

# Privacy Policy

*Effective: May 25, 2018.*

This Privacy Policy (together with our [Terms of Use](#) and any other documents referred to within it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It also describes how long that information is kept for and the limited circumstances in which we might disclose it to third parties. This Privacy Policy applies to the processing of information about individuals that we collect when you use Squad In Touch which means any website, application, or services we offer, or when you communicate with us. This Privacy Policy does not apply to the information that you may provide to third parties, such as other users of Squad In Touch, and others with whom you may share information about yourself. For more information about the scope of our Privacy Policy, please see Section 7.1.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it. By submitting any Personal Data to us you consent and agree that we may collect, use and disclose such Personal Data in accordance with this Privacy Policy and our [Terms of Use](#), as permitted or required by law. If you do not agree with any terms of this Policy and our [Terms of Use](#), please do not provide any Personal Data to us. If you refuse or withdraw your consent, or if you choose not to provide us with any required Personal Data, we may not be able to provide you with the services that can be offered through our online interfaces (e.g., our websites and mobile applications) owned and controlled by us, including but not limited to [www.squadintouch.com](http://www.squadintouch.com), [www.squadintouch.co.uk](http://www.squadintouch.co.uk).

Consent can be withdrawn at any time as described in Section 5 of this Privacy Policy. Please note that we may also rely on legitimate interests or fulfilment of a contract to continue processing your data.

If you do not understand any aspects of our Privacy Policy, please feel free to get in touch using contact details provided in Section 8 of this Privacy Policy.

To make this Privacy Policy easier to understand we have provided summaries in these grey boxes. These summaries are not part of the official policy and even though we have provided summaries it is important for you to read the entire Policy carefully.

## 1 Who we are

Squad In Touch Ltd ('our', 'we', 'us') is a limited company providing a cloud based kids and youth sports development platform tailored to schools, youth sports clubs and associations, teachers, coaches, parents/guardians and young athletes.

Here, at Squad In Touch Ltd we are committed to protecting and respecting your privacy. We will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

For the purpose of the Data Protection Legislation Squad In Touch Ltd (company number 09657481, with registered address at Pacific House, 382 Kenton Road, Harrow, Middlesex, HA3 8DP) acts as the Data Controller with regards to the Personal Data of Registered Users who sign up for their account with Squad In Touch Cloud Solution (Squad In Touch) and are provided with a direct access to its functionality.

## 2 How we collect your Data

### Summary:

We collect information about you when you:

- Create an account with us;
- Access Squad In Touch via our web or mobile interfaces;
- Visit our website;
- Communicate with us.

We also collect information, such as usage statistics, by using cookies, server logs, and similar technologies.

Some of our Squad In Touch functionality can be accessed and used without being a Registered User and revealing any Personal Data (e.g. Registered Organisations Public Area), though for features or services related to fixtures management, receiving instant messages and notifications, communicating to other users, uploading media files and other features and benefits of Squad In Touch, Personal Data is required.

In some cases, we may use a third party payment and e-commerce services to process purchases made through our web and mobile interfaces. In these cases, your Personal Information may be collected by this third party and not by us and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party's use or disclosure of your Personal Information.

We may collect your data in a variety of ways including:

- whenever you access Squad In Touch through our web or mobile interfaces;
- when you sign up for an account with Squad In Touch through our web or mobile interfaces;
- whenever you or a third party provide data using our web or mobile interfaces;
- whenever you contact us for any reason such as when you telephone or email our Customer Service team;
- whenever you disclose your data to us, or we collect your data from you, in any other way.

## **2.1 Personal Data**

Personal Data refers to Personally Identifiable Information provided directly by you or via third parties.

Information sufficient for creating an account with Squad In Touch includes:

- your name;
- e-mail address;
- mobile phone number.

When creating an account with Squad In Touch you will be also required to confirm you are the age of 13 or over to proceed. If you are under the age of 13 you will not be able to proceed until we have a verified consent from a relevant parent/guardian. You can find more details in the Section 2.2 below.

Additional information we may collect with Squad In Touch includes:

- Gender;
- Date of birth;
- Profile picture.

To be able to get linked to Registered Organisation(s) you may be required to provide additional data such as your Child(ren)'s details (First name, Last name, Date of Birth, School form, School House).

For further details about the rights over this information available to individuals, see Section 5 of this Policy.

## **2.2 Children's Personal Information**

We are strongly committed to protecting the privacy of children. We do not knowingly collect or use Personal Data from persons under 13 years of age without verified parental/guardian consent. We will take appropriate steps to get a verified parental/guardian consent prior to providing a person under 13 years of age with access to Squad In Touch features and benefits.

If we learn that we have collected information from an individual under the age of 13 without a verified parental/guardian consent, then we will delete that

information as soon as possible and may at our discretion disable such individual's access to Squad In Touch. If you believe that we have mistakenly or unintentionally collected Personal Data of a minor through our web or mobile interfaces without appropriate consent, please contact us immediately using contact details specified in the Section 8 of this Policy.

### **2.3 Member Content**

We may receive information about you when you or another member uploads photos or posts other content to Squad In Touch through our web or mobile interfaces. For further details about the rights over this information available to individuals, see Section 5 of this Policy.

You can also report inappropriate content to us using contact details specified in the Section 8 of this Policy.

### **2.4 Usage data**

We may also collect information how Squad In Touch is accessed and used by you ("Usage Data") through web browser or mobile app. This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### **2.5 Location data**

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of Squad In Touch (for instance, providing navigation to the fixture venue) as well as to improve and customize our Service.

You can enable or disable location services when you use Squad In Touch at any time, through your device settings.

### **2.6 Cookies**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Please refer to our [Cookie Policy](#) to learn more about Cookie technologies and the information that they collect, use, or share.

### 3 How we use your data

#### Summary:

We use information about you to:

- Operate, improve, promote, and protect Squad In Touch;
- Communicate with you; and
- Personalize content.

We use Your Data in a number of ways including:

- providing you with access to Squad In Touch Cloud Solution functionality including your interaction with the Registered Organisations on Squad In Touch Cloud Solution by receiving emails, instant notifications and text;
- ensuring security of your account;
- personalising the content you access within our web site and mobile apps, including the proposals you can see on the Squad In Touch Cloud Solution marketplace;
- processing of your orders in case you order goods or services on the Squad In Touch Cloud Solution marketplace;
- notifying you about changes to our service or about new functionality of Squad In Touch Cloud Solution in place;
- conducting marketing research about further functionality of Squad In Touch Cloud Solution.
- monitoring, developing and improving Squad In Touch Cloud Solution and your experience;
- processing any enquiries or complaints received from you;
- investigating any suspected breach of the terms of service by or otherwise relating to you.

## 4 Disclosure and Transfer of Your Data

### Summary:

We do not share information about you in any way other than as described in this Privacy Policy.

We may disclose information about you:

- to our third-party service providers who help us to operate or improve our Platform;
- to authorities to comply with legal obligations and to protect and defend our rights and property; and
- to an affiliate or successor entity as part of a corporate transaction.

We may also share de-identified or aggregated information.

The data that we collect from you shall never be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

In addition to the third parties mentioned above, we may disclose Your Data to third parties for our legitimate interests as follows:

- to our employees to administer your account;
- to business partners, suppliers and sub-contractors who provide services to us (such as credit card processing services, analytics, site management, information technology and related infrastructure provision, e-mail service providers for sending transactional instant notifications, emails or text, auditing, and other similar services). When we share Personal Data with such third-party providers we require that they use your Personal Data to the extent necessary for providing services to us (or you) and not for their own marketing purposes;
- to governing and representative bodies of sport and recreation including local and county leagues, Schools Sports Partnerships and other organisations;
- to software suppliers such as Tawk.to when you use the live chat functionality on our websites;
- to HM Revenue and Customs, regulators and other authorities who require reports of processing activities in certain circumstances; and

- to the police, regulatory bodies, legal advisers and other parties for legal reasons. These would include third parties to whom we are under a legal obligation to disclose your personal information or to whom we need to disclose your personal information to protect our rights, property or safety or the rights, property or safety of others, or to detect and investigate illegal activities and breaches of any agreement we have with you.

We do not pass any information we collect from you outside the European Economic Area (“EEA”).

## 5 Your rights with relation to your Data

### Summary:

You have a series of rights under the GDPR in relation to your Personal Data.

- You have the right to exercise your data protection rights, including to request that Squad In Touch amends, deletes or provides you with a copy any personal data that we hold about you.
- You have the right to ‘opt out’ of any promotional emails, campaigns or messages that Squad In Touch send to you. However, you may receive other communications from us.
- We aim to reply to all data requests that we receive as promptly as possible and as required by law, however, we may require additional information from you to confirm your identity. See section 8.2 below.

You have the right to withdraw your consent to the collection, processing and transfer of your Personal Data at any time.

### 5.1 Your rights execution

You have the following data protection rights under the GDPR with relation to your Data:

- access any Personal Data we hold about you;
- prevent the processing of your Personal Data for direct-marketing purposes;
- update any Personal Data which is out of date or incorrect;
- delete any Personal Data which we are holding about you;
- restrict the way that we process your Personal Data;
- provide your Personal Data to a third-party provider of services;

- provide you with a copy of any Personal Data which we hold about you.

You may update or correct your account information as well as deactivate your account by logging in to your account or by sending us a request by email.

If you would like further information in relation to your rights or would like to exercise any of them, you may also contact us [privacy@squadintouch.co.uk](mailto:privacy@squadintouch.co.uk) / .com or using other contact details as explained in Section 8 below

## **5.2 Processing your requests**

We aim to respond to every request promptly where possible and provide our response within the time period stated by applicable law. When you contact us with a request, we may ask that you provide us with information necessary to confirm your identity.

Please note that certain Personal Data may be exempt from such requests in certain circumstances, which may include if we need to keep processing your Personal Data to comply with a legal obligation.

Data protection legislation may allow or require us to refuse to provide you with access to some or all your Data and/or to comply with requests made in accordance with your rights referred to above. If we cannot provide you with access to your Data, or deal with any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

You can get in touch with any requests using contact details specified in the Section 8 below.

## **6 Additional information**

### **Summary:**

We are committed to use all reasonable measures to ensure your Data is stored and processed in a secure and a confidential manner.

We advise you to carefully read all Privacy Policies of the third parties when you follow their links provided via our web and mobile interfaces.

### **6.1 Data security**

We consider the confidentiality and security of your information to be of the utmost importance. We will use industry standard physical, technical and administrative security measures to keep your Personal Data confidential and secure and will not share it with third parties, except as otherwise provided within this Privacy Policy,



or unless such disclosure is necessary in special cases, such as a physical threat to you or others, as permitted by applicable law.

Where you have chosen a password which enables you to access certain parts of Squad In Touch, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

All information you provide to us is stored on our secure servers. We have implemented appropriate physical, technical and organisational measures designed to secure your information against accidental loss and unauthorised access, use, alteration or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access. All interactions with our websites, including payment transactions, are encrypted using SSL technology.

## **6.2 External links**

Squad In Touch and websites powered by Squad In Touch may, from time to time, contain links to and from the websites of third parties. We do not disclose your Personal Data to these Third-Party Sites without obtaining your consent. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for when you leave our website, we encourage you to read the privacy notice/policy of every website you visit.

# **7 Policy scope and changes to our privacy policy**

## **Summary:**

This Privacy Policy does not apply to any information that you provide to third parties.

This Privacy Policy may be updated and amended from time to time so we advise that you check this page regularly to be aware of any updates.

## **7.1 Policy Scope**

This Privacy Policy does not apply to information that you provide to third parties, such as other members, including group organizers and network administrators, and others with whom you may share information about you. Our Platform may direct you to a third-party service, such as social media services, or a portion of our Platform may be controlled by a third party (typically through the use of a frame or pop-up window separate from other content on our Platform). Disclosure

of information to these third parties is subject to the relevant third party's privacy policy. We are not responsible for the third-party privacy policy or content, even if we link to those services from our Platform or if we share information with these third parties.

## 7.2 Changes to this Policy

We may update this Privacy Policy at any time so you should review this Policy periodically. When we make changes to this Privacy Policy we will update the 'last modified' date at the bottom of this Privacy Policy. Changes to this Privacy Policy are effective when they are posted on this page.

## 8 Contact us

### Summary:

If you have any questions, you can get in touch via [privacy@squadintouch.co.uk](mailto:privacy@squadintouch.co.uk).

Please do not hesitate to contact us if you have any privacy-related questions, requests, suggestions, unresolved problems, or complaints.

Our Data Protection Officer is Miss L. Bennett, Head of Customer Support.

Please send any requests relating to the above to our Data Protection Officer at [privacy@squadintouch.co.uk](mailto:privacy@squadintouch.co.uk) specifying your name the action you would like us to undertake. Where you are a registered user please also supply the email address you used to register with us.

Note that in relation to requests to access Your Data, we reserve the right in certain circumstances to charge a reasonable fee (up to £10) to carry out your request.

If we are unable to satisfactorily resolve your concerns about our handling of your Personal Data, you can contact the Information Commissioner's Office (ICO) either through their website: <https://ico.org.uk/> or through the ICO telephone helpline: 0303 123 1113.

*This Policy was last updated on 24 May 2018.*