



Appendix 2: Pitchero Privacy Policy

1. General

- 1.1. Pitch Hero Limited a company registered in England with company number 06361033 whose registered office is at Sterling House, Capitol Park East, Tingley, Leeds, West Yorkshire, WF3 1DR ("**we**", "**us**" and "**our**") takes the privacy rights of users of the PITCHERO.COM platform, applications and website ("**Site**") seriously. We are the data controller and we will process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 and national laws which relate to the processing of personal data ("Data Protection Legislation").
- 1.2. This privacy policy explains how we process personal data when you use the PITCHERO.COM platform as a registered user, when you visit our website or use our applications (including the club app and the manager app). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.
- 1.3. If you are one of our suppliers or a non-registered user please see sections 5 and 7 of this policy which provide specific details regarding how we process your personal data.

2. Your data

- 2.1. For the purposes of this privacy policy, "Your Data" means any information about you from which you are personally identifiable, including without limitation your name, age, address, role at club, email address and mobile telephone number (and where applicable, your login name and password) and other information from which you can be identified (such as video footage or photographs) which you (or a third party) may disclose to us or otherwise via our Site or applications at any time.

3. How we collect your data

- 3.1. We may collect and process Your Data in the following circumstances:
 - 3.1.1. whenever you visit PITCHERO.COM. We may collect details of your visits including, but not limited to, traffic data, location data and other communication data and the resources you access (see section 3.2.2 below);
 - 3.1.2. when you register to use PITCHERO.COM;
 - 3.1.3. whenever you or a third party provide Your Data on an online form on PITCHERO.COM (for example, when you submit video, images and other material via android and mobile applications, when you enter competitions or free prize draws etc);
 - 3.1.4. whenever you provide Your Data to us when reporting a problem with PITCHERO.COM, making a complaint, making an enquiry or contacting us for any other reason;
 - 3.1.5. whenever you complete one of our voluntary surveys that we use for research purposes; and
 - 3.1.6. whenever you disclose Your Data to us, or we collect Your Data from you, in any other way, through PITCHERO.COM or otherwise.
- 3.2. We may also collect data in the following ways:
 - 3.2.1. **IP Address** - We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device's operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.



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- 3.2.2. **Cookies** - Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

4. How we use your information

- 4.1. We use Your Data for our own legitimate interests, in order to:
- 4.1.1. monitor, develop and improve PITCHERO.COM and your experience and ensure that content of PITCHERO.COM is presented in the most effective manner for you and for your computer;
 - 4.1.2. process your registration to use PITCHERO.COM and provide you with a user name and password;
 - 4.1.3. provide you with information, products or services that you request from us;
 - 4.1.4. ensure security of your account;
 - 4.1.5. allow you to participate in interactive features of our service, should you choose to do so;
 - 4.1.6. notify you about changes to our service;
 - 4.1.7. process and deal with any complaints or enquiries made by you;
 - 4.1.8. investigate any suspected breach of the terms of service by or otherwise relating to you; and
 - 4.1.9. contact you for marketing purposes and share Your Data with third parties (see sections 9 and 10 of this policy for further details).

5. Non-registered user data

- 5.1. Where you do not have an account with us and your personal data is uploaded to a club website by a third party we may share your personal data such as your name, position, photographs, video footage and times and dates of sporting matches you participate in to the Press Association for the purpose of sports coverage and third party platform/social media organisations. We do not share or syndicate personal data relating to children under the age of 14. You have the right to object to us using Your Data in this way at any time by contacting us using the details in 18 of this policy in addition to your other rights set out in section 15.

6. Retention of your data

- 6.1. Where you are a registered user of the Site, subject to exercising your rights detailed in section 15 of this policy, we retain Your Data for as long as you remain an active user of your account. Where there has not been any activity on your account for three years we will contact you to check you still wish to retain your account with us. Where you decide to cancel your account or we do not hear further from you, your account will be de-activated and Your Data will be deleted. Where you have subscribed to receive marketing correspondence from us we will keep your personal data for marketing purposes whilst your account remains active and for the period of time referred to above. This is subject to exercising your right to unsubscribe from receiving such correspondence at any time.
- 6.2. Where you are a non-registered user or a registered user whose personal data has been uploaded to the club website, we will store Your Data on our software for the benefit of your club for as long as your Club requires (we do not use this information for our own purposes). For details how long Your Data is retained by you club, please contact your club direct.



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7. Supplier data

- 7.1. We will collect details such as a contact name, email address, telephone number and bank details in order to contact you about goods and/or services we have ordered from you, to place further orders and to pay you for the goods or services supplied. We may share your data with our employees to manage our relationship with you and we will keep the personal data for as long as we require your goods and services and for a period of 6 years further to being provided with the goods/services. You may exercise any of the rights referred to in section 15 of this policy in relation to your personal data.

8. If you fail to provide personal data

- 8.1. Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

9. Marketing

- 9.1. In addition to the uses described in sections 2 to 7 above, we may also use Your Data for our legitimate interests including for marketing, market research and related purposes, such as:
- 9.2. providing you with information about our products and services, or related products and services via email/post/telephone/text which may be of interest to you;
- 9.3. asking you to participate in market research, for example surveys about topical issues, our services and products. We will always try to tell you before you participate in a survey how any information you provide in the survey will be used.
- 9.4. Where we have your consent, we may use your data to market the services and products of sports focused brands and ask you to participate in related market research via email/post/telephone/text which may be of interest to you.
- 9.5. We will always inform you before collecting Your Data if we intend to use Your Data for marketing, market research and related purposes. Where we intend to use Your Data for the marketing of services and products of third party organisations and/or disclose Your Data to any third party for such purposes we will obtain your prior consent.
- 9.6. **Your right to opt-out** - You have a right to opt-out of receiving any marketing information (from ourselves and/or a third party) at any time. To opt-out of receiving such information you can:
- 9.6.1. amend your preferences accordingly in your [on-line account](#); or
- 9.6.2. use the facility contained in any marketing communication you receive; or
- 9.6.3. email us at support@pitchero.com.
- 9.6.4. where you have subscribed to receive marketing correspondence from us we will keep personal data for the period set out in section 6.1 of this policy.

10. Disclosure of your data to Third Parties

- 10.1. In addition to the third parties mentioned above, we may disclose Your Data to third parties for our legitimate interests as follows:
- 10.1.1. to our employees and agents to administer your on-line account;
- 10.1.2. to payment providers to process online payments for our goods and/or services;
- 10.1.3. IT software providers that host our website, store data and provide other software services on our behalf;



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- 10.1.4. to reputable third parties in order to gather general statistical information about the Website user base, sales patterns, traffic volumes and related matters but these details will not include information personally identifying you;
- 10.1.5. HM Revenue and Customs, regulators and other authorities who require reports of processing activities in certain circumstances;
- 10.1.6. marketing organisations to assist with the distribution of our marketing correspondence;
- 10.1.7. to the Press Association for the purpose of press coverage;
- 10.1.8. Third parties who we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses, then the new owners may use your personal data in the same way as set out in this privacy policy;
- 10.1.9. to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence or suspected breach of the [Terms of Service](#) or where We are under a duty to disclose or share Your Data in order to comply with any legal obligation;
- 10.1.10. to governing and representative bodies of sport and recreation including local and county league's to improve the management and co-ordination of sport within their territory, undertake marketing and survey participation (where we have your consent);
- 10.1.11. social media organisations for their own promotion and marketing purposes (this relates to video footage only and such data will only be shared with your prior consent);
- 10.1.12. to software suppliers when you use the chat forums with our applications. The software analyses user generated content to identify any anomalies which may indicate behaviour that poses a threat to children. Where such a threat is identified further to analysis of the individual's behaviour, we may take action we consider appropriate including but not limited to removing you as a registered user and/or the notification of law enforcement organisations; and
- 10.1.13. to the Perform Group who work with various third parties to identify audience segments to advertise to. Software is used to track website use and helps build a profile resulting in adverts being sent to you which match your profile. As a consequence, you will see third party advertisements relevant to your interests and lifestyle when you visit our website. Please note that the only information we share with the Perform Group is your gender and if you are a youth player. You cannot be identified from this information. The Perform Group is required to adhere to strict guidelines when advertising to our users and we prohibit the use of advertisements containing adult or gambling content. You may object to profiling being undertaken in relation to Your Data at any time by contacting Perform Group via email customerservices@performgroup.com.

11. Cross border data transfers

- 11.1. Some of our third party software providers may transfer and process Personal Data outside of the European Economic Area ("EEA"). Adequate levels of protection approved by the European Commission are in place for the security of your personal data through the software providers certification under the EU-US Privacy Shield.



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12. Data security

- 12.1. Where we have given You (or where You have chosen) a password which enables you to access certain parts of PITCHERO.COM, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 12.2. Unfortunately, the transmission of information via the internet and mobile networks is not completely secure. Although we will do our best to protect Your Data, we cannot guarantee the security of Your Data transmitted to PITCHERO.COM. Any transmission is at your own risk. Once we have received Your Data, we will use strict procedures and security features to try to prevent unauthorised access.
- 12.3. Information you provide to us is stored on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

13. Links to other websites

- 13.1. PITCHERO.COM may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these when you leave our Site, we encourage you to read the privacy notice/policy of every website you visit.

14. Legal basis for processing your personal data

- 14.1. We will only use your personal data where the law allows us to. Most commonly, we will use your personal data in the following circumstances:
 - 14.1.1. for performance of a contract we enter into with you;
 - 14.1.2. where necessary for compliance with a legal or regulatory obligation we are subject to;
and
 - 14.1.3. for our legitimate interests (as described within this policy) where your interests and fundamental rights do not override these interests.

15. Access to, updating, deleting and restricting use of your data

- 15.1. It is important that the personal data we hold about you is accurate and current. Please keep us informed if the personal data we hold about you changes. Where you are a registered user of PITCHERO.COM you may update your data contained in your [on-line account](#) at any time).
- 15.2. Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal data, please send an email to support@pitchero.com. In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.
- 15.3. You can also ask us to undertake the following:
 - 15.3.1. update or amend Your Data if you feel this is inaccurate;
 - 15.3.2. remove Your Data from Our database entirely;
 - 15.3.3. send you copies of Your Data in a commonly used format and transfer Your Data to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract;
 - 15.3.4. restrict the use of Your Data.



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15.4. We may request specific information from you to help us confirm your identity and your right to access/provide you with the personal data we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all of Your Data/comply with requests made in accordance with your rights referred to above. If we cannot provide you with access to Your Data, or deal with any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

15.5. Please send any requests relating to the above to our Data Protection Lead at support@pitchero.com specifying your name the action you would like us to undertake. Where you are a registered user please also supply the email address you used to register with us and your username. Note that in relation to requests to access Your Data, we reserve the right in certain circumstances to charge a reasonable fee to carry out your request.

16. Right to withdraw consent

16.1. Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact us at support@pitchero.com.

17. Changes to our privacy policy

17.1. Any changes we may make to this privacy policy in the future will be posted on this page. We encourage you to check this privacy policy from time to time for any updates or changes to the privacy policy. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent before using your personal data for a new or unrelated purpose. We may process your personal data without your knowledge or consent where required by applicable law or regulation.

18. Contact us

18.1. If You have any questions, comments or requests regarding this policy or how We use Your Data please contact our Data Protection Lead at support@pitchero.com. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at <https://ico.org.uk/global/contact-us>.

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