

AiScout App – Privacy Notice

Introduction

This Privacy Policy needs to be read in conjunction with the AiScout App User Terms <https://www.aiscout.io/terms/> and together forms the entire agreement between us and you.

This policy (together with our App User Terms applies to your use of:

- the AiScout mobile application software (App), once you have downloaded or streamed a copy of the App onto your mobile telephone, handheld or other device (Device).
- any of the services accessible through the App (Services). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Consent to installation of the App

Under data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This information is provided in this policy and it is important that you read this information before downloading the App.

Although you can change your mind and withdraw consent at any time by contacting us at support@aiscout.io, that will not affect the lawfulness of any processing carried out before you withdraw your consent

Children and Consent

If you are under 16 years of age and we rely upon consent as a ground for processing your personal data, we are required to receive consent from your parent or another person with personal responsibility for you

Introduction and details about us

AiScout is owned by [**Project 23rd Century Limited**], which is the controller and is responsible for your personal data (collectively referred to as “we”, “us” or “our” in this policy). We have appointed a data privacy manager and if you have any questions about this privacy policy or the way in which we handle your personal data, please contact our data privacy manager using the details set out below.

Contact details

Our full details are:

- Project 23rd Century Limited
- Data Privacy Manager: support@aiscout.io

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues or other competent supervisory authority of an EU member state if the App is downloaded in an EU member state.

This policy (together with our App User Terms as set out at [INSERT LINK] (App User Terms) together our Terms of Use) applies to your use of:

- the AiScout mobile application software (App), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld or other device (Device).
- any of the services accessible through the App (Services). This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Project 23rd Century Limited (we) are committed to protecting your personal data and respecting your privacy.

Legal Basis for our processing your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- where you have consented before the processing.
- where we need to perform a contract we are about to enter or have entered with you or a third party.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- where we need to comply with a legal or regulatory obligation.

Please see the Glossary at the end of this policy to find out more about the types of lawful basis that we will rely on to process your personal data.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

This version was last updated on 20th April 2020 We reserve the right to make changes to our Privacy Policy from time to time, so we would recommend that you regularly review the Privacy Policy so that you are aware of its exact content. In the event of any important changes to the Privacy Policy we will inform you of such changes by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you. In particular, you are required to update the Basic Data (as defined) at least once a calendar year and continued failure to do so and/or to use the App for a significant period may lead to our terminating your use and/or deleting personal data held on you.

Third party links

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such

as Contact and Location Data. Please check these policies before you submit any personal data to these websites or use these services.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you as follows:

- **Basic Data:** physical data relating to your height, weight, age and your current school and sporting club memberships/affiliations.
- **Specific Data:** the specific results of any sporting trials and/or physical tests you have undertaken in respect of a specific trial, including video footage, which will be made available to the relevant third party which has initiated that sporting trial/exercise.
- **Identity Data:** first name, last name, maiden name, username or similar identifier, marital status, title, date of birth, gender.
- **Contact Data:** billing address, delivery address, email address and telephone numbers.
- **Transaction Data:** includes [details about payments to and from you and details of in-App purchases].
- **Device Data:** includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting,
- **Content Data:** includes information stored on your Device, including friends' lists, login information, photos, videos or other digital content, check-ins,
- **Profile Data:** includes your username and password, in-App purchase history, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data and other communication data, whether this is required for our own billing purposes or otherwise [and the resources that you access.
- **Marketing and Communications Data:** includes [your preferences in receiving marketing from us and our third parties and your communication preferences].
- **Location Data:** includes your current location disclosed by GPS technology.

We also collect, use and share Anonymised Data such as statistical or demographic data for any purpose. Anonymised 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 your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Anonymised 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.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information you consent to giving us about you by uploading Basic Data and/or Specific Data about yourself on the App, filling in forms on the App, or by corresponding with us. It includes information you provide when you register to use the App, subscribe to any of our Services, or by taking part in one of the sporting trials and/or competitions which you participate in. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you use our App we will automatically collect personal data including Device, Content and Usage Data. We collect this data using cookies and other similar technologies. Please see our cookie policy below for further details.
- **Location Data.** The App is designed to use GPS technology to determine your current location. You can withdraw your consent at any time by disabling Location Data in your settings. Please note that the default position of the App is that the GPS technology is deactivated and so you will need to activate it in your settings. The use of location data is likely to be of assistance to you as it will increase the chances of clubs and/or sporting bodies in your geographic area getting to know about you and making contact in relation to possible trials.**Third Party Sources.** We may also obtain personal data about you from third parties, such as Google Analytics or other providers of personal data.

Cookies

We use cookies and/or other tracking technologies to distinguish you from other users of the App and to remember your preferences. This helps us to provide you with a good experience when you use the App and also allows us to improve the App. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies,

Purposes for which we will use your personal data

These purposes include:

- (a) To install the App and register you as a new App user
- (b) To deliver Services to you, for example, enabling you to participate in a trial, competition or complete a survey
- (c) To manage our relationship with you, including notifying you of changes to the App or any Services
- (d) To administer and protect our business and this App including troubleshooting, data analysis and system testing
- (e) To monitor trends so we can improve the App.

Use of your personal data for marketing purposes

We will only send you direct marketing communications in relation to matters not related to the App by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us

Sharing your personal data with third parties for marketing purpose

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Disclosures of your personal data

Basic Data: due to the nature and purpose of the AiScout App, this personal data will be available to all those who use and access the App, so Basic Data is limited in its scope.

Specific Data: Due to the nature and purpose of the App, all results and information relating to any specific trial/assessment undertaken for a specific club or related body will be made available to the sporting club or related body conducting that trial or exercise. You will be made aware of this before taking part in any specific trial/assessment and only the named club(s) and/or organisation(s) will have access to such Specific Data]. Please note, in relation to Specific Data, we shall also have access to it and, in the event the relevant club or sporting body does not wish to make an offer in relation to a specific trial, we reserve the right to send the Specific Data to other relevant clubs or sporting bodies which may be interested in you. Equally the clubs and/or sporting bodies who have set up the trial may also want to pass Specific Data on to other clubs and sporting bodies. This will also be made clear to you in relation to any specific trial

We may also disclose your personal data to other companies in our company group, i.e. a subsidiary or parent company or another company controlled by the same parent company as us.

We may also disclose personal data to certain service providers to us including lawyers and bankers where this is strictly necessary to provide us with advice.

We may also be required to disclose personal data to HM Revenue & Customs and other regulators and authorities where this is required by law.

Aggregated Data: there may be occasions where we provide Aggregated Data to third parties. Aggregated Data is data taken from personal data but in such a way that an individual cannot be identified in respect of Aggregated Data. For example, sporting bodies such as the Football Association may be interested in knowing how many boys and girls of a certain age are playing in a specific geographic region. Strictly speaking, such data is not personal data in the legal sense as it does not identify an individual or is capable of doing so.

International transfers

There may be occasions when the processing of your personal data will involve a transfer out of the European Economic Area (EEA). Whenever we transfer your personal data out of the EEA, 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 by the European Commission;
- where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the EEA ;
- where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

This Privacy Policy has been created prior to the UK's formal exit from the EU. Subject to any amended UK law and/or regulations in relation to data protection, it is our aim to provide the same level of protection for personal data once the UK has formally left the EU as set out above, although the specific mechanisms may change. Subject to any future UK legal amendments, this section of the Privacy Policy may be amended.

Data security

All information you provide to us is stored on secure servers. If we have given you (or where you have chosen) a password that enables you to access certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

Data retention

Unless we are required by law to keep personal data for a specified purpose, for example, tax purposes, our policy in relation to retention periods is as follows:

- where you are a regular user of the App, we will keep all Basic Data and Specific Data held on you (you are normally required to update your Basic Data once every calendar year);
- in the event that you notify us in writing that you wish to terminate use of the App, we will delete all Basic Data and Specific Data that we hold unless you specifically request otherwise (we are unable to delete/destroy any personal data shared with third parties before the date that you terminate use of the App);
- in the event that you do not use the App for a period of 24 months or you fail to update your Basic Data for 24 months, we will treat your account as expired and your personal data may be deleted.

In some circumstances you can ask us to delete your data: see *Your legal rights* below for further information.

In some circumstances we may 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.

Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data.

You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data

for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. 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.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

You can exercise any of these rights at any time by contacting us at support@aiscout.io

Glossary

Lawful basis for processing personal data

Consent means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.