

PRIVACY POLICY VBS

PRIVACY POLICY OF VBS WEB APP

The “VolleyBallSystem” application (hereinafter “VBS” or “Web App”) is managed by Sport System s.r.l.s., which operates as Data Controller of the data provided therein by users.

This information intends to accurately describe the management of the processing of personal data of users of the Web App and also provide the information required by art. 13 of EU Regulation 2016/679, in order to satisfy legal obligations and provide information on data management within VBS. At any time, you will have access to the latest version of this data protection information within the Web App.

Information on the processing of personal data

Sport System s.r.l.s. (“Company”) makes access to the “VBS” web app available to users (hereinafter “users”) via the website www.volleyballsystem.it, acting as a software solution to allow users to manage your team, anywhere and at any level, customize training and race preparation programs and take advantage of all the other services available.

We inform you that following the download and use of this Web App, data relating to identified or identifiable persons may be processed. The processing of personal data will take place using VBS's automated tools, for the time strictly necessary to achieve the purposes for which they were collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

DATA CONTROLLER

The **Data Controller is Sport System S.r.l.s.** (“Company”), with headquarters in Corso Guglielmo Pepe n. 74 - 88069 Squillace (CZ), C.F./P.Iva 03809120797, Tel: 3281086256, E-mail vbssportssystem@gmail.com.

PURPOSE

In general, it should be noted that, through the use of the Web App, different types of data collection are carried out for the following purposes:

1. allow the user to register on VBS and create a personal profile through which the interested party will acquire the qualification of coach, technical staff or player, as well as provide the services provided by the Web App;
2. verify contact requests, including through our additional services (through the “ADD WORK” or “Contacts” form) and respond to user requests (including support) by e-mail or telephone;
3. allow authentication and access to the reserved area on VBS and use the chosen services;
4. as part of the service purchase processes we collect personal data (such as, for example, personal data, e-mail address, postal address, telephone number or e-mail address, tax code or VAT number) using the form order for sale, to provide you with e-commerce services and/or access to the reserved area;
5. for the management of payments and administrative-accounting obligations regarding the activities carried out by us, as well as for the fulfillment of a legal obligation to which our Company is subject;
6. as part of the request for technical assistance services, we collect personal data to provide the user with information about navigation problems, browser compatibility and viewing or loading of web pages (the legal basis is the legitimate interest of the company to carry out this type of activity)
7. verify the necessary and automatic collection of data relating to interaction with our Web App and/or prevent or discover fraudulent activities or harmful abuse to the detriment of VBS.

Soft spam

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Our Company may use, for the purposes of direct sales of the services offered for sale through the Web App, the e-mail coordinates provided by you in the context of a purchase on VBS, even without your consent, provided that it is a service similar to that of the previous sale (so-called "soft spamming"). However, you can refuse this treatment at any time by communicating your objection to us. The legal basis of the processing is our legitimate interest in sending this type of communications. This legitimate interest can be considered equivalent to the interest of the interested party in receiving "soft-spam" communications.

LEGAL BASIS OF THE PROCESSING

The personal data indicated are processed by our Company for contractual or pre-contractual purposes (i.e. for the purposes referred to in points 1 to 4 above, the legal basis of the processing is the obligation of our company to perform the contract with the interested party) or for compliance with specific legal obligations (accounting and tax obligations).

TYPE OF PERSONAL DATA PROCESSED BY VBS

Personal data means any information relating to an identified or identifiable natural person. An identifiable natural person is someone who can be identified, directly or indirectly, in particular by reference to an element such as a name, an identification number, location data, an online identifier or one or more factors specific to physical identity, physiological, economic, cultural or social nature of that person.

For the purposes of providing the services offered by VBS, the following mandatory data relating to users are collected and processed:

- Name, Surname and contact details (email address, authentication credentials).

Depending on the service and when using the Web App, the following data relating to users may also be collected and processed:

- Data of VBS users or third parties (personal details, contact details, tax code, photos, videos, authentication credentials, nationality, height and role)
- Anthropometric data and measurements of users who request particular types of services (e.g. waist and wrist circumference)
- Data from technical operations (e.g. domain name, IP address of the device from which service is requested, date/time of access, client file request, http response code, website used, number of bytes transferred during the connection, etc.).

Browsing data

The computer systems and software procedures used to operate VBS acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes the IP addresses or domain names of the computers and terminals used by users, the addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the requested resources, the time of the request, the method used in the submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's IT environment.

These data, necessary for the use of web services, are also processed for the purpose of:

- obtain statistical information on the use of services (most visited pages, number of visitors per time slot or day, geographical areas of origin, etc.);

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- check the correct functioning of the services offered.

The navigation data persist for a limited period and are deleted immediately after their aggregation (except for any need to ascertain crimes by the judicial authority).

Payment card data

Payment management services allow VBS to process payments via credit card or other instruments (PayPal). The data used for payment are acquired directly by the manager of the requested payment service without being processed in any way by our Company.

To make a payment, in fact, the user will have to enter the confidential payment card data directly on a page which will communicate via a secure encryption protocol with the payment service provider (which will act as an independent data controller), without pass through the VBS server which, therefore, will not process such data in any way.

NATURE OF THE PROVISION OF DATA

The provision of data by users who use the application is in some cases mandatory to achieve the purposes indicated above; their failure, partial or incorrect provision could result in the impossibility of using the services provided by the application.

In particular, data may be collected online when browsing the application or when sending emails or uploading other data. Depending on the case and, if necessary, from time to time, the user will be informed of the mandatory or optional nature of the provision of personal data (e.g. to make a specific request). The mandatory or optional nature of the data communication will be highlighted by means of a notice or a specific character for the mandatory information. Finally, please note that failure to provide optional personal data will not entail any obligation or disadvantage, while failure to provide mandatory data will not allow the use of the service.

RECIPIENTS AND DATA COMMUNICATION

For the purposes of using the services provided through the Web App, as well as to fulfill certain legal and/or regulatory requirements, your data may be communicated:

- to members, employees and/or internal collaborators (specifically authorized for processing);
- to third-party companies, contractually connected to our Company or other subjects that carry out outsourced activities and services for the operation of VBS (third-party technical service providers such as, for example, provider of web platform development and maintenance services, provider of hosting or e-mail or text message sending services, suppliers of statistics or video analysis services, etc.), appointed where necessary as external sub-processors for the processing of personal data;
- to third parties for whom this is necessary and indispensable (or in any case functional) for carrying out the activities of VBS (e.g. external professionals).

In any case, personal data will not be disclosed. In any case, the communication or dissemination of data requested, in accordance with the law, by Police Forces, Judicial Authorities, information and security bodies or other public entities for purposes of defense or security of the State or for the prevention, detection or repression of crimes.

TERRITORIAL SCOPE OF PROCESSING

The data provided will be processed in Italy and no data transfer will take place to non-EU countries.

SECURITY MEASURES

VBS adopts all necessary technical and organizational security measures to protect users' personal data from unauthorized access, alteration, disclosure, loss, destruction and other forms of abuse. These measures include internal analyzes and audits of our data collection, storage and processing

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processes, as well as security measures to protect the IT systems, on which we store contractual data and data from technical operations, from unauthorized access.

DATA RETENTION PERIOD

The data collected is used exclusively for the purposes indicated above and stored for the time strictly necessary to provide the services requested by users. We will not retain data for longer than is necessary to fulfill the purpose for which it was processed. To determine the appropriate retention period, we take into account the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means.

The criteria used to determine the retention period are established by specific legal provisions (which regulate the specific activity of the Data Controller) and by tax legislation, in relation to paid services, with regards to the processing of administrative-accounting data (5 or 10 years from the expiry of the contract also to guarantee the availability of the data in the event of a dispute with customers - art. 2934 of the civil code) and, even after termination, to manage all administrative and/or accounting obligations law connected or deriving from them, unless you have given explicit consent in relation to some of the services offered; in the latter cases, the processing may last until the consent is revoked. Finally, personal data may also be kept for up to the time allowed by Italian law for the exercise of our right of defense in court.

In any case, the personal data of registered users (both with a coach profile and a technical staff or player profile) will be deleted after 12 months from the end of the subscription, without the renewal of the same having taken place and this only in the event that the The user does not decide to close the account directly and early (via cancellation request).

RIGHTS OF INTERESTED PARTIES

Users have the right at any time to obtain confirmation of the existence or otherwise of personal data concerning them and their communication in an intelligible form.

In particular, you have the right to obtain information:

- the content and origin of the personal data;
- the purposes and methods of processing;
- the logic applied to the processing carried out with the aid of electronic instruments;
- the identification details of the owner and managers;
- the duration of storage in relation to the specific categories of data processed;
- of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it, as managers or agents.

Interested parties also have the right to obtain:

- updating, rectification or, when interested, integration of data;
- the cancellation, transformation into anonymous form or limitation of the data processed (e.g. if processed in violation of the law), including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed ;
- data portability to another owner;
- opposition to processing (e.g. for sending advertising or direct marketing material or for carrying out market research or commercial communication);
- opposition to any automated decision-making process (including profiling);

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- the revocation of any consent given, where applicable (it is specified that the revocation of consent does not affect the lawfulness of the processing based on the consent given before the revocation), including for marketing processing through automated contact methods or traditional methods (consent also revocable separately or for individual marketing tools used by us);
- the certification that the operations referred to in the previous points have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right.

To exercise the aforementioned rights, users can write to the person responsible for verifying the rights of the users themselves by sending a communication to the following email address: vbssportssystem@gmail.com.

RIGHT TO COMPLAIN

Interested parties who believe that the processing of personal data relating to them carried out through this service is in violation of the provisions of the Regulation have the right to lodge a complaint with the supervisory authority, as provided for by the art. 77 of the Regulation itself, or to take action in the appropriate judicial offices (art. 79 of the Regulation).

LINKS TO OTHER WEBSITES

VBS may contain links to other websites that may have no connection with it.

We do not control or carry out monitoring operations on these websites and their contents and, therefore, we cannot be held responsible for the contents of these sites and the rules adopted by them also with regard to your privacy and the processing of your personal data during the navigation operations. Please, therefore, pay attention when you connect to these websites via the links on VBS and carefully read their conditions of use and privacy regulations. The Privacy Policy of this Web App does not apply to third-party websites and, therefore, we are in no way responsible for the privacy policy applied by such websites.

CHANGES AND UPDATES TO THIS PRIVACY POLICY

We may modify or simply update, in whole or in part, the VBS Privacy Policy also in consideration of the modification of the laws or regulations that govern this matter and protect your rights. Changes and updates to the Privacy Policy will be notified to users on the dedicated page as soon as they are adopted and will be binding as soon as they are published in this same section. We therefore ask you to regularly access this section to check the publication of the most recent and updated Privacy Policy.

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