

PRIVACY POLICY

last update: April 12, 2024

Respect for your privacy is of paramount importance to us. At Sport Heroes, we apply several fundamental principles:

- We do not ask you for personal information unless we really need it.
- We do not sell your personal information to third parties for commercial purposes.
- We treat your personal information with the utmost respect for security and your privacy.

These different principles are described in more detail in this Policy.

Terms written with a capital letter in this Privacy Policy (hereinafter the "**Policy**") refer to terms as defined in the [Sport Heroes General Conditions of Use](#) (hereinafter, the "**CGU** »).

1. **What is Sport Heroes and how does it work?**

Sport Heroes is a digital Services Platform enabling the development of its Users' practice of sport. The Platform is accessible to any person who has created a User Account in accordance with the T&Cs. Through their User Account, the User can access the Platform from:

- Sport Heroes Sites and Sport Heroes Applications, for the Services developed by Sport Heroes in its own name:
 - **United Heroes**: Service that the User can use when he is a Collaborator of a Subscriber Company by connecting to his User Account;
 - **Running Heroes (only for Australia region)** : Services that the User can use spontaneously by connecting to their User Account on the dedicated Sport Heroes Site or Application;
 - **VRace**: Service provided by Sport Heroes upon request from a Partner Company that the User can use spontaneously or after being invited by a Partner Company, by connecting to their User Account.
- Sites and Applications developed, operated and managed by a white label Partner Company integrating the Sport Heroes Platform (or "**Partner Platform** ») :
 - **Virtual Club**: Service that a User can use by connecting to their User Account spontaneously or after a Partner Company has invited them to do so.

Sport Heroes guarantees continuity on all means of access to the Platform that we offer, both for the Sport Heroes Sites and for the Sport Heroes Applications and when the Platform is integrated into the Application or Site of a Company Partner. As such, Sport Heroes is responsible for the processing of your Personal Data, their integrity, their security and respect for your privacy in accordance with the Applicable Regulations.

His contact details are as follows :

Sport Heroes

18/20 rue du Faubourg du Temple,
75011 Paris – France

Email: help@sportheroes.com

Sport Heroes is committed to respecting your right to privacy and shares your concerns about the security of the Personal Data that you transmit to it via the Sites and Applications of Sport Heroes or the Application and Site of a Partner Company integrating the Platform.

The Policy presents the guidelines established by Sport Heroes to protect the Personal Data that you provide during your visits to the Platform.

2. What information about me does Sport Heroes collect and how is it used?

As part of the provision of the Services, Sport Heroes collects personal data, within the meaning of article 4.1 of the GDPR, concerning Visitors as well as Users (hereinafter the “**Personal data**”) under the conditions detailed below.

In particular, Sport Heroes may collect the following Personal Data:

2.1 Concerning Visitors:

Data	Goals	Justifications / Legal Basis
Navigation data	Audience and attendance measurement	Free, informed, unequivocal and retractable consent of the User
Personal data voluntarily provided in the contact form	Contact Sport Heroes in order to respond to the Visitor's request and ensure follow-up	Provision of services and responses provided to the Visitor

2.2 Regarding Users:

Data	Goals	Justifications / Legal Basis
Identification data	Creation of the account and management of Sport Heroes' relationship with Users	Need to provide the User with the Services relating to the use of their Account
Data provided voluntarily and optionally by the User on their User Account or in one of the chat feeds within the application.	Personalization of Services and Rewards	Realization of the legitimate interests of Sport Heroes to adapt and measure the terms of use of its Services
Sports activity data provided by the User or generated on the Platform	Taking activities into account and calculating points	Need to provide the User with the Services relating to the use of their Account

Data collected via third-party applications if the User chooses to connect them to the Platform	Taking activities into account and calculating points	Free, informed, unequivocal and retractable consent of the User
Identification data and statistical data on the sporting activity of Collaborators or Users	Activity report on the use of the Services, when this report is requested by the Subscriber Company or the Partner Company	Legitimate interest for Sport Heroes and need to execute its contract with the Subscriber Company or Partner Company

INVITATION

The United Heroes Service allows Subscribing Companies to invite Collaborators to join the Applications.

In the event that the Collaborator is invited in this way, Sport Heroes will store the email address of the invited Collaborator and the message sent to him/her to follow up on the registration (and, where applicable, to allow a message to be sent back).

The legal basis is the realization of the legitimate interests of Sport Heroes and the need to execute its contract with the Subscribing Company.

Sport Heroes will let the guest know who invited them and allow them to request that their information be removed from our systems by making a request on help@sportheroes.com.

HEALTH DATA

No Personal Data collected by Sport Heroes, nor those resulting from their processing, fall within the scope of health data as defined by the GDPR.

ANONYMIZED DATA

Sport Heroes may use this data by aggregating it so as to no longer allow the identification of the persons concerned, for statistical purposes and to improve the quality of its Services.

Finally, GPS data is kept in a pseudo-anonymized manner in order to minimize as much as possible a potential impact on the privacy of Users.

INTERACTION BETWEEN USERS AND SOCIAL FUNCTIONS

On the Sport Heroes Applications, Users can interact with Users of the same solution.

Special case on United Heroes : Users can only interact with members of the same company. The United Heroes Applications are partitioned from each other.

Due to its objectives of inclusiveness and cohesion, Sport Heroes integrates social functions into its Applications (sending messages, photos, reacting and sharing activities).

Sport Heroes may share messages and photos posted on the global chat feed of United Heroes with the respective Subscribing Company. This exchange is conducted with the utmost regard for privacy, underpinned by GDPR compliance.

The purpose is to enhance community interaction, ensure adherence to guidelines.

In our commitment to creating a respectful and lawful community environment, Sport Heroes enforces rules for messages and moderates content within all chat feeds, this moderation is also enacted by the Subscribing Company that can delete messages reported by Users.

All photos posted must adhere to legal standards, especially concerning the depiction of individuals, requiring prior authorization for use.

DEFAULT USER ACCOUNT STATUS

A User's Account in its initial state is configured as “public”.

It allows the User of a Sport Heroes experience to display certain elements of their Account to other Users of the same experience, namely:

- The name
- The clubs
- Summary of activities carried out for the month and year (without time details)
- The teams
- The badges

Accounts can be configured privately at any time by the User.

Only the name will then be displayed.

Ranking information always displays the name and is visible to all Users in the experience.

2.3 List of data provided by third-party sports applications:

The Sport Heroes Applications allow Users who wish to do so to connect one or more third-party sports applications to the Platform in order to automatically retrieve the data listed below and integrate them into the experiences and challenges offered by Sport Heroes.

Connector	Data collected and processed by Sport Heroes
Apple Health	<ul style="list-style-type: none">- Date of activity- Time zone- Distance- Duration of activity- Number of steps- Type of activity- Number of daily steps (excluding activity)
Coros	<ul style="list-style-type: none">- Date of activity- Time zone- Distance- Duration of activity- Number of steps- Type of activity- Number of daily steps (excluding activity)- GPS coordinates
Google Fit	<ul style="list-style-type: none">- Date of activity- Distance

	<ul style="list-style-type: none"> - Duration of activity - Number of steps - Type of activity - Number of daily steps (excluding activity)
Garmin	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps - Type of activity - Number of daily steps (excluding activity) - Activity entered manually or not
Polar	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps - Type of activity - Number of daily steps (excluding activity) - GPS coordinates
Suunto	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps - Type of activity - Number of daily steps (excluding activity) - Activity entered manually or not
TomTom	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps - Type of activity - Number of daily steps (excluding activity)
Runkeeper	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Type of activity - GPS coordinates
Nike+	<ul style="list-style-type: none"> - Date of activity - Distance - Duration of activity - Type of activity
Decathlon Coach	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps

	<ul style="list-style-type: none"> - Type of activity
Fitbit	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps - Type of activity - Number of daily steps (excluding activity)
Health Mate	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps - Type of activity - Number of daily steps (excluding activity)
Adidas Running (Runtastic)	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Type of activity
Underarmour apps (Map My Run, Map My Ride, Map My Walk, Map my Fitness)	<ul style="list-style-type: none"> - Date of activity - Time zone - Distance - Duration of activity - Number of steps - Type of activity
Rouvy	<ul style="list-style-type: none"> - Date of activity - Distance - Duration of activity - Type of activity - GPS coordinates
FulGaz	<ul style="list-style-type: none"> - Date of activity - Distance - Duration of activity - Type of activity - GPS coordinates
Wahoo	<ul style="list-style-type: none"> - Date of activity - Distance - Duration of activity - Type of activity - GPS coordinates
Social Ride	<ul style="list-style-type: none"> - Date of activity - Distance - Duration of activity - GPS coordinates
Samsung Health	<ul style="list-style-type: none"> - Date of activity - Distance - Duration of activity

	<ul style="list-style-type: none"> - Type of activity - GPS coordinates - Number of daily steps (excluding activity)
Kinomap	<ul style="list-style-type: none"> - Date of activity - Distance - Duration of activity - Type of activity

Connecting a third-party application is performed by the User, and can be deactivated at any time by the User.

The data listed above is processed by Sport Heroes strictly for the purposes of providing the Services. Any processing of data by third-party applications, for their own purposes, is subject to the respective conditions of use and confidentiality policies of each third-party service, which the User is invited to read.

3. **Special case of third-party connection connectors**

You can link your third-party account to a Sport Heroes Service. By linking to these services, you authorize us to collect, store and use the information they may provide to us (for example, your email address).

By registering or identifying themselves, Users allow Sport Heroes to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, Sport Heroes may access certain data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; For more information, please refer to the description of each service.

- **Google OAuth**

Google OAuth is a registration and authentication service provided by Google and is connected to the Google network.

Personal data processed: different types of data as specified in the privacy policy of the service.

Place of processing: Ireland - Privacy policy (<https://policies.google.com/privacy>).

The use by Sport Heroes and the transfer to any other application of information received from Google APIs complies with the rules relating to the processing of user data of the [Google API services](#), including limited use requirements.

- **Login with Facebook**

Facebook Connect is a service provided by Meta (formerly Facebook).

This service identifies you and offers you the opportunity to share certain personal information with us, such as your name and email address, in order to pre-populate your account information.

Services such as Connect with Facebook give you the ability to post information about your activities on this website to your profile page to share with others in your network.

The use and transfer by Sport Heroes to any other application of the information received by the Meta APIs complies with the [Facebook terms](#).

- **Sign in with Apple**

Signing in with Apple is a service provided by Apple.

This service authenticates your identity and provides you with the ability to share certain personal information with us, such as your name and email address, in order to pre-populate your account information.

Sport Heroes' use and transfer to any other application of information received from Apple's APIs complies with the [Apple privacy policy](#).

We use your personal data in the following cases and those defined in the conditions of use for the purposes of:

Service operation :

- Provide and improve the Service to you
- Provide you with information about our Services;
- Establish and maintain your User profile on the Service;
- Communicate with you about the Service, including to send you announcements, updates, security alerts or other support information;
- Communicate with you about events and competitions in which you have participated;
- Better understand your needs and interests and thus personalize your experience on the Service and in our communications with you;
- Provide you with support and maintain the Service;
- Answer your questions, requests or feedback on experiences.

Research and development : We analyze the use of the service in order to improve it and provide new services and associated products, in particular by analyzing the demographics of our users and their usage habits. This analysis is carried out on anonymized data.

Legal compliance : The processed data may be transmitted to the competent authorities, at their request, in the context of legal proceedings, in the context of judicial research and requests for information from the authorities or in order to comply with other legal obligations. They can finally be transmitted to third parties authorized by a court decision.

Security and fraud prevention : We monitor interactions with Sport Heroes Services to prevent abuse and limit security risks to Sport Heroes Services or users. The processed data can also be used to constitute a file of evidence in the context of fraud investigations. These security and fraud aspects concern the risks of computer attacks or abuse.

4. How long are Personal Data kept by Sport Heroes ?

Sport Heroes only retains the Personal Data of Visitors and Users for the period strictly necessary to achieve the above purposes, subject to compliance with its legal and regulatory obligations.

In particular, the Personal Data of a User processed for the purposes of providing the Services are deleted immediately after the closure of a User Account at the initiative of the User or after a period of inactivity of the User of three years .

Furthermore, a User's Personal Data processed for commercial prospecting purposes is deleted 3 years from the User's last interaction with Sport Heroes relating to an electronic communication of a commercial nature.

Data	Retention duration	Basis
User account content (email, name, activities)	3 Years from last service interaction	Contractual necessity: Required to manage the user account and provide ongoing service until the user decides to terminate the account.
IP Address	1 Year	Legitimate interest: Necessary for ensuring network and information security, including monitoring and preventing unauthorized system access.

5. What cookies does Sport Heroes use?

For the purposes of this Article 5 the expression “**cookie** » refers indifferently to a cookie or a tracker.

For your complete information, we would like to inform you of the difference in operation between what is generally called a “cookie” and the specificities that this leads to, and what the expression “tracer” covers in terms of realities and modes of operation.

5.1 What is a cookie " ?

A “cookie”, or connection witness, is a small text file that can be placed on the computer, tablet or smartphone of the Visitor and/or User (hereinafter the “cookie”) when consulting a website or a mobile application, thanks to the navigation software.

A cookie file allows its issuer to identify the Terminal in which the cookie is recorded, during the validity or recording period of said cookie.

Certain cookies are essential for the use of the Sport Heroes Sites and Applications or for the provision of the Services provided by Sport Heroes. In this case, they are systematically deposited in the User's Terminal.

Other cookies make it possible to optimize and personalize the content or available functionalities displayed within the Sport Heroes Sites and Applications.

In this case, the deposit and reading of these cookies in the Visitor's and User's Terminal takes place subject to the choices offered to them within the Sport Heroes Sites and Applications.

5.2 What is a “tracker”?

The expression “tracker” designates an identifier recorded in the Terminal of a Visitor or User, without the intervention of the navigation software, and likely to be issued by the Terminal and to be read by a technical service provider to which the Terminal is connected, without this identifier having itself been placed in the Terminal by this service provider.

In practice, the expression “tracker” most often corresponds to an identifier of the User's or Visitor's Terminal managed by their operating system. This is the case in particular of the identifier of the mobile Terminal, the accessibility or reading of which can be managed differently by the operating system concerned, depending on whether the User or Visitor uses an Android Terminal (the identifier is often called a “**Android ID** » or «**AAID** ”) or iOS (the identifier is often called “**IDFA** » or «**ID for Advertiser** ”), or another operating system.

The expression “tracker” can also correspond to the identifier of a mobile application installed in the User's or Visitor's Terminal, and which can be read by the publisher of this mobile application or by one of the providers of this editor.

This is particularly the case for the number of “**SDK** » (« **Software Development Kit** ”), through which information flows between the mobile application installed in the User's or Visitor's Terminal and the publisher of this application (or its service providers), can be established to allow the operation of the various software components of the application.

5.3 By whom are cookies placed and read?

Cookies placed on the User's or Visitor's Terminal from the Sport Heroes Sites and Applications may be placed or read by Sport Heroes or by third parties. The cookies placed or read by Sport Heroes are mainly linked to the operation of the Sport Heroes Sites and Applications.

The others are “third-party” cookies placed or read by our Sport Heroes partners. Sport Heroes ensures that the issuance and use of cookies on their part is carried out in compliance with the regulation in application.

Only the issuer of a cookie (within the meaning defined in Article 5.1) has the possibility of reading the information contained therein.

5.4 How and why do we use cookies?

Multiple categories of cookies or trackers are implemented within the Sport Heroes Sites and Applications for the purposes described below.

For completeness, we inform you, as far as possible, of the purpose of cookies or tracers placed or read by third parties and of the means available to the User or Visitor to make choices with regard to these cookies. or tracers.

(a) Cookies strictly necessary for the operation of the Sites

These are cookies essential for browsing the Sport Heroes Sites and Applications which allow the User or Visitor to use the main functionalities of the Sport Heroes Sites and Applications and to secure their connection.

More precisely, these cookies allow in particular:

- to adapt the presentation of the Sport Heroes Sites and Applications to the display preferences of the Terminal (language used, display resolution, operating system used, etc.) when using the Sport Heroes Sites and Applications, according to the hardware and software for viewing or reading that the Terminal includes;
- to allow access to the User Account on the Sport Heroes Sites and Applications;
- to memorize information relating to the forms that the User or Visitor has completed when using the Sport Heroes Sites and Applications;
- to memorize the usage preferences, display parameters and players that the User or Visitor uses in order to facilitate their navigation during their next visit to the Sport Heroes Sites and Applications.

Without these cookies the User or Visitor would not be able to normally use the Sport Heroes Sites and Applications. Consequently, their deposit or reading on the Terminal is not a matter of choices offered to the User or Visitor.

The main cookies (as defined in Article 5.1) strictly necessary for the provision of services and the operation of the Sport Heroes Sites are as follows:

Cookie issuer	Purpose	Concerned person
Algolia	Search functions in the application	Visitor and User
Stripe	Bank fraud detection	Visitor and User
Sport Heroes	User ID	User
Sport Heroes	Experience ID	Visitor and User
Sport Heroes	User authentication token	User
Sport Heroes	Language used for translation	Visitor and User
Sport Heroes	Definition of the technical environment	Visitor and User

(b) **Audience measurement cookies strictly necessary for the proper functioning of the Sites**

The management of Sport Heroes Sites and Applications requires the use of attendance and/or performance statistics, **without the identity of the Visitor or User being known to Sport Heroes**. These measures are essential to analyze the functioning of the Sport Heroes Sites and Applications, and for the provision of the Sport Heroes Services.

Consequently, Sport Heroes places and/or reads cookies or trackers in the Terminal whose purpose is limited to measuring the audience of the Sites, to meet different needs:

- performance measurement,
- detection of navigation problems,
- optimization of technical performance or ergonomics,
- estimation of the power of the necessary servers,
- analysis of content consulted, etc.

These cookies or trackers being strictly necessary for the functioning and day-to-day administration operations of the Sport Heroes Sites and Applications, they are not subject, in application of article 82 of the “Informatique et Libertés” law, to the prior consent of the 'User or Visitor.

However, their purpose is strictly limited to the sole statistical and aggregate measurement of the audience of the Sport Heroes Sites and Applications, for the exclusive account of Sport Heroes.

These cookies do not allow the overall tracking of the navigation of the User or Visitor, in particular when he uses other mobile applications or browses different websites outside of the Sport Heroes Services.

Likewise, these cookies are only used to produce anonymous statistical results, and the data collected is not cross-checked with other processing operations or transmitted to third parties.

The audience measurement cookies strictly necessary for the proper functioning of the Sport Heroes Sites and Applications are as follows:

Cookie issuer	Purpose	Concerned person
Sentry	Crash report	Visitor and User
Mixpanel	Product improvement and statistics	Visitor and user
Braze	Newsletters / application push notification	User

(c) **Analytical and performance cookies**

Analytical and performance cookies allow us to:

- know the use and performance of the Sport Heroes Sites and Applications;
- to establish statistics, measurements of attendance and use of various elements making up the Sport Heroes Sites and Applications (content visited, routes, etc.) for the purposes of

improving the interest and ergonomics of our Services (the pages or the most frequently consulted sections, the most read articles, etc.);

- count visitors to a page;
- improve the interest and ergonomics of our Services (the pages or sections most often consulted, the most read articles, highlighting a challenge, etc.);
- prevent computer fraud.

The fact of refusing or not accepting the implementation of such cookies or deleting them has no impact on the navigation of the User or Visitor on the Sport Heroes Sites and Applications, but it is of a nature to prevent Sport Heroes from ensuring the best quality of Services that it wishes to offer to its Visitors and Users.

The main analytical and performance cookies used are as follows:

Issuer you cookie	Purpose	Concerned person
Plausible	Count visitors	Visitor and User
Google Tag Manager	Tracking aggregator	Visitor and User
Adjust	Campaign/course monitoring	Visitor and User
Hubspot	Audience measurement	Visitor and User

(d) Sharing cookies (social networks)

Sport Heroes may include on its Sport Heroes Sites and Applications, computer applications from third parties, which allow the User or Visitor to share content from said Sport Heroes Sites and Applications with other people or to make known to the latter its consultation or its opinion concerning the content of the Sport Heroes Sites and Applications.

Some of our Sites may therefore contain sharing links to Facebook, Twitter and other similar social networks, which allow the User or Visitor to share content from Sport Heroes Sites and Applications with other people. When the User or Visitor uses these sharing buttons, a third-party cookie from the social network concerned is installed, but only if the User or Visitor uses these buttons, or if the User or Visitor has previously consented on a Site or Sport Heroes Application to the installation of cookies by these social networks. If the User or Visitor is connected to the social network when browsing the Sport Heroes Sites and Applications, the sharing buttons allow the content consulted on our Sport Heroes Site or Application to be linked to the user account of the social network concerned. .

If the User or Visitor has refused the implementation of social network cookies or if they have not previously consented, the User or Visitor must authenticate with their social network account during each operation. sharing that he wishes to make to the network(s) concerned.

The social network providing such an application button is likely to identify the User or Visitor thanks to this button linked to the User's or Visitor's account on this social network, even if the User or Visitor has not used this button when consulting one of our Sport Heroes Sites or Applications. Indeed, this type of application button can allow the social network concerned to follow the navigation of the User or Visitor on the Sport Heroes Sites and Applications, simply because the social network account concerned was activated on the Terminal (open session) during the User's or Visitor's navigation on said Sport Heroes Sites and Applications.

Sport Heroes invites its Users and Visitors to consult the privacy protection policies of these social networks in order to be aware of the purposes of use, in particular advertising, of the navigation information that they can collect thanks to these sharing buttons with these networks.

These data protection policies must in particular allow the User or Visitor to exercise the choices offered to them by these social networks, in particular by configuring the usage accounts of each of these networks.

The refusal, absence or withdrawal of consent from the User or Visitor with regard to these social network cookies has no impact on the use of the Sport Heroes Sites and Applications.

The main social media cookies used are as follows:

Cookie issuer	Purpose	Concerned person
Facebook Connect	SSO connection	Visitor and User
Google Connect	SSO connection	Visitor and User
Apple Connect	SSO connection	Visitor and User
Facebook	Content sharing	Visitor and User
Facebook Messenger	Content sharing	Visitor and User
Twitter	Content sharing	Visitor and User

5.5 Cookie management

All of the rights recognized in Article 10 below are also applicable to the User or Visitor.

The User and the Visitor have different means to manage the implementation of cookies subject to their choice.

The User and the Visitor can at any time choose to deactivate the implementation of cookies subject to their choice or to delete those which have already been installed on their Terminal.

The settings of the User's and Visitor's navigation software may modify the conditions of access to the Services when the use of certain cookies is necessary, while the settings of the navigation software or the Terminal's operating system prevent the deposit or reading of these cookies or trackers.

In addition, if the User's or Visitor's Terminal is used by several people and when the same Terminal has several navigation software, Sport Heroes cannot ensure with certainty that the services intended for the Terminal of the The User and the Visitor correspond to their own use of this Terminal and not to that of another user of this Terminal.

6. To whom, and how, does Sport Heroes transfer my Personal Data?

6.1 Main data flows

In order to provide Users with the Services and functionalities relating to their use of the Services, Sport Heroes may transfer or make accessible certain User data, strictly necessary for this purpose, to the following categories of recipients:

Recipient categories	Purposes of the transfer
Partner Companies Subscribing Companies	Delegation of certain support request management services Provision of Services as part of a Partner Platform
Providers	Provision of Services
Collaborators within Sport Heroes, needing to know as part of their duties	Provision of Services
Partner Companies Subscribing Company	Activity report (identification data and sports activity statistical data) Messages and photos posted on the global feed

The Subscribing Company is granted the right to utilize content from the global chat feed, under the premise that all contributions comply with applicable laws and respect privacy and intellectual property rights.

6.2 Details on activity reports

The transfer of activity reports is only carried out within the framework of the United Heroes Solution.

The transfer of activity reports only concerns aggregated activity data making it possible to measure engagement (the proportion of Users who actively use the Solution) or participation in Challenges, in the same way as rankings inside the Solution.

The Personal Data included in these activity reports are:

- The name of the User
- The User's email address

The activity reports do not detail the activities of each User (whether the times and duration of activity, geolocation data, or even the category of activity(ies) practiced).

They only provide an overall view of engagement aggregated per month (i.e. only the number of points awarded per month). These reports in no way call into question the User's rights over their data, detailed in point 10 of this confidentiality policy.

The legal basis for this processing is the need for Sport Heroes to perform its contract with the Subscriber Company or Partner Company.

The User must contact the Subscribing Company or the Partner Company in order to assert their rights on the use of their data which is provided in these reports, the Subscriber Company or the Partner Company becoming responsible for processing on this data upon receipt of these reports.

6.3 Transfer to third parties

Sport Heroes may transfer data to its service providers. A list of all providers to whom we transfer subsets of data can be found in the appendix.

Furthermore, in the context of certain Challenges, and subject to the express consent of the User, Sport Heroes may transfer the User's contact details to the Partner Company in the organization of the Challenge. This Partner Company may then, subject to the User's consent, contact the User again for promotional and advertising purposes.

When the User uses the Services through a Partner Platform:

- The User's Personal Data may be exchanged between Sport Heroes and this Partner for the purposes of providing the Services to the User.
- Said Partner may share Personal Data with other third parties of its choice, provided that the User has expressly and previously consented to the sharing of their Personal Data within our Services or on the Partner Platform. In this case, the third party recipient of the Personal Data remains responsible for processing the Personal Data concerned.

The Personal Data of Users may be transmitted to Partners so that the latter can, if necessary, manage support requests in connection with the Services.

6.4 **Transfer outside the European Union**

All User Personal Data is stored within the European Union, on AWS servers in Dublin and Frankfurt.

Automatic backups of Data are also carried out within the European Union.

Sport Heroes undertakes not to carry out any transfer of Personal Data outside the European Union without implementing appropriate guarantees in accordance with the Applicable Regulations as interpreted by the CNIL and the Court of Justice of the European Union, in particular by concluding contractual clauses based on the models adopted by the European Commission.

7. **What does Sport Heroes do to protect the data I transmit to it?**

Sport Heroes attach particular importance to the security of your Personal Data.

Sport Heroes has implemented appropriate and stringent security measures intended to prevent your Personal Data from being deleted, altered, lost, used, extracted, modified, disclosed or accessed without authorization and fraudulently.

These measures are adapted according to the level of sensitivity of the data processed and the level of risk.

In particular, Sport Heroes has implemented procedures to detect, analyze and deal with any suspected violation of your Personal Data, and notifies you and any relevant supervisory authority of a violation when Sport Heroes is legally or contractually required to do so.

In addition, Sport Heroes limits access to your Personal Data only to employees, subcontractors and other third parties who need access to it to carry out their missions. They are subject to an obligation of confidentiality.

Sport Heroes also requires its co-contractors to respect the security of the Personal Data of its Users and Visitors and to process them in accordance with the data protection laws in force. To this end, Sport Heroes ensures that it works with partners who have certification to guarantee these levels of security, favoring companies certified with ISO 27001, SOC2 or other certification standards for security management.

The Sites use the industry standard Transport Layer Security (TLS) to encrypt Personal Data, including your name and address. The Sites are also registered with website identification authorities so that your browser can confirm the identity of Sport Heroes before any Personal Data is sent.

Personal Data is also encrypted when recorded on storage media (hard drives).

This encryption uses the AES-256 standard.

Finally, the banking data collected by our online sales service providers (Stripe) are subject to a level of security adapted to the risk associated with the processing of this data.

Sport Heroes only stores an identifier specific to our online sales service providers (Stripe) and does not have unencrypted access to this data.

8. **What can I do to help keep my data secure?**

Here is a non-exhaustive list of measures you can take to secure your experience on the Sport Heroes Applications:

- Use a reputable and secure web browser, such as Google Chrome or Mozilla Firefox, and keep it up to date with the latest updates and security patches.
- Use a strong, unique password for every online account and website, and use a password manager to store and manage your passwords securely.
- Avoid clicking on suspicious links or downloading unknown files as they may contain malware or others.
- Install and regularly update antivirus and anti-malware software on your computer, and regularly scan your computer for viruses and other threats.
- Keep your computer and mobile operating system and other software up to date with the latest patches and security updates.
- Update Sport Heroes apps when a new version is available.

In case you notice any security issue, you can report it to Sport Heroes Support at the following address: help@sportheroes.com

Sport Heroes cannot be held responsible for any compromise of your data which may have been intercepted due to your use of an unsecured browser or subpar security practices (ie. weak password, credential sharing).

9. **Does Sport Heroes offer to unsubscribe from communications?**

Yes. If you no longer wish to receive emails from Sport Heroes, we invite you to:

- to follow the unsubscribe instructions accessible in each email; Or
- to send an email to the email address: help@sportheroes.com

In such a case, Sport Heroes will not provide or share its mailing lists or other information about you to any other company or service for promotional purposes.

10. **What are my rights ?**

In accordance with the Applicable Regulations, you benefit at any time and free of charge from a right of access, rectification, modification, deletion (right to be forgotten), limitation of processing, opposition and, where applicable applicable, limitation of processing and portability (in JSON format) of Personal Data concerning you, subject to the rights and freedoms of third parties and the obligations incumbent on Sport Heroes.

You also have the right to define directives relating to the fate of your Personal Data after your death.

When processing is based on consent, the User may, at any time, request withdrawal of consent, it being specified that processing carried out prior to withdrawal remains lawful.

Users can exercise their rights:

- By sending an email to the following address: help@sportheroes.com ; or
- By writing to the postal address: Sport Heroes 18/20 rue du Faubourg du Temple, 75011 Paris - France;

- Regarding the rights of rectification, modification and deletion, by configuring or updating your profile in “Edit your profile” on your Sport Heroes User Account.

If you consider that Sport Heroes has failed to fulfill its legal obligations under the Applicable Regulations, you, or an association mandated for this purpose, have the possibility of lodging a complaint with the CNIL or the supervisory authority of the Member state of the European Union in which you usually reside.

11. Changes to the Privacy Policy

Sport Heroes may modify the Policy at any time, and therefore invites you to consult it regularly, on the Sport Heroes Sites and/or Sport Heroes Applications that you consult or use.

In the event of a substantial modification of the Policy concerning your rights, Sport Heroes will bring them to your attention as soon as possible.

12. How do I contact Sport Heroes?

Sport Heroes welcomes your questions and comments. You can send us your questions or comments by email to the email address: help@sportheroes.com or contact our DPO at the email address: dpo@sportheroes.com

Annex

Data Card:

1. Users

- First name - public
- Name – public
- Email – private
- Gender – private or public when the data is deducted from registration for certain Challenges. (optional)
- Birthday – private or public when the data is provided for registration for certain Challenges (optional)
- Currency - public (optional)
- Language - public (optional)
- Photo - public (optional)
- Facebook - private (optional)
 - Identifier
 - Access token
- Google - private (optional)
 - Identifier
 - Access token
- Places - public (optional)
 - Location identity
 - Would
 - Pays
 - Time zone
 - Code postal
 - Lat.
 - Lng.
- Apps - public (optional)
 - Id. they profile
 - Profile URL
 - Access token
- Company - private (optional)
- Commercial unit - private (optional)
- Bib number - private (optional)
- Phone number - private (optional)
- Postal address - private (optional)
- Shoe size - private (optional)
- T-shirt size - private (optional)

2. Activities - public or private (at the User's choice)

- Identifier
- Supplier
- Distance
- Duration
- Climb
- Descent
- Departure date
- Waypoints
 - Lat.
 - Lng.
 - Age.
 - Time
- Type
- Time zone
- Calories
- Number of steps
- Duration of activity

List of main third-party providers to whom we transfer data:

Subcontractor	Use / Function	Data localization
AWS	Cloud computing	Ireland
Algolia	Search service	France
Braze	CRM	Ireland
MongoDB Atlas	Database	Ireland
CloudAMQP	Database	Ireland
Typeform	Form	Barcelona
Zendesk	Support	EEA
Meta, Apple et Google	Login SSO	World
Mixpanel	Analytics	EEA
Stream	Feed and Chat as a service	Western Europe