

## GENERAL PRIVACY POLICY

MYLAPS (as defined in Article 10 (*Contact with MYLAPS*) below and hereinafter also referred to as “**we**” and “**us**”) respects your privacy and ensures that your personal data are handled with due care. In general, MYLAPS does not share your personal data with third parties without your consent, unless this is part of the service that MYLAPS performs for you.

Below is an explanation regarding all of MYLAPS’s websites, including mylaps.com, sporthive.com, speedhive.com, Looptijden.nl, Fietstijden.nl, SchaatsApp.nl, hardloopspel.nl and the websites for on-line Registration for Events with various url’s (the “**Websites**”), the mobile applications that are linked to the above websites and the EventApp (the “**Apps**”) and the products linked to those Apps and Websites (such as transponders, the “**Products**”) and how we process the personal data that we receive from you via the Websites, Apps or Products.

### Article 1 – How do we collect your personal data and on which legal basis?

MYLAPS collects your personal data in the following situations, among others, but not limited to:

1. when you visit one of the Website, including hosted websites for Event Registration (those can have various url’s);
2. when you use one of the Apps;
3. when you use one of the Products that allow the collection of data from you (e.g. transponders);
4. when you contact MYLAPS, e.g. by email, using a contact form or by telephone;
5. when you register for the digital newsletter;
6. when you place an order via the web shop on the Websites;
7. when you open or use an account via the Websites or Apps;
8. when you take part in a public forum on the Websites or via the Apps.
9. When you take part in an Event, and the Event Organizer uses MYLAPS services for measuring, recording, storing and publication of Event Result and other Event related information.

Where MYLAPS processes your personal data, it does so on the following legal basis:

- A. performance of a contract with you (or taking steps at your request prior to entering into a contract with you);
- B. compliance with a legal obligation of MYLAPS;
- C. our legitimate interests, which include but are not limited to (i) our commercial and marketing interests, (ii) our interests in providing, maintaining and improving our services and customer experience, (iii) our interest in combating fraud, abuse and security or technical issues with our services, (iv) our interest in performing (statistical) research, and (v) our interest in enforcing or investigating (potential) legal claims; and
- D. your consent (and if applicable, your explicit consent (e.g. in relation to health data)).

### Article 2 – What personal data do we collect and for what purpose?

#### a. Visit to Websites and Apps in general

When you visit the Websites or use the Apps, our servers automatically store information, such as your URL, IP address, browser type and language and device type, and the date and time of the visit. We use this information for statistical reasons only.

General visit data and click behavior on the Websites or are monitored to allow us to improve the services to you, to optimize the layout of the Websites, to improve the provision of information to you, to combat fraud and for statistical purposes.

During the use of the Websites cookies are furthermore placed on your computer, smartphone or tablet; see e.g. Article 4 for further information on the use of cookies by MYLAPS.

b. Contact with MYLAPS

When you contact MYLAPS, for instance with a request for information or when filing a complaint in accordance with Article 6, MYLAPS records personal data that you provide to us. This is limited to your name, contact details, and information provided by you in relation to your information need or complaint. This information is used to answer your information request or settle your complaint. We record this data, because you are making inquiries with us. We also use information relating to complaints in order to improve our services and customer experience.

c. Orders/purchases

When you place an order via the web shop on one of the Websites or the Apps for certain products or services offered by MYLAPS, you must provide us with the following data, so that MYLAPS can execute the order:

- contact details;
- email address;
- delivery address; and
- payment information.

The payment information is not stored by MYLAPS; MYLAPS shares this information with an external payment provider (while applying appropriate safeguards that protect your privacy - especially to the extent such external payment provider is located outside of the EEA) after which the payment information cannot be accessed by anyone else. The other order information as listed above is stored only in the MYLAPS accounting files and kept there for administrative and fiscal reasons.

d. Newsletters

When you give your email address to us, for example in opening an account, or placing an order, or contact us for information, you may register for our newsletter, that we send from time to time. We may also send you our newsletter if you previously made any purchase with us. You can unsubscribe from the newsletter at any time by clicking the unsubscribe button at the bottom of the newsletter or by stating that in your account

e. Accounts (for training)

You may open an account on the Websites and via the Apps. The purpose of these accounts is to record information on your sport, yourself (as set out below) and your training data. These accounts are known as Speedhive and Sporthive, and you can look at these results via the Websites and Apps.

To open an account, you must provide us with one or more of the following personal data:

- username (chosen by you);
- password (chosen by you); and
- email address.

Optionally, you may also provide us with the following personal data via your account: your first name and surname, photographs and other visual material, your place of residence, date of birth, website, gender, reviews, blogs, data on your health, the location of a competition, performance and other personal data, such as equipment, personal calendar, coach and friends. Again, this is all optional.

You can link your account to a mobile device and/or to a transponder, that you have purchased at MYLAPS. This equipment can send training information to your account.

There are two ways of collecting data:

- Your mobile device collects data, such as date, distance, time, route (using a GPS signal); you can see the information in the App and on the Website; and
- Your transponder connects to the timing system connected to the track on which you perform your sport. The timing systems sends information, such as date, number of laps, lap times to the Website and the App, where you can see it.

You are in full control on who to show this information. You can share it with whomever you want to; you also can hide all information, if you choose to do so.

If you register via a third party, such as, but not limited to Facebook, we receive data about you from said third party to open and activate your account, such as name, date of birth, address, gender. MYLAPS never actively shares any information with Facebook or any other social media.

MYLAPS keeps this information until you close the account; then we delete it. You can always request to delete accounts by emailing to [privacy@mylaps.com](mailto:privacy@mylaps.com) in accordance with Article 6.

These accounts offer the possibility of taking photographs and/or selfies. MYLAPS stores these photographic images. By using our Apps or Websites to make any photographic image, you agree to the processing and handling of your photograph by MYLAPS as set out in this privacy policy. MYLAPS does not publish any photographs on its own initiative.

f. Event Registration

MYLAPS offers the service Event Registration to Event Organizer and you as a participant. MYLAPS acts on behalf of the Event Organizer, as data processor.

When you wish to register for an Event, you must provide us with the following data:

- contact and address details;
- email address; and
- payment information.

The payment information is not stored by MYLAPS; MYLAPS shares this information with an external payment provider (while applying appropriate safeguards that protect your privacy - especially to the extent such external payment provider is located outside of the EEA) after which the payment information cannot be accessed by anyone else. MYLAPS transfers the other information listed above to the Event Organizer, to enable them to contact you for the organization of the Event, for example to send you Event information, your start number and other items for the Event.

When you participate in an Event, you shall appear in the official Event Result, which stipulates your name, city, name of the race, achieved result (position, time, distance) and in some cases gender and age (if that event makes a distinction on those categories).

g. EventApp

MYLAPS offers the service EventApp to Event Organizer and you as a participant. MYLAPS acts on behalf of the Event Organizer, as data processor.

In the EventApp, the Event Organizer can share any relevant information with you. You can choose to download the App on your mobile device, if you wish to receive that information.

The EventApp uses technologies that make it possible to establish your exact location at any time during a sports event (live tracking) by receiving signals on time lines on the track which are read by your device and/or transponder (i.e. the chip or tag worn by you) during the course of the event. We record this information in a file and publish it via the EventApp. As a result, all spectators of the event can track your location. If you wish to



limit the number of people with access to this information, please link your account to the Live Tracking section in the EventApp. You can then control the Live Tracking service at any time via your account (settings). When you add a pin code to it, your exact location can only be tracked in real time by spectators to whom you have supplied the pin code (such as family and friends, or nobody at all if you do not share the pin code with anyone). After each Event, MYLAPS will delete the relevant Live Tracking information.

In the EventApp you have the possibility of taking photographs and/or selfies. MYLAPS stores these photographic images. By using our Apps or Websites to make any photographic image, you agree to the processing and handling of your photograph by MYLAPS as set out in this privacy policy. If you upload this photograph to the EventApp, you in fact publish to all EventApp viewers. MYLAPS does not publish any photographs on its own initiative.

An Event Organizer can arrange for Photo/Video services during the Event. As part of this service, you may be recorded while participating in the Event and footage of you (pictures or videos) may be visible on screens at the Event and in the EventApp. Please contact the Event Organizer should you wish to be excluded from this service.

#### h. Event Results (Websites and Apps)

MYLAPS offers the service Event Results to Event Organizers and you as a participant. MYLAPS acts on behalf of the Event Organizer, as data processor.

The Event Organizer can publish Event Results on a MYLAPS hosted Website or App. If you participate in such an Event, you shall appear in the official Event Result, which stipulates your name, city, name of the race, achieved result (position, time, distance) and in some cases gender and age (if that event makes a distinction on those categories).

Also, during a sports event, transponder technology may be used that make it possible to show live timing during an Event. This information is limited to your name (the name you have used to register for that Event), date of the event, lap times and your position in the race. After each Event, MYLAPS will delete the relevant live timing information.

If you wish to be excluded from the Event Results you need to contact the Event Organizers. Or you can email [privacy@mylaps.com](mailto:privacy@mylaps.com), after which MYLAPS will send your request to the Event Organizer.

### **Article 3 – Retention Period**

MYLAPS does not keep your personal data longer than necessary for the purposes the relevant personal data was collected for as set out in this privacy policy.

To the extent MYLAPS processes personal data at the instruction of the Event Organizer, MYLAPS will delete that information at the instruction of the Event Organizer.

You, as a participant can always request deletion of your personal data in accordance with article 6.

### **Article 4 – Use of cookies**

MYLAPS uses cookies and similar techniques. Cookies are small text files that are generated and stored on your computer, tablet or smartphone when you use the Websites. In general, MYLAPS does not use tracking nor profiling cookies. For more information on cookies, please see our separate cookie policy at [www.mylaps.com/cookiepolicy](http://www.mylaps.com/cookiepolicy).

### **Article 5 – Security**

MYLAPS applies a security level to the processing of the personal data that suffices, within the possibilities of current technology, to avoid unauthorized access, alteration, publication or loss of your personal data. The security of your personal data is dependent on your account data (username and password) being kept secret. You yourself must arrange for that by handling your account data with due care and never making them available to a third party.

#### **Article 6 – Rights of access and erasure & complaints**

All personal data, that is stored in an account (as described in article 2), you can inspect and update by logging into your account. You may at any time request for access to your data at MYLAPS or rectification or erasure of your personal data or restriction of processing of your personal data, via the [privacy@mylaps.com](mailto:privacy@mylaps.com) email address. You also have the right to data portability of your personal data.

MYLAPS may be required by law to keep certain personal data, such as accounting records. MYLAPS cannot remove or update those personal data at your request. Please bear in mind that, after we update or remove your data at your request, those data may be present in our backups of the all data as described in article 2 for some time until those backups are also deleted. MYLAPS will never share any backup information.

As described in article 2, MYLAPS also processes personal data as data processor for Event Organizers. In those instances, such Event Organizer is the data controller. The Event Organizer shares certain personal data relating to you with us as set out in this Privacy Policy. MYLAPS has no control over the processing of personal data by the Event Organizer and it is the responsibility of the Event Organizer to process the personal data in accordance with applicable data protection laws and regulations (e.g. on the basis of an agreement entered into directly with you). As a consequence, MYLAPS cannot change any Event Results and other data on the website of an Event in which you have taken part. To the extent MYLAPS processes your personal data as data processor for an Event Organizer, you shall contact the Event Organizer in order to exercise your rights as set out in this Article 6 (including requests to inspect, update or correct your personal data). As an additional service, you can also contact [privacy@mylaps.com](mailto:privacy@mylaps.com); providing at least your name, email address, the event date and the event name. MYLAPS will then forward your request to the relevant Event Organizer.

If you have a complaint about the processing of your personal data, you can contact Mylaps via the [privacy@mylaps.com](mailto:privacy@mylaps.com) email address. You also have the right to lodge a complaint with a competent supervisory authority (for the Netherlands: *Autoriteit Persoonsgegevens*) if you consider that the processing of personal data relating to you infringes your rights under applicable law.

#### **Article 7 – Third parties**

We do not pass on your personal data to a third party without your consent, unless:

- the performance of the agreement between you and MYLAPS so requires, for instance due to the payment for or delivery of the products you have ordered;
- MYLAPS is required by law or in an emergency to pass on your personal data to public authorities; or
- if a reorganization or a transfer of business activities takes place at MYLAPS as a result of which MYLAPS is required to hand over personal data to another organization.

#### **Article 8 – Determine what you do and do not wish to share with others**

Your account can be used in MYLAPS's various sports communities. You yourself can state in your account which data may or may not be visible to others (your coach, friends or other users) who also use the sports community in question. In the standard setting other parties have access to your username, photograph and competition data. Only your coach and the other users (friends) that you have accepted have access to your training data and health measurements (that you upload yourself); other third parties do not have access to those data in the standard setting.

#### **Article 9 – Third-party privacy policies**



If you share your data via the Websites and Apps with third-party websites or apps (e.g. the public sharing of information via social media), those data are made available to those third parties. MYLAPS's privacy policy does not apply to websites or apps of third parties, also not if MYLAPS has placed a hyperlink to that other website on its Websites or in its Apps. MYLAPS accepts no responsibility or liability for the manner in which third parties handle personal data and cookies. We advise you to take note of the privacy policies and cookie policies of such websites before visiting them.

#### **Article 10 – Contact with MYLAPS**

If you have any questions regarding this privacy policy, please contact the Data Protection Officer of MYLAPS with these contact data:

Name:	MYLAPS B.V.
Attention:	Data Protection Officer
Address:	Zuiderhoutlaan 4, 2012 PJ Haarlem, the Netherlands
E-address:	privacy@mylaps.com
Chamber of Commerce no.:	34053090

The name "MYLAPS" as used in this privacy policy means the entire MYLAPS group. The MYLAPS group includes MYLAPS B.V., Mylaps Experience Lab B.V., Mylaps Event Timing B.V., Mylaps US, Inc (Atlanta, GA, USA), Mylaps Japan KK (Tokyo, Japan), Mylaps Asia-Pacific (Sydney, Australia), and Mylaps Trading (Shanghai) Co., Ltd. (Shanghai, China). MYLAPS entities within the European Economic Area (EEA) (i.e. MYLAPS B.V., Mylaps Experience Lab B.V. and Mylaps Event Timing B.V.) may receive personal data from MYLAPS entities outside of the EEA. The MYLAPS entities within the EEA will not transfer personal data to countries outside the EEA (including, for the avoidance of doubt, the MYLAPS entities outside the EEA), unless appropriate safeguards for the protection of the personal data are put in place.

The MYLAPS group has several platforms, websites and trade names, including mylaps.com, sporthive.com, speedhive.com, Looptijden.nl, Fietstijden.nl and SchaatsApp.nl. This privacy policy governs every visit to and every use of MYLAPS's platforms, Websites and Apps.

#### **Article 11 – Amendments**

This privacy policy may be amended at any time. The most recent privacy policy can be found at [www.mylaps.com](http://www.mylaps.com). We recommend that you take note of the privacy policy on the Websites or via the Apps before entering any new personal data.