

PRIVACY POLICY

1. INTRODUCTION

The SFA Sporting Services Private Limited ("**Company**"/ "**SFA**"/ "**we**"/ "**us**"/ "**our**") is a company incorporated and validly subsisting under the applicable laws of India, having its registered address at, 17A, Raviraj House, 6th Floor, Saraswati Road, Off Linking Road, Santacruz (West), Mumbai – 400054, and is the owner of this Website and all its variants ("**Website**") The Company through this Website aims to promote its business of organizing, operating and managing a multi-sport Olympic-style championship across 27 disciplines of sport ("**Championship**") and other similar sporting events to be hereinafter collectively referred to as ("**SFA Events**"), which aims to provide grassroots development of young athletes, by providing them with a platform to showcase their talents and have an opportunity to train with the best coaches in top training facilities of the country. This privacy policy ("**Privacy Policy**") contains how we collect, use, store and process any personal data, information, content or communication of the user of this Website, competitors, athletes, parents, guardians, sports organizations, schools, federations, corporations, institutions in such context and right as may be applicable to them ("**you**", "**your**", "**yourself**") submitted or collected on this Website with your due consent. By browsing, accessing, signing up, registering and/or by accepting any information or waiver on this Website, it is assumed that you have expressly consented to the collection, use, sharing, transfer, storage, disclosure and other uses of your information (including but not limited to personal and non-personally identifiable information) in accordance with this Privacy Policy.

By browsing, accessing, signing up, registering and/or by accepting any information or waiver on this Website, it is assumed that you have read this Privacy Policy and are submitting any personal data or information with due consent. By accessing and using this Website and/or various features available and present herein, you accept and confirm your acceptance to the practices and standard operating procedure as described in this Privacy Policy. Through your use of this Website it is assumed that you have read and understood this Privacy Policy along with the terms and conditions of use thereof ("**Terms of Use**").

Commented [AH1]: Hyperlink to the Terms and Conditions of Use to be inserted.

SFA recognizes that privacy is important and that individuals have a right to control their personal information. The following Privacy Policy governs how SFA handles your personal information. Please keep in observance that this Website may contain links to other websites and/or third-party portals, gateways, persons or websites not owned or controlled by us and we would in no case be responsible for the privacy practices of the linked third-party persons or websites. We encourage you to be aware when you leave our Website and to read the privacy policies of other websites that may collect your personal information.

Our principles for collecting, storing, using and processing personal data or information through this Website are based on:

- a) **Fairness and Lawfulness:** When we process personal data or information, the individual rights of the users are protected. All personal data and information so collected and processed through this Website shall always be in a manner, which is legal and fair.

- b) **Restricted to a specific purpose:** The personal data of the user of this Website is processed only for specific purposes including but not limited to, associating with SFA, registration for participation in any SFA Events etc. and in relation to improving other services and products offered on this Website.
- c) **Transparency:** We intend to be transparent about our use, processing and collecting of any personal data and information, and inform the user of how their personal data is being collected, processed and used.

Further, this Privacy Policy should be read in conjunction and together with the Terms of Use applicable to the service (Website or other SFA services) you are using. This Privacy Policy shall come into effect from the date of launching of this Website for use by the users and shall be in force for a period until this Website is active, available and/ or accessible by users on any such browser, server, marketplace, software or otherwise.

2. COLLECTION OF PERSONAL INFORMATION:

Personal information or personally identifiable information ("**PII**") is information that identifies (whether directly or indirectly) a particular individual or natural person, such as the individual's name, postal address, email address, and mobile number indicating to that particular person or is identifiable. When anonymous information is directly or indirectly associated with personal information, the resulting information can also be treated as personal information. SFA does not collect personal information unless the information is necessary for one or more of its services, functions or activities. SFA will also only collect personal information by lawful and fair means and not in an unreasonably intrusive way.

SFA shall require certain PII, when you wish to engage, participate or associate with SFA, or at other times through various enrolment forms, physical and online forms, waivers or through any other forms that may be required. You acknowledge that, providing SFA with information about yourself, is voluntary and is necessary for any engagement with SFA or participation in any SFA Events, and such persons may choose not to provide certain information, but then such persons may not be able to take advantage of or participate in any of SFA's Services.

The kinds of PII, SFA may collect from you, generally comprises of name, address, age group, gender, photographs, school details, contact details (including phone, fax and email), general preferences, medical / fitness related details and information, collected primarily for the purpose engaging with SFA or participation in any SFA Events, in the course of SFA's business.

We also collect information from and about the computers, phones, and/or other devices that you may use our Website from, and such information shall include, information that you may allow us to receive through device settings that you turn on, such as access to your GPS location, camera, photos ISP, language, time zone, mobile phone number, IP address and we shall only use such information to enhance the features and user experience on our Website.

3. COOKIES

We may use "cookies", "web beacons" and other similar tracking technologies to collect non-PII automatically as you visit and use this Website. Cookies are pieces of information that a website either transfers to your computer's hard drive or stores temporarily in your computer's memory for record-keeping purposes. We may use cookies for a number of purposes. For example, we may use cookies to track usage or behavioural patterns on this Website or to analyse web activity in accordance with the applicable laws and this Privacy Policy, however, we do not save any PII in cookies. This is done in order to personalize and enhance your experience with us, and services offered by us. Cookies help us provide, protect and improve this Website and our services there under, such as by personalizing content, tailoring and measuring advertisements, and providing you a safer and seamless experience on this Website.

Cookies in this Website are used for the following purposes:

- a) **Authentication:** We use cookies to verify your account and determine when you have logged in so we can make it easier for you to access the services in this Website and help you use the appropriate experience and features on this Website.
- b) **Website Security and Integrity:** We use cookies to help us keep your profile, account, data and this Website safe and secure. We also use cookies to combat activity that violates this Privacy Policy and/or Terms of Use of the Website.
- c) **Advertising, recommendations, insights and measurement:** We use cookies to help us show advertisements and make recommendations for businesses and other organisations in relation to the products, services you may be interested in. We also use cookies to help provide you with content relevant to your locale, preferences and taste.

Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you decline to accept cookies, it may hinder your use of certain functions of this Website. SFA uses cookies for tracking the statistics of their website. This allows SFA to better understand the users and improve the functionality of the Website. This tracking is conducted in such a way to ensure the anonymity of visitors to mean that the cookies may identify the user's IP address or browser, but it shall not identify the user.

4. USE OF PERSONAL INFORMATION

The PII collected from you by SFA is used to, provide you with SFA services including but not limited to, access to the Website, engagement with SFA, participation in SFA Events etc. This will include use of personal information for establishing and maintaining your membership record (if relevant), or to enrol you in SFA Events, courses, or competitions; and/or notify you about the services and promotions offered by SFA and its sponsors.

Information provided will be used in various methods of communication apart from participation in SFA Events, including but not limited to direct mail, advertising, email, SMS, phone contact. SFA may use the personal information they collect and store for the purposes as mentioned herein after obtaining due consent. SFA also carry out research using personal information from time to time, in order to improve the quality of SFA

Events. The analysis is carried out using aggregated information, not information relating to specific individuals.

As a sporting event organiser, SFA enters into sponsorship arrangements with third parties from time to time. This will mean that SFA uses personal information about you to provide any partners, sponsors, affiliates or other parties associated with SFA, the information about SFA Events offered by SFA. If at any time you do not wish to be notified about the products, services or promotions offered by SFA's sponsors, you can choose to opt out of such services. It is hereby acknowledged by SFA, that it does not provide, sell, rent or trade any personal information collected by you, directly to its sponsors or commercial partners.

The information collected by SFA is used to fulfil your requests, to develop, protect, maintain, notify you of, and improve, SFA programs, services, including but not limited to this Website, organising SFA Events, developing young talent, promoting various sports, and advertising other SFA services. SFA may use the collected information to provide efficient customer support, conduct analysis and to prevent you from facing any technical issues in relation to the services offered by SFA.

- a) User Related Information: SFA uses the information that they may collect to verify you and your activities in relation to SFA Events, maintain the integrity of the services offered by SFA, promote your safety and security by investigating any suspicious activity or breaches of this Privacy Policy.
- b) Location Related Information: SFA may also use location related information only in a case where you have enabled access to information to communicate and improve the services SFA offers to you.
- c) Advertisements and other Sponsored Content: SFA may use the information it collects about and from you including information about your interests, actions and connections to select and personalize advertisements, promotional offers and other sponsored advertising that SFA may engage in.
- d) Product Research and Development: SFA uses the information collected to develop, test and improve their services, including but not limited by conducting surveys, research, testing, scouting and management of services.

5. SHARING OF PERSONAL INFORMATION

We may share the information we collect from you in accordance with this Privacy Policy and all applicable laws through:

- a) Sharing within this Website: We may share your information to enable you to use the functions, services, and content on this Website. The people, accounts and organisations that interest you and for you to connect and communicate with such people, accounts and organisations on this Website as per the audience, social group, and privacy preferences chosen by you.
- b) Public Information and Content that others share or re-share about you: People who can see your activity or any public information that is listed by due consent or

you may create, post or share on our Website can choose to share or create content relating to you and re-share it with others on and off our Website, including people, coaches, sponsors, partners, and businesses. If you wish to contain such sharing of public information, you may report the content or such activity and intimate SFA of the same.

- c) Third Party Websites, Websites and Integrations on this Website: When you choose to use third-party apps, websites or other services, that use, or are integrated with our Website including but not limited to advertisers, analytical partners, businesses or sponsored partners who offer goods and services to you on this Website, third-party payment and service vendors, researchers and law enforcement authorities, may receive information about what is listed about you, or posted or shared by you. Information collected by these third-party websites, and integration services is subject to their own terms and policies, and we are not liable for their use of the information subject to our security and data protection norms along with these Privacy Policy.
- d) New Owner: If the ownership or control of all or part of our Website or its assets change, we may transfer your information to the new owner only in accordance with this Privacy Policy that you have consented to.

When you disengage with SFA and withdraw consent of use of your personal information, we remove all data, information, images, videos and other content or that may be listed on this Website, or you may have posted, shared such as your images, audio-video updates and other content on this Website, and you won't be able to recover this information later. Information that others have shared about you is not a part of your account and won't be deleted but you can always choose to report such content.

Personal information may be disclosed outside by SFA to outsource content and services in a lawful manner and the Personal information collected by SFA may be disclosed to third parties to whom SFA contracts out specialised functions (including mailing houses, photographers, printing companies and event organisers). SFA does not sell, rent or trade personal information to or with third parties.

6. STORAGE OF PERSONAL INFORMATION

The security of your personal information is important to us. We strive to ensure the security of your information and to protect your personal information against unauthorized access or unauthorized alteration, disclosure or destruction. For this purpose, we adopt internal reviews of the data collection, storage, usage and collection and/or processing practices and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store your information.

SFA takes steps to ensure the security of personal information held by it from such risks as loss or unauthorised access, destruction, use, modification or disclosure. SFA only permits your details to be accessed by authorised personnel, and it is a condition of employment that SFA employees maintain the confidentiality of personal information.

Although we strive to protect your personal data, we cannot guarantee the security of your data while it is being transmitted to our Website; any transmission is at your own risk. Once we have received your information, we have commercially reasonable procedures and security features in place to reasonably endeavour to prevent unauthorized access.

7. SENSITIVE PERSONAL INFORMATION

We do not collect sensitive personal data. The definition of sensitive personal data varies from country to country. We consider sensitive personal data to be any information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership in addition to data concerning your health, genetic and biometric information and sex life or sexual orientation.

8. PRIVACY OF MINORS

This Website is not intentionally designed to collect, exploit and or directed at Minors except for providing such Minors with information and entertainment in relation to the services provided by SFA. We do not knowingly permit any person who is a Minor to use the services or to provide any other personal information. The User will be asked to confirm his/her age (i.e. to ensure that the user is above the age of 18 years) while registering themselves for accessing and using the Website.

If we become aware that any such personal information of persons less than 18 years of age has been collected on this Website without verified parental consent, then we will endeavour to take commercially reasonable steps to delete any such information and notify the parent.

SFA considers it the responsibility of parents or legal guardians to monitor their children's use of SFA's services including but not limited to the use of this Website and participation in any SFA Events. Nevertheless, it is SFA's internal policy to restrict collection and processing of any personal information of Minors, and SFA seeks to protect the PII of Minors in every capacity. SFA shall not be liable for any loss, damage or liabilities that may arise, due to unauthorised breach of security by any third-party.

However, we consider it the responsibility of parents or legal guardians to monitor their children's use of our services and participation in SFA Events. Nevertheless, it is our policy not to collect and process any personal information from children below 18 years of age without due consent from parents or legal guardians, or offer to send any promotional materials to persons in that category. Should a parent or guardian have reasons to believe that a minor has provided us with personal information without their prior consent, you can contact our customer support team to ensure that the personal information is removed from this Website immediately.

9. ONLINE PRIVACY ISSUES

SFA will apply these Terms to all personal information it handles, whether collected online or otherwise. To the extent that these Terms apply to online privacy issues, it is to be read as forming part of the terms of use for the Website. the Website also collects other information which may or may not be personal information. For each visitor to the

Website, our server automatically recognises and stores user data like domain name or Internet protocol address, the type of user's Internet browser, etc.

Websites linked to the Website are operated by third parties and are not controlled by or affiliated to or associated with SFA, unless expressly specified by SFA. SFA is not responsible for any form of transmission, whatsoever, received by the user from any linked website or third-party. Accordingly, SFA does not make any representations concerning the privacy practices or policies of such linked websites or terms of use of such websites, nor does SFA control or guarantee the accuracy, integrity or quality of the information, data, text, software, music, sound, photographs, graphics, videos, messages or other materials available on such linked website or any third-party.

10. LINKS TO THIRD PARTY WEBSITES

This Website may also provide third-party advertisements, services and links to other websites, persons, businesses, portals and/or applications ("**Linked Parties**"). However, we do not provide any PII to these Linked Parties.

Linked Parties including but not limited to the coaching services, training facilities, payment gateway, ticketing gateway, sale of merchandise are operated by third parties and are not controlled by or affiliated to or associated with this Website or us, unless expressly specified on this Website. We are not responsible for any form of transmission, whatsoever, received by you from any Linked Parties. Accordingly, We do not make any representations concerning the privacy practices or policies of such third parties or terms of use of such Linked Parties and their services or websites, nor do we control or guarantee the accuracy, integrity or quality of the information, data, text, software, music, sound, photographs, graphics, videos, messages or other materials available on such Linked Parties. The inclusion or exclusion does not imply any endorsement by us, of the Linked Parties, the Linked Party's provider or the information on the Linked Parties. The information provided by you to such Linked Parties and shall be governed in accordance with the privacy policies of such Linked Parties, and it is recommended that you review the privacy policy on any such Linked Parties websites prior to using such Linked Party services as we shall have no liability or responsibility towards such information given by you to these Linked Websites or the services so rendered to you.

11. FORCE MAJEURE EVENT

A force majeure event shall mean any event that is beyond the reasonable control of ours and shall include, without limitation, sabotage, fire, flood, explosion, acts of God, civil commotion, strikes or industrial action of any kind, riots, insurrection, war, acts of government, etc. ("**Force Majeure Event**"). Notwithstanding anything contained in this Privacy Policy or the Terms of Use, we shall not be held responsible for any loss, damage or misuse of your personal information, if such loss, damage or misuse is attributable to a Force Majeure Event.

12. GRIEVANCE REDRESSAL

In accordance with applicable laws and rules made thereunder, if you notice any discrepancies in the information provided or have any grievance against this

Website/Company, you may contact our Grievance Officer. The name and contact details of the Grievance Officer are:

Mr./Ms./Mrs. [*]

Company: [*]

Contact No: [*]

Email: [*]

Commented [AH2]: To be provided.

13. CHANGE IN PRIVACY POLICY

This Privacy Policy is subject to change from time to time. We reserve the right, at our sole discretion, to modify this Privacy Policy from time to time in order to ensure compliance with applicable laws ("**Updated Privacy Policy**"). The Updated Privacy Policy shall be effective immediately and shall supersede this Privacy Policy. We will notify you of any changes to this Privacy Policy if the changes made to this Privacy Policy significantly affect your rights or as may be required by law. You shall be solely responsible for reviewing the privacy notice from time to time for any modifications. By continuing to use this Website after the Updated Privacy Policy has been published, you affirm your agreement to the Updated Privacy Policy.

14. GOVERNING LAW AND DISPUTE RESOLUTION

This Website is governed by and operated in accordance with the laws of India. Any dispute, or cause of action in relation to this Privacy Policy shall be settled amicably and harmoniously between the parties to such dispute, and in the event such efforts of amicable settlement is futile, the parties may resort to litigation only in accordance with the Indian laws and the courts in Mumbai, India shall have competent and exclusive jurisdiction to try and settle any such dispute.

By using this Website, participating in any Website activities and/or providing us with your PII and any other information, you (a) provide us express consent to the collection and/or transfer and/or processing of any information to and in Mumbai, India, and (b) understand that we shall collect, transfer, store, process and/or deal with your information in accordance with this Privacy Policy and all applicable laws of India. Consequently, to the full extent permitted by law, you hereby waive any claims relating to the processing of your PII and any other information in accordance with this Privacy Policy that may arise under the laws and regulations that apply to you.