

PRIVACY NOTICE

PROSOCCERGLOBAL HUNGARY PRIVACY NOTICE

About this Privacy Notice

Takács Gábor Gergely self-employed, in the following referred as “**ProSoccerGlobal Hungary**”, VAT number is: 55862002-1-41 address is at 1054 Budapest, Hungary, Garibaldi street 5. We take the privacy of your information very seriously. This notice is designed to tell you about our practices, as data controller, regarding the collection, use and disclosure of personal data which may be collected in person from you, obtained via our website (www.liverpoolfccamps.com), app or collected through other means such as by an online form, email, or telephone communication.

This notice applies to personal data provided by our clients or prospective clients, the child/participant for whom the camp is being booked (the “**player**”) and any third party agents, resellers or suppliers whose data we process, but does not apply to information we hold in relation to our staff or contractors. In this notice “**you**” refers to any individual whose personal data we hold or process. This privacy notice is governed by the EU General Data Protection Regulation (the “GDPR”), the Data Protection Act 2018 and any other applicable data or privacy legislation.

ProSoccerGlobal Hungary specialises in sports and English language programmes designed to accelerate learning, sporting prowess and personal development for young people. By using the services, you agree to the collection and use of information in accordance with this notice.

This notice may be updated from time to time and you should check this page regularly for any updates. Changes to this notice are effective when they are posted on this page.

Personal data we collect and how we process this data

Below we have set out the categories of data we collect, the legal basis we rely on to process the data and how we process the data:

- Contact information for our users who submit an enquiry to us, subscribe to our newsletter or book a camp for the player. Contact information may include your name, surname, email address, address, telephone number or other log-in details (“**Contact Information**”).

If you subscribe to our newsletter, we will process your Contact Information on the basis that you have consented to this and will only send our newsletter to you for as long as you continue to consent. Otherwise, we process this information to provide our services and communicate with you (including with respect to customer care and support) on the basis of performing our contract with you or on the basis of our legitimate interest in providing our services to you.

- Contact information which we hold because you are a third party relevant to the services we provide to our clients (you may for example be a payment processor, marketing software provider, credit agency or transport provider) ("**Third Party Contact Information**").

We process this information when we provide services to our clients on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to our clients.

- A record of any correspondence or communication between you and us ("**Communication Information**").

We process this information when we monitor our relationship with you and provide services to you on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.

- Camp booking information which we hold when you book a camp for a player. Such information includes Contact Information, your relationship to the player, the player's name, surname, date of birth, gender, nationality and Financial Information ("**Booking Information**").

Other than gender which we process on the basis of your consent, as a special category of data, we process Booking Information on the basis of performing our contract with you or on the basis of our legitimate interest in providing our services to you.

- Information which we hold relating to a player's or other user's comments, reviews, feedback and ideas ("**User Generated Information**").

We process this information in order to improve or customise our services on the basis of our legitimate interest in providing our services to you and our other clients.

- Player welfare information which we hold once you made a booking for one of our camps. Such information includes the camp booking reference, your Contact Information, the player's name, surname, date of birth and medical and care information such as the player's medical conditions, medication, allergies and dietary requirements ("**Player Welfare Information**").

We process this information on the basis of performing our contract with you, on the basis of our legitimate interest in providing our services to you or as necessary in order to protect the vital interests of the player.

- Financial information which we hold in the context of providing services to you ("**Financial Information**") such as billing and banking details.

We process this information when we provide services to you on the basis of the performance of our contract with you or on the basis of our legitimate interest in providing our services to you.

- **Cookie Information.** A cookie is a small text file which asks permission to be placed on your computer's hard drive or mobile device. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

We process Cookie Information where applicable and necessary on the basis that you have consented to this in order to improve or communicate with you about our services and/or to customise the website according to your personal interests.

- **Marketing information.** We may hold information about you in order to provide information about our services. This may include names, job titles, email addresses, phone numbers, addresses, and other information ("**Marketing Information**").

We process this information in order to improve or customise our services, communicate with you about our services or for market research purposes, on the basis of our legitimate interests in communicating with you about our services or on the basis that you have consented to receiving the information. We will collect information either from you directly or from a third party (for instance an introducer). If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this privacy notice.

Data Retention

Our current data retention policy is to delete or destroy (to the extent we are able to) personal data after the following periods:

- Following an enquiry with us, we will remove your Contact Information and Communication Information from our CRM system after a period of 1 year unless you make a subsequent booking with us.
- In respect of booking with us - 7 years from either the booking.
- In respect of Cookie Information – such data is removed from the Google Analytics online platform after 3 years. After such period, only aggregated data (from which all personal data has been removed) is stored by us.
- In respect of Marketing Information - 5 years from the last date on which you have interacted with us.

For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data. The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).

We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or securely delete this data as may be required.

If you wish to request that data we hold about you is amended or deleted, please see below for your privacy rights.

Sharing your information

We may disclose information to third parties in the following circumstances:

- We may work with other professionals and providers in providing and delivering our services to you - this may include a payment processor, marketing software provider, credit agency, transport partners (for the player's airport transfer purposes), insurance provider (for the player's medical insurance purposes).
- We may disclose information to our group companies (as applicable).
- If we are sub-contracting services to a third party we may provide information to that third party in order to provide the relevant services.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime).
- In order to enforce any terms and conditions or agreements for our services that may apply.
- As part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected.
- To protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If we do supply your personal data to a third party we will take steps to ensure that your privacy rights are protected and that such third party complies with the terms of this notice.

Security

We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):

- protecting our servers by both hardware and software firewalls;
- locating our data processing storage facilities in secure locations;
- encrypting all data stored on our server with an industry standard encryption method that encrypts the data between your computer and our server so that in the event of your network being insecure no data is passed in a format that could easily be deciphered;

- when necessary, disposing of or deleting your data so it is done so securely;
- regularly backing up and encrypting all data we hold.

We will ensure that our staff are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and data security obligations.

This notice and our procedures for handling personal data will be reviewed as necessary.

Third party links

Our website may contain links to other sites that are not operated by us. This notice applies to our services only so if you click on a third-party link, we strongly advise you to review that site's privacy policy.

We have no control over and are not responsible or liable for the content, privacy policies or practices of any third-party sites or services.

Your privacy rights

With respect to your personal data, you have:

- **The right to be informed** - a right to know about our personal data protection and processing activities, details of which are contained in this notice
- **The right to access** - the right to request a copy of any personal data that we have about you
- **The right to rectification** - the right to request a correction of any errors in or update of the personal data that we have about you
- **The right to erasure** (*the 'right to be forgotten'*) - the right to request that your personal data is deleted from our records
- **The right to restrict processing**- the right to request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data
- **The right to object to processing** - the right to request that your personal data will not be processed
- **The right to data portability** - the right to request that your personal data be transferred or exported to another organisation
- **The right to withdraw consent** - the right to withdraw any permission you have given us to process your personal data
- **Rights in relation to automated decision making and profiling**
 - The right not to be subject to automated decision-making (including profiling) when those decisions have a legal (or similarly significant effect) on you

- The right to request that your personal data will not be used to contact you for direct marketing purposes

All SARs and other requests or notifications in respect of your above rights must be sent to us in writing at info@liverpoolfccamps.com or by post to Sports Camps UK Limited, 4th Floor, Bedser Stand, The Kia Oval, London, SE11 5SS.

We will endeavour to comply with such requests as soon as possible but in any event we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

Data breaches

If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to our data protection manager or officer (if an officer has been appointed) and the Information Commissioner's Office (ICO) (as necessary).

If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

Transferring your information outside the EEA

We will not transfer your personal data in a systematic way outside of the European Economic Area or UK (together the "EEA") but there may be circumstances in which certain personal data is transferred outside of the EEA, in particular:

- From time to time, some of our data processors (including third party payment processors, server providers, transport partners), may be based outside of the EEA. In that case, we will ensure we have an agreement in place with such processors to provide adequate safeguards and a copy of such safeguards will be available on request.
- If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with our services or communicate with you.
- We may communicate with individuals or organisations outside of the EEA in providing our services. Those communications may include personal data (such as contact information).
- From time to time your information may be stored in devices which are used by our staff outside of the EEA (but staff will be subject to our cyber-security policies).

If we transfer your information outside of the EEA, and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice.

Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal data or how it is handled, you can do so via the following email address at prosoccerglobalhungary@gmail.com or contact us at www.prosoccerglobalhungary.com/en_GB/contact/