

PRIVACY NOTICE

PLAYER WORKLOAD MONITORING PLATFORM

The Fédération Internationale des Associations de Footballeurs Professionnels (FIFPRO) (“**we**”, “**us**”, “**our**”) is committed to protecting and respecting your personal data (*i.e.*, information that directly or indirectly identifies an individual) in accordance with applicable data protection laws, including the General Data Protection Regulation of the European Union (“**GDPR**”).

This privacy notice explains the manner in which we collect, use, share, protect and otherwise “process” personal data relating to football players (“**Players**”, “**you**”, “**your**”) in the context of the FIFPRO Player Workload Monitoring Platform and applies to our processing of your personal data in our capacity as data controller, *i.e.*, the party responsible for deciding why and how your personal data is processed.

1. Personal Data We Process

a. Categories of Personal Data

We process the following categories of personal data about you in connection with the Player Workload Monitoring Platform . For each category, we have included types of personal data commonly processed, by way of example.

- Identity – name, date of birth, nationality, height, weight and gender;
- Professional information – position, current and previous clubs (*i.e.* within the period of retention of the data collected, see 7), international career information;
- Player workload data – number, location, date and frequency of matches played; competition type and format; minutes on the pitch (and whether part of the starting line-up, substitutions or bench); duration of rest time between matches; distance travelled, (including place of departure and arrival in order to calculate distances and time zones crossed) and times of travel.

b. How we Collect your Personal Data

We collect the personal data described above through our third party strategic partners and from publically available sources such as the media and press (including online platforms).

2. Purposes For Processing Personal Data

We process your personal data in connection with the Player Workload Monitoring Platform for the purposes set out below. We will not process your personal data for any purposes which are incompatible with the purposes set out below without first notifying you.

a. Player Wellbeing and Research

We process your personal data in order create the FIFPRO Player Workload Monitoring Platform. We have partnered with KPMG to create an analytics platform dedicated to the collection of information about player work schedules (including the number, location, date

and frequency of matches played; format of tournaments; minutes on the pitch and player participation was part of the starting line-up, substitutions or bench; duration of rest time between matches; distance travelled to matches and times of travel) with the ultimate aim of informing better management of match calendars in the future in order to promote player wellbeing.

In the future, the information gathered through the Player Workload Monitoring Platform will inform the way we advocate for improvements in connection with player wellbeing and calendar design.

b. Representation of Players

We will process your personal data for purposes related to our representation of you including:

- Representation or support of you in connection with disputes or disciplinary matters or other matters;
- Provision of career support, assistance, advice and representation of you in negotiations (whether on an individual or collective basis);
- Promotion of your professional interests;
- Education and training;
- Management of your relationship with clubs or national, continental and international federations, associations and other football industry stakeholders.

c. Legal Requirements and Proceedings

We may also process your personal data processed in connection with the Player Workload Monitoring Platform for purposes related to legal requirements and proceedings including:

- In connection with investigations, claims, grievances, and defending or pursuing legal claims;
- Responding to requests from foreign and domestic law enforcement, regulators and courts;
- Obtaining professional advice from, for example, attorneys, accountants, experts;
- Complying with our legal and regulatory obligations.

3. Legal Basis for Processing Personal Data

Our processing is necessary for our legitimate interests, where our legitimate interests are not overridden by your interests or fundamental rights and freedoms. Examples of our legitimate interests include (i) the fulfilment of our mission as a professional union, (ii) representing your interests and the interests of the union generally, (iii) promotion of player wellbeing through research and analysis; (iv) to contribute to the body of publically available evidence based

information, allowing third parties to design more balanced competition calendars to protect the health and performance of players; and (v) to effectively comply with any legal, regulatory or contractual obligations to which we are subject and to defend ourselves against any legal or regulatory complaint or proceedings.

Please contact us using the contact details set out in section 9 (How to Contact us) below if you need more details about the legal basis we are relying on to process your personal data.

4. Joint-Controllership

In connection with the creation of the FIFPRO Player Workload Monitoring Platform, we have worked with our strategic partner, KPMG, as a “joint controller” of certain data processing activities. We have entered into an arrangement with KPMG to ensure that your personal data is protected in connection with the FIFPRO Player Workload Monitoring Platform and to set out the responsibilities that FIFPRO and KPMG have vis-à-vis the protection of your rights. FIFPRO and KPMG have therefore agreed to data security standards and have determined that FIFPRO shall take primary responsibility for administering your rights, providing information to you about the processing of your personal data, and acting as the primary point of contact for you should you wish to make a complaint or exercise any of your rights.

Please contact us using the contact details set out in section 9 (How to Contact us) below if you need more details about the processing of your personal data in connection with the Player Workload Management Platform or wish to exercise your rights.

5. Sharing your Personal Data

The FIFPRO Player Workload Monitoring Platform will be publically accessible via the FIFPRO and KPMG websites. Public access to this information is intended to allow third parties to design more balanced competition calendar and protect player health and wellbeing, based on evidence based information. This information is not, however, downloadable.

Additionally, we may share your personal data with third parties directly to the extent necessary for a relevant purpose. Where we do share your personal data, we will ensure that appropriate measures are in place to safeguards your personal data. We require all third parties to respect the security of your personal data and to treat it in accordance with applicable law.

We may share certain of your personal data with the following categories of third parties:

- Football stakeholders – for example federations and leagues, FIFA, clubs and associations, sponsors, philanthropic organisations;
- Service providers – for example law firms assisting players and/or unions, IT service providers, business consultants;
- Strategic partners – for example, KPMG in the context of the FIFPRO Player Workload Monitoring Platform;

The sharing of your personal data shall only occur in connection with the purposes described above. We do not sell your personal data to third parties and we will contact you in the event that an interested third party wishes to commercialise your personal data.

6. International Transfers of Personal Data

Your personal data may be shared with a third party, or stored, outside of the European Economic Area (meaning the European Union, Iceland, Lichtenstein and Norway) in which case we will ensure there is an appropriate legal basis for such transfer and appropriate safeguards are in place to protect your personal data. When we transfer your personal data outside of the EEA to a country with a data protection regime that is not deemed “adequate” under the GDPR, we will take appropriate steps such as entering into appropriate data transfer agreements that incorporate standard clauses approved by the European Commission. Please contact us *via* the contact details set out in section 9 (How to Contact us) below if you would like more information on international transfers and the safeguards we rely on.

7. Retention of your Personal Data

We will keep your personal data for no longer than is necessary to fulfil the purposes of processing set out in section 2 (Purposes For Processing Personal Data) of this privacy notice. We will generally retain your personal data for no longer than ten (10) years so that we can use historic data to inform future calendar planning and player wellbeing initiatives. We may retain your personal data for longer if necessary, for example if required by laws or regulations or where necessary in connection with actual or potential legal actions at the time of the scheduled erasure of your personal data.

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, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and any applicable legal requirements.

We take technical and organizational security measures against accidental or intentional manipulation, partial or complete loss, destruction or unauthorised access of personal data by third parties. Our security measures are continuously improved in line with technological developments.

8. Your Rights

You have the following rights in relation to the personal data we collect, use and hold about you:

- Access – to request confirmation of whether we process personal data relating to you and, if so, to request a copy of that personal data;
- Correction – to request that we rectify or update your personal data in the event that the personal data we hold is inaccurate, incomplete or outdated;
- Erasure – to request that we erase your personal data in certain circumstances, such as where we collected personal data on the basis of your consent and you withdraw your consent or where the personal data are no longer necessary for the purpose for which they were collected;

- Restriction of processing – to request that we restrict the use of your personal data in certain circumstances, such as while we consider another request that you have submitted, for example a request that we update your personal data where it is inaccurate;
- Withdrawal of consent – where our processing of your personal data is based on your consent, to withdraw your consent, although withdrawal of consent (i) does not invalidate the consent-based processing that occurred prior to such withdrawal or processing that is not based on consent, (ii) means that we will no longer be able to perform such consent-based processing activities, and may result in us being unable to provide certain services to you and (iii) does not prevent us from processing your personal data if we have another lawful basis (other than consent) for doing so;
- Data portability – in certain circumstances (such as where our processing of your personal data was based on your consent or your contract with us) to request that we provide a copy of your personal data to you or to a third party in a structured, commonly used and machine readable format;
- Object to processing – to object to certain of our data processing, such as for direct marketing purposes or where we are relying on legitimate interests to which you object based on your particular circumstances;
- Lodge a complaint – to lodge a complaint with a data protection supervisory authority if you consider that we have infringed any of your rights with respect to your personal data and failed to remedy such infringement (Dutch Data Protection Authority (Dutch DPA) if you are of the opinion that FIFPRO is acting contrary to the applicable privacy rules: <https://autoriteitspersoonsgegevens.nl/en> or Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ Den Haag, +31 70 8888500).

If you wish to exercise any of these rights, please contact us with the contact information set out below.

9. How to Contact us

If you would like additional information on our data protection practices or would like to exercise any of your rights, please address your questions and requests using the contact detail below:

FIFPRO House
 Scorpius 161
 2132 LR Hoofddorp
 The Netherlands
info@fifpro.org

10. Amendments to the Privacy Notice

We may amend this privacy notice at any time. We may also notify you in other ways from time to time about the processing of your personal data.

Current version dated: 30 March 2021