grounds for doing so. Our legitimate interests for processing your personal information are:
  - (a) To communicate with you about the App, and to keep you informed about deals and promotions in relation to the Club;
  - (b) To personalise and improve the App; for example we may use your personal information to personalise the types of deals and promotions we think may be of interest to you (which may include sending you certain marketing material); and
  - (c) To improve your experience at the Club and your interaction with the Club and its commercial partners.

## **6. WHO DO WE SHARE YOUR INFORMATION WITH?**

6.1 We may disclose your information to third parties as follows:

- 6.1.1 To other companies within our corporate group;
- 6.1.2 To the Club and any other companies within the Club's corporate group;
- 6.1.3 To our affiliates and licensees;
- 6.1.4 To third parties to whom we may choose to merge with, sell or transfer all or parts of our business or our assets;
- 6.1.5 To service providers such as IT infrastructure, software and hosting, analytics, along with other relevant partners used to help us deliver the App to you;
- 6.1.6 To our commercial partners or sponsors. For example, if required for a promotion or opportunity fulfilment in relation to a deal you engage with;
- 6.1.7 Other organisations in the football industry, such as other football leagues, clubs, governing bodies, and match venues. For example, if you enter a competition and win tickets to a match, we may share your details with the participating club and/or venue;
- 6.1.8 To law enforcement agencies and regulatory bodies where we are under a duty to disclose or share your personal information to comply with a legal duty, or lawfully co-operating in the protection of third party rights;
- 6.1.9 to any credit reference or similar pre-service or communication vetting agency (if any) for the purposes of fraud protection and credit risk reduction.

6.2 We may also provide anonymised aggregated data to third parties, such as aggregating your usage data to calculate the percentage of users accessing a particular feature on the App.

## **7. HOW DO WE STORE YOUR PERSONAL INFORMATION?**

7.1 We have put in place appropriate operational, technical and security measures to reduce the risk of your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes use of encryption where relevant.

7.2 In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

7.3 We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7.4 Generally, we hold your personal data in secure data centres in the European Economic Area (EEA).

7.5 Some organisations to which we may disclose your personal information may be situated outside of the EEA. Whenever we transfer your personal data out of the EEA, we take reasonable steps to ensure that your information is still properly protected. This may include safeguards such as checking the relevant countries have been deemed to provide an adequate level of protection for personal data by the European Commission, or using contractual provisions to ensure your information is properly protected, as approved by the European Commission.

## **8. HOW LONG DO YOU KEEP MY PERSONAL INFORMATION FOR?**

8.1 We will keep the personal information you have provided only for as long as we reasonably require to fulfil the purposes we collected it for.

8.2 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means. This is in addition to any applicable legal requirements. Details of any specific retention periods for different aspects of your personal information are available on request by contacting us at [dataprivacy@footballnetglobal.com](mailto:dataprivacy@footballnetglobal.com).

- 8.3 For legal reasons we may have to keep basic information about our App users (including contact, identity, financial and transaction data) for up to seven years after they cease being users of the App – this is particularly the case for any paid for products or services.

## 9. WHAT ARE YOUR RIGHTS?

9.1 **AS AN INDIVIDUAL, YOU ARE PROVIDED WITH LEGAL RIGHTS GOVERNING THE USE OF YOUR PERSONAL DATA. THESE GRANT YOU THE RIGHT TO UNDERSTAND WHAT PERSONAL DATA RELATING TO YOU IS HELD, FOR WHAT PURPOSE, HOW IT IS COLLECTED AND USED, WITH WHOM IT IS SHARED, AND WHERE IT IS LOCATED. THEY ALSO ALLOW YOU TO OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA, TO HAVE YOUR DATA CORRECTED IF INACCURATE, TO REQUEST COPIES OF YOUR DATA, AND TO PLACE RESTRICTIONS ON ITS PROCESSING. YOU CAN ALSO REQUEST THE DELETION OF YOUR PERSONAL DATA.**

- 9.2 These legal rights are known as Individual Rights under the data protection laws. The following list details these rights:

- 9.2.1 **Request Access:** You can request to receive a copy of the personal data we hold about you. Requests for copies of your personal information will be dealt with within one month, unless your request is complicated or if you have made a large number of requests. In these circumstances it may take us longer to deal with your request, in which case we will let you know if we need longer than one month to respond.
- 9.2.2 **Request Correction:** You can have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of new information you provide.
- 9.2.3 **Request Deletion:** You can ask us to delete or remove personal information in certain circumstances, for example where: there is no good reason for us continuing to process it; you have successfully exercised your right to object to processing (below); or where we may have processed your information unlawfully or where we are required to erase your personal information to comply with data protection laws.
- 9.2.4 **Object to processing of your personal data:** This applies where we are relying on a legitimate interest or those of a third party and you feel our processing on this ground impacts your fundamental rights; or where we are processing your personal information for direct marketing purposes. If you raise an objection we will stop processing your personal information unless very exceptional circumstances apply, in which case we will let you know why we're continuing to process your personal information.
- 9.2.5 **Request Restriction of Processing:** In some circumstances you can "block" us from using your personal information or limit the way in which we can use it.
- 9.2.6 **Request Transfer:** You have the right to request that we move, copy or transfer your personal information.
- 9.2.7 **Right to withdraw consent:** This only applies where we are relying on consent to process your personal information. 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.

- 9.3 To make enquiries or exercise any of your rights set out in this Privacy Notice please contact us by emailing us at [dataprivacy@footballnetglobal.com](mailto:dataprivacy@footballnetglobal.com).

## 10. UPDATES TO THIS PRIVACY NOTICE

- 10.1 We may need to update this Privacy Notice, and minor changes will be posted on this page so you should check back from time to time. Significant changes will be notified to you.