

Grasshopper Fussball AG – Privacy Notice

1. IMPORTANT INFORMATION

Grasshopper Fussball AG ("**GFAG**" or "**we**") respects your privacy and is committed to protecting your Personal Data. This Privacy Notice ("**Notice**") will inform you as to how we look after your personal data, e.g. when you visit our website (regardless of where you visit it from) and tell you about your data privacy rights and how the data protection law protects you.

It is important that you read this Notice together with any other privacy policy or notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This Notice supplements other notices and privacy policies and is not intended to override them.

We have appointed a data protection advisor ("DPA") who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this Notice or our privacy practices, including any requests to exercise your rights, please contact the DPA using the following contact details:

Grasshopper Fussball AG, Dielsdorferstrasse 165, 8155 Niederhasli, Switzerland, datenschutz@gcz.ch

We keep our privacy policy under regular review. This version was last updated on 1 September 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** may include first name, last name, title, date of birth, gender.
- **Contact Data** may include physical address, email address and telephone numbers.
- **Financial Data** may include bank account details.

- **Performance Data** may include data about your sporting performance and data regarding your formation, education and career as a football player or coach or any other official or manager in the football and/or business sector.
- **Transaction Data** may include details about payments to and from you and other details of transactions or interactions with us.
- **Technical Data** may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** may include your username and password, your interests, preferences and feedback.
- **Usage Data** may include information about how you use our website.
- **Marketing and Communications Data** may include your preferences in receiving marketing from us and your communication preferences.

Subject to our other data privacy policies and notices, we do not collect any Particularly Sensitive Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data, information about criminal convictions and offences).

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - subscribe to our service or publications;
 - apply for a job with us;
 - give us feedback or contact us in any other way or for any other purpose.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, such as agents and intermediaries, clubs, national and international federations, analytics providers, sports/statistic data providers, media, TV stations and other information providers.
- Contact, financial and transaction data from providers of technical, payment and delivery services.
- Identity and contact data from data brokers and publicly available sources.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when we have a proper (business) reason to do so. Most commonly, we will use your personal data in the following circumstances:

- Where you have contacted us in relation to our club, teams, players, games, products, services and any other aspects of our operations.
- Where you have submitted a job application to us.
- Where you have submitted an offer to us or where we have submitted a request for an offer or a request for a product or service to you.
- Where we need to perform a contract we are about to enter into or have entered into with you.
- Where we need to evaluate your performance and physical data as a football player in the context of a contract we are about to enter into or have entered into with you.
- Where it is necessary for our other legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation or an obligation towards a national or international sport governing body such as the SFL, the SFV, UEFAS, FIFA, WADA.
- Where you have given your consent for the processing of your personal data you have the right to withdraw consent by contacting us.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data. Please contact us if you need details about the specific business reasons we are relying on to process your personal data.

Purpose/Activity	Type of data
To register you as a new employee or customer or business partner or prospect	- Identity - Contact - Performance
To process your inquiry, offer, order or contract including: - Manage and update your personal data - Manage payments and charges - Collect and recover money	- Identity - Contact - Financial - Performance - Transaction - Marketing and Communications
To manage our relationship with you and third parties in your interest, which may include: - Manage and update our relationship data	- Identity - Contact - Performance

<ul style="list-style-type: none"> - Manage and update relationship data with relevant third parties such as accommodation or equipment providers - Notify you about changes to our terms or privacy policy - Ask you to leave a review or take a survey 	<ul style="list-style-type: none"> - Profile - Usage - Marketing and Communications
<p>To manage our relationship with the public-media and press, which may include</p> <ul style="list-style-type: none"> - Promote our and your reputation and performance - Manage relationship with the public and the media 	<ul style="list-style-type: none"> - Identity - Contact - Performance
<p>To manage our relationship with national and international sports governing bodies which will include:</p> <ul style="list-style-type: none"> - Manage and provide data about your sports career and transfers - Manage compliance with pertaining rules and regulations of national and international sports governing bodies 	<ul style="list-style-type: none"> - Identity - Contact - Performance
<p>To manage and monitor your physical and sporting performance</p>	<ul style="list-style-type: none"> - Identity - Contact - Performance
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> - Identity - Contact - Technical
<p>To deliver relevant website and other electronic media content and measure or understand the effectiveness of the content we provide</p>	<ul style="list-style-type: none"> - Identity - Contact - Profile - Usage - Marketing and Communications - Technical
<p>To use data analytics to improve our website, electronic content, products/services, marketing, relationships and experiences</p>	<ul style="list-style-type: none"> - Technical - Usage

Marketing and promotional offers from us

We strive to provide you with choices regarding certain personal data uses, particularly around marketing, advertising and merchandising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain why we intend to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table [*Purposes for which we will use your personal data*] above.

Internal Third Parties

Wolverhampton Wanderers Football Club Limited and Fosun Sports Group Europe acting as processors and who are based in the UK and Belgium provide support as well as administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities as well as national and international sports governing bodies acting as processors or controllers based who require reporting of processing activities and sports-related activities and transactions.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. INTERNATIONAL TRANSFERS

We may share certain personal data with Wolverhampton Wanderers Football Club Limited and Fosun Sports Group Europe. In addition, there may be occasions when a third party that we share your data with is situated outside Switzerland, the UK or Belgium (which may be the case in the context of sharing personal data in the context of an international transfer or the evaluation of a data subject's performance) or they use servers or other cloud services based outside these jurisdictions.

Whenever we transfer personal data out of Switzerland, we undertake to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or
- We use specific contracts approved for use in Switzerland which give personal data the same protection it has in Switzerland.

8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a

complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see 'Your legal rights' below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, under data protection laws in relation to your personal data you have the rights to:

Request access to your personal data. This enables you to receive a copy of the personal data we hold about you.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.

- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. EFFECTIVE DATE

1 September 2023

12. LAST MODIFIED AND MODIFICATIONS

1 September 2023. We reserve the right to modify this Notice at our discretion.