

## PROCESSING REGISTER

### GENERAL

Multifix FreeKickPro B.V. is the developer and owner of an advanced and patented training and feedback system for practising free kicks. To the extent that this can be summarised briefly and concisely, it concerns (1) a 'football wall', which is a mechanical construction with remote-controlled electronic control that can be used to simulate actual match situations during training, and (2) a corresponding app with which all data on the free kicks of every training can be registered, after which this information can be analysed via the website. This can be done per player, per team and per club.

In this processing register, FreeKickPro has explained whether and to what extent it collects and/or processes personal data pursuant to Article 4.1 of the GDPR as controller pursuant to Article 4.7 of the GDPR or as processor pursuant to Article 4.8 of the GDPR.

### COLLECTION OF INFORMATION

Data will be entered by persons employed by the club and will concern the own football team. Using an app, a series of relevant data is recorded concerning each free kick taken during training, and the mechanical 'football wall' will be used for this purpose.

### COLLECTED INFORMATION & PURPOSE

The data that are collected pertain to the free kick itself (angle, distance, etc.) and the 'football wall' (number of artificial 'persons' in the 'wall' and data per 'person'). In addition, any associated personal data pursuant to Article 4.1 of the GDPR are collected: first name and last name, left-footed or right-footed, height of the player and a photograph for the app of players who train in this manner and the club and team that are concerned.

FreeKickPro will subsequently create computerised analyses per player on the basis of this information for feedback to the users of the FreeKickPro app. No other personal data will be collected in this context. A player's height and whether they are left-footed or right-footed are relevant to the technical analysis of the manner in which a free kick can be taken most effectively.

For this purpose, the relevant trainer and/or football club are the controllers. In the processing agreement that is used, an obligation is explicitly imposed on them to inform the relevant players in accordance with Article 12 of the GDPR about the fact that personal data will be collected, which personal data are concerned and for which purpose this is done. This processing protocol is accessible online via the website [www.freekickpro.com](http://www.freekickpro.com) of FreeKickPro, and can be used with the required explanation that is necessary to fulfil this obligation. In this context, the processing protocol is accessible to all visitors to its website, not only to its customers. FreeKickPro is the *processor* in this context.

The stored data can be consulted and analysed for feedback to the players concerned by the relevant trainer(s). In addition, there is an authorisation per club that provides access to the data registered within that club only, which means that analyses can be made at team level, player level and club level. This is the primary goal of collecting the data to be entered. Data that can be traced back to persons will only be provided to them. Not to other clubs or parties. One stipulated exception applies in this regard, i.e. for national teams (country teams). A player's data may be shared only with the staff of the national team for which this player is active. They must then confirm in writing in advance that the personal data may not be shared with others without the data subject's permission and that suitable technical and organisational measures will be taken to

that end. This is a processing operation about which we are assuming that it might concern special personal data pursuant to Article 9 of the GDPR (biometric data). A condition for this is that the player involved has given permission for it. To this end, the controller (the club with which the player is affiliated) will ask the permission of the player involved, and will record that and how this permission has been given. It will report to FreeKickPro in advance if these data are missing. FreeKickPro may request proof in case of any doubts. Verifiable permission granted by the player involved via the national team involved or directly to FreeKickPro will also suffice. FreeKickPro will also be authorised to request permission directly from a player involved if there is uncertainty / a lack of clarity about the permission granted, and there is a request for sharing information with a national team.

## **TECHNICAL AND ORGANISATIONAL MEASURES OF FREEKICKPRO APP**

FreeKickPro will arrange the application of appropriate technical and organisational measures within the meaning of Article 28.1 of the GDPR so that the processing satisfies the requirements of the GDPR to protect the rights of the persons involved.

This is done in the following manner:

- Using up-to-date antivirus software for protection against hackers. Access to personal data will be limited to the trainer involved and/or other people of the club who are involved in the team or a contact person designated by the club involved. And access will only be granted if the user name and password are used and a telephone login code that is only provided to them for that purpose;
- Personalised data will not be provided to other parties;
- Pseudonymization pursuant to Article 4.5 of the GDPR takes place with respect to the use of data for other purposes, i.e. analyses, where the resulting data cannot be traced back to a person. Technical data relating to football will then no longer be linked to a specific data subject and will be kept separately so that they cannot be linked to an identified or identifiable natural person;
- A duty of confidentiality will be imposed on any third parties to be engaged at any time who have access to personal data, and they may only use data for the execution of the instruction given to them. If they engage third parties, they must also impose the same obligations on those third parties;
- Although FreeKickPro becomes the owner of the data, it may only use these data for anonymised analyses, with the exception of the purpose specified above in this document.

## **GDPR BASIS FOR DATA COLLECTION BY THE FREEKICKPRO APP**

The justification for collecting these data within the meaning of Article 6 of the GDPR by means of the FreeKickPro app is twofold. On the one hand the execution of the agreement between FreeKickPro and the user of the app, which is aimed at providing specific analyses for training and trainers. On the other hand this concerns a legitimate interest, i.e. facilitating targeted football training for the persons to whom the collected personal data relate.

## **DATA NOT COVERED BY THE GDPR**

FreeKickPro may only provide anonymised data that are used for or arise from statistical analyses by FreeKickPro, which do not concern technical football information that can be traced back to any person, to interested parties for gaining technical football insights into free kicks.

## **OTHER PERSONAL DATA THAT ARE COLLECTED**

FreeKickPro also records the name of one or more contact persons at its customers or at parties who are interested in information about its products. To that end it will record: name, initials, gender of the contact

person for salutation purposes, telephone number and e-mail address as well as address details of the organisation in question. No private address details. If applicable, a direct dial number (mobile telephone) will also be recorded if the relevant contact person indicates that such is desirable.

The objective of collecting this information is to be able to fulfil all obligations arising from or connected with the arrangements with the relevant organisations and being able to inform the relevant organisations about the products of FreeKickPro and new developments in this area. This information will also be used to be able to verify, if the customer submits a complaint at a later point in time, which arrangements were made and how they were implemented, as well as to be able to contact customers again about further products or solutions of FreeKickPro (legitimate interest).

Furthermore, information is collected via the website and via cookies (please refer to the separate cookie statement). They are necessary to have the website function properly, and do not store personal or traceable data.

IP addresses and other personal data will not be made available to the relevant service provider in the context of analytics services.

## **HOW LONG WILL PERSONAL INFORMATION BE KEPT?**

In principle, money claims expire after five years. This is why, in connection with proving the correct fulfilment of all obligations of FreeKickPro, data will be kept for at least five years after the end of the agreement on the basis of which personal data have been collected.

Data concerning contact persons at clients will only be kept in the context of the business relation with the relevant company, and will not be used for other purposes. They will be kept for at least five years after an invoice was sent for the last time, a product was delivered and/or another legal obligation was assumed. These contact details will also be kept as long as further information will be sent about the products of FreeKickPro.

If a contact person who leaves the employment of a customer or prospective customer requests that their data be deleted, this information will only be kept to the extent that it has been included in data relating to communications exchanged previously with this customer. Such information will in any event be kept for seven years in order to be able to fulfil all obligations towards the tax authorities for the provision of information and in order to respond to any claims from the affiliated companies. Moreover, if proceedings are pending or imminent this information will be kept until any related claims have been finalised or the related limitation periods have expired.

## **REQUESTS WITH RESPECT TO THE PERSONAL DATA OF DATA SUBJECTS**

To the extent that personal data are not kept on one of the above bases, they will be deleted on the data subject's demand. To the extent relevant, they will moreover be corrected on demand. If requested, a copy of the saved personal data will be provided on demand.

## **ADDITIONS TO THE PROCESSING REGISTER**

Because any new use of personal data must be included in the processing register, these processing operations will be added if and as soon as they are relevant.

Each time that FreeKickPro considers processing data in a manner other than described in this document, this will be described and the GDPR basis applied will be stated explicitly by adding all this to this document.



## **GENERAL**

FreeKickPro has drawn up this privacy statement / this processing protocol in order to fulfil all of its obligations pursuant to the GDPR. Anyone who should nevertheless notice any shortcoming in the context of the GDPR is more than welcome to communicate this. FreeKickPro would be happy to use this to complete its GDPR compliance should the comment be correct.