

PRIVACY AND DATAPROTECTION POLICY

Article 1 – **General terms**

1.1. Every processing of personal data In the use of the Clubhouse Hockey Application and services will be conducted in accordance with the applicable privacy and data protection legislation, in particular (1) the EU-regulation on Data Protection 2016/679 of the European Parliament and the European Council of April 27, 2016 and the principles of free movement of these data and the withdrawal of EU directive 95/46 (General Data protection Regulation); (2) The European Directive 2002/58 of the European Parliament and the European Council of July 12, 2002 concerning the processing of personal data and the protection of privacy in the electronic communication sector (Directive on privacy and electronic communications); (3) the protection of privacy and data protection act December 8, 1992.

1.2. Using the Clubhouse Hockey services, logging in on the Clubhouse Hockey Application or entrusting references to Clubhouse Hockey implies the client explicitly consent that his personal data and all useful information for the performing of the services shall be collected, kept and processed by Clubhouse Hockey for the period of the services and further term as necessary.

The acceptance of the member by Clubhouse Hockey entitles Clubhouse Hockey to process the personal data of the member in accordance with the terms and modalities of the Privacy and data protection policy.

Processing personal data of a person under 16 requires the explicit consent of the person in charge with the parental authority.

Article 2 - **Application**

2.1. Clubhouse Hockey is responsible for the personal data processing of all private and personal data handed over by the member at the acceptance of the service of Clubhouse Hockey.

The data are used for communication purposes useful or necessary for the performance of the service and all accessory operations or actions;

2.2. The personal details, ie. name, identity and addresses of the clients are also used by Clubhouse Hockey to maintain the client relation and for communication purposes. The URL addresses are available to Clubhouse Hockey for adapted commercial purposes.

2.3. Clubhouse Hockey only keeps the data that are strictly necessary for its services and these are limited to the name, identification details, URL, address, mailing address and telephone number. The data are kept and archived for three years after termination of the service unless the client decides otherwise by opting out.

Article 3 – **Infrastructure**

Clubhouse Hockey will ascertain that personal data are received and kept in a safe infrastructure and with respect of the legal provisions thereto. On first written demand Clubhouse Hockey will provide the member with all the guaranties installed for data protection.

Article 4 – **Cybersecurity and access**

4.1. For the installation as well as the maintenance of software Clubhouse Hockey relies on inhouse and extern expert IT services, update-infrastructure and secured hardware. Extern experts have no access to the IT-infrastructure unless with the consent of Clubhouse Hockey and under the supervision of Clubhouse Hockey.

4.2. Clubhouse Hockey warrants the security of access to active running clients and archived members and will keep secret the personal data of its members.

Article 5 – **Obligation of the data processor**

5.1. When discovering an infringement, Clubhouse Hockey will remediate immediately and inform the Data Protection Authorities

within a period of 72 hours, ie. The commission For the Protection of the Privacy (CBPL), unless there is no risk for the rights and liberties of the client. When the informing of the authorities takes place later than 72 hours after its discovery, the late statement will be motivated.

When discovering an infringement, Clubhouse Hockey will do its utmost best to amend the technical and organizational measures in order to protect its members data.

5.2. On first written demand of the member a copy of the data that have been processed is made available.

5.3. On first written demand Clubhouse Hockey will amend and alter the data and/or supplement the data when these are incorrect or incomplete.

5.4. On first written demand Clubhouse Hockey shall delete the personal data all with respect of the legal provisions however, the obligation of archiving, the exercise of the freedom of expression and speech and information required for any authority or in court.

5.5. Clubhouse Hockey will keep at its premises a register with the data processing activities. The register will be open for viewing on first written demand of the member.

Article 6. – **Complaints**

6.1. A complaint on the personal data processing can be communicated by electronic mail to Clubhouse Hockey. When a complaint is found justified, Clubhouse Hockey will immediately remediate.

6.2. When the member is of the opinion that a claim has not been remediated, the member may address the commission on the protection of Personal data Meldpunt Privacy van de Autoriteit Persoonsgegevens, Prins Clauslaan 60, 2595 AJ Den Haag, Netherlands (tel. 0 8 8 . 1 8 0 5 2 5 0) , <https://autoriteitpersoonsgegevens.nl>, who will handle the claim.

6.3. In case of judicial procedure only the courts of Amsterdam will be competent to hear the matter.