

## **§ 1 Personal Data Administrator**

The personal data administrators (co-administrators) are:

1. ICFDS Canada Limited

founded and registered in Canada under company number A0108699 with headquarters at 8160 Minler Road, Richmond, British Columbia, V7C 3T7, Canada represented by the following director:

Huw Harris

hereinafter referred to as Socatots or Brazilian Soccer Schools

2. ICFDS GLOBAL Limited

founded and registered in England and Wales under number 08756436, based in Oxford, Cumnor Road, Wootton, OX1 5JW, United Kingdom represented by:

Przemysław Olewnik - Member of the Management Board

hereinafter referred to as ICFDS,

hereinafter collectively referred to as PDA

## **§ 2 The provisions of the law on the protection of personal data**

The Socatots or Brazilian Soccer Schools Privacy Policy refers to the following provisions regarding the protection of personal data:

- The *Personal Information Protection and Electronic Documents Act* (PIPEDA) of 13 April 2000
- Provincial Privacy Acts as applicable in Alberta, British Columbia and Quebec.

## **§ 3 Personal data subject to processing**

Socatots or Brazilian Soccer Schools processes, in particular, personal data belonging to:

- Clients, i.e. persons and legal guardians of persons who participate in Socatots or Brazilian Soccer Schools classes;
- Pupils - children who participate in Socatots or Brazilian Soccer Schools activities, including regular activities, half-camps, camps, birthday parties and tournaments using the Socatots or Brazilian Soccer Schools brand;
- Potential clients - people interested in taking part in Socatots classes or Brazilian Soccer Schools;
- Former Clients - people who participated in Socatots or Brazilian Soccer Schools classes.

Personal data that is processed by ICFDS Canada Limited. may include: name, surname, PESEL (personal identity number), date of birth, telephone number, e-mail address, home address, size.

Persons whose personal data is processed by ICFDS Canada Limited are hereinafter referred to as "Clients".

## **§ 4 Rules for the processing of personal data**

As part of the processing of personal data, we attach great importance to the data being processed

in a safe, reliable, lawful and transparent manner for people whose data is processed.

Below are the most important principles we follow:

- We collect personal data only to the minimum extent necessary to achieve the objectives, for which they are collected, or resulting from separate provisions.

- The purposes of collecting Clients personal data are clearly defined, based on the law - we do not process data in a manner inconsistent with these purposes.
- We care about the validity and correctness of Clients' personal data and we respond promptly to any requests for correcting or updating data.
- We implement the right of Clients to access their personal data and correct them.
- We also implement Clients' rights to delete personal data, withdraw consent, limit processing, transfer data, the right to object to data processing, the right not to be subject to a decision based solely on automated data processing, in this profiling.
- We limit the storage of personal data in accordance with the law, only to the period necessary to achieve the purposes for which they are collected, unless there are events that may extend the period of data storage.
- We protect Clients' personal data against loss, unauthorized access, accidental loss or change and other unlawful forms of processing.
- If personal data is shared with other entities, it is done in a safe, contractually secured manner and in accordance with applicable law.

#### **§ 5 The purpose of data processing**

Socatots or Brazilian Soccer Schools will process Client's personal data in order to:

- outline the offering of Socatots or Brazilian Soccer Schools;
- conclude an agreement regarding participation in Socatots or Brazilian Soccer Schools classes;
- information about promotions relating to the classes;
- conducting ongoing cooperation during the duration of the contract for conducting classes;
- presenting the offer of complementary services, in relation to the conducted classes, such as: offers of camps, half-camps, birthday parties, the sale of sports equipment and clothing, insurance, including marketing of Socatots or Brazilian Soccer Schools partners;
- direct marketing of our own products or services;
- pursuing claims for business activity.

#### **§ 6 The period of data processing**

Personal data will be processed within a time period including:

- the period before establishing cooperation (signing a contract for conducting classes),
- the duration of the contract for conducting classes,
- a period after termination of the contract, indicated in other legal regulations, including tax law, as well as resulting from the provisions on limitation of claims;

However, no more than 10 years after the termination of the contract for conducting classes.

#### **§ 7 Profiling**

As part of processing Client's personal data, we can profile:

- based on the consent of the Client - in order to select offers of products and services in terms of the needs of a given Client, including the use of automatic processes, consisting in compilation of data in the scope of granted consent, coming from various sources and the profile assigned on that basis, the consequence of which is selecting and presenting to the Client corresponding advertisements or offers to match his profile;



- without consent, based on our legitimate interest in the scope of processed cookies, in order to customize the content and marketing messages displayed on Socatots or Brazilian Soccer Schools websites and other websites visited by you - to the preferences and interests of the Client, based on such data as: visits to websites and clicks within individual website functionalities, login and registration dates, data in the use of individual services on websites.

The data collected during the Client's visit to our websites is used to display ads (banner, text and video). This ad uses cookies (cookies) or scripts provided by advertising system vendors. Our goal is to develop an advertising offer that will be attractive and beneficial for the Client, that is why as part of the banner advertising the Client can see primarily the advertising of services he was interested in visiting our websites or products similar to previously viewed on other websites (so-called retargeting).

### **§ 8 Rights of persons whose data are processed**

The person whose personal data is processed has the right to:

- a. access the data,
- b. obtain from the administrator copies of personal data to be processed
- c. correcting / supplementing data
- d. deletion of data (right to be forgotten), if:
  - personal data are no longer necessary for the purposes for which they were collected, or
  - the data subject has withdrawn consent, which is the basis for data processing and has no other legal basis for the processing, or
  - the data subject has lodged an objection in accordance with g and there are no overriding, legitimate purposes of processing, or
  - personal data was processed unlawfully.
- e. processing restrictions, if:
  - the data subject reports that the data being processed is incorrect, for the time of data verification;
  - data processing is unlawful and the data subject opposes their removal and demands restricting their use;
  - the administrator no longer needs personal data for processing, but they are needed by the person to whom they are to determine, assert or defend claims;
  - the data subject has lodged an objection in accordance with g, until it is established whether the legitimate grounds on the part of the administrator to override the grounds for objection of the data subject
- f. data transfer, i.e. the right to receive copies of personal data that the Client provided if the processing is based on consent or under a contract, and in an automated manner
- g. objection - if personal data are processed for direct marketing purposes, the Client has the right to object at any time to the processing of personal data for the purpose of such marketing, including profiling, to the extent that the processing is related to such direct marketing. If personal data are processed on the basis of Socatots' legitimate interests (eg analytical, evidential, archiving purposes), then if the Client opposes, Socatots will have to stop processing the data, unless it demonstrates the existence of a substantive reasonable basis for processing that objectively they should take precedence over the inconvenience of the Client or rely on the defense of claims (eg in court proceedings).

h. not to be profiled

i. The right to submit a complaint to the supervisory body - the Office of the Privacy Commissioner of Canada (OPC) .

All requests regarding personal data being processed, including the rights to which the Client is entitled, may be sent by e-mail to: [info@socatots.ca](mailto:info@socatots.ca), or in writing to the address of ICFDS Canada Limited, 8160 Minler Road, Richmond, British Columbia, V7C 3T7, Canada with the note "IOD".

According to the law, Socatots as PDA gives the person who has requested a response about the actions taken up to a month's time.

## **§ 9. Security of personal data**

Socatots takes up technical and organizational measures to protect personal data against unauthorized or unauthorized access or use, as well as against accidental destruction, loss or violation of integrity. When designing the IT infrastructure used to the processing of personal data, the security of personal data is taken into account.

As part of ensuring the security of personal data processed, Socatots applies the following rules:

- confidentiality - data protection against accidental disclosure to third parties,
- integrity - data protection against unauthorized modification,
- accessibility - providing access to data only to authorized persons

Personal data may be processed by third parties only if such entity agrees to provide appropriate technical and organizational means to guarantee the security of personal data processing as well as to preserve the confidentiality of such data. Each person having access to personal data has the appropriate authorization and is obliged to confidentiality.

## **§ 10. Providing data to other entities**

Personal data may be made available to processors - companies providing services on behalf of Socatots or Brazilian Soccer Schools and performing activities requiring data processing, in particular in the field of IT services, marketing services (including marketing agencies), market research, organization and implementation of events, call centers.

The entities that process personal data are franchisees running Socatots or Brazilian Soccer Schools classes in the Client's region.

With the consent of the Client, personal data may be made available to the entities indicated in the consent.

## **§ 11. Cookies**

1. Cookies (so-called "cookies") are IT data, in particular text files, which are stored in the Client's end device and are intended for use of the Website's websites. Cookies usually contain the name of the website from which they originate, their storage time on the end device and a unique number.

In connection with the use of websites by the Client, Socatots or Brazilian Soccer Schools collects data contained in the system logs

2. Cookies are used for the following purposes:

- creating statistics that help to understand how Clients - Website Users use websites, which allows improving their structure and content;
- maintaining the Client - Website User's session (after logging in), thanks to which they do not have to re-enter the login and password on each subpage of the Website;
- defining the Client - Website User's profile in order to display adjusted materials in advertising networks, in particular the Google network.

3. Socatots or Brazilian Soccer Schools uses two basic types of cookies: "session" and "persistent" cookies. Session cookies are temporary files that are stored on the Client's end device until logging out, leaving the website or turning off the software (web browser). Persistent cookies are stored in the Client's end device for the time specified in the cookie file parameters or until they are removed by the Client.

4. Software for browsing websites (web browser) usually by default allows storing cookies on the end device of the Client. Clients - Website Users can change their settings in this area. The web browser allows you to delete cookies. It is also possible to automatically block cookies. Detailed information on this subject is provided in the help or documentation of the web browser.

5. Restrictions on the use of cookies may affect some of the functionality available on the Website.

6. Cookies placed on the Website User's end device may also be used by advertisers and partners cooperating with the Website operator. Cookies may be used by advertising networks, in particular the Google network, to display advertisements tailored to the manner in which the user uses the Website. For this purpose, they can save information about the user's navigation path or the time of staying on a given page.

7. In terms of information about user preferences collected by the Google advertising network, the user can view and edit information derived from cookies using the tool:  
<https://www.google.com/ads/preferences/>

## **§ 12. Changes to the Privacy Policy**

Socatots or Brazilian Soccer Schools reserves the right to change the above privacy policy at any time and place, at the same time committing itself to immediately publishing the new privacy policy on its websites and informing all Clients about this fact.