Privacy Statement Forward Football B.V.

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This privacy statement explains which personal data Forward Football B.V. processes through its marketing website, why we do so, with whom we share data and what rights you have.

1 Who we are

Forward Football B.V. is responsible for the processing of personal data through the website www.forward.football.

Our contact details are:

Forward Football B.V.
Entrada 300-4e
1114AA Amsterdam-Duivendrecht
Chamber of Commerce number: 66167639
Email address: info@forward.football

2 Who this privacy statement applies to

This privacy statement applies to visitors to our marketing website and to individuals who:

- subscribe to our email newsletter;
- request further information using the contact form;
- visit the website without completing a form.

This privacy statement does not cover personal data processed when football organisations, players, coaches, parents or other users use Forward Football's products and services. A separate privacy statement or an agreement with the relevant organisation may apply to that processing.

3 Which personal data we process

3.1 Requests for further information

When you request further information using the contact form, we process:

- your first name;
- your last name;
- your email address;
- the name of your football club or organisation;
- your job title, if provided;
- your telephone number, if provided;
- your preferences regarding the products about which you wish to receive information;
- the content of any additional questions;
- our subsequent correspondence with you.

Your first name, last name, email address and club name are required to handle your request. Providing a job title and telephone number is optional.

3.2 Newsletter subscriptions

When you subscribe to our newsletter, we process:

- your first name;

- your last name;
- your email address;
- any preferences regarding products or topics;
- the date and time of your subscription request;
- the date and time when you confirm your subscription;
- the IP address recorded when you request and confirm your subscription;
- the source and status of the subscription;
- information about changes to your preferences or your unsubscription.

3.3 Technical website data

When you visit our website, technical data may be processed automatically, including:

- the IP address of your internet connection;
- an approximate geographical location;
- the device and device type used;
- your browser and operating system;
- the date and time of your visit;
- the pages you visit;
- the sequence and duration of your visit;
- the website or page from which you reached our website;
- technical log data required for the operation and security of the website;
- pseudonymous technical identifiers.

Forward Football does not independently attempt to link this technical data to your name or direct identity.

4 Why we process personal data

4.1 Responding to requests for information

We use the data from the contact form to:

- assess your request;
- provide the information you requested by email;
- answer any additional questions;
- contact you about the products in which you have expressed an interest;
- keep records of our communications with prospective customers.

A Forward Football employee handles your request and sends the requested information directly to the email address you provided.

Submitting a request for information does not automatically subscribe you to the newsletter.

4.2 Sending newsletters

We use newsletter subscribers' data to:

- register and confirm your subscription;
- send newsletters and product information by email;
- tailor the content to your stated preferences where possible;
- manage subscriptions, unsubscriptions and communication preferences;
- demonstrate that you have given consent.

4.3 Website analytics and security

We use technical website data to:

- compile general visitor statistics;
- understand how visitors use our website;
- measure how visitors find our website;
- improve the website's content, functionality and discoverability;

- keep the website technically available and secure;
- investigate malfunctions, misuse and security incidents.

5 Our legal bases for processing personal data

We process personal data only where there is a valid legal basis for doing so.

5.1 Requests for information

We process the data from the contact form to provide information at your request and, where applicable, to take steps prior to entering into a contract. The legal basis for this is Article 6(1)(b) of the General Data Protection Regulation (GDPR).

We may also have a legitimate interest in keeping records of and appropriately following up on business requests for information, as referred to in Article 6(1)(f) GDPR.

5.2 Newsletter

We send the newsletter only after you have given consent and confirmed your subscription through double opt-in. The legal basis for this is Article 6(1)(a) GDPR.

You may withdraw your consent at any time using the unsubscribe link in each newsletter or by contacting us.

5.3 Website analytics and security

For limited website analytics and security, we rely on our legitimate interest as referred to in Article 6(1)(f) GDPR.

This interest consists of managing, securing and improving our website. When configuring our analytics tools, we aim to limit processing to what is necessary for these purposes.

6 Subscribing through double opt-in

Forward Football uses a double opt-in procedure for the newsletter.

After you complete the subscription form, you receive an email asking you to confirm your subscription. Your subscription becomes final only after you click the confirmation link. Without this confirmation, you will not receive regular newsletters.

When you request further information using the contact form, we may separately offer you the option to subscribe to the newsletter. This choice is voluntary and independent of your request for information.

Not subscribing to or not confirming the newsletter subscription does not affect how your request for information is handled. The newsletter option is not pre-selected.

7 Use of Mailchimp

Forward Football uses Mailchimp to:

- receive and process form data;
- manage requests for information;
- process newsletter subscriptions;
- carry out the double opt-in procedure;
- store and manage newsletter subscribers;
- record subscriptions, consents and unsubscriptions;
- send newsletters.

Mailchimp is a service provided by The Rocket Science Group LLC, part of Intuit. Mailchimp processes data on behalf of Forward Football.

If you only request further information, your data may be entered into Mailchimp to process your request. This does not automatically make you a newsletter subscriber. You will receive newsletters only after you have separately opted in and confirmed your subscription through double opt-in.

When a subscription is requested and confirmed, Mailchimp may record, among other things, the IP address, time and source of the subscription. Forward Football uses this information to demonstrate the validity of a subscription and prevent misuse.

Every newsletter includes an option to unsubscribe and, where applicable, to change your preferences.

8 Use of Google Analytics

Forward Football uses Google Analytics 4 to obtain information about the use and performance of the website. Google Analytics is provided by Google Ireland Limited.

Google Analytics may process, among other things, the following data:

- the IP address during data collection;
- an approximate geographical location derived from it;
- device, browser and operating system data;
- the date and time of the visit;
- pages visited;
- the duration and sequence of the visit;
- general information about the source of the visit;
- pseudonymous technical identifiers.

According to Google, the IP address is used to derive an approximate location and is then deleted before the Analytics data is stored. Forward Football cannot view the full IP address in Google Analytics.

Forward Football uses the reports to analyse website usage and improve the website's content, discoverability and functionality. We do not independently attempt to link the data collected through Google Analytics to a visitor's name or direct identity.

Google may process data in accordance with the Google Analytics settings, links to other Google products, and Google's applicable terms and privacy policies.

9 Link to Google Ads

Forward Football's Google Analytics environment is linked to a Google Ads account. As a result, Analytics data, conversion data or audiences created within Analytics may be made available within the linked Google Ads account. This depends on the settings in Google Analytics and Google Ads.

Forward Football's Google Ads account is currently inactive. Forward Football is not running any paid advertising campaigns at present.

The absence of active advertising campaigns does not necessarily mean that no technical data is processed or that no data is made available between the linked Google services.

If Forward Football activates advertising campaigns or additional marketing features in the future, we will first:

- update this privacy statement;
- assess which personal data will be processed for those purposes;
- check the settings in Google Analytics and Google Ads;
- obtain prior consent where required;
- take additional measures concerning cookies and similar technologies where required.

10 Use of Google Search Console

Forward Football uses Google Search Console to understand how the website performs in Google search results.

Google Search Console provides information on, among other things:

- the number of times Forward Football's pages have been displayed in Google;

- the number of clicks from search results;
- the search terms used;
- the average position in search results;
- the pages visitors reach from Google;
- aggregated information about countries and devices.

Google Search Console collects this information in connection with the use of Google's search engine. The information shown to Forward Football is mainly aggregated. Google omits certain search queries to protect users' privacy.

11 Cookies and similar technologies

The website uses cookies and similar technologies. These are small data files or forms of browser storage that allow information to be stored on or read from a visitor's device.

11.1 Mailchimp pop-up

Forward Football may display a pop-up on a visitor's first website visit, allowing the visitor to subscribe to the newsletter.

For this purpose, Mailchimp places a functional cookie or uses similar browser storage. This remembers that the pop-up has already been displayed or has been closed by the visitor. It prevents the same pop-up from appearing again on every visit or every page.

This information is used for the operation and usability of the pop-up. Forward Football does not independently use this cookie to establish visitors' direct identity.

11.2 Analytics cookies

Google Analytics may use analytics cookies or similar technologies to distinguish visits and sessions and collect information about website usage.

Forward Football uses the resulting reports for website analytics and improvement. The Google Analytics environment is linked to Google Ads, as described in Section 9.

12 Personal data relating to minors

The marketing website is not intended to collect personal data relating to minor players or their parents for the use of Forward Football products.

Forward Football does not request player data, parent data or other personal data relating to minors through the marketing website for the use of its products. The contact and newsletter forms are aimed at business contacts, representatives of football clubs and other individuals with a professional interest.

If we discover that personal data relating to a minor has been provided through the marketing website without a valid legal basis, we delete that data unless we are legally required to retain it.

13 With whom we share personal data

Forward Football may share personal data with:

- **Mailchimp, The Rocket Science Group LLC and relevant Intuit entities, for managing subscriptions and sending email newsletters;**
- **Google Ireland Limited and relevant Google entities, for website analytics and the link to Google Ads;**
- **Leaseweb Netherlands B.V., located at Hessenbergweg 95, 1101 CX Amsterdam, for the hosting, storage, technical availability and security of the website;**
- **Aut O'Mattic A8C Ireland Ltd., located at Grand Canal Dock, 25 Herbert Place, Dublin, D02 AY86, Ireland, and, for certain processing activities, Automattic Inc. in the United States, for providing and technically managing WordPress.com and its associated website functionalities;**

- Forward Football employees who handle requests for information;
- professional advisers or competent authorities where legally necessary.

These parties receive only the data they need for their work.

Forward Football does not sell personal data.

14 Processing outside the European Economic Area

Mailchimp, Google, Automattic and their subprocessors may process personal data outside the European Economic Area, including in the United States.

Applicable legal safeguards are used for such transfers. These may include:

- an adequacy decision by the European Commission;
- the EU-US Data Privacy Framework;
- standard contractual clauses approved by the European Commission.

Where necessary, Forward Football enters into agreements with suppliers concerning the protection and processing of personal data.

15 How long we retain personal data

We retain personal data for no longer than is necessary for the purpose for which it was collected.

As a general rule, we apply the following retention periods:

- requests for information and related correspondence: up to 24 months after the last substantive contact, unless a contract is concluded or a longer retention period is necessary;
- unconfirmed newsletter subscription requests: up to 30 days after the initial request;
- newsletter subscriber data: until the subscriber unsubscribes;
- product and communication preferences: for as long as the newsletter subscription or business contact relationship continues;
- evidence of consent: for as long as the newsletter is sent and thereafter for as long as reasonably necessary to demonstrate compliance with legal obligations;
- unsubscription data: a minimal record may be retained to prevent a person from being unintentionally subscribed again after unsubscribing;
- Google Analytics data at user and event level: up to 14 months;
- data in Google Search Console: generally up to 16 months;
- technical server logs: for as long as necessary for security and investigating incidents, generally no longer than three months.

Aggregated statistics that can no longer be traced back to an individual may be retained for longer.

16 Security

Forward Football takes appropriate technical and organisational measures to protect personal data against loss, unauthorised access, alteration and unlawful processing.

Where appropriate, we use:

- encrypted connections;
- secure user accounts;
- restricted access rights;
- two-factor authentication;
- periodic checks of systems and suppliers;
- back-ups and security measures against misuse.

17 Automated decision-making

Forward Football does not use data collected through the marketing website to make fully automated decisions that have legal or similarly significant effects on visitors.

18 Your rights

Depending on the circumstances, you have the right to:

- request access to your personal data;
- have inaccurate data corrected;
- request deletion of data;
- have processing restricted;
- object to processing based on a legitimate interest;
- have your data transferred;
- withdraw consent previously given.

You may unsubscribe from the newsletter at any time using the unsubscribe link in the newsletter.

For other requests, you can contact info@forward.football. We generally respond within one month. We may request additional information to verify your identity.

Because technical website data is processed in aggregated or pseudonymous form as far as possible, we may be unable to determine which specific Analytics data relates to a particular visitor. We will explain this if it limits our ability to fulfil a request.

19 Complaints

If you have a complaint about how Forward Football processes personal data, we encourage you to contact us first at info@forward.football.

You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) at www.autoriteitpersoonsgegevens.nl.

20 Changes

Forward Football may amend this privacy statement if the website, our practices, the suppliers used or the applicable regulations change.

If Forward Football activates advertising campaigns or additional marketing and tracking features in the future, we will first assess whether this privacy statement and our technical measures need to be amended.

The most recent version of this privacy statement is published on our website. The date at the top indicates when the statement was last updated.