

Data Protection Policy

1) Introduction

a) Purpose

SPORTSAFE needs to gather and use certain information about Individuals. These can include customers, suppliers, business contacts, employees and other people SPORTSAFE has a relationship with or may need to contact.

This Data Privacy Policy describes how these personal data must be collected, handled and stored to meet SPORTSAFE's data protection standards and to comply with the law, especially the EU General Data Protection Regulation (GDPR).

The GDPR is a European regulation coming into force on 25 May 2018 which is designed to:

- harmonize data privacy laws across Europe,
- protect and empower all EU citizens data privacy,
- reshape the way organizations across the region approach data privacy.

The GDPR applies to all companies processing personal data of citizens residing in the EU, regardless of the company's location.

b) Definitions

In this Data Privacy Policy, unless the context otherwise requires, the following words and expressions shall have the following meanings:

- Data privacy Committee – means the committee composed of the DPO and data Privacy managers whose missions are described in Appendix 1.
- Data Privacy Manager – the person appointed in the company who is charge of providing a relay to the DPO. The missions of Data Privacy Managers are set forth in Appendix 1.
- DPO – the person appointed within the company as its Data Protection Officer, whose missions are described in Appendix 1.
- Individual – any person whose Personal Data are collected and/or used by SPORTSAFE;
- Personal Data – any information that can be used to identify and Individual, whether directly or indirectly (e.g name, address, phone number, computer ID, location data, life habits etc.), even in a professional context;
- Policy – this Data Protection Policy and its appendices and any amendment thereof;
- Processing – any operation or set of operations which is performed on Personal Data, whatever method is used. In other words, any use of Personal data should be considered as Processing. Processing can be computerized (e.g video surveillance, files transfers over the Internet, electronic databases, etc) or manual (e.g paper files).
Any Processing performed by SPORTSAFE is identified in a specific document which is updated on a regular basis.



The terms defined in the singular have a comparable meaning when used in the plural, and vice versa.

c) Policy scope

This Policy comprises the SPORTSAFE data privacy principles without replacing the existing national laws. It supplements the national data privacy laws but any relevant national law shall prevail over this Policy if it conflicts with it or if it has stricter requirements than it.

To the extent GDPR is applicable, this Policy applies to:

- SPORTSAFE, all staff thereof and all contractors, suppliers and other people working on behalf of SPORTSAFE, and
- all Personal Data SPORTSAFE gathers from Individuals.

Everyone who works for or with SPORTSAFE has some responsibility ensuring Personal Data collection and Processing are performed appropriately.

2) Governance and organization

a) Data Privacy Managers

SPORTSAFE has appointed a Data Privacy Manager within its organisation.

Their mission may not be exclusive and may be entrusted to a person whose position is (HR, IT, accounting, etc.)

b) DPO

SPORTSAFE appoints its Commercial Analyst as its DPO. The DPO can be reached via the following email address: cclare@sportsafeuk.com

c) Data Privacy Committee

A Data Privacy Committee, composed of the DPO and the Data Privacy Managers, is created. It will meet at least twice a year.

The Data Privacy Committee is responsible for organizing audits on a regular basis in order to analyse the Processing carried out and to ensure their proper compliance with the GDPR.

3) Processing

Subject to GDPR requirements, Processing are permitted under pursuant to the following legal basis:

I. Contracts

Processing of Personal Data is permitted in order to establish, perform and terminate a contract. In this case, Individual's consent is deemed to be tacitly given and Processing can last until the term of the contract (i.e. for the needs of its performance).

II. Legal obligation

Processing is permitted if national laws requests, requires or allows this. The type and extent of Processing must be adequate and necessary for the legally authorized Processing activity and must comply with the relevant statutory provisions.

III. Legitimate interest

Processing may be permitted when it is necessary for a legitimate interest of SPORTSAFE.

IV. Internet

SPORTSAFE websites and applications shall contain a privacy statement which informs Individuals on how their Personal Data are collected and, on any Processing, thereof. Individuals consent shall be obtained before setting-up cookies.

When websites or applications can access Personal Data in an area restricted to registered users, the identification and authentication of the Individual must offer sufficient protection during access.

V. Individual's consent

Any Processing shall be subject to prior written consent from the Individual. Such consent shall state:

- the identity of the Company,
- the purpose of Processing,
- the detail of Processing activity,
- the right of the Individual to withdraw consent at any time and how to do this.

Should the purpose of collecting or Processing Personal Data differ from the original purpose, Individual's consent shall be collected for this new purpose.

Before any Processing, Individuals shall be provided with information set forth in Appendix 2.

Any restriction requested by an Individual shall be complied with and the relevant Data Privacy Manager shall be informed.

4) Protection of Personal Data

a) Confidentiality

To provide a proper security level to all Personal Data collected and processed, SPORTSAFE shall ensure that this Personal Data will be accessible only to the employees who require knowledge and who are accredited thereof. Within SPORTSAFE, the only people able to access Personal Data should be those who need it for their work.

Personal Data should not be disclosed to unauthorized people, either within SPORTSAFE or externally. Access to Personal Data shall be secured by implementing access control to make sure that Personal Data are not made accessible to an indefinite number of persons.

Access rights are granted depending on the position of each employee and are to be reviewed at least once a year by the IT department.

b) Security

Whether electronically or on paper, Personal Data shall be processed in a manner that ensures appropriate security, and shall be kept:

- in a secure place,
- from unauthorized access,
- from accidental loss, modification, destruction or damage,
- from malicious hacking attempts.

When necessary, appropriated measures to improve the security of Personal Data (such as encryption, backup solutions and recovery tests) shall be set up.

Everyone who works for SPORTSAFE shall keep all Personal Data secure by taking sensible precautions and by following the rules contained in this Policy.

In order to maintain security, SPORTSAFE shall implement passwords maintenance rules requiring strong and secured passwords and periodical renewal thereof.

5) Rights of Individuals

Subject to GDPR provisions, SPORTSAFE guarantees the following rights to Individuals involved by Processing:

i Right of access

Individuals can request to be informed whether a Processing is being performed and, where that is the case, request access to the concerned Personal Data and the following information:

- the purposes of the Processing;
- the categories of Personal Data concerned;
- the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request rectification or erasure of Personal Data or restriction of Processing of Personal Data concerning the Individual or to object to such Processing;
- the right to lodge a complaint with a supervisory authority;
- where the Personal Data are not collected from the Individual, any available information as to their source;
- whether the processing is automated or not.

ii Right to rectification

When a Personal Data is incorrect or incomplete, Individuals can request that it be corrected or supplemented.

iii Right to erasure

Individuals may request their Personal Data to be deleted if the purpose of the Processing has lapsed or changed. The same applies if Processing has no legal basis, or if the legal basis no longer exists. Legal retention periods must be observed.
Erasure requests shall include subcontractors involved in the Processing.

iv Right to restriction

Individuals are entitled to request the limitation of the use which is made of their Personal Data.

v Right to Personal Data portability

Individuals are entitled to request their Personal Data to be ported to another company.

vi Right to object

If Individuals object to the use of their Personal Data for any purpose, and save for cases when the Processing is legally required, the relevant Group Company shall take all appropriate measures to stop the Processing after having notified such request to its Data Privacy Manager.

SPORTSAFE shall enable Individuals to assert their rights and inform the latter of the identity and details of the relevant Data Privacy Manager in charge of reception and handling of these requests.

Any request from an Individual pertaining to his/her rights shall be handled immediately.

6) Personal Data breach and notification

A Personal Data breach is an event that may affect the confidentiality, integrity or availability of Personal Data.

Should such a breach occur, it should be reported to the DPO who shall inform the supervisory authority with no delay and within 72 hours.

Appendix 3 provides a framework for reporting and managing Personal Data breaches.

7) Subcontractors

SPORTSAFE shall identify all the subcontractors involved in Processing and maintain an updated list of their contracts.

Any subcontractor involved in Processing shall be required by SPORTSAFE to:

- ensure Personal Data are properly protected and sufficient guarantees thereof are provided,
- ensure people processing Personal Data are under relevant confidential agreement,
- process Personal Data only with written agreement from SPORTSAFE,
- comply with this Policy and GDPR,
- maintain an inventory of Processing made for SPORTSAFE,
- inform SPORTSAFE on Processing nature, characteristics and protection measures,
- implement privacy by default and by design,
- implement security measures to ensure Personal Data protection,
- assist SPORTSAFE in ensuring GDPR compliance,
- demonstrating compliance with GDPR in case of audit and cooperating with supervisory authority,



- delete or return all Personal Data at the end of the Processing,
- notify SPORTSAFE in case of data breach with required information within 24 hours,
- assist SPORTSAFE in fulfilling Individual's right request.

8) Transmission of Personal Data

Transmission of Personal Data to recipients outside or inside SPORTSAFE is subject to the authorization requirements for Processing under Article III and to Protection commitments under Article IV. The recipient must be required to use the Personal Data only for the defined purposes.

Any employee which receives Personal Data from outside SPORTSAFE shall comply with requirements from the discloser and use the Personal Data only for the defined purposes.

Should a Personal Data be transmitted to a recipient outside SPORTSAFE to another country, this country must agree to maintain a data protection level equivalent to this Policy and to GDPR. This does not apply if transmission is based on a legal obligation.

If Personal Data from Individuals which are European citizens are to be transferred outside EU, the DPO shall be informed and make recommendations thereof.

Signed:

A handwritten signature in black ink that reads "A Wilkins".

Position: Managing Director

Date: 6th August 2025