## **Privacy Policy**

Privacy Policy of SC9 Skateboard Coaching HD9

SC9 is owned and operated by SC9 CIC and collects some Personal Data from its Users and Visitors.

## Sections of the Privacy Policy

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#### 1. Owner and Data Controller

### SC9 CIC

Registered address: 35 Honey Head Lane, Honley, HD9 6RW

Company Number: 16110108

Data Controller: sc9cic@gmail.com

## 2. Types of Data collected

Among the types of Personal Data that SC9 CIC collects, by itself or through third parties, there are: Trackers; Usage Data; number of Users; city; device information; session statistics; browser information; email address; date of birth; first name; last name; country; postal code; various types of Data; phone number.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when booking services provided by SC9 CIC or browsing scnine.com

Unless specified otherwise, all Data requested by SC9 CIC is mandatory and failure to provide this Data may make it impossible for SC9 CIC to provide its services. In cases where SC9 CIC specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by SC9 CIC or by the owners of third-party services used by SC9 CIC serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through SC9 CIC and confirm that they have the third party's consent to provide the Data to the Owner.

## 3. Mode and place of processing the Data

## Methods of processing:

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT-enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of SC9 CIC (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications and marketing agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

## Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof:
- processing is necessary for compliance with a legal obligation to which the Owner is subject; processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### Dlace

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organisation governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or enquire with the Owner using the information provided in the contact section.

#### Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

#### Therefore:

Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.

Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfil such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## 4. The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Traffic optimisation and distribution, Analytics, Tag Management, Displaying content from external platforms, Operations, Handling payments, Managing contacts and sending messages, Contacting the User and Registration and authentication provided directly by SC9 CIC.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## 5. Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

## Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

Google Analytics 4 (Google Ireland Limited)

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilises the Data collected to track and examine the use of Sc9 CIC, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualise and personalise the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data centre or server. Users can learn more by consulting <u>Google's official documentation</u>.

Personal Data processed: browser information; city; device information; number of Users; session statistics; Trackers; Usage Data. Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out.</u>

Facebook Ads conversion tracking (Facebook pixel) (Meta Platforms Ireland Limited)



Facebook Ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on SC9 CIC. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data. Place of processing: Ireland - Privacy Policy.

### Contacting the User

### Mailing list or newsletter (SC9 CIC)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning SC9 CIC. Your email address might also be added to this list as a result of signing up to SC9 CIC or after making a purchase.

Personal Data processed: city; country; date of birth; email address; first name; last name; Trackers; Postal code.

### Contact form (SC9 CIC)

By filling in the contact form with their Data, the User authorises SC9 CIC to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address; first name; last name; Trackers; various types of Data.

## Phone contact (SC9 CIC)

Users that provided their phone number might be contacted for commercial or promotional purposes related to SC9 CIC, as well as for fulfilling support requests.

Personal Data processed: phone number.

## Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of SC9 CIC and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

### Handling payments

SC9 CIC processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. SC9 CIC isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

## JotForm Inc ("JotForm")

In providing our services to you we work with JotForm. These interactions include purchasing Venue tickets or gift cards, attending Venue events, signing participation waivers, making reservations, completing Venue surveys, consuming goods or services that we offer, submitting an inquiry or posting on our page on social networks such as Facebook, LinkedIn or Twitter. Contact information will be stored for 49 months from the customer's final visit unless the customer subscribes to receive our marketing emails, at which point the customer's details will be stored until 49 months after they unsubscribe from our marketing activity. JotForm's privacy policy can be found <a href="https://example.com/networks/networks/">https://example.com/networks/network

Waiver information is shown in the Waivers section of this policy.

# Managing contacts and sending messages

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

# Wix.Com ("Wix")

Wix hosts our website and email address management and message sending service.

Wix Privacy Policy can be found here.

## Operations

## Waiver

Your participation in our on-site activities requires the signing of a waiver. This waiver will capture your data including; name, email address and date of birth. We are required to hold this information by our insurance providers, however, this data will only be shared with our chosen insurance partners in the case of an onsite incident. Waiver data will be held for 49 months.

Registration and authentication provided directly by SC9 CIC



By registering or authenticating, Users allow SC9 CIC to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

# Direct registration (SC9 CIC)

The User registers by filling out the registration form and providing the Personal Data directly to SC9 CIC. Personal Data processed: various types of Data.

#### Tag Management

This type of service helps the Owner to manage the tags or scripts needed on SC9 CIC in a centralised fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited. Personal Data processed: Trackers; Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

## 6. Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may follow the instructions provided by <u>YourOnlineChoices (EU)</u>, and the <u>Digital Advertising Alliance (US)</u>, <u>DAAC (Canada)</u>. <u>DDAI (Japan)</u> or other similar initiatives. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest- based advertising on mobile apps.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

# 7. Further information about the processing of Personal Data

## Selling goods and services online

The Personal Data collected are used to provide the User with services, including payment.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by SC9 CIC depends on the payment system used.

# 8. The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.

Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.

Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.

Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected. Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.

Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

Lodge a complaint. Users have the right to bring a claim before the ICO.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights



Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and within one month. We reserve the right to charge a 'reasonable fee' for the administrative costs of complying with a request if it is manifestly unfounded or excessive, or if an individual requests further copies of data.

## 9. Additional information about Data collection and processing

#### Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of SC9 CIC or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities. Additional information about User's Personal Data

In addition to the information contained in this privacy policy, SC9 CIC may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

#### System logs and maintenance

For operation and maintenance purposes, SC9 CIC and any third-party services may collect files that record interaction with SC9 CIC (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## How "Do Not Track" requests are handled

SC9 CIC does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honour the "Do Not Track" requests, please read their privacy policies.

## Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within SC9 CIC and/or – as far as technically and legally feasible – sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## Definitions and legal references

## Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

## Usage Data

Information collected automatically through SC9 CIC (or third- party services employed in SC9 CIC), which can include: the IP addresses or domain names of the computers utilised by the Users who use SC9 CIC, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

## User

The individual using SC9 CIC who, unless otherwise specified, coincides with the Data Subject.

## Data Subject

The natural person to whom the Personal Data refers.

## Data Processor (or Data Supervisor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

## Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of SC9 CIC. The Data Controller, unless otherwise specified, is the Owner of SC9 CIC.

## SC9 CIC (or this Application)

The means by which the Personal Data of the User is collected and processed.

#### Service

The service provided by SC9 CIC as described in the relative terms (if available) and on this site/application.

# European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

#### Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

#### Tracker

Tracker indicates any technology – e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting – that enables the tracking of Users, for example by accessing or storing information on the User's device.

## Legal information

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to SC9 CIC, if not stated otherwise within this document.

