# Privacy Policy

The purpose of this Privacy Policy (hereinafter, the "Policy") is to regulate the processing of personal data conducted by LaLiga Group International, S.L. (hereinafter, "LALIGA") for the LALIGA Academy Camps Madrid programme website (hereinafter, the "Platform").

## Who is responsible for the processing of your personal data?

Your personal data will be processed by LALIGA with NIF: B-05421805 and address at Calle Torrelaguna 60, 28043, Madrid.

Contact with LaLiga's Data Protection Delegate: dpo@laliga.es

## Where do we obtain your personal data from?

LALIGA will process the following personal data that you have provided us:

- In the information and admission application form, the following will be requested: name, surname(s), contact email and the condition as player or legal guardian of the player.
- Regarding the admission application form, the following will be requested:
  - o From the player's legal guardian: name and surname, DNI or ID card, telephone number, email, country, address, postcode and province, and finally, proof of payment.
  - Regarding the player: name and surname, date of birth, gender, DNI or ID card and copy of it, country, address, postcode and province, playing position, size and copy of the health card of the registered player.
- In addition, one month before the camps start, a medical information request form will be sent to the contact's email address, requesting information on whether the player has any allergies or intolerances, information on any medication he/she may require and information on vaccinations.

#### For which purpose do we process your personal data?

LALIGA commits to treat your personal data in accordance with the provisions of the applicable regulations and, in particular, to treat confidentially the user's personal data to which it has access as a result of registration on the Platform. To this end, LALIGA has implemented appropriate technical and organisational measures to guarantee the security of your personal data and prevent its destruction, loss, illicit access, or illicit alteration. When determining these measures, criteria such as (i) the scope; (ii) the context and purposes of the processing; (iii) the state of the technique and (iv) the existing risks have been taken into consideration.

#### Main purposes:

/ Request of information relating to the Camps Madrid programme: By completing the information and admission request form, we inform you that we will process the data you provide us with (name, surname, contact email and condition whether as a player or legal guardian of the player, as compulsory data) in order to send you relevant information about the Camps Madrid programme.

Accordingly, in order to verify the validity of the email provided to LALIGA to request information about the programme, LALIGA uses the services of a third-party provider (RP Solutions, Inc.) which involves international transfer to the United States, a country that guarantees a level of protection equivalent to that of the European Union for personal data transferred from Europe to third party providers in the United States that are adhered to the Data Privacy Framework, among which is said provider.

The legal basis for the abovementioned purpose is the fact that the processing is necessary for the performance of pre-contractual measures requested by the data subject pursuant to Article 6.1 b) of the General Data Protection Regulation. The necessary and essential data will be name, surname(s), contact email and condition whether as player or legal guardian of the player. In case you do not provide these details, we will not be able to provide you with the requested information.

/ Application for admission to the Camps Madrid programme: In case that the player has been pre-selected to participate in the programme, we inform you that the data you provide through the complementary web application form will be processed by LALIGA for the purpose of managing and organising the programme offered. In particular, LALIGA will use the following personal data to accomplish this purpose:

- o Regarding to the participating male and female players:
  - Identification data: name and surname, identification document and copy of this and finally, copy of the health card (mandatory);
  - Contact details: address, postcode and country of residence (mandatory);
  - Data relating to personal characteristics: gender, date and place of birth and clothing size (mandatory);
  - Existence of any disability or behavioural disorder that may affect the player's experience in the programme.
- o Regarding the legal guardians of the players:
  - Identification data: name and surname(s) and identification document (mandatory);
  - Contact details: address, postcode, province, country, mobile phone number and e-mail address (mandatory);
  - Payment details: proof of payment (mandatory).

The legal basis for the abovementioned purposes is that the processing is necessary for the performance of a contract to which the data subject is a party pursuant to Article 6.1 b) of the General Data Protection Regulation. The

data mentioned above is necessary and essential. In case you do not provide such data, we will not be able to offer you the services provided for in the programme. In addition to the fact that the processing is necessary for the performance of the contract, with respect to personal data relating to the existence of a disability or behavioural disorder of the participant, the legal basis will be the consent given by the data subject (in this case, his/her legal guardian) pursuant to the provisions of 9.2 a) of the General Data Protection Regulation.

/ Attention to the medical needs of the player within the programme and supply of necessary medication: We inform you that the player's data provided one month prior to the execution of the Camps, related to the player's allergies and intolerances, his/her vaccinations (vaccinations administered, allergies, intolerances, possible reactions and how to proceed) and the necessary medication (name of the medication, dosage and way of administration) will be processed by the medical team to attend to the medical needs of the participant during the duration of the programme. In this case, the medical services will act as responsible for the treatment by virtue of the provisions of Law 41/2002, of November 14th, which regulates the autonomy of the patient and the rights and obligations regarding information and clinical documentation. LALIGA will act in this case as a mere facilitator of the information, having taken the necessary technical and organisational measures to guarantee the confidentiality of the information so that it is exclusively accessible to healthcare personnel.

The legal basis for the above-mentioned purposes is that the processing is necessary for the performance of a contract to which the data subject is a party and, on the other hand, that it is necessary for the purposes of medical diagnosis and the provision of health care or treatment under a contract with a health care professional. This is in accordance with art. 6.1 b) and 9.2 h) of the General Data Protection Regulation. The necessary and essential data are those mentioned above. In case you do not provide this information, we will not be able to offer you the services contemplated in the programme.

/ Care and attention to the participant's medical needs within the Camps Madrid programme and supply of medication by internal staff: We inform you that the player's data provided one month prior to the execution of the Camps, relating to the player's allergies and intolerances, his/her vaccinations (vaccinations administered, allergies, intolerances, possible reactions and how to proceed) and the necessary medication (name of the medication, dosage and way of administration) will be processed by LALIGA staff as strictly necessary, in order to organise and implement the activities with the players while maintaining the proper care and attention to the medical needs that the participant may have during the duration of the programme's activity.

The legal basis for the above-mentioned purposes is that the processing is necessary, for the performance of a contract to which the data subject is a party, and, on the other hand, that the data subject (in this case, his/her legal guardian) gave his/her explicit consent to the processing of this data. This is

in accordance with art. 6.1 b) and 9.2 a) of the General Data Protection Regulation. The necessary and essential data are those mentioned above. If you do not provide this information, we will not be able to offer you the services contemplated in the programme.

You have the right to revoke your consent at any time in accordance with the procedure described in the section "What are your rights when you provide us with your personal data", without this affecting the lawfulness of the processing based on consent prior to its withdrawal.

/ Cession of image rights in the framework of the Camps Madrid programme: by providing consent for the granting of image rights through the consent check included in the application form, and in accordance with the provisions of section 18 of the Terms and Conditions of the programme, LALIGA will process the minor's data relating to his/her image and voice for the capture, recording and publication of photographic and audiovisual material of the activities carried out in the framework of the programme for advertising purposes as detailed in the relevant section of the Terms and Conditions of the programme.

The legal basis for processing your data for the above-mentioned purpose is the consent you have given us to process your data for the specific purposes selected pursuant to art. 6.1 a) of the General Data Protection Regulation. Your personal data will be kept for this purpose until you withdraw your consent.

You have the right to revoke your consent at any time in accordance with the procedure described in the section "What are your rights when you provide us with your personal data", without affecting the lawfulness of the consent-based processing prior to your withdrawal of consent.

/ Child protection: LALIGA may process the personal data of players within the framework of the Child Protection System in the event of any type of event in which it is involved. This processing will be regulated in accordance with the following <a href="Privacy Policy">Privacy Policy</a>

/ Management of disciplinary proceedings: LALIGA may process the player's personal data (name and surname, infraction committed, and sanction applied) in order to ensure compliance with the codes of conduct applicable to the programme.

The legal basis for the above-mentioned purpose is that the processing is necessary for the execution of pre-contractual measures requested by the data subject by virtue of the provisions of art. 6.1 b) of the General Data Protection Regulation.

/ Internal reports: In addition, LALIGA will process, in aggregate form, the personal data that you have provided about the player through the application form (in this case, country of residence and date of birth of the minor) for the development of relevant metrics and statistics that allow LALIGA to analyse the number of applications and/or registrations in the activities offered, through different user segments that are generated based

on the data analysed to assess the interest of the activities by region, country and age range. In particular, LALIGA will apply aggregate segmentations based on the above-mentioned data, among which are:

o Segmentations based on country of residence or age ranges (e.g. 20 registrants reside in Spain and are between 10 and 15 years old).

The legal basis for the aforementioned purposes is that the processing is necessary to achieve the legitimate interest of LALIGA by virtue of the provisions of art. 6.1 f) of the General Data Protection Regulation, consisting of extracting lessons learned from the information provided and obtained from users to enable it to improve the programme and optimise the communication campaigns it undertakes based on the interest that these generate among the different groups of users. Prior to this, we inform you that LALIGA has performed an analysis of the proportionality between its legitimate interest and the rights and freedoms of its users. You can request the conclusions of this analysis through dpo@laliga.es.

You have the right to object to the above-mentioned purpose at any time in accordance with the procedure described in the section "What are your rights when you provide us with your personal data".

Additional purposes

Below are the additional reasons for which LALIGA will process your personal data:

/ LALIGA commercial communications: In order to LALIGA to send you commercial communications via email about other services offered within the framework of LALIGA Academy, LALIGA will only process your email address.

Furthermore, we inform you that, in order to send you commercial communications via email, LALIGA uses a service provided by a third party provider (salesforce.com EMEA Limited) which involves the international transfer of the email address you have provided to the United States, a country that guarantees a level of protection equivalent to that of the European Union for personal data transferred from Europe to third party providers in the United States that are adhered to the Data Privacy Framework, among which is this provider.

The legal basis for the processing of your data for the above-mentioned purpose is the consent you have given us to process your data for the specific purposes selected pursuant to art. 6.1 a) of the General Data Protection Regulation. Your personal data will be kept for this purpose until you withdraw your consent.

You have the right to revoke your consent at any time in accordance with the procedure described in the section "What are your rights when you provide us with your personal data", without affecting the lawfulness of the consent-based processing prior to your withdrawal of consent.

## How long will we keep your personal data?

The personal data we process will be kept for as long as the purposes for which they were collected persist and/or you do not revoke any consent you may have given, or exercise your rights of deletion, objection, or limitation of processing.

In this regard, once the aforementioned period has expired, LALIGA will keep your personal data duly blocked for the sole purpose of meeting any liabilities of any kind that may arise.

/ Application for information regarding the Camps Madrid programme: the data provided for the application for information regarding the Camps Madrid programme will be kept as long as you do not request the deletion of your data, this purpose persists and, once this purpose has been completed, during the period of limitation of the legal actions that may arise from it.

/ Application for admission to the Camps Madrid programme: the data provided in the admission application form will be kept as long as you do not request the deletion of your data, this purpose persists and, once this purpose has been completed, during the period of limitation of any legal actions that may arise from it.

/ Attention to the medical needs of the player within the programme and supply of necessary medication: the data provided to meet the medical needs of the participant and the supply of medication during the course of the programme will be kept by the medical staff responsible for the treatment during the time necessary to provide the necessary assistance to the patient and for at least five years from the date of discharge from each assistance process. Once this purpose has been fulfilled, during the period of prescription of the legal actions that may be derived from the same.

/ Care and attention to the participant's medical needs within the Camps Madrid programme and supply of medicines by internal staff: the data provided to attend to the participant's medical needs and supply the necessary medicines during the course of the programme will be kept as long as you do not request the deletion of your data, this purpose persists, or you revoke the consent granted or limit the processing and, once this purpose has been fulfilled, for the period of limitation of any legal actions that may derive from the same.

/ Cession of image rights within the framework of the Camps Madrid programme: the data provided for the cession of image rights in the programme will be kept for a period of 10 years, as long as you do not request the deletion of your data. Once this purpose has been fulfilled, during the period of limitation of the legal actions that may arise from it.

/ Internal reports: the data provided for internal reports will be kept as long as you do not request the deletion of your data, this purpose persists, you do not object to the processing and, once this purpose has been fulfilled, during the period of limitation of the legal actions that may derive from it.

/ Management of disciplinary proceedings: the data provided for the management of disciplinary proceedings will be kept as long as you do not request the deletion of your data, this purpose persists, you do not object to the processing and, once this purpose has been fulfilled, during the period of limitation of the legal actions that may derive from it.

/ Commercial communications from LALIGA: the data provided for commercial communications about other activities organised by LALIGA within the framework of LALIGA Academy will be kept as long as you do not request the deletion of your data, this purpose persists, you do not revoke the consent granted or limit the processing and, once this purpose has been fulfilled, during the period of limitation of the legal actions that may derive from it.

This personal data will be deleted when the stated time limits expire.

## To which recipients will your personal data be communicated?

Your personal data will not be communicated to third parties. However, LALIGA may disclose personal data and any other user information when required to do so by public authorities in the exercise of their legitimate functions and in accordance with the applicable provisions.

In addition, some entities subcontracted by LALIGA may have access to personal data and information as processors or sub-processors in order to provide LALIGA with a necessary service, as indicated in each of the purposes in the section **"For which purpose do we process your personal data?"** These service providers sign a contract that obliges them to use your personal information only for the provision of the services described in this policy.

#### What are your rights when you provide us with your personal data?

We inform you that, at any time, you can exercise your rights of access, rectification, opposition, deletion, not being subject to automated decisions, portability and limitation of processing, as well as revoke your consent at any time before LALIGA:

#### What are your rights as a user?

- Right of access: you have the right to obtain confirmation as to whether LALIGA processes your personal data, as well as to access them.
- Right of rectification: you may request the modification or rectification of inaccurate personal data.
- Right of erasure: you may request the deletion of your personal data.

- Right to limitation of processing: In certain circumstances, you may request the limitation of the processing of your data, in which case they will only be kept for the exercise or the defense of claims.
- Right of opposition: you may oppose the processing of your data for the purpose you specify. LALIGA will cease processing the data, except for compelling legitimate reasons, or the exercise or the defense of possible claims.
- Right not to be subject to automated individual decisions: you have the right not to be subject to a decision based only on automated processing, including the creation of profiles, which may produce legal effects on you or significantly affect you in a similar manner.
- Right to portability: if the Platform allows it, you may exercise the right to the portability of your data, in a structured, commonly used and machine-readable format, and to transmit it to another data controller.

## How do I exercise my rights?

By sending an email to <u>dpo@laliga.es</u>. Exercising your rights is completely free of charge.

If you have given your consent for the purposes for which you have been requested, you may revoke it at any time, and you may object to the processing of data based on the legitimate interest of LALIGA, either by following the procedure established in each of the communications you receive, or by sending an e-mail to the following address: <a href="mailto:dpo@laliga.es">dpo@laliga.es</a>.

Opposition to a specific purpose or revocation of the consent granted will not affect the lawfulness of the processing prior to the opposition or revocation of consent.

Finally, if you consider that you have not obtained satisfaction in the exercise of your rights or that the processing of your personal data by LALIGA has not been in accordance with data protection regulations, you may contact or file a complaint with the Data Protection Officer of LALIGA at the e-mail address <a href="mailto:dpo@laliga.es">dpo@laliga.es</a> or file a complaint with the Spanish Data Protection Agency through its website <a href="mailto:www.aepd.es">www.aepd.es</a>.