



Sport Time Balkans d.o.o, Omladinskih brigada 88, 11070 Novi Beograd  
Phone number: +381 11 44 22 010

## POLICY

### CONCERNING CONFIDENTIALITY AND PROTECTION OF PERSONAL DATA

This Privacy and Data Protection Policy ("**Policy**") describes the key principles and practices we follow to ensure your privacy is respected while you use our website.

SPORT TIME BALKANS DOO. Belgrade with registered office in Belgrade, Republic of Serbia ("**Sport Time Balkans**"), and the specific local entities "**Sport Time local**", SPORT TIME EU EOOD with registered office in Sofia, Bulgaria and SPORT TIME TRADE SRL with registered office in Bucharest, Romania, belong to the same group of companies ("**Sport Time**", "We"). We process the personal data of users and visitors of the website [www.sporttimegroup.com](http://www.sporttimegroup.com) ("**the Website**").

In this Privacy Policy, the term "User" or "You" refers collectively to customers, representatives and other authorized users of our customers, potential customers and users of the Website of the Sport Time.

Some of our services/products may be subject to separate privacy policies such as the Privacy Notice for the processing activities carried out during the recruitment process provided on the careers page of the Website. If a separate privacy policy applies to a particular service, we will post it in connection with that service.

By using our Website, you declare that you have read, understood and acknowledged our Privacy Policy.

#### 1. THE DATA CONTROLLERS AND THEIR CONTACT DETAILS

This Privacy Statement applies to the processing of personal data carried out by Sport Time.

The data controller responsible for the processing of your personal data is, depending on the entity with which you establish a relationship, one of the following:

- (a) **Sport Time Balkans doo.** Belgrade, with registered office in Belgrade, Republic of Serbia, address Omladinskih brigada 88, 11070 Belgrade; e-mail address: [data.protection@sporttime.rs](mailto:data.protection@sporttime.rs)



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- (b) **Sport Time EU EOOD** with registered office in Sofia, Bulgaria, address 102-D Cherni vrah Blvd., fl. 7, Triaditsa district Sofia; e-mail address: [data.protection@sporttime.bg](mailto:data.protection@sporttime.bg), if the user is in Bulgaria;
- (c) **Sports Time Trade SRL** . with headquarters in Bucharest, Romania, address: Str. Dinu Vintilă no. 11, Euro Tower, 7th floor; e-mail address: [data.protection@sporttime.ro](mailto:data.protection@sporttime.ro), if the User is in Romania.

With respect to the data collected through the Website for its users, all Sport Time entities act as associated operators. In accordance with the agreement concluded between them, all Sport Time entities will have direct access to the data collected through the Website, as follows:

Local Sport Time entities will act as administrators of the Website and Sport Time Balkans will provide any necessary support services, including technical services. Likewise, any data collected in the context of surveys/marketing campaigns/events through the Website will have the same regime. **The joint control relationship covers only collection, storage and sharing of the data collected through the Website, as well as the relevant operations specific to the support services, depending on the connection of the data with the Sport Time entities.** Thus, entities jointly determine the means and purposes of processing only for these specific activities. All entities will have access to the aggregate form of the Website's performance, traffic and other user-related analytics.

The Entities will inform you together about how they process your data through this Policy. Shared control only relates to data collected through the Website, for which the details below apply. With respect to data collected through the Website, you may contact any relevant Sport Time entity that you believe is the subject of your request/complaint/question. All entities will cooperate in handling your requests.

Separate from the Website, **only one Sport Time entity** acts as an independent controller with respect to your personal data (the entity with which the contractual relationship between you and Sport Time was established - for example, organizer of events) and determines the purpose and manner in which your personal data is processed, as described below. Other Sport Time entities may also act as agents in the context of the provision of services/products). Such separate roles will become active once data from/sent via the Website is shared/reaches the relevant Sport Time entity.



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Sport Time is concerned with protecting individuals' right to privacy, and while we may rely on local laws, we aim to maintain GDPR personal data protection standards even for Sport Time entities outside the EU, as far as possible. If you disclose data to us or share data with us about other people, such as family members, co-workers, etc., we assume that you are authorized to do so and that the relevant data is correct. Please ensure that these individuals have been informed of this Policy.

For questions related to personal data related to the use of the Website, you can contact us via the contact details or email addresses above.

## 2. THE CATEGORIES OF TARGETED PERSONS

This Policy refers to the following categories of data subjects:

- users of the Website, and
- people participating in events organized by or with the involvement of Sport Time, collectively referred to as ("**Data Subjects**").

## 3. PERSONAL DATA PROCESSED AND DATA SOURCES

Your personal data is usually collected directly through the Website, e-mail, social media accounts, or our call center or through the contact form, through the platforms and applications used by us. Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the categories of data listed below:

- **Identification data**, for example: your name and surname, image;
- **Contact details**, for example: your email address, home or residence, your telephone number; landline and/or mobile phone and your IP address;
- **Data collected through cookies and similar technologies** - For details, please visit Sport Time's cookie policy.
- **Data related to your device** (to access the Website): device type, IP;



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- **Customer Relationship Data**, for example: (i) notes or recordings of a customer service telephone call, or a live chat/email correspondence, (ii) details of your complaints, enquiries, contract requests or feedback, (iii) requests for access to your personal data, personal and other requests to exercise your rights, according to the legislation on the protection of personal data, (iv) other records of your interactions with us, regardless of support (notes, recordings, etc.), including their average duration, (v) information regarding your level of satisfaction with our services/products and/or with other service providers/products in the market, (vi) video recordings of your interaction with our agents, if applicable;
- **Data regarding the relationship with the user/event participant**, as appropriate, for example: (i) email correspondence, (ii) details of your complaints, questions, service/product requests or feedback, (iii) requests for access to your personal data, personal and other requests to exercise your rights, according to the legislation on the protection of personal data, (iv) other records of your interactions with us, regardless of support (notes, recordings, etc.); (v) information regarding your level of satisfaction with our services/products and/or with other service providers/products in the market; (vi) permissions to receive newsletters.
- **Data relating to interaction with our services/products**, for example: (i) details of your use of our services/products; (ii) information about product errors/deficiencies, as well as other events that may affect the quality of our services/products, (iii) information about benefits and offers accessed.
- **Data regarding the relationship with our partners and their staff**, as appropriate: for example: (i) notes or recordings of a telephone call with the relations service, or of a live chat/e-mail correspondence, (ii) details of complaints, questions, requests related to your feedback (iii) requests for access to your personal data and other requests to exercise your rights under the legislation on the protection of personal data, (iv) other records of of your interactions with us, regardless of medium (notes, recordings, etc.), including their average duration, (v) video recordings of your interaction with our agents.
- **Inferred Data**: This category includes data generated or inferred by us based on the data we hold about you, regardless of its source (ie obtained directly from you, from your interaction with our services/products or from external sources, as applicable). For example, we may anticipate your preferences or areas of interest based on services/products purchased, segment customers (as appropriate, nominally or pseudonymized).



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#### 4. WHERE DO WE GET YOUR DATA?

We may obtain your personal data:

- a. **Directly from you**, meaning (i) when you provide us with the information directly, either in writing (for example, by filling out a form), or verbally (for example, as a result of a telephone conversation), or (ii) by reviewing the interaction that we have with you. For example, we will obtain your personal data when you: (i) purchase any of our services/products, (ii) enter into a contract with us, (iii) subscribe to receive commercial communications or other offers and information from us or our partners, (iv) contact us through various channels or request information/offers regarding a product; (v) participate in promotions, contests, promotional lotteries or various studies and analyzes organized or sponsored by Sport Time or in partnership with us, (vi) visit or browse the Website or use our systems and applications.
- b. **From sources other than directly from you**, namely: (i) from external sources or (ii) inferred data that we generate based on the data we hold about you.

External sources from which we may obtain your personal data include:

**Public sources**, for example, websites or social media pages, public databases (including the trade register database, the Ministry of Finance database, the Official Gazette for partners who are legal entities, etc.).

**Third parties**, namely: (i) our suppliers or contractors (including financial service providers - for example, the status of a payment), (ii) Business Customers - when you act as their representative or contact person; (iii) survey and market research agencies, for example, your telephone number and feedback on our services/products; (iv) our business partners, when you act as their representative/employer/collaborator.

**Public authorities or institutions**, for example in the context of judicial investigations, court requests, requests related to your complaints (in which case we may learn certain information about you).



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## People representing you or contacting us on your behalf;

**Inferred data we generate based on the data we hold about you**, such as: the level at which you benefit from products - for example, problems in the context of delivery or other events that trigger the return and refund of products; details of your use of certain products; the type of problems indicated by Customers.

## 5. PURPOSES AND BASIS OF PERSONAL DATA PROCESSING

### 5.1. IF YOU ARE A USER OF THE WEBSITE, SPORT TIME CAN PROCESS YOUR PERSONAL DATA AS FOLLOWS:

#### A. For direct marketing activities, respectively for the transmission by e-mail of commercial communications (newsletters).

As a general rule, this personal data will be processed for direct marketing purposes only with your consent and through the use of electronic communication channels as promotional messages to you relating to our activities, newsletters, including invitations to other events.

We will use: *Contact details: your email address, Account details: your consent, the date and time of its expression, the withdrawal of your consent and the corresponding time coordinates.*

**Legal basis:** The processing of your data for this purpose is based on **your consent**, if you choose to provide it in the newsletter section. You may unsubscribe from these communications at any time by: clicking on the "unsubscribe" link or button in our messages or by writing to us at the email address, as appropriate, in the Contact section below. If you withdraw your consent or if you do not initially provide us with your contact details for this purpose, you will no longer receive commercial communications from us by email.

**How long we keep your data** (depending on the specific situation): we retain your marketing opt-in and proof of acknowledgment of this privacy policy as long as it is not withdrawn, i.e. for a period of 3 years after withdrawal and, exceptionally, for the duration of any proceedings / disputes / controls involving this data.



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**B. Support and relationship management with users of the Website:** handling any questions or requests, information or services that you have requested from us, including to provide you with any information required by law, on any communication channel.

We use the following data: *Identification data (such as name, surname); Contact details (such as email address, telephone number, home address, postal address); User relationship data (such as complaint history, correspondence and records with you); any other data provided by you through applications and supporting documents; any other data in the categories listed above under the heading Customers related to the relationship with you necessary to resolve the requests.*

**Legal basis:** *our legitimate interests* to ensure a good relationship with you and to defend our rights and interests in legal, administrative or similar proceedings, to properly handle any request you make to us and to improve services/products; specific legal obligations in the field (for example, the processing of certain mandatory data in the form dedicated to the complaint and for resolution, the obligation to keep certain documents according to the law, etc.); your consent if you contact us by phone and the call is recorded.

**How long we keep your data** (depending on the specific situation): for the duration of the resolution of your request and after resolution for a duration of 3 years for resolved complaints, respectively for the duration of any litigation/procedures and for a duration of 3 years after their final resolution, or for other periods required by our legal obligations.

**What happens if you do not provide us with the data from the standard forms / or requested by our colleagues:** The data we request from you is mandatory for the correct resolution of your requests. Your refusal to provide this data may prevent or affect the full resolution of your claim (eg, denial due to insufficient information, delays, partial resolution, etc.). If you choose to contact us through another communication channel operated by a third party (eg WhatsApp, Facebook), we will share your personal data with the owner of this channel to confirm that you are a user of this service. We recommend that you check the privacy settings and read the privacy policy of the respective operators to obtain more detailed information on how they use the personal data of the users of the services they provide. If you do not agree with the recording of calls, you can contact us through the other communication channels.



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### C. To monitor traffic and improve your experience on our Website

When you visit our website, we may use cookies and/or similar technologies to collect technical information that can identify the user, such as your IP address, the type of Internet browser used to navigate the site- the web, operating system, domain name or domain host through which the user navigates the website. The main purpose of using cookies is to help you have an improved browsing experience and for advertising purposes, to be able to provide you with individualized content tailored to your interests and preferences. Therefore, to the extent that you have consented to the use of different categories of cookies or other similar technologies, we will use them to provide you with a personalized and relevant browsing experience and to understand how you interact with the content our advertiser. For more information about the use of cookies on the website and the purposes for which they are used, as well as the possibilities to control and/or disable cookies, please see our Policy on cookies used on the website web, accessible [here](#).

**Legal basis:** The processing of your data for this purpose is based on the legitimate interest of Sport Time to ensure the proper functioning of the Website, as well as to permanently improve the experience of visitors, including by solving various questions or complaints for the necessary functionalities (cookies necessary) and on your consent for other cookies and technologies that ensure performance, functionality or marketing cookies.

### D. Surveys, market research and other internal analysis

To communicate with you in the process of carrying out customer satisfaction surveys for the purpose of analysis, for quality improvement, for service development, to measure the success of advertising campaigns or to tailor our services/products to your requirements.

We use the following data: *Identification data: name, surname, contact data: telephone number and e-mail address, city of residence; Demographic data: age range, gender; Customer value management data: type of services/products, utility, data related to your opinion of our services/products and your expectations from a provider of such services/products; your feedback about the campaigns we run, communication with you*





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**Legal basis:** *our legitimate interest* to know the opinion and preferences of Customers regarding our services/products or those of other suppliers, as well as to optimize our activity and identify new opportunities for the development and promotion of services/products and the activity in general; **your consent** expressed in the context of surveys/market studies we carry out. Your participation in such surveys or market research is voluntary. Accordingly, it is your choice whether or not to provide us with data by filling in the participation forms on our website or other similar forms made available in the context of the respective surveys or studies

We will ensure that we use personal data only if such use is necessary to achieve the intended purpose. As a rule, the result of internal analyzes and studies is presented in an anonymized format.

**Where we get the above data:** In general, we use data that: we receive from you (directly or through our partners - such as marketing, promotion and market research agencies), or that we generate or infer them based on the information we hold about you.

**How long we keep your data** (depending on the specific situation): in the case of data that are the basis of studies, surveys, analyzes with anonymous results - for the period necessary to transform them into anonymous statistics, but no more than 6 months from the completion of the survey / market study or analysis / internal study. If they are not anonymized, the results of studies, surveys, analyzes will be kept for 1 year from the date of their generation and will not be made public.

**What happens if you don't provide us with your data: If you don't want to participate in our surveys or studies,** or if you don't provide us with certain information for that purpose, we may not implement or consider certain suggestions from you .or other matters of interest to you. In any event, your refusal to do so will in no way affect your relationship with Sport Time. Certain surveys may be conducted through our website. For data processed through cookies and new technologies in this case, see our Cookie Policy.

#### **E. Economic, financial and administrative management.**

We process your personal data to optimally organize and streamline our activity. In this regard, we may use the data, among other things: to improve and optimize the activity of Sport Time, as well as our services/products; to support our position in various investigations, administrative and judicial proceedings, litigation, etc. in which Sport Time is involved; in the context of various analyses, internal audit procedures and/or investigations carried out by Sport Time, on its own initiative or as a result of receiving a notification from a third entity (including public authorities); management of controls/investigations launched by public authorities.

*We use Identification Data, Contact Data, depending on the type of investigation / purpose pursued, Customer Relationship Data.*



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**Legal grounds** : *our legitimate interest* to improve our services/products and the relationship with Customers, to optimize and streamline our activity, including by exchanging data with our affiliates, but also to defend our interests and rights, to adequately research the activity and identify possible irregularities, respectively to comply with the requirements of public controls.

**We can obtain the data from** : competent authorities (for example, OPC), when they circulate new notices regarding complaints / notifications / other matters; other persons, who may provide us with data at your request, when acting as your proxies in relation to Sport Time;; other service providers, depending on the specifics of the investigation.

**How long we keep your data** (depending on the specific situation): during investigations/procedures/audits, including recovery procedures and after resolution, for a period of 3 years; for the duration of any litigation and 3 years from the receipt of a final decision, for the duration imposed by the public authorities, within the limits of their powers.

**What happens if you do not provide us with the requested data**: The data we request from you is mandatory for the correct resolution of the investigated situations. Refusal to provide data in accordance with legal provisions may affect our contractual relationship.

#### **F. Security. Preventing misuse of services/products and customer data. Fraud and incident prevention and management.**

We will process your personal data to ensure the security of your Customer data as well as our services/products. We may use your personal data to ensure the functionality and performance of the technical solutions we use in our business. Our systems detect and flag events that could constitute abuse or misuse of our systems and applications, as appropriate, that could affect the security of our systems, generate alerts and automatically cause specific actions to be taken. For example, when the systems detect that there has been a repeated attempt to access an account without the password being hit and require it to be reset, they will alert us to these login attempts.

We will process your personal data in order to combat possible fraud regarding the fraudulent conclusion of a contract or the use of products, which may occur in the context of the provision of our products. We can process any of the above data, depending on the specifics of the situation. Most frequently, identification data, login data, contact data, account details, customer relationship data will be processed.



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**Legal grounds: *our legitimate interest*** to ensure the appropriate security of our products and systems, to investigate, prevent and report any fraudulent, improper or abusive use and to prevent the risk of financial loss generated by illegal access or fictitious payments of products; ***our legitimate interest*** to comply with the obligations and legal requirements regarding the level of security ensured to the data and information processed by us, respectively to identify and prevent incidents, minimize damages and exercise correlative rights in the context of situations of unauthorized access in any way to systems/others locations where we store information.

**How long we keep your data** (depending on the specific situation): during security investigations/procedures/audits, including recovery procedures and after resolution, for a period of 3 years; for the duration of any litigation, if applicable, and 3 years from the receipt of a final decision, for the duration imposed by the public authorities, within the limits of their powers; during the resolution of security complaints/incidents and for a period of 3 years after the closure of the resolution/investigation process.

**What happens if you do not provide us with the data:** The data we request from you is mandatory for the correct resolution of the investigated situations. Refusal to provide the data in accordance with the legal provisions may affect our contractual relationship, respectively the security of your data.

#### **G. Interaction through social media**

We process your personal data when you use your profile registered on a social network, for example, Facebook, Instagram or LinkedIn or other similar portals (referred to as "Social Media") to interact with our professional pages on these social networks. We use these Social Media pages and the tools made available to us by the operators of these platforms for the following purposes: customer support and relations, measuring the performance of the Social Media pages, promoting the image of our company and personalizing the content and advertisements on Social Media and defending our rights and interests. Correlative details for these purposes apply accordingly.



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## H. Mergers and acquisitions

If we are involved in a corporate transaction (for example, a merger, spin-off or sale of the business), we will share or, as applicable, receive your personal data from the entities involved. We transfer/receive your personal data also for the purpose of integrating the databases with the customers of the companies involved in the transaction. For this purpose, we transfer certain Contact Details, Account Details or other data related to you to the companies involved in the transaction as a beneficiary for the integration of customer databases in the transfer where you are already a customer of the other entity involved in the transaction. As part of the transfer of a planned corporate transaction (for example, where our Group or we buy or sell a business), we may use (disclose to the party involved in the transaction) your personal data, your personal information to identify and plan the best way to realize any commercial opportunities and possible rapid and efficient service/product improvements within the transfer of that corporate transaction. For example, we may communicate or obtain certain Customer data such as contact details, account details (eg type of offers/benefits used). As a rule, this information will be transmitted/received in pseudonymized or anonymized form. In all cases, we will communicate or further process (as applicable) personal data only on the basis of appropriate analysis and risk mitigation measures to ensure that the fundamental rights of data subjects that may be affected do not prevail.

**Legal basis:** our and/or the third party's (transaction party's) legitimate interest in identifying, planning and implementing the best way to realize any commercial opportunities and database integration, where applicable, and possible improvements to services, or your consent quickly and effectively.

**How long we will keep the data:** the data extracted for this purpose will not be kept separately for longer than during the purchase process and for 3 years after its conclusion. If they are the subject of official procedures, litigation, the retention periods specific to these purposes will apply.

## I. Defending our rights and interests, respectively fulfilling legal requirements / complying with specific legal obligations

We may process any of your personal data to defend our interests (e.g. email, permission, time coordinates) in the context of complaints, official controls, litigation or to comply with specific legal requirements regarding data security, personal data processing, consumer protection, archiving or other obligations depending on the activity you carry out on the Site.



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**Legal grounds:** our legitimate interests to defend our rights and interests in the context of situations where the image and interests of Sport Time would be exposed or affected, respectively to preserve evidence of our rights and interests, as well as to comply with specific legal obligations (for example ) our legal obligations, such as to comply with the requests of public authorities / courts / other public institutions that have the power to impose certain processing operations on us; the obligation to archive certain documents/information according to the archiving rules or other regulations applicable to Sport Time; the obligation to notify confidentiality/security incidents to the competent authorities, etc.

**Where we can get the above data:** directly from you or we can derive it from our own systems.

**How long we keep your data (depending on the specific situation):** for the duration imposed by the specific legal provisions; in the absence of any rules, for the duration of the procedure/audit/investigation/litigation and, respectively, for a period of 3 years after its completion, taking into account the limitation period applicable to the specific situation; for the duration imposed by the competent authority/institution/court, according to legal provisions; for the duration requested by you to defend your rights and interests or those of a third party that has a legitimate interest in this regard.

**What happens if you do not provide us with the data:** in certain situations, the refusal to provide us with the data may attract your contractual or civil liability in relation to us, with other persons whose rights/interests would be affected.

## **5.2. IF YOU ARE A PARTICIPANT/POTENTIAL PARTICIPANT TO OUR EVENTS SPORT TIME CAN PROCESS YOUR PERSONAL DATA AS FOLLOWS:**

### **A. Registration for our events and communication related to them (including online or in-person events)**

We may process some of your data for the purpose of registering you for our events and communicating all relevant event details. Your identification and contact details will be used on a regular basis.

**Legal ground:** *our legitimate interest* in organizing the events and communicating all relevant details about the events to you.



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**How long we keep your data** (depending on the specific situation): for a maximum period of 6 (six) months after registration. Any communication related to the events will be kept for a period of 3 years from the date on which it takes place. If the relevant data is related to a formal procedure/complaint, the period may be extended until the procedure is closed/complaint is resolved.

**What happens if you do not provide us with the data from the registration forms / or requested by our colleagues** : The data we request from you is mandatory for your registration at our events. Your refusal to provide us with this data may prevent or affect your participation in our events - for example, missing contact data may affect the information you receive about the event location, time, agenda, etc. Providing this data may prevent or affect your participation in our events - for example, missing contact data may affect the information you receive about event location, time, agenda, etc.

## **B. Organizing and hosting events**

When you decide to participate in one of our events, we will process your data in order to organize our event, including granting access to the event, preparing the necessary relevant documents/materials specific to the event (including certificates of participation), ensuring the security of people and property in event time. For these purposes, we may process the following data: *Identification data (e.g. name, surname, identity-related data, photographs, video images), Contact data, Event participant relationship data (your specific requests), Sub-data.*

**Legal grounds: our legitimate interest** to organize our events, to ensure adequate documents/materials or other resources to be provided to participants, to ensure the security of persons and property, **our legal obligations** where certain legal provisions/public authorities require the fulfillment of certain conditions specific for the organization of the event.

**How long we keep your data** (depending on the specific situation): for a period of 3 years from the organization of the event. If the relevant data is related to an official procedure/complaint, the period may be extended until the procedure is closed/complaint is resolved.



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**What happens if you do not provide us with the data requested by our colleagues :** some of the data we request from you is mandatory for your participation in our events (we will let you know which data is mandatory). Your refusal to provide this data may prevent or affect your participation in our events - for example, the lack of identification data may prevent your access to the event, etc.

### **C. Internal analytics related to events**

To communicate with you in the process of conducting event attendee satisfaction surveys for analysis purposes, to improve quality, to measure the success of events or to tailor our events to your requirements.

We use the following data: *Identification data: name, surname, contact data: telephone number and e-mail address, city of residence; Event Attendee Relationship Data: event type, data related to your opinion of our events and your expectations; your feedback about the events we organise, communicating with you*

**Legal basis: our legitimate interest** to know the opinion and preferences of event participants regarding our events, as well as to optimize our activity and identify new opportunities to develop and promote our services/products in general.

We will ensure that we use personal data only if such use is necessary to achieve the intended purpose. As a rule, the result of internal analyzes is presented in an anonymized format.

**Where we may obtain the above data:** In general, we use data that we either: receive from you (directly or through our partners - such as marketing, promotion and market research agencies) or generate, or we infer them based on the information we hold about you.

**How long we keep your data** (depending on the specific situation): in the case of data that form the basis of analyzes with anonymous results - for the period necessary to transform them into anonymous statistics, but no more than 6 months after the completion of the survey/market study or the analysis/internal study. If they are not anonymized, the results of the analyzes will be kept for 1 year from the date of their generation and will not be made public.



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What happens if you don't provide us with your data: If you do not wish to participate in our surveys or, as applicable, provide us with certain information for this purpose, we may not implement or consider certain suggestions or other aspects of interest to you. In any event, your refusal to do so will in no way affect your relationship with Sport Time. Specific surveys may be conducted through our website. For data processed through cookies and new technologies in this case, see our Cookie Policy.

#### D. Internal training and assessment of our staff

We may use analytics or various analytics related to events, as well as images (photos, videos, your feedback) to provide internal training in relation to the organization of events and to evaluate our staff in the context of the event they manage, organized by or involving Sport Time.

**Legal basis:** *our legitimate interests* to improve our events, promote our image and services/products, evaluate and train our staff.

**How long we keep your data** (depending on the specific situation): in the case of training and evaluation data, only until the training/evaluation of the relevant employees is completed. Only anonymous data will be included in the output.

#### E. Promotion of our events

We may use your image (photos/video), your feedback or other data about you to promote our events (eg the company you represent, your interests, your opinion of the event).

**Legal basis:** *our legitimate interest* in promoting our events: for overview, wide angle, panoramic photos/video recordings and for anonymous feedback posted online/general event articles mentioning feedback without participant details; for close-up photos/video recordings, we base the processing on your consent (which you may give us in writing or verbally, including through gestures, behavior (for example, your presence in a photo-taking area, participation your active in a certain activity, etc.) Also, for publishing your feedback together with other details on social media, on our website or similar means, we rely on your consent for processing.

If you withdraw your consent, the processing that has already taken place remains as such and your withdrawal will only have effects for the future.

If you do not want to appear in the event photos/videos, you have the option to contact the photographer directly or, for online events, log in with the camera and microphone functions turned off.





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**F. The purposes described in points A, B and I of section 5.1. above, apply accordingly.**

Any references to services are understood as references to events organized by or with the participation of Sport Time. Also, the collection of consent for marketing activities takes place in the context of event registration/organization through dedicated forms/channels, and the contract as the legal basis is replaced by the corresponding legitimate interest.

## **6. DISCLOSURE OF PERSONAL DATA AND DATA TRANSFER OUTSIDE EU/EEA**

Although we generally do not disclose your personal data to third parties, we may disclose your personal data to third parties if this is necessary to provide our services and/or to provide our products, to comply with a legal obligation or if it is in our legitimate interests to do so.

In each case, the data strictly necessary for the provision of the services/products or which we are obliged to provide will be disclosed after confirmation of the compliance of the data list by the privacy officer.

- Common Recipients for all Data Subjects: Our Affiliated Companies;
- To data processors, who will process personal data on our behalf in accordance with our written instructions and for the purposes stated above;
- To other recipients if we are required by a court order or an order issued by another governmental authority or applicable law;
- To other recipients, if Sport Time is involved in a merger, acquisition or sale of assets, we may transfer your personal data to the third parties involved. However, we will continue to ensure the confidentiality of all personal data.

We may transfer your personal data to recipients who are located outside the EU/EEA ("Third Countries"), i.e. affiliated companies and data processors. We have service providers, operations and group companies in many geographic locations. As such, we and our service providers may transfer your personal data or process it in jurisdictions outside the European Economic Area or the User's domicile.

In these cases, we will do everything to ensure that your personal data will receive an adequate level of protection, which includes the use of standard contractual clauses approved by the European Commission for the transfer to countries that are not considered to provide an adequate level of protection. The Standard Contractual Clauses are available in various languages at this link: [https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers\\_en](https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en).



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In other cases, we may transfer your personal data to third countries based on your explicit consent. More information about transfers of personal data can be obtained by contacting us at any of the addresses indicated above.

## **7. DATA RETENTION PERIOD**

We intend to keep your personal data for as long as necessary to fulfill the purposes detailed in this notice, in accordance with our legal obligations and our internal policies.

Unless there is a legal or contractual obligation to the contrary, we will delete or anonymize your data once the storage or processing period has expired as part of our normal processes.

## **8. PROTECTION AND SECURITY**

We take safeguards to protect your personal data against loss, misuse and unauthorized access, disclosure, alteration and destruction. We have adopted appropriate technical and organizational measures to protect the computer systems on which your personal data is stored, and we require data processors to protect your personal data by contractual means. These measures may include, for example, where appropriate, encryption, pseudonymisation, firewalls, secure facilities and access rights systems. Our security controls are intended to maintain an adequate level of data confidentiality, integrity, availability, resilience and the ability to recover data.

In addition, access to personal data by Sport Time employees is restricted and access to data is subject to whatever is necessary for the purpose of the employees' assignments.

## **9. AUTOMATIC DECISION MAKING**

To the extent that the fulfillment of some of the above processing purposes will be achieved through the use of computer techniques that do not involve the presence of a human factor, that will lead to legal effects on you or that may similarly significantly affect you, the processing will be based on your express consent for this purpose or on another legal basis as required by law. In this regard, this document will be updated whenever necessary to ensure that you are properly informed. We currently do not use such processes.



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## 10. YOUR RIGHTS

With certain exceptions and restrictions provided by applicable law, you have the following rights:

- **Right of access**

You have the right to be informed of the relevant details of the processing activities described in this Data Protection Notice or to request a copy of your personal data by contacting us.

- **Right to withdraw consent**

If the processing is based on a consent given by the User, the User can withdraw his consent at any time and free of charge by clicking on the "unsubscribe" link or button in our messages for newsletters or similar communications, using the dedicated functionalities within the Sport Time services/products, where available, or by writing to us at the coordinates indicated in the Contact Section below. Withdrawing a consent may lead to reduced possibilities of using the website. The withdrawal of consent does not affect the legality of the processing based on the consent prior to its withdrawal. Only the future processing of the data will cease, as a rule, from the moment of withdrawal of your consent, but not later than 3 (three) days at most.

- **The right to rectification**

You have the right to obtain the correction or completion of incorrect or incomplete personal data we have stored about you by contacting us.

- **The right to erasure**

The right to be forgotten means that you have the right to ask us to delete your personal data without undue delay if one of the following reasons applies: (i) it is no longer necessary for the purposes for which it was collected or processed; (ii) you withdraw your consent and there is no other legal basis for the processing; (iii) you object to the processing and there are no overriding legitimate grounds; (iv) personal data have been processed illegally; (v) personal data must be deleted to comply with a legal obligation; (vi) the personal data were collected in connection with the provision of information society services.



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In this regard, we will notify each recipient to whom the personal data has been disclosed of any deletion thereof, unless this proves impossible or involves disproportionate effort, and we will inform you of such recipients if you request it.

Important! We will not be able to comply with such requests in all cases, such as when the law obliges us to keep the data for a certain period or when the data is necessary for a legitimate interest, such as defending a right before a court of law judgment.

- **The right of opposition**

It concerns the right to object to the processing of personal data when the processing is necessary for the performance of a task that serves a public interest or when it is considered a legitimate interest of Sport Time. When the processing of personal data is carried out for direct marketing purposes, you have the right to object to the processing at any time.

- **The right to restriction of processing**

It allows you to ask us not to use your personal data in any way, except to store it until another request from you is resolved, namely: (i) you have requested rectification of the data; (ii) you objected to the deletion of the data in case of illegal processing; (iii) you have requested us to provide you with certain data for the defense of a right; (iv) you have objected to data processing.

The rectification will be communicated to each recipient to whom the data has been transmitted, unless this proves to be impossible or involves disproportionate effort, and we will inform you of these recipients if you so request.

- **The right to data portability**

You have the right to receive the personal data you have provided to us in a structured and commonly used format and to independently transmit this data to a third party.

Important! The law obliges us to comply with such requests only for data previously processed on the basis of your consent or on the basis of the execution of the contract concluded with us and only if the processing is carried out by automated means.



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- **The right to lodge a complaint with the data protection authority and defend your rights before a competent court**

The relevant information regarding the complaint submission procedure can be found on the website:

- Romania (dataprotection.ro)
- Serbia (poverenik.rs)
- Bulgaria (cpdp.bg)

### **How to use your rights?**

You may exercise the rights set forth above in your relationship with any Sport Time entity, if covered by them. If you wish to exercise the rights set out above in relation to us (or one of our group companies), please contact us in writing by email to [data.protection@sporttime.rs](mailto:data.protection@sporttime.rs) (for Serbia), [data.protection@sporttime.ro](mailto:data.protection@sporttime.ro) (for Romania), and [data.protection@sporttime.bg](mailto:data.protection@sporttime.bg) (for Bulgaria), or by post to the addresses set out in the Contact section . Please note that these rights are subject to conditions, exceptions or restrictions in accordance with applicable data protection legislation (for example, to protect third parties or trade secrets). We will inform you accordingly, if applicable

We may also require the provision of additional information necessary to confirm the User's identity. We may reject or charge for requests that are unreasonably repetitive, excessive or manifestly unfounded.

## **11. COOKIES**

We use cookies and similar technologies to ensure that you get the most out of our website, to collect information about how you use the website and to track your online behaviour. The type of information collected may include the origin of the website visitor or email recipient, the type of browser, operating system and search engine used, and the duration of the visit to the web page or email message. For more information about how we use cookies and similar technologies and how you can control them, please see our cookie policy posted at the bottom of the Site.



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## **12. LINKS TO OTHER SITES**

The Website may contain links to third party websites. We do not assume responsibility for any control over these sites, relationship with these sites or approval of these sites and will not be liable for any damages resulting from the content of these sites. Links to other sites are provided only as a convenience, and we encourage you to read the Terms of Use and Privacy Statements of those third-party sites.

## **13. CHANGES TO THIS PRIVACY POLICY**

This Privacy Statement may be updated from time to time to reflect changes in data processing practices or otherwise. You can find the current version on our Website.

*Updated on January 15<sup>th</sup> 2024*