

# PRIVACY POLICY

*With effect from 25.5.2018*

In the following document, you will find all the necessary information: what data we collect, how we use or share it, how you can control it, about the measures that protect your data and the rights you have.

With effect from 25 May 2018, all data are processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation – hereinafter referred to as “GDPR Regulation”), and according to Act No. 18/2018 Coll. on the Protection of Personal Data and on Amendments to Certain Acts, as amended on 25 May 2018 (hereinafter also referred to as “Act on Personal Data Protection”).

## Who we are

The operator of the SPPM project that processes personal data is:

### **Touch4IT s.r.o.**

with registered office at Hany Meličkovej 5, 841 05 Bratislava

ID: 48 024 066

The company is registered with the Companies Register of District Court Bratislava I, section: Sro, insert No. 102430/B (hereinafter referred to as “**Touch4IT**” or “we”).

We take full responsibility for the protection of your personal data, and if you have any questions about this document or you wish to exercise your rights described in this document, you may contact us by [hi@touch4it.com](mailto:hi@touch4it.com).

The data controller of the SPPM project is:

### **Touch4SPORTS s.r.o.**

with registered office at Cukrovarská 319/17, 914 01 Trenčianska Teplá

ID: 50 409 093

The company is registered with the Companies Register of District Court Trenčín, section: Sro, insert No. 33437/R (hereinafter referred to as “**Touch4SPORTS**”).

## What data we collect

The SPPM project currently includes two iPad applications: SPPM Planner and SPPM Playbook. SPPM Planner is an efficient tool which allows sports coaches to plan and manage their team. It enables team administration, setting up performance objectives, creating a strategic plan, managing and determining the required time for parts of microcycle and creating and managing each Training Session Plan. SPPM Playbook is a fully customizable application that allows sports coaches to create, animate and share their plays and drills.

The operator of the project processes personal data related to your person to the following extent:

1. Your name, surname and email address (when you sign up for iPad apps).
2. Your email address and your position (when you sign up for our newsletter on website).
3. Your email address (when you write us a message through our contact form on website).

### Data obtained when using our service

When you use our services, we also get information on how you use them. This is information about your interactions with our services, such as when you visit our website, what you search for, and so on.

We also receive data about the devices and computers you use to access our services, including IP addresses, browser settings, operating system information, or information about your mobile device, information from which source you come, the pages you visit, and information from cookies and similar tools.

## How we use this data

We use the data for the following purposes:

### Communicate with you

We use your personal data: "Name and surname" and "Email address" to reach you when you sign up for one of our SPPM applications.

We use your email address to reach you if you contact us through our contact form on our website.

We use your email address to send you regular newsletter with new features or other news in SPPM applications.

## **Improve and personalize our services and marketing**

Information about your visits and movements on our website is also used for advertising and marketing purposes. We use this information for analytical purposes to understand how people use our applications or web and to make it more intuitive and user-friendly, too.

## **Security and protection of your rights**

We use your personal data to ensure the security of our services in order to respond to the claims that have been made to us in proceedings before the state and other authorities that control our activities and to enforce the claims that have arisen to us.

## **Cookies**

Cookies are small pieces of data that are stored in your browser or mobile device while browsing the website. Individual cookies have different storage times on your device.

Cookies help us understand what interests you on our website, whether it is clear enough for you and you can find what you are looking for. These files may also record additional information, such as the number of website visitors and the most frequently visited pages on our website. They are also used to show you the advertisement and page content that can be relevant to you.

### **We use the following types of cookies:**

**1. Functional and technical cookies** ensure the proper functioning of our website, which means that their use is essential and therefore we do not ask you to consent to their storage and access to them.

**2. Analytical cookies** are used to collect traffic data on our website, information about searches performed on our web, and also to find out how you move around. It should help us make it as easy to use for you as possible. With these cookies, we use the following third party solutions:

- Google Analytics
- Hotjar
- Heap

**3. Marketing and advertising cookies** are used to show the ads based on your interests. We only collect and store this type of cookies based on your consent. With these cookies, we use the following third party solutions:

- Facebook Pixel

Here are methods how you can manage or restrict how we (or our partners) use cookies or similar technologies:

- A. Browser settings –most browsers have basic cookie settings, but they also allow you to delete or reject cookies. However, there is a risk that in some cases the service may not run properly.
- B. Third parties – there are some third parties’ solutions that may be used to restrict cookies.
- C. Custom partner solutions – solutions offered by individual partners can be used.

## Legal basis

In accordance with the requirements of personal data protection legislation, we need to inform you of the legal bases for the processing of your personal data, which are:

**1. Fulfillment of contract:** in the case of the conclusion of a service contract, contract for work, contract of confidentiality and others.

**2. Consent:** is needed when sending emails about job offers or placing candidates in our database. Every given consent is voluntary and you can revoke it at any time, but this does not affect the legality of processing prior to its removal. If you want to delete your personal data from our database, please contact us at [hi@touch4it.com](mailto:hi@touch4it.com).

**3. Fulfillment of our legal obligations:** when making data available to state and other authorities that oversee our activities or which deal with disputes or enforcement of decisions.

**4. Our legitimate interest:** in improving and personalizing our services, some marketing activities, or in relation to security and protection of rights.

## Whom we share your data with

We do not publish, disclose, provide your personal data to any other subjects, except these situations:

### In cases of external processing

Your personal data is available to some of our vendors who process them for us, based on our instructions and in accordance with this document. In this case, they follow all necessary security, technical and organizational rules to provide your personal data with the required protection. These partners currently include:

- MailChimp / The Rocket Science Group LLC

## **For legal reasons and preventing damage**

We can also keep your data or make it available to others to comply with legal obligations, requests from state and other authorities to enforce our claims or to defend yourself in proceedings where others apply to us.

To third parties to whom we make personal data available for these reasons belong courts, governmental and other authorities competent to exercise our control over our activities, to resolve disputes or to make decisions, or our legal and accounting advisers and auditors.

## **The transfer of personal data to third countries**

We **do not transfer** your personal data to third countries outside the EU. However, some of the partners with whom we cooperate in the processing of personal data do realize such transfers, specifically to the United States. Persons who make the data available in the U.S. comply with the US-EU Privacy Shield and thus provide an adequate level of protection for your personal data.

## **How we protect your data and how long is it stored**

In accordance with the legislation requirements, we follow all necessary safety, technical and organizational rules to protect your personal data. Electronic data is stored in a protected database on our server. We protect the database containing personal data from damage, destruction, loss and misuse.

In cases of use of your data based on our legitimate interest described in chapters "How we use this data" and "Whom we share your data with", we will store your data until the reason for processing has expired. However, we need to alert you that even if one of the processing reasons fails, this does not have the effect of ending the storage of your personal data. These personal data can and sometimes we have to process for another purpose with another legal basis.

## **What are your rights**

Because we process your personal data, you have the following rights:

## **The right to have access to data**

You have the right to receive confirmation from us about your personal data being processed and if we process your personal data, we will provide you with information about what data we collect, the purpose, if it is transferred to a third country and how long we will keep your personal data.

## **Right to correction**

If you think that our company is processing incorrect personal information about you, you can ask us to correct it.

## **Right to delete**

You have the right to delete your personal data that we process if the following conditions are met and no statutory exceptions apply:

1. the data is no longer necessary for the purposes for which they were obtained;
2. you withdraw consent to the processing of your personal data and there is no other legal basis for processing it;
3. refuse, based on your particular situation, the processing of your personal data processed on a legitimate interest and there are no legitimate reasons for processing or oppose processing for direct marketing purposes;
4. personal data was processed illegally.

If you exercise the right to delete, we will also inform the other recipients of your personal data that you have exercised this right, so they should delete all references to your data. If it will be possible with regard to available technology and the cost of implementing these measures.

## **The right to restrict processing**

You have the right to request a temporary limitation of processing in the following cases:

- if you assume that we are processing incorrect personal data about you (this right is valid if it is verified the accuracy of the data);
- data processing is illegal and you decide not to erase personal data, but to restrict the limitation of their processing;
- we no longer need your personal data for processing, but these are necessary for your own purposes to demonstrate, enforce or defend your legal claims;
- in the case that you object to processing of your personal data – it is until the validation or legitimate reasons for the processing of personal data prevail over your legitimate interests.

## **The right to data portability**

You have the right to obtain personal data that are processed by us on the basis of your consent (or contract) in a structured, commonly used and machine-readable format. You may also transfer this data to another person or company, so if it is possible we can transfer your data directly to your chosen operator.

## **The right to object**

You have the right to object to processing of your personal data that is performed on our legitimate interest. You also have the right to object to profiling based on our legitimate interest.

You also have the right to object to the processing of your personal data when it is processed for direct marketing purposes.

## **Complaints**

If you think that processing of your personal data by our company is inconsistent with the applicable data protection laws, you have the right to file a complaint with our principal supervisory authority - the Personal Data Protection Office of the Slovak Republic.

Once again, if you have any questions about this document, you should contact us by [hi@touch4it.com](mailto:hi@touch4it.com).