



EBFA – www.GotFootball.co.uk GotFootball Privacy Policy and Terms of Service 2015/2016



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East Berks Football Alliance / GotFootball

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Change History

Version	Description	Date
1.00	1 st Release	08-Jul-15
1.01	Typo Page 4	22-Jul-15
<u>1.02</u>	<u>U.S.-EU Safe-Harbor Compliance</u>	<u>16-Aug-15</u>

GotFootball Privacy Policy and Terms of Service

East Berks Football Alliance Specific Terms

GotFootball.co.uk affirms that we will never sell, lease, or give any access to our database to any third party entity unless required to do so by law.

GotFootball.co.uk will not email the EBFA database on behalf of any third party.

GotFootball Privacy Policy and Terms of Service – 7 August, 2015

GotSoccer UK Ltd, doing business as GotFootball, is hereafter referred to as GotFootball in this document.

There are many different ways you can use our services to share and search for information, to communicate with players, teams, associations and events or to create new content. When you share information with us, for example by creating a player or team account, we can help you connect with the football community or to make sharing with others quicker and easier.

Let's start with the most important issue. GotFootball does not and will not share, sell or lease personal information on players, parents, coaches, referees, administrators or any other person in our database to any commercial company (for example, XYZ sporting goods store or ABC soft drink company) other than those we reasonable believe you want to share your information or unless you give us explicit consent. An example of a commercial entity we would share information with would be a company that runs a league using our software. When a team applies to the league we assume they want the company running the event to see that they've applied and will want them to contact the team about the event.

As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains -

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information

Information we collect

We collect information to provide better services to all of our users from figuring out basic information like what gender a player is, to more complex things like which programs you'll find most useful or the people who matter most to you in the football community. We process all information in accordance with applicable UK data protection legislation.

We collect information in two ways:

Information you give us - For example, many of our services require you to sign up for a GotFootball Account. When you do, we may ask for personal information, like your name, email address, telephone number, gender, birth date. This is most often used by your team, club, association and county organization.

Information others give us about you - For example, managers may enter player information into a team account for a cup or league without your knowledge. County organizations may require your club or association to upload information into GotFootball including your personal and contact information. GotFootball assumes those that enter personal information into or export data from our database have the right to do so.

Information we get from your use of our services

We may collect information about the events and programs that you use and how you use them, like when you apply to a tournament, or register to play with a club that uses our services. This information includes:

Device information

We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).

Log information

When you use our services or view content provided by GotFootball, we may automatically collect and store certain information in server logs. This may include:

details of how you used our service, such as your event attendance, Internet protocol addresses (IP addresses), system activity, browser type, the date and time of your request and referral URL cookies that may uniquely identify your browser or your GotFootball Account.

Unique application information

Certain services including event applications, background checks, player registrations, or programs registration have a unique application number. This number and information about your application may be kept by GotFootball when you use our software.

Cookies and anonymous identifiers

We use various technologies to collect and store information when you visit GotFootball, and this may include sending one or more cookies or anonymous identifiers to your device. We may also use cookies and anonymous identifiers when you interact with services we offer to our partners, such as advertising services.

How we use information we collect

We use the information we collect from all of our software services to provide, maintain, protect and improve them, to develop new ones, and to protect GotFootball and our users. We also use this information to offer you tailored content - like giving you more relevant programming and ads.

We may use the name you provide for your GotFootball account across all of the services we offer that require a GotFootball account. In addition, we may replace (merge) past names associated with your GotFootball Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible

GotFootball Profile information, such as your name and photo. This would include users such as your team manager, club, association, league, tournament you entered, county organization, or other users that we have reasonable belief is entitled to your account information. We may also publish certain information (name, position, photo) on our team ranking page, though you and your team can opt out.

Creating or accessing an account in GotFootball equals becoming a member of the GotFootball community. We are allowed email you from time to time regarding things we believe may be of interest including new services and products developed by GotFootball and its partners.

When you contact GotFootball, we may keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming events changes or improvements. We allow clients to email you where we have reasonable belief that you are or expect to become a member. These include your club, association, county organization and national organization.

We use information collected from cookies and other technologies, like pixel tags, to improve your user experience and the overall quality of our services.

We may combine personal information from one service with information, including personal information, from other GotFootball services - for example to make it easier to share things with people you know or associations you belong to.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Transparency and choice

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

Review and control certain types of information tied to your GotFootball Account by using your account. Certain information may not be directly editable by the user, such as gender, name, and birth date, after certain verification processes. (Examples are, player pass and official roster information.)

View and edit certain preferences, such as which colleges might interest you, using the college recruiting area of a player account.

Control who you share information with from a team or player account.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services may not function properly if your cookies are disabled.

Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines. Our services provide you with different options on sharing and removing your content.

Once information is shared with your actual or implied permission (applying to play for a club implies you want them to see your personal information so they can place the player on a team), these organizations (events) may email or contact you using the GotFootball email system. In this instance, it is our position that you or your team has become a member of these organizations (events) and the organization or event has the right to contact you. Please consult these organizations (events) with regard to their privacy policies.

Ownership of the actual account

GotFootball is a 'Software as a Service' (SaaS) company. We own the actual accounts and have the right to restrict or deny access as we see fit. For example, if an association elects a new president, we may change the password to deny the past president access and allow the new president access. Teams sometimes split and GotFootball must decide who will maintain the team account. GotFootball will only restrict a parent's access to a child's account under court order.

Right to advertise

GotFootball retains the right to place advertisements in all software accounts. GotFootball retains the right to advertise on all event public pages with the exception of events that pay for our services where the event asks to opt out.

Accessing and updating your personal information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it - unless we have to keep that information for legitimate business or legal purposes. These legitimate purposes may include official rosters, club registration, or county registration. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes or other archive systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

Information we share

We do not share personal information with companies, organizations and individuals outside of authorized GotFootball users unless one of the following circumstances apply:

- With your consent
- Your team's consent
- Your club's consent
- Your association's or league's consent

We will share personal information with organizations or individuals outside of GotFootball when we have your, your team's, or your club/association consent to do so. An example would be an export to comply with your county or league registration requirements.

For legal reasons

We will share personal information with companies, organizations or individuals outside of GotFootball if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request, enforce applicable Terms of Service, including investigation of potential violations, detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of GotFootball, our users or the public as required or permitted by law.

We may share aggregated, non-personally identifiable information publicly and with our clients like county organizations, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If GotFootball is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

Information security

We work hard to protect GotFootball and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

We encrypt many of our services using Secure Socket Layers (SSL as https:)

We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.

We restrict access to personal information to GotFootball employees, contractors and agents who need to know that information in order to process it, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Application

Our Privacy Policy applies to all of the services offered by GotFootball and its affiliates, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy. For example, clubs, associations, county associations may export information from GotFootball to comply with obligations from the F.A. or other organizations. Our Privacy Policy does not extend to information and its use once exported from our database. Please contact your club, association, county organization or others regarding their Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals. Our Privacy Policy does not cover the information practices of other companies and organizations that use our services.

Changes

We regularly review our compliance with our Privacy Policy and our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Your right to access the information

You have the right to access the information that GotFootball holds about you in accordance with the Data Protection Act 1998. In order to do this please make a written application to the Data Protection Officer, at the address provided below. GotFootball may require you to provide verification of your identity and to pay an administrative fee (which is currently £10) to provide a copy of the information that it holds. Please note that in certain circumstances GotFootball may withhold access to your information where it has the right to do so under current data protection legislation.

Refund Policy

GotFootball only bills after leagues and cups start play and after all registrations are completed and schedules published. GotFootball will refund any player or team registration fee it receives once a league or club deletes a player registration or deletes a team from a league after play has started and upon proof the league or club has refunded the player or team application fees.

Cancellation Policy

Clients can cancel their arrangement with GotFootball at any time on 30 days notice.

U.S.-EU Safe-Harbor Compliance

GotFootball complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. GotFootball has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern.

To learn more about the Safe Harbor program, and to view GotFootball's certification (appearing as GotSoccer, LLC), please visit <http://www.export.gov/safeharbor/>

Privacy Inquiries and Dispute Resolution

In compliance with the US-EU Safe Harbor Principles, GotSoccer commits to resolve complaints about your privacy and our collection or use of your personal information. European Union citizens with inquiries or complaints regarding this privacy policy should first contact GotSoccer using our online contact form.

GotSoccer has further committed to refer unresolved privacy complaints under the US-EU Safe Harbor Principles to an independent dispute resolution mechanism, the BBB EU SAFE HARBOR, operated by the

Council of Better Business Bureaus.

If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/us/safe-harbor-complaints for more information and to file a complaint.

Contact Us

If you have any queries about this Privacy Policy or you wish to access or update your information please write to the Data Protection Officer, GotSoccer UK Ltd, 158 Gillespie Road, London N5 1LP