

Privacy Policy
Updated: January 2025

Introduction

Welcome to **Super Fun Sport Academy's (SFSA)** privacy policy.

SFSA respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this Privacy Policy

This privacy policy aims to give you information on how SFSA collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up and purchase a service, or take part in a competition.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

SFSA is the controller and responsible for this website.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact [\[insert email address here specific to privacy queries e.g. privacy@SPSA.com\]](mailto:privacy@SPSA.com).

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 (either directly or indirectly). 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:

- (a) **Identity Data** includes first name, last name, username or similar identifier, date of birth and gender;
- (b) **Contact Data** includes billing address, email address and telephone numbers;
- (c) **Financial Data** includes payment card details;
- (d) **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us;
- (e) **Technical Data** includes 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;
- (f) **Profile Data** includes your username and password, purchases made by you, your interests, preferences, feedback and survey responses;
- (g) **Usage Data** includes information about how you use our website and services; and
- (h) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any **Special Categories of 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). Nor do we collect any information about criminal convictions and offences.

If you fail to provide Personal Data

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Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel the service you have with us, but we will notify you if this is the case at the time.

3. **How is your personal data collected?**

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

- (a) **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
 - (i) apply for our services;
 - (ii) create an account on our website;
 - (iii) subscribe to our service or publications;
 - (iv) request marketing to be sent to you;
 - (v) enter a competition, promotion or survey; or
 - (vi) give us feedback or contact us.
- (b) **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, server logs and other similar technologies..
- (c) **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below.
- (d) **Technical Data** from the following parties:
 - (i) analytics providers such as Google;
 - (ii) advertising networks; and
 - (iii) search information providers.
- (e) **Contact, Financial and Transaction Data** from providers of technical and payment services.
- (f) **Identity and Contact Data** from publicly available sources.

4. **How we use your Personal Data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data where:

- (a) we have received your consent;
- (b) we need to perform the contract we are about to enter into or have entered into with you; or
- (c) we need to comply with a legal obligation.

We will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your Personal Data

We have set out below, a description of all the ways we plan to use your personal data:

- (a) To register you as a new client;
- (b) To process the bookings you make through our Site including:
 - a. Manage payments, fees and charges; and
 - b. Collect and recover money owed to us;
- (c) To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);

- (d) To use data analytics to improve our website, services, marketing, customer relationships and experiences; and
- (e) To enable you to participate in a prize draw, competition or complete a survey.

Marketing

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

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

You can ask us to stop sending you marketing messages at any time 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 service purchase, service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for an unrelated purpose, we will notify you and obtain your consent.

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.

5. 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 above in the **Purposes for which we will use your Personal Data section**.

- (a) service providers and professional advisors to SFSA;
- (b) any other third party if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to protect the rights, property and or safety of SFSA, our personnel or others; and
- (c) any other third party for the purposes of acting in accordance with the requirements of a court, regulator or government agency, for example complying with a search warrant or court order or acting in accordance with an applicable law or regulation.

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.

6. 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.

Unfortunately, no transmission of data over the internet is guaranteed to be completely secure. It may be possible for unauthorised third-parties, to intercept or access transmissions or private communications unlawfully. While we strive to protect your personal data, we cannot ensure or warrant the security of any personal data you transmit to us. Any such transmission is done at your own risk. If you believe that your interaction with us is no longer secure, please contact us.

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.

7. Data Retention

How long will you use my personal data for?

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.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Your Rights** at section 9 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.

Whilst we continue to process your personal data we will ensure that it is treated in accordance with this privacy policy. Otherwise, we securely erase your information once it is no longer needed.

8. **Your Rights**

You have the right to:

- (a) **request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- (b) **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;
- (c) **request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or 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 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;
- (d) **object to processing** of your personal data where we are relying on a Legitimate Interest (or those of a third party) and 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;
- (e) **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:
 - (i) where you want us to establish the data’s accuracy;
 - (ii) where our use of the data is unlawful but you do not want us to erase it;
 - (iii) 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; or
 - (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- (f) **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; and

- (g) **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.

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.

Cookies

A cookie is a small text file which is placed onto your device when you access our website. We use cookies and other online tracking devices to make your online experience more efficient and enjoyable. 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.

Changes to the Privacy Policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: SFSA

Email address: [insert email address]

Registered email address: [info@superfunsports.com]

If you are concerned about our handling of your personal information, you can lodge a complaint with the

We would appreciate the chance to deal with your concerns before you approach the relevant privacy supervisory authority, so please contact us in the first instance.

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