

This Privacy Policy is made by VillageSports, a S-Corp having its registered office in San Francisco, California and registered through ZenBusiness under the license number 5155534.

VillageSports offers a platform that allows parents, school reps, outside orgs to contact college athletes for coaching opportunities who have subscribed on the Platform and as such have a user account (hereafter, the “**Users**”). The Platform is available at the following url address [:]

VillageSports uses a solution called “Hivebrite”, which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

In this regard, VillageSports collects and processes User’s personal data in accordance with the Privacy and Cookie policy.

VillageSports is particularly aware and sensitive with regards to the respect of its Users privacy and personal data protection. VillageSports commits to ensure the compliance of the processing it carries out as data controller in accordance with the Data Protection Law.

Data Protection Law is the US Regulation **TITLE 1.81.5. California Consumer Privacy Act of 2018 [1798.100 - 1798.199.100] also known as CCPA.**

The Data Controller has put in place an appropriate privacy and cookie policy to be fully transparent on how the personal data of Users are processed within the use of the Platform and services provided.

This privacy policy is intended for the Users of the Platform of the Data Controller.

*Data Controller has appointed a Data Protection Officer (hereinafter “DPO”) you may contact at the following address: Alejandro Munoz, email at villagesportscompany@gmail.com*

Date of last update: 09/16/2022

## **ARTICLE 1. COLLECTED PERSONAL DATA**

### **1.1 When subscribing on the Platform**

When subscribing to the Platform, the User is informed that its following personal data is collected for the purpose of creating a user account:

Mandatory data

- First name
- Last name
- Gender
- Birthdate

Secondary Info

- User type
- Current location
- Bank Details

Optional data:

- Coaching Information
- School Rep Information
- Outside Organization Information
- Parent Information

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

## **1.2 During the use of the Platform**

The User may validly publish, at its own initiative, any content on the Platform which shall be kept by the Company:

[To be completed by customer]

- [Posts] ;
- [Events] ;
- Live Feed

The User is aware that when using the Platform, the User may not provide « sensitive data » within the meaning of Data Protection Law, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

## **ARTICLE 2. THE PURPOSE OF THE DATA PROCESSING**

The Data Controller and its subcontractors process personal data that are freely transferred by the User when accessing the services proposed by the Platform for the following purpose:

<b>Purpose</b>	<b>Legal basis</b>
<i>Creation and management of a user account; [•];</i>	[to be completed as per options listed in <b>TITLE 1.81.5. CCPA</b>
<i>Providing the User with all functionalities of the Platform, meaning:</i>	

<ul style="list-style-type: none"> <li>• <i>Sending invitations for events organized by Data Controller or other Users, if the User has accepted to receive such invitations;</i></li> <li>• <i>Sending offers [jobs / commercial offers – if applicable] from the Data Controller or its partners if the User has accepted to receive such offers.</i></li> <li>• <i>Invite the User to events organized by the Platform</i></li> <li>• <i>[•];</i></li> </ul>	
<p><i>Management of data subjects rights according to the Personal Data Legislation.</i></p> <p><i>Storage of User personal data;</i></p>	
<p><i>If applicable [management of transactions through the Platform – if applicable];</i></p>	
<p><i>If applicable [management of delinquencies and claims]</i></p>	
<p><i>If applicable: [Management of prospection operations:</i></p> <ul style="list-style-type: none"> <li>• <i>Sending email prospect campaigns in the Name of Customer] and/or its commercial partners</i></li> <li>• <i>Sending newsletters in the Name of Customer] and/or its commercial partners</i></li> <li>• <i>[•];</i></li> </ul>	
<p><i>Making statistics in order:</i></p> <ul style="list-style-type: none"> <li>• <i>to improve the quality of the services proposed by the Platform;</i></li> <li>• <i>improve the usage functionalities of the Platform;</i></li> </ul>	
<p><i>Making statistics regarding the effective use of the Platform;</i></p>	
<p><i>Making statistics regarding the different levels of activity on the Platform.</i></p>	

<i>Enable the synchronization of the User's LinkedIn profile;</i>	
[to be completed/deleted as applicable]	[.]
[.]	[.]
[.]	[.]
[.]	[.]
[.]	[.]

### ARTICLE 3. DATA RETENTION PERIOD

VillageSports informs the User that the personal data related to the User Account is retained only during the length of the User's subscription on the Platform.

Following the termination of said subscription, the data collected upon the subscription as well as the content published by the User on the Platform shall be deleted after a period of 1 week.

### ARTICLE 4. DATA TRANSFERS

When the service providers to whom personal data are transferred are located in the United States, these transfers are governed by the standard data protection clauses adopted by the Commission.

Users can access such safeguards by contacting the DPO at the following email [villagesportscompany@gmail.com](mailto:villagesportscompany@gmail.com).

### ARTICLE 5. COMMITMENT OF VILLAGESPORTS

VillageSports commits to process User's personal data in compliance the Data Protection Law and undertake to, notably, respect the following principles:

- Process User's personal data lawfully, fairly, and in a transparent manner;
- Only collect and process the Users' data for the strict purpose as described under article 2 of the present privacy policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Do the best efforts to ensure that the personal data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep personal User's data for no longer than is necessary for the purposes for which they are processed;

- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Users' data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

## **ARTICLE 6. EXERCISE OF THE USERS' RIGHTS**

The User is duly informed that it disposes at any time, depending on the legal basis of the processing, a right to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.

When processing is based on User's consent, the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

The User can exercise its rights by sending an email to the following email [villagesportscompany@gmail.com](mailto:villagesportscompany@gmail.com).

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data is collected can lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

## **ARTICLE 7. COOKIES**

VillageSports informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the VillageSports Cookie Policy [insert link].

## **ARTICLE 8. RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS' DATA**

Only **authorized persons working for the Data Controller**, VillageSports can access your personal data. The Data Controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of User's personal data.

VillageSports also uses **trusted service providers** to carry out a set of operations on his behalf for hosting and payment services. The Data Controller can also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

VillageSports only provides service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. The Data Controller does his best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

VillageSports may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of the user.

List of the main service providers:

Service Provider	Service	You can consult the privacy policy by clicking on the following link:
KIT UNITED 44 rue la fayette 75009 Paris France	HIVEBRITE solution	<a href="https://hivebrite.com/privacy-policy">https://hivebrite.com/privacy-policy</a>
Stripe 510 Townsend Street San Francisco CA 94103, USA	Payment Service	<a href="https://stripe.com/fr/privacy">https://stripe.com/fr/privacy</a>
Paypal 21 rue Banque 75002 Paris France	Payment Service	<a href="https://www.paypal.com/us/webapps/mpp/ua/privacy-full">https://www.paypal.com/us/webapps/mpp/ua/privacy-full</a>
Google Cloud Platform Gordon House, 4 Barrow St, Dublin. Ireland	Hosting of all data and content produced / provided by the User, as well as images, profile	<a href="https://cloud.google.com/security/privacy/">https://cloud.google.com/security/privacy/</a>

Amazon AWS 38 avenue John F. Kennedy, L-1855, Luxembourg	pictures and backups	<a href="https://aws.amazon.com/compliance/gdpr-center/">https://aws.amazon.com/compliance/gdpr-center/</a>
Sentry 132 Hawthorne Street San Francisco, CA 94107 USA	Production and storage of error logs enabling our developers to correct the code	<a href="https://sentry.io/privacy/">https://sentry.io/privacy/</a>
Sendgrid 375 Beale Street, Suite 300, San Francisco, CA 94105 USA	Sending of emails from the Platform	<a href="https://api.sendgrid.com/privacy.html">https://api.sendgrid.com/privacy.html</a>
Hivebrite, Inc. 16 Nassau St, New York, NY 10038, USA	Customer support for the Platform	<a href="https://hivebrite.com/privacy-policy">https://hivebrite.com/privacy-policy</a>