

PRIVACY NOTICE

PlayerData Limited and PlayerData Inc.

1. Introduction

PlayerData Limited (registered in Scotland, SC571960) and PlayerData Inc. (a Delaware corporation)(together "**PlayerData**", "**we**", "**us**", "**our**") are committed to protecting personal data. This Notice explains how we collect and use personal data through our website (www.playerdata.com), the PlayerData App, and EDGE devices and other PlayerData equipment ("**Equipment**") (together, the "**Services**").

2. Our Role: Controller or Processor

How we handle your personal data depends on how you interact with us. This is important – it affects who you should contact if you have questions about your data.

When we act as a data processor

In most cases, PlayerData provides its Services to sports clubs and entities, teams, educational institutions and other similar organisations ("**Customers**"). Where a Customer uses our Services to collect performance data about athletes and other users ("**Authorised Users**"), the Customer is the data controller of that performance data. PlayerData processes it only on the Customer's documented instructions, under the data processing terms attached to or included within our Terms of Service ("**DPA**").

If you are an Authorised User of a Customer's account – typically an athlete, coach or team member – your primary contact for questions about your personal data is the organisation that is our Customer (usually your club, team or organisation that you are affiliated to). We are not responsible for the Customer's own privacy practices.

When we act as a data controller

We are the data controller when we collect and use personal data for our own purposes, including:

- operating and improving our website and Services;
- processing orders placed directly with us by individuals for personal use of the Services;
- managing our relationships with Customer contacts (e.g. team managers and administrators);
- direct marketing (where consented or otherwise permitted); and
- creating anonymised, aggregated data for product development and analytics.

The Services may include features that PlayerData operates as data controller, including a "**Leaderboard**" (which displays selected performance data of Authorised Users) and the "**Recruitment Platform**" (which makes Authorised User's profiles visible to registered scouts) (together, "**Data Sharing Features**"). Where an Authorised User is enrolled in a Data Sharing Feature – whether by submitting a request through the Software, or by the Customer enrolling that Authorised User on the basis that the Customer has the necessary consent or other lawful basis – PlayerData processes the relevant Personal Data as controller for the purpose of operating that feature. The Customer may at any time disable any or all Data Sharing Features for its Authorised Users.

3. What We Collect

From Customers and their contacts (where we are controller)

- Name, job title, email address, phone number, organisation details
- Billing and payment information
- Communications with us

From Authorised Users and the Customer via the App and Equipment (where we are processor on behalf of Customer)

- Identification data: first name, last name, date of birth, photo (optional), gender (optional), role (athlete/staff).
- Contact details: email address and phone number
- Technical and device data: IP address, device identifiers, app usage log
- Performance and activity data: distance covered, speed and top speed, sprints, accelerations, decelerations, workload metrics, training load and session intensity, progression and performance history
- Location data: Real time and historical GPS or LPS location during training/matches, movement patterns and positional data
- Video content: where a Customer uses PlayerData video camera equipment, video footage recorded during training sessions or matches, together with any associated GPS performance overlays
- Where provided by the Customer: height and weight, and heart rate data (see Section 4 below in respect of heart rate data)

From website visitors

- Technical data: IP address, browser type, cookie identifiers (see Section 10)

4. Heart Rate and Special Category Data

Heart rate data is health data and is subject to additional protections under applicable data protection laws. PlayerData only processes heart rate data as a processor acting on Customer instructions. Customer must confirm that it holds a valid basis under applicable law to instruct such processing. PlayerData does not collect or use heart rate data for its own purposes.

Where a Customer and its Authorised Users use third-party heart rate monitoring equipment, PlayerData accepts no liability for the accuracy or security of data generated by equipment it did not supply.

Where we act as processor, we process personal data on the Customer's instructions under our DPA.

5. Legal Basis for Processing (UK and European Users)

Where we act as controller and you are located in the UK, European Economic Area or Switzerland, our legal bases for processing are:

- Contract: to process orders, deliver Services, and manage Customer relationships.
- Legitimate interests: to maintain business records, respond to enquiries, and protect our legal rights, where our interests are not overridden by your rights.

- Legal obligation: to comply with applicable law (e.g. tax, accounting, regulatory requirements).
- Consent: for direct marketing and certain cookies. You may withdraw consent at any time by contacting us.
- Consent: For Data Sharing Features, our lawful basis is the consent of the Authorised User, given by submitting an in-app request to be enrolled. Where the Customer has enrolled an Authorised User, we rely on the consent or other lawful basis the Customer has confirmed it holds in respect of that Authorised User. You can withdraw your consent at any time by contacting PlayerData support or using an in-app removal option (where available).

Where we act as processor, we process personal data on the Customer's instructions under our DPA.

6. How We Use Personal Data

As controller

- Fulfilling orders and delivering the Services
- Managing Customer accounts and providing administrative support
- Billing and invoicing
- Communicating with Customers and responding to enquiries
- Direct marketing to Customers and prospects (where consented or permitted under legitimate interests). You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt out of receiving promotional email messages from us, you will continue to receive administrative messages from us.
- Anonymising and aggregating performance data to create derived datasets for product development, benchmarking and research. Once data is irreversibly anonymised it is no longer personal data.
- Developing and improving our products, features, and AI systems using video content collected through our camera equipment, where a Customer has agreed to this use under their agreement with us. In this context PlayerData acts as an independent data controller. This processing is carried out in accordance with applicable law.
- Complying with legal obligations and enforcing our agreements

As processor (on Customer instructions only)

- Providing the Services, including generating and displaying performance metrics
- Storing and making performance data available to the Customer and its Authorised Users
- Providing technical support relating to the Services (including support Authorised Users with analytics and understanding the Services data)

Data Sharing Features

The Data Sharing Features (**see When we act as a data controller** in section 2 above) are features that PlayerData operates as data controller. Authorised Users may be enrolled either by submitting an in-app request, or by the Customer enrolling them with the necessary consent or other lawful basis. Where you are enrolled:

- We process identification data (name, club, role) and performance and activity data (such as GPS-derived performance metrics). Heart rate data is not used in Data Sharing Features.
- Leaderboard entries are publicly visible.
- Recruitment Platform profiles are visible to scouts approved by PlayerData. Scouts may export profile data from the Recruitment Platform and share it with colleges, professional teams or other recruiting organisations. PlayerData does not control what scouts do with profile data after export.
- Entries are retained while you remain enrolled and are removed when you withdraw, when your Customer instructs PlayerData to remove you, or when your account becomes inactive.
- You may withdraw your consent at any time using the in-app removal option. Your Customer may also disable these features for you.
- Where you are under 18, enrolment on the Recruitment Platform requires verifiable parental consent (see Section 13).

7. Sharing Your Information

We share personal data only in the following circumstances:

- Service providers: third parties who help us operate our Services, acting as our processors and bound by appropriate data processing terms. These include cloud hosting providers, CRM, billing, product analytics, communications and monitoring. A current list of sub-processors is available on our trust centre at <https://trust.playerdata.com/>.
- Analytics Partners: We use analytics services such as Google Analytics, Firebase Analytics and Grafana Labs, to collect and process certain analytics data. You can learn more about Google's practices by visiting [Privacy Policy – Privacy & Terms – Google](#), and opt out of them by downloading the Google Analytics opt-out browser add-on, available at [Google Analytics Opt-out Browser Add-on Download Page](#). Grafana Privacy Policy is found at: [Grafana Labs Privacy Policy | Grafana Labs](#)
- Advertising Partners. We work with third-party advertising partners to collect and process your information in order to show you ads that we think may interest you. Some of our advertising partners are members of the Network Advertising Initiative (<https://thenai.org/how-to-opt-out/>) or the Digital Advertising Alliance (<https://optout.aboutads.info>) and serve ads through cookie-based technologies. Please visit their opt-out pages to learn about how you may opt out of receiving certain web-based personalized ads from member companies. These opt-outs will apply only to our third-party advertising partners that are members of these organizations. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt out of personalized ads in mobile apps.
- Customers: where we act as processor, we make data available to the relevant Customer as controller.
- Legal requirements: where required by law, court order, or regulatory authority.
- Business transfers: in connection with a merger, acquisition, or sale of assets, subject to appropriate confidentiality and data protection obligations.
- With your consent: where you have specifically agreed to a disclosure.
- Group companies: PlayerData Limited and PlayerData Inc. share personal data within the PlayerData group for operational purposes, including infrastructure, technical

support, and engineering. Each entity handles personal data in accordance with this Notice.

We do not sell personal data to third parties. See Section 8 for details of the safeguards in place for international transfers.

8. International Transfers

We may transfer personal data internationally, including: (a) between PlayerData Limited (UK) and PlayerData Inc. (US) for support and engineering purposes; and (b) to service providers and sub-processors that support our Services and are located outside your jurisdiction. In addition, US customer data is currently hosted on UK infrastructure operated by PlayerData Limited. This hosting arrangement may change as our business develops; where it does, we will ensure that appropriate safeguards are in place to maintain the same level of protection.

Where we transfer personal data, we ensure that appropriate safeguards are in place to protect the data in accordance with applicable data protection laws. Depending on the nature and destination of the transfer, we use one or more of the following mechanisms:

- the European Commission's Standard Contractual Clauses for transfers of personal data outside the EEA
- the UK's International Data Transfer Agreement and/or the European Commission's Standard Contractual Clauses and/or the UK Addendum for transfers of personal data outside the UK.

For further information or to request a copy of the transfer safeguards, contact dataprotection@playerdata.com.

9. Security

PlayerData implements appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, or alteration. These measures include encryption of data in transit and at rest, access controls, regular security testing, and staff training.

Please be aware that the transmission of information via the internet is not always completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the complete security of your data transmitted to us electronically; any transmission is at your own risk.

Where PlayerData acts as a processor, security obligations are set out in the relevant DPA. Where video content is recorded using PlayerData camera equipment, footage is stored locally on the device prior to upload. Physical security of the device and locally-stored content during that period is the responsibility of the Customer.

10. Retention

We retain personal data only for as long as necessary for the purpose for which it was collected, or as required by law. Our standard retention periods are set out below.

Category	Retention period
Customer account details (name, contract terms and invoices)	Duration of contract plus 6 years
Billing and financial records	7 years (legal obligation)

Marketing contact data	Until opt-out, or 3 years from last interaction, whichever is earlier
Website and technical logs	12 months
Performance data and video content from Equipment	Duration of account plus 12 months

After the applicable retention period, personal data is securely deleted or anonymised.

11. Cookies

PlayerData uses cookies and similar technologies on its website. Cookies are small files placed on your device that help the website function and allow PlayerData to understand how it is used.

PlayerData uses three categories of cookies:

- **Strictly necessary:** essential for the website and app to operate (e.g. login and session management). These are placed without consent as they are required for the service to function.
- **Analytics:** to understand how PlayerData's Services are used (e.g. Google Analytics, Hotjar). These are only placed with your consent.
- **Advertising:** to serve relevant content and measure campaign effectiveness (e.g. Meta). These are only placed with your consent.

When you visit PlayerData's website, a cookie consent banner will allow you to accept or decline non-essential cookies. You can update your preferences at any time via the cookie settings link in the website footer.

12. THIRD PARTIES

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Notice does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

13. Children

When PlayerData acts as a data processor

PlayerData's Services are deployed primarily by sports clubs, teams and educational institutions to their members, including children. In this context, the Customer is the data controller and is responsible for providing appropriate notices and obtaining any consents required by applicable law before enrolling children in the Services. PlayerData processes children's personal data only on the Customer's documented instructions under the DPA.

When PlayerData acts as a data controller

Account activation

Where PlayerData acts as data controller, including where Equipment is purchased directly and when operating Data Sharing Features, the following minimum ages apply:

Jurisdiction	Minimum age without parental consent
UK	13
US	13
EEA	16 (or lower national threshold if applicable)

Recruitment Platform enrolment

Where an Authorised User is under 18, regardless of whether parental consent was obtained at account activation, PlayerData requires verifiable parental consent for all users under 18 before enrolment in this feature. Where an Authorised User under 18 is to be enrolled in the Recruitment Platform, PlayerData additionally requires verifiable parental consent regardless of the minimum age threshold above, given the nature of that feature.

If we become aware that we have collected personal data from a child below the applicable minimum age without appropriate consent, we will delete it promptly or seek to obtain consent where permitted by law.

Parents and guardians may exercise rights over their child's data – including access, correction and deletion – by contacting dataprotection@playerdata.com. The general rights described in Section 14 apply equally to children's data where PlayerData is the controller.

14. Your Rights

If PlayerData is the data controller of your personal data

Depending on your location, you may have the following rights:

- Access: to receive a copy of your personal data
- Rectification: to correct inaccurate data
- Erasure: to request deletion in certain circumstances
- Restriction: to limit how we process your data
- Portability: to receive your data in a machine-readable format
- Object: to processing based on legitimate interests, or to direct marketing
- Withdraw consent: at any time, without affecting prior lawful processing

To exercise any right, contact dataprotection@playerdata.com.

If you are an Authorised User of a Customer account

Your rights in respect of your performance data should be exercised with the organisation that is our Customer (usually your club, team or organisation) in the first instance, as they are the data controller. PlayerData will cooperate with the Customer to fulfil data subject requests as required under the DPA.

If you wish your performance data to be transferred to another club or organisation, please contact your current club or organisation. Because they are the data controller, the decision whether to transfer, what to transfer and to whom rests with them. PlayerData cannot action such a transfer without the Customer's instruction.

PlayerData may also provide an in-app export function through which you can take a copy of your performance data. The availability of this function depends on your Customer's settings, and does not affect any of the rights described above.

Complaints

If you have a concern about how PlayerData handles your personal data, PlayerData would welcome the opportunity to address it first – please contact dataprotection@playerdata.com.

You also have the right to complain to the relevant supervisory authority for your location. For UK users this is the Information Commissioner's Office at ico.org.uk. For EEA users, this is the data protection authority in your country of residence. For US users, this is the relevant state Attorney General or consumer protection authority; California residents may contact the California Privacy Protection Agency at cpa.ca.gov.

15. US Privacy Rights

PlayerData Inc. serves customers in the United States. US privacy law varies by state and PlayerData monitors its obligations as its US business develops.

PlayerData applies the same data protection standards globally, including the principles of purpose limitation, data minimisation, security, and individual rights of access and correction, regardless of where a user is located.

PlayerData is not a covered entity or business associate under HIPAA. Heart rate data collected through the Equipment does not constitute protected health information within the meaning of HIPAA.

16. Individual Athletes Using PlayerData Directly

Where you have purchased Equipment directly from PlayerData (not through a club or team), PlayerData acts as data controller of your personal data, and all sections of this Notice apply to you directly.

As a direct customer you may, through the PlayerData App:

- Access and view your performance data
- Edit your account and profile information
- Upload additional personal performance data
- Download your data
- Share selected performance statistics on social media

To exercise your data rights or to request deletion of your account, contact dataprotection@playerdata.com.

17. Changes to This Notice

We will post updates to this Notice on our website. For material changes, we will notify Customers directly. Continued use of the Services following notification of a material change constitutes acceptance.

18. Contact Us

PlayerData Limited, 3–5 Melville Street, Edinburgh EH3 7PE

PlayerData Inc., 2 Oliver Street, Boston MA 02109 US callers may also reach us at +1 888-413-6220.

Email: dataprotection@playerdata.com

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