

## Privacy Policy

*This privacy policy is to provide all the information on the processing of personal data carried out by **Soccerment S.r.l.** when the User navigates and makes purchases on the website (as indicated below)*

### 1. INTRODUCTION – WHO WE ARE?

**Soccerment S.r.l.**, with registered office in Via Pietro Paleocapa 6, 20121 - Milan, Italy, VAT No. and Fiscal Code No. 09992800962 (hereinafter, “**Data Controller**”), manager of the internet website [xvalue.ai/soccer/stats](http://xvalue.ai/soccer/stats) (hereinafter, the “**Website**”), in its capacity as data controller in relation to personal data pertaining to the users using the Website (hereinafter, the “**Users**”) hereby provides the privacy policy pursuant to art. 13 of the Regulation EU 2016/679 of the Council of 27 April 2016 (hereinafter, “**Regulation**” or “**Applicable Law**”).

### 2. HOW TO CONTACT US?

The Data Controller takes the utmost account of Users’ right to privacy and protection of personal data.

For any information related to this privacy policy, Users may **contact the Data Controller** at any time, using the following methods:

- Sending a registered letter with return receipt to the registered offices of the Data Controller: Via Pietro Paleocapa 6, 20121 - Milan, Italy;
- Sending an electronic mail message to [customerservice@soccerment.com](mailto:customerservice@soccerment.com);

### 3. WHAT DO WE DO? - PROCESSING PURPOSES

Through browsing the Website, the User can register on it and purchase products available on the Website, as well as access discounts and/or promotions (hereinafter, “**Service**”).

In relation to these activities, the Data Controller collects personal data relating to the Users.

This Website and the services eventually offered through the Website are reserved to subjects over the age of 18 years old. Hereby, the Data Controller does not collect personal data pertaining to subjects under the age of 18 years old. At request of the Users, the Data Controller will promptly delete all the personal data, involuntary collected, pertaining to subjects under the age of 18 years old.

Particularly, the personal data of the Users will be lawfully processed for the following purposes:

- a) **Contractual obligations and provision of the Service**: to execute the Website Terms and Conditions, which are accepted by the User during registration to the Website and to fulfil the User’s specific requests.  
User data collected by the Data Controller for registration, purchase of products and shipment of products, through the Website, include: name, last name, e-mail address, shipping address, telephone number.  
Unless the User gives the Data Controller specific and optional consent to the processing of his / her data for the additional purposes set forth in the following paragraphs, the User’s personal data will be used by the Data Controller for the sole purpose of ascertaining the identity of the User (also by validating the e-mail address), thus avoiding possible scams or abuses, and contacting the User only for service reasons (e.g. sending of notifications regarding the services offered on the Website). Notwithstanding the provisions contained elsewhere in this privacy policy, under no circumstances will the Data Controller make the personal data of the Users accessible to other Users and/or third parties.
- b) **administrative and accounting purposes**, i.e., to carry out activities of an organisational, administrative, financial and accounting nature, such as internal organisational activities and activities functional to the fulfilment of contractual and pre-contractual obligations;
- c) **legal obligations**, i.e., to comply with obligations imposed by law, an authority, a regulation or European legislation.

The provision of personal data for the above processing purposes is optional but necessary, as failure to provide such data will result in the User being unable to take advantage of the Service offered through the Website.

In case of non-registration, the possibility to browse the Website and purchase products through the e-commerce platform offered by the Website will not be affected in any way, but it will still be necessary to give the Data Controller the data required for the purchase.

Personal data which are necessary for the pursuit of the processing purposes described in this paragraph 3 are indicated with an asterisk in the request form.

#### **4. OTHER PROCESSING PURPOSES**

##### **4.1. Marketing (sending of advertising material, direct sales and commercial communication, Newsletter)**

With the User's free and optional consent, some of the User's personal data (name, surname and e-mail address) may also be processed by the Data Controller for marketing purposes (as for example, sending of advertising material, direct sales, commercial communication or sending newsletters containing information regarding news regarding the sector relative to the Website activities and the services offered by the Data Controller), or in order for the Data Controller to contact the User through electronic mail to propose to the User the purchase of products and/or services offered by the Data Controller and/or by third parties, to present offers, promotions and business opportunities by the Data Controller and/or by third parties.

In case of lack of consent, the possibility to contact the Data Controller will not be in any way affected.

In case of consent, the User may at any time revoke the same, making a request to the Data Controller in the manner indicated in paragraph 8 below.

The User can also easily oppose further sending of promotional communications via e-mail by clicking on the appropriate link for the revocation of consent, which is present in each promotional email. Once the consent has been revoked, the Data Controller will send the User an e-mail message confirming the revocation of the consent.

The Data Controller informs that, following the exercise of the right of opposition to the sending of promotional communications via email, it is possible that the User continues to receive further promotional messages due to technical and operational reasons (e.g. formation of contact lists already completed shortly before the Data Controller's receiving of the opposition request). Should the User continue to receive promotional messages after 24 hours from the exercise of the right of opposition, please report the problem to the Data Controller, using the contacts indicated in paragraph 8 below.

#### **5. LEGAL BASIS FOR PROCESSING**

Contractual obligations and provision of the Service (as described in the previous paragraph 3, letter a)): the legal basis consists of art. 6, paragraph 1, lett. b) of the Regulation, or the processing is necessary for the performance of a contract to which the User is party or in order to take steps at the request of the data subject prior to entering into a contract.

Administrative and accounting purposes (as described in the previous paragraph 3, letter b)): the legal basis consists of art. 6, paragraph 1, lett. b) of the Regulation, as the processing is necessary for performance of a contract to which the User is party or in order to take steps at the request of the data subject prior to entering into a contract.

Legal obligations (as described in the previous paragraph 3, letter c)): the legal basis consists of art. 6, paragraph 1, lett. c) of the Regulation, as the processing is necessary for compliance with a legal obligation to which the Data Controller is subject.

Other processing purposes (as described in paragraph 4.1 above) for the processing relating to marketing activities, the legal basis is Article 6, paragraph 1, letter a) of the Regulation, i.e., the provision by the data subject of consent to the processing of his/her personal data for one or more specific purposes. For this reason, the Data Controller asks the User to provide a specific free and optional consent, in order to pursue such processing purpose.

#### **6. PROCESSING METHODS AND DATA RETENTION PERIOD**

The Data Controller will process the personal data of Users using manual and IT tools, with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

The personal data of Users will be retained for the time strictly necessary to carry out the main purposes explained in paragraph 3 above or, in any case, as necessary for the protection in civil law of the interests of both the Users and the Data Controller.

In the case referred to in paragraph 4.1 above, Users' personal data shall be stored for the time strictly necessary to fulfil the purposes set out therein and, in any case, until Users revoke their consent.

In any case, this is without prejudice to any retention periods prescribed by law or regulation.

#### **7. TRANSMISSION AND DISSEMINATION OF DATA**

The User's personal data may be transferred outside the European Union, and, in this case, the Data Controller will ensure that the transfer takes place in accordance with the Applicable Law and, in particular, in accordance with Articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate guarantees) of the Regulation.

The personal data of the Users may be disclosed to the employees and/or collaborators of the Data Controller in charge of managing the Website and the Users' requests. These subjects, who have been instructed to do so by the Data Controller pursuant to Article 29 of the Regulation, will process the User's data exclusively for the purposes indicated in this policy and in compliance with the provisions of the Applicable Law.

The personal data of the Users may also be disclosed to third parties who may process personal data on behalf of the Data Controller as "**Data Processors**" pursuant to Article 28 of the Regulation, such as, for example, IT and logistic service providers functional to the operation of the Data Controller's Website, suppliers of outsourcing or cloud computing services, professionals and consultants.

Users have the right to obtain a list of any data processors appointed by the Data Controller, making a request to the Data Controller in the manner indicated in paragraph 8 below.

## **8. RIGHTS OF THE DATA SUBJECTS**

Users may exercise their rights granted by the Applicable Law by contacting the Data Controller as follows:

- Sending a registered letter with return receipt to the registered offices of the Data Controller: Via Pietro Paleocapa 6, 20121 - Milan, Italy;
- Sending an electronic mail message to [customerservice@soccerment.com](mailto:customerservice@soccerment.com);

Pursuant to the Applicable Law, Users have:

- a. the right to withdraw consent at any time, if the processing is based on their consent;
- a. the right of access to personal data;
- b. (where applicable) the right to data portability (the right to receive all personal data concerning them in a structured, commonly used and machine-readable format), the right to restriction of processing of personal data, the right to rectification and the right to erasure ("right to be forgotten");
- c. the **right to object**:
  - . in whole or in part, for legitimate reasons to the processing of personal data concerning them, even if relevant to the purpose of collection;
  - i. in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
- a. if they consider that the processing of their personal data is in breach of the Regulation, the right to lodge a complaint with a supervisory authority (in the Member State in which they have their habitual residence, in the Member State in which they work or in the Member State in which the alleged breach has occurred). The Italian Supervisory Authority is the Garante per la protezione dei dati personali, located in Piazza Venezia n. 11, 00187 - Rome (<http://www.garanteprivacy.it/>).

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The Controller is not responsible for updating all links that can be viewed in this privacy policy, therefore whenever a link is not functional and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to such link.