

## **CIES Observatory**

### ***Privacy notice***

#### **1. What is this Notice about?**

This privacy notice (the “**Notice**”) sets out the basis and rules on which CIES – International Centre for Sport Studies (“**CIES**”, “**We**” or “**Us**”) collects and/or processes Personal data relating to you (“**You**”) in the context of the activities deployed in the context of the CIES Observatory, which specialises in the statistical analysis of sports. It includes the processing operations done through our website [football-observatory.com](http://football-observatory.com) (the “**Website**”).

“**Personal data**” means any information relating to an identified or identifiable natural or legal person, according to the Swiss Federal Act on Data Protection (“**FADP**”).

Do read this Notice carefully to understand how We will process your Personal data.

#### **2. Who is responsible for processing your Personal data?**

CIES is a controller for Personal data covered by this Notice. We hope to be able to answer your questions regarding the way We process your Personal data. Please note that CIES is based in Switzerland and, as such, is subject to Swiss law, including in particular the FADP.

Should You have any concerns in this regard, please contact Us in writing or by email with the following information:

#### **International Centre for Sports Studies**

##### **CIES Observatory**

Avenue DuPeyrou 1

2000 Neuchâtel

Switzerland

Tel.: +41 32 718 39 00

Email: [privacy@cies.ch](mailto:privacy@cies.ch)

Please note that for some of the processing operations, third-parties may be co-controllers or joint-controllers together with CIES (please refer to par. 4 hereunder).

#### **3. Which Personal data do We collect, for what purpose and based on which lawful ground?**

In the context of its activities linked to the Observatory, CIES may collect and/or process the following Personal data, each time for the purposes detailed in *italic*. Overall, the overarching reason for processing your Personal data is to:

- Enable Us to inform You on our activities;
- Enable Us to execute Our research and analytical activities linked to the Observatory;
- Communicate with You and ensure that We answer at best to your queries and requirements.

##### **A. Personal data received from You or through your interactions with Us**

- a) *Registration to our newsletter and contacting Us*

When registering to our newsletter, or otherwise contacting Us, You may provide Us with the following Personal data:

- Contact details (Name, surname, email address, language, etc.), being underlined that we only process your email address for newsletters;
- Any other Personal data that you would communicate to Us, especially links to your social networks (LinkedIn, Facebook, etc.), mobile phone number, requests and requirements from services from Us, etc.

► *→With your consent, We may send You our newsletter regarding general activities of the CIES and/or the specific activities of the CIES Observatory, as well as invitation emails to our events. Please note that other emails (such as answers from Us, specific invitations, etc.) may be sent to You based on your request or our legitimate interest.*

► *We shall use the aforesaid received information to answer any request or message You would have sent Us, as well as keep track of any such exchanges We may have had.*

*→The lawful ground is in this context your consent (provided by contacting Us in view of requesting an answer) and the legitimate interest of CIES to keep track of its exchanges and communications.*

#### *b) Questionnaires and interviews*

In the context of the analytic activities of the Observatory, We do collect information through questionnaires that you may fill up and/or interviews to which you may take part. We may keep the answers and, where applicable, recording of it. Please note that You shall always be informed at the start of an interview if it is recorded and be asked for your consent regarding the recording.

► *We shall use the aforesaid information to build up statistics and perform our general analytic work.*

*→The lawful ground is in this context the legitimate interest of CIES to perform its analytical activities in the context of the CIES Observatory.*

#### *c) Interaction through online tools and social networks*

When You use our Website or receive and/or open our newsletters, We may collect and process the following Personal data:

- Personal data obtained through cookies and similar technologies, including the IP (Internet Protocol) address used to connect your computer to the Internet, the type of mobile device You use, a unique device identifier;
- Time and location data.

When You authorize a third party social network (such as Facebook, Twitter, Instagram, LinkedIn, etc.) to share your Personal data with Us, We are entitled to receive any Personal data that You share publicly on the social network, that is part of your profile or that You allow the social network to share. The applicable terms of use and the privacy notice of each social network that You use shall apply, for which We have no responsibility

► *This information is necessary to help Us understand and enhance your use of our Website and/or relationship in the context of the social network.*

*→The lawful ground is in this context the legitimate interest of CIES to develop its activities as well as better understand the use and effectiveness of its online tools.*

#### *d) Third-party Personal data*

Should You communicate Us Personal data of third-parties, you must ensure that You are entitled to do so (especially in case of the data subject's consent) and that such Personal data is correct and up-to-date.

#### B. Personal data obtained from publicly available sources

Within the execution of its research activities linked to the CIES Observatory, CIES may collect and process personal data obtained from publicly available sources on the topic of sports and sports players, especially regarding:

- Name, club and history of a player;
- Game information as well as nominal stats and figures for specific players;
- Transfer data and financial information regarding specific players.

► *This information is necessary to allow CIES to proceed to its research activities in the context of the CIES Observatory, establish figures and stats as well as other results that would be required.*

→ *The lawful ground is in this context the legitimate interest of CIES to proceed to analysis and research work for academic or commercial purposes.*

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► → *Please note in addition that all of the above mentioned categories of Personal data may be used to establish statistics by CIES. Any statistics shall be anonymized as soon as possible, when it is not required by the pursued purpose to hold nominal information. The lawful ground is in this context the legitimate interest of CIES to develop and understand its research activities as well as contribute to its programs, courses and classes which would use the results of the analytical work of the CIES Observatory.*

### 4. Transfer of your Personal data

#### A. Within CIES

Within CIES, all transfers and communications are decided based on a need-to-know assessment.

#### B. Subcontractors and processors

Your Personal data may be transferred to subcontractors, who support CIES in the implementation of its tasks as well as in the execution of its activities. This mainly concerns the running of IT services and operations, the organization of events as well as the sending of newsletters.

Analytical and research work may be performed in collaboration with external experts.

CIES ensures that the contractual legal frame required to ensure the protection of personal data is implemented.

#### C. Clients and cocontractors

In the context of the research and analytical activities of the CIES Observatory, CIES may communicate stats, figures and other results of such research to third-party partners and clients. It is explicitly underlined that results derived from the research work of CIES (analysis, pooling or otherwise processing) may freely

be used by CIES, including through its communication to third-parties, and may be covered by CIES' intellectual property rights.

In any situation where only statistical data would be required and not nominal information, CIES does as a rule anonymize the Personal data.

#### D. International transfers of Personal data

Whenever a transfer is done outside of Switzerland and the EU/EEA to a controller or processor by CIES, CIES ensures that your Personal data is correctly protected through adequate guarantees. This especially includes standard contractual clauses as recognized by the Swiss data protection commissioner, as well as other possible contractual tools. A copy of these guarantees may be obtained from CIES upon request, by using the contact information provided under par. 2 above.

Notwithstanding the above, any results derived from the research work of CIES (analysis, pooling or otherwise processing) may be communicated outside of Switzerland and the EU/EEA without further formalities, unless otherwise is absolutely required by applicable data protection laws.

### 5. Security of your Personal data and principles guiding retention

CIES ensures the safety and the security of Personal data by implementing enhanced security measures. Such appropriate measures are taken at both a technological and organizational level in order to protect Personal data from unauthorized access, improper use, alteration, unlawful or accidental destruction and accidental loss. Such measures also cover access-rights limitations and password protected systems. These are consistent with the good practice, considering the risks involved.

Please note however that We cannot guarantee an absolute security for your Personal data, to the extent that the Personal data retention and electronical transmission involves certain risks.

Concerning the retention period, it is guided by the following principles:

- *For newsletters and contact details:* For as long as the newsletters are sent by Us and/or that We communicate with You.
- *For questionnaires and Personal data obtained from publicly available sources:* For as long as the information gathered is used in our analytical and research work, being underlined that We favour the anonymization of Personal Data as statistical data whenever and as soon as possible.
- *For cookie-related information:* Please refer to our cookie notice.

When You request the erasure of your Personal data, most of it will be completely deleted, unless applicable law or another justification requires to retain it. Please note that CIES has in particular to keep results of its research activities, to ensure its continuous activities and services.

### 6. Your rights

Depending on the applicable legal regime to your Personal data, You may have the following rights. Please note that they may each be limited based on the CIES and/or third-parties' legitimate interests or based on other grounds, including CIES legal obligations. To exercise them, please contact us by using the contact information provided under par. 2 above.

- **Information right:** See current Notice.

- **Access right:** You have the right to receive from CIES confirmation about the actual processing or not of your Personal data. If your Personal data is processed, you have the right to access such Personal data (including to receive a copy). Limits may apply especially for the results of research activities led by CIES and that enter CIES' intellectual property rights.
- **Rectification right:** You have the right to request that your Personal data be rectified or completed, without undue delay.
- **Erasure right:** You have the right to request the erasure of your Personal data without undue delay.
- **Limitation of processing right:** CIES grants You the right to request that your Personal data be processed in a limited manner.
- **Data portability right:** CIES grants You the right to retrieve the data you have provided, in a structured, commonly used and machine-readable format, and You have the right to transfer this Personal data to another controller.
- **Right to object:** CIES grants You the right at any time to object to the processing of your Personal data for reasons deriving from your personal situation, even if this processing concerns CIES' legitimate interest or public interest.
- **Possible right to lodge a complaint with a supervisory authority.**

When the processing is based on your consent, You can at any time withdraw it. Please note however that in such a case, CIES may be authorized to continue processing your Personal data, based on another lawful ground. Similarly, the lawfulness of any data processing occurred before the consent's withdrawal is not impacted by such withdrawal.

## **7. Changes to this Notice**

This Notice was last updated on 23.07.2020.

We may update this Notice at any time. Any new version of this notice shall be posted on CIES website. Please check this Notice regularly to identify any changes.

## **8. Cookies and other website-related processing**

Please refer to our [cookie notice](#) – accessible on our Website – for details regarding the use of cookies and other technological tools on our Website. It is specified that, as a rule, our Website only uses technical and other required cookies (including analytic cookies), to the exclusion of commercial and advertisement-related cookies, whether first-party or third-party.

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