



FUTURE PRO USA LTD PRIVACY POLICY

1. Background

Your personal data is of utmost importance to us.

We've developed this Privacy Policy to inform you about what happens to any personal data that you give to us, or any that we may collect from or about you. We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. This policy applies to all products and services ("referred to in this policy as Services"), and instances where we collect your personal data.

We will take appropriate technical and organisational measures to safeguard your personal information.

This Policy applies to personal information processed by or on behalf of FutureProUSA Ltd and FutureProUSA Soccer Ltd, as privately-owned family businesses.

In this Policy we will:

- set out the types of personal data that we collect
- explain how and why we collect and use your personal data
- explain when and why we will share personal data with any other organisations; and
- explain the rights and choices you have when it comes to your personal data.

Using our Services means:

- purchasing our Services over the phone, in person, or online or otherwise using any of the websites or social media or mobile applications where this Policy is posted.

2. What kinds of personal information about you do we process?

Personal information that we'll process in connection with our Services, if relevant, includes:

- **Personal and contact details**, such as title, full name, gender, age, billing addresses, home addresses, email addresses, phone numbers and contact details history
- **Information about your CV**, such as education, qualifications, sporting records, achievements and awards, club memberships and testimonials.
- **Student Profile**, which includes appraisal of your CV, academic and sporting achievements, photographs and video footage of you in your sporting activity
- **Online contact** such as details of the emails and other digital communications we send to you that you open, including any links in them that you click on and your username and password or when you speak with us through social media or online chat.
- **Records of your contact with us** such as via the phone number of our Services and, if you get in touch with us online using our online services, details such as your mobile phone location data, IP address and MAC address.
- **Services** you purchase from us, as well as have been interested in and the associated payment methods used.
- **Marketing to you and analysing data**, including history of those communications, and information about services we think you may be interested in
- **We don't intend to process information about your health or of a family member or beneficiary** unless it is provided to us for the purposes of adjusting the manner in which we provide our Services
- **Financial details about you**, such as your payment method(s) and details of money you owe
- **Your family, lifestyle or social circumstances**, if relevant to our Services (for example, if payments are made by your parents or guardians)
- **Feedback and contributions** such as to customer surveys and questionnaires or regarding complaints through customer service

3. What is the source of your personal information?

We'll collect personal information from the following general sources:

- From you directly, and any information from family members, associates or beneficiaries of our Services

- Photographs and video footage of you, as normally taken at our assessment days
 - Information generated about you when you use our Services including when you sign our contract
 - From a referrer or other intermediary or partner who we work with to provide or improve our Services to you
 - From other publicly available directories, organisations and information (for example, club membership lists, team sheets, competition entry lists, social media, internet, news articles). Please note that whilst we will put in place appropriate protection to make sure your personal data remains protected we cannot guarantee the security of any personal information you transfer over the internet to us
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4. What do we use your personal data for?

We use your personal data, including any of the personal data listed in section 1 above, for the following purposes:

- Manage your account with us and personalise your experience and communicate with you
- Contact you about our Services, for example by phone, email, SMS, online chat or post or by responding to social media posts that you have directed at us
- Assessing a request for our Services, including considering whether to offer you our Services, the price, availability of payment methods and the terms or making any requested changes to our Services or your data
- Managing any aspect of our Services
- Updating your records, tracing your whereabouts and recovering any outstanding monies on your account
- Communicating relevant data about you to Coaching Staff and Administrators or others at Colleges, Universities and Trade Associations or other Institutions in North America, in the process of supplying our service to you.
- To improve the operation of our business and that of our business partners
- To follow guidance and best practice under the change to rules of governmental and regulatory bodies
- For management and auditing of our business operations including accounting
- To monitor and to keep records of our communications with you and our staff

- Help to develop, review and improve our Services, information Systems, know-how and the way we communicate with you
- For market research and analysis and developing statistics
- For direct marketing communications and related profiling to help us to offer you relevant products and services, including deciding whether to offer you certain products and services. We'll send marketing to you by SMS, email, phone, post, social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match).
- To provide personalised content and services to you, such as tailoring our products and services, our digital customer experience and offerings, online chat, offers, latest news and deciding which offers or promotions to show you on our digital channels
- To measure the effectiveness of our marketing communications
- To comply with legal and regulatory obligations, requirements and guidance
- To share information, as needed, with business partners (for example health insurers, solicitors), account beneficiaries, service providers or as part of providing and administering our Services or operating our business
- To invite you to take part in customer surveys, questionnaires and other market research activities carried out by us or other organisations on our behalf (unless you tell us that you do not want us to contact you for market research purposes)
- To facilitate the sale or transfer of one or more parts of our businesses

5. What are the legal grounds for our processing of your personal information (including when we share it with others)?

We rely on the following legal bases to use your personal data:

5.1. Where it is needed to provide you with our products or services, such as:

a) Assessing a request for our Services, including to consider whether to offer you our Services, the price, the payment methods available and the conditions to attach.

b) Managing our Services to you, or a request for our Services. Specifically in marketing your player profile and other data to colleges, universities and other institutions in North America.

c) Updating your records, to contact you about your account

d) All stages and activities relevant to managing our Services including enquiry, application, administration and management of accounts.

e) For some of our profiling and other decision making to decide whether to offer you our Services, particular payment method and the price or terms of this.

5.2. Where it is in our legitimate interests to do so, such as:

- a) Managing our Services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for seeking payments (where appropriate)
- b) To perform and/or test the performance of our Services and internal processes
- c) To follow guidance and recommended best practice of government and regulatory bodies
- d) For management and audit of our business operations including accounting
- e) To carry out monitoring and to keep records of our communications with you and our staff (see below)
- f) To administer our good governance requirements, such as internal reporting and compliance obligations or administration required for auditing purposes
- g) For market research and analysis and developing statistics
- h) For direct marketing communications and related profiling to help us to offer you relevant Services, including deciding whether to offer you certain Services. We will send marketing to you by SMS, email, phone, post and social media and digital channels (for example, using Facebook Custom Audiences and Google Custom Match)
- i) Subject to the appropriate controls, to provide insight and analysis of our customers to business partners either as part of providing products or Services, helping us improve products or Services, or to assess or to improve the operating of our businesses
- j) For some of our profiling and other decision making
- k) Where we need to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations

5.3. To comply with our legal obligations

5.4. With your consent or explicit consent:

- a) For some direct marketing communications
- b) For some of our profiling and other decision making
- c) For some of our processing of special categories of personal data, such as about your health, or of a family member or beneficiary if relevant to adjusting the manner in which we provide our Services.

6. When do we share your personal information with other organisations?

We may share information with the following third parties for the purposes listed above:

- Business partners (for example, health insurers, financial services institutions), account beneficiaries, or others who are a part of providing our Services or operating our business
- Other organisations and businesses who provide services to us such as solicitors, back up and server hosting providers, IT software and maintenance providers (including for our website), document/data storage providers, payment processing and suppliers of other back office functions
- If we sell or transfer (or enter into negotiations to sell or transfer) any part of our businesses or any of our rights or obligations under any agreement we may have with you and to any successors in title to our business.
- Consumer rights organisations
- Marketing companies, market research organisations and insight companies who help us to develop and improve our communications and Services

7. Your rights?

You have the right to:

1. Ask us to cease marketing communications to you (opt out)
2. Ask us not to process your personal information for marketing purposes at any time
3. Have any inaccuracies in your personal information held about you corrected
4. Ask us to delete your account permanently
5. Access a copy of the information we hold about you

We will make reasonable efforts to comply with your requests except where we are permitted or required to do so under applicable law. Requests are free of charge.

8. Is your personal information transferred outside the UK or the European Economic Area?

We are based in the UK and your personal information will be stored and processed in the United Kingdom, however, it may also be processed by companies operating outside of the EEA. Specifically, in the process of us providing our services to you, we will provide access to your personal information to Colleges, Universities, Trade Organisations and other related organisations in North America. We will put in place appropriate protection to make sure your personal data remains adequately protected.

9. External service providers

We may engage third party companies and individuals to facilitate our Services to you such as payment, data storage or website related services. These third parties may have access to your personal information only to perform these tasks on our behalf and they are obliged through contract not to use your personal information for any other purpose or to disclose your personal information to any third party without our express consent.

10. What should you do if your personal information changes?

We want to make sure that the personal data we hold about you is accurate and up to date and so if any of the details are incorrect you should tell us so that we can update our records.

11. Do you have to provide your personal information to us?

We're unable to provide you with our Services if you do not provide certain information to us. In cases where providing some personal information is optional, we'll make this clear.

12. Do we do any monitoring involving processing of your personal information?

In this section monitoring means any: listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages, in person (face-to-face) meetings and other communications.

We may monitor where permitted by law and we'll do this where the law requires it, or to comply with regulatory rules, in the interests of protecting

the security of our communications systems and procedures and for quality control and staff training purposes. This information may be shared for the purposes described above.

13. For how long is your personal information retained by us?

Unless we explain otherwise to you, we'll hold your personal information based on the following criteria:

- For as long as we have reasonable business needs, such as managing our relationship with you and managing our operations
- For as long as we provide products and/or Services to you and then for as long as someone could bring a claim against us; and/or
- Retention periods only for as long as necessary and in line with legal, accounting and regulatory requirements or guidance.

Your consent to the use of your personal information for such purposes remains valid after the termination of our relationship with you to the extent permitted by applicable law so long as you do not request otherwise, where permitted.

We may anonymise your personal data (in order that you can no longer be identified) for research or statistical purposes and under these circumstances we may retain this information indefinitely.

14. What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not. The right of data portability is only relevant from 25th May 2018.

- The right **to be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right **to object** to processing of your personal information
- The right **to restrict processing** of your personal information
- The right **to have your personal information erased** (the "right to be forgotten")

- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** (“data portability”)
- Rights in relation to **decision making which has a legal effect or otherwise significantly affects you.**

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>. You can contact us using the details below.

15. Your right to object

You have the right to object to certain purposes for processing, to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests although we will be required to continue to process certain personal information in order to provide our Services to you and for legal reasons.

16. What are your marketing preferences and what do they mean?

We may use your sporting category, home addresses, phone numbers, email addresses and social media or digital channels (for example, Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. You can stop our marketing at any time by contacting us.

17. Changes to this privacy policy

We may change this privacy policy together with our terms and conditions from time to time by updating this policy. We encourage you to check this policy for changes whenever you visit our website.

Contact Us

If you have any questions about this policy, or if you wish to exercise your rights, you can contact us by going to the Contact Us section of our website <http://www.futureprousa.com> or by writing to the below address.

FutureProUSA Ltd, Oakfields, Town End Lane, Swinscoe, Ashbourne, DE6 2HS marking it for the attention of the DPO.