

Privacy Policy

SPORT HEROES GROUP

Your privacy is critically important to us. We, at Sport Heroes Group ("SHG"), have a few fundamental principles:

- We don't ask you for personal information unless we truly need it.
- We don't share your personal information with anyone except to comply with the law, develop our products and services, or protect our rights.
- We treat your personal information with the highest regard to privacy and security.

What is Sport Heroes and how does it work?

"Sport Heroes" (connect.sportheroes.group) is a software developed by Sport Heroes Group to aggregate the sports data activities of Members via Tracking Applications.

A Sport Heroes Account is a user account that is required to participate in SHG Connected Experiences. Once registered on Sport Heroes, Members benefit from the technology developed by SHG and can participate in SHG Connected Experiences. These Connected Experiences are developed by SHG on their own behalf (Running Heroes, Cycling Heroes, Skiing Heroes and United Heroes) or on behalf of third parties ("Partners").

Members participate in Connected Experiences through dedicated sites (hereinafter the "Sites") after creating an account on Sport Heroes.

SHG respects your right to privacy and shares your concern about the security of any data you may submit to Sport Heroes via SHG's websites and its Partner websites (the "Sites"). The following statement (the "Privacy Policy") discloses the guidelines SHG has established for protecting the information you provide to SHG during your visit to the Sites.

The Sites are all owned, operated, and maintained by:

Sport Heroes Group

11 rue laborde, 75008 Paris - France

E-mail: contact@sportheroesgroup.com

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

Sport Heroes only collects personal information about you if you voluntarily choose to share it with SHG. SHG does not share, rent or sell information concerning Sport Heroes' Members or other Users of its Sites to third parties in ways other than disclosed in this privacy statement.

To use the core functionality of the Sites, you must first complete the registration form on the Sport Heroes Single Sign On website (connect.sportheroes.group) which automatically create a Sport Heroes Account and agree to our Privacy Policy. During registration you will be required to provide personal information such as your name and email address.

There are several other opportunities on the Sites for you to share personal information about yourself with Sport Heroes. This may include all the information listed in the Data Map in Appendix. If you choose to share any personal information with Sport Heroes, SHG may store it and use it for internal research, product updates and information about SHG Connected Experiences developed on SHG own behalf (Running Heroes, Cycling Heroes, Skiing Heroes and United Heroes). If the information is sent as part of a website evaluation, SHG may also use the information to contact you about your comments. You may remove your name from our email list by updating your profile in "Edit your profile" in Sport Heroes. SHG does not share, rent or sell your information to another company. For a proper functioning of our Sites, all data submitted need to be kept indefinitely until the account is deleted. Finally, we only store GPS data for internal processing, all location data is never publicly displayed.

We use cookies and other tracking technologies on our Website. Functionalities may include:

- Assisting you in navigation;
- Assisting in registration, login, and your ability to provide feedback;
- Analyzing your use of our products, services or applications;
- Assisting with our promotional and marketing efforts;
- Providing content from third parties

SHG may use your IP address to identify you, to administer the Site and to assist in diagnosing problems with SHG's server. You can find a list of the cookies we use on our Sites in the appendix.

Like most standard Web site servers, the Sites uses log files. This includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the Sites, track user's movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information. In addition, SHG uses Google Analytics as a method of tracking site statistics and user behaviour on the Sites.

You may decide to send SHG personally identifying information in an e-mail message which might contain information or inquiries about SHG's products or services. SHG will use this information to identify you as a Sport Heroes member and to respond to the electronic mail. SHG will only use the information obtained to resolve the issue identified in the e-mail.

The data set is automatically backed-up every 12 hours and is securely stored by MongoDB Inc. in the US. A subset of this data is also transferred in the US by our CRM tool (Intercom) in a secure manner. And finally the backups stored by our Search tool (Algolia) are located in Ireland. A list of all third-parties to which we transfer a subset of data can be found in appendix.

SHG guarantees continuity on all Sites we offer. We are sole responsible of data integrity, privacy and security as defined in the General Data Protection Regulation.

SHG will only share your personal information with third parties if:

- SHG has your consent;
- SHG determines that it is required to do so by law; such as in response to a court order or subpoena;
- SHG finds that you are in breach of its terms and conditions or any of its policies or usage guidelines for specific products or services;
- it is necessary in SHG's opinion to do so to prevent, investigate, detect or prosecute criminal offenses or attacks on the technical integrity of the Sites or SHG's network;
- it is necessary in SHG's opinion to do so to protect the rights, property, or safety of SHG or its employees, the users of its website(s), or the public; or
- it is necessary to fulfil your product or service order.

Information about you and your use of the Sites may be aggregated with other information collected on the Sites or otherwise used in ways that do not personally identify you or constitute personally identifiable information. This type of aggregated or statistical information may be used by us to improve the quality of the Sites or for other purposes that we may deem appropriate.

What does SHG do to protect the data I transmit to SHG?

The Sites use industry standard Transport Layer Security (TLS) technology to allow for the encryption of personal information such as your name and address. The Sites are also registered with site identification authorities so that your browser can confirm SHG's identity before any personal information is sent.

What can I do to help make sure the security works correctly?

To help ensure that these measures are effective in preventing unauthorized access to your private information, you should be aware of the security features available to you through your browser. You should use a security-enabled browser to submit your personal information at the Sites. Please note: If you do not use a SSL-capable browser, you are at risk for having data intercepted. SHG will not be responsible for any compromise of data that is intercepted due to your use of an unsecured browser.

Most browsers have the ability to notify you if you change between secure and insecure communications, receive invalid site identification information for the site you are communicating with, or send information over an unsecured connection. SHG recommends that you enable these browser functions to help ensure that your communications are secure. You can also monitor the URL of the site you are visiting (secure URLs begin with https:// rather than the normal http://), along with the security symbol of your browser (a green or red padlock in Google Chrome for example) to help identify when you are communicating with a secure server. You can also view the details of the security certificate of the site to which you are connected. SHG encourages you to use this to check the validity of any site you connect to using secure communications.

Does SHG offer opt-out or opt-in services?

Yes. If you choose to stop receiving emails from SHG, please follow the unsubscribe instructions within each email communication or send an email to contact@sportheroesgroup.com. SHG will not provide or share any mailing lists or other information about you to another company or service for promotional purposes.

Right to be forgotten

If you want to delete your account, you can do so from the Sport Heroes setting page. All personal data will be deleted immediately with the exception of data in backups that require a maximum of one month to be deleted.

Right to rectification

If needed you may correct, amend or delete submitted information that is inaccurate by visiting “Edit Profile” on Sport Heroes.

Right to data portability

You can request a copy of your data by sending an email to contact@sportheroesgroup.com. You will be returned a JSON file in a timely manner.

Privacy Policy changes

If SHG makes changes to any terms or conditions of this Privacy Policy, these changes will be posted on the Sites in a timely manner. If SHG decides to change this Privacy Policy, it will post those changes on this Privacy Policy and other places SHG deems appropriate, which may include the Sites, for a period of time SHG deems appropriate, so that you are aware of what information SHG collects, how SHG uses it, and under what circumstances, if any, SHG discloses it. SHG reserves the right to modify this Privacy Policy at any time, so please review it frequently.

Contact SHG

SHG welcomes your questions and comments about security and privacy. Please send any questions or comments via email to contact@sportheroesgroup.com. Or reach out to our DPO, Mandana Latifi, mandana@sportheroes.group.

Appendix

Data map:

1. Users

- first name
- last name
- Email
- Gender
- Birthday
- Motto
- Language
- Picture
- Facebook
 - Id
 - access token
- Google
 - Id
 - access token
- Locations
 - Label
 - City
 - Country
 - Timezone
 - Zip
 - Lat
 - Lng
- Apps
 - profile id
 - profile url
 - access token
- Company
- Business unit
- Bib number
- Phone number
- Postal address
- Shoe size
- Shirt size

2. Activities

- Id
- Provider
- Distance
- Duration
- Climb
- Descent
- Start date
- Waypoints
 - Lat
 - Lng
 - Ele
 - Time
- Type
- Timezone
- Calories
- Steps
- ActiveTime

Cookie list

Analytics:

- __cfduid
- _allowed
- _ga
- _gid

Facebook:

- act
- c_user
- datr
- fr
- presence
- sb
- wb
- xs

CRM:

- intercom-lou-xkpy3p4c
- intercom-session-xkpy3p4c

Sport Heroes:

- redirect
- token

List of all third party providers to which we transfer data:

- AWS - Cloud Computing Services
- Algolia - Search as a Service
- Intercom - CRM
- Logz.io - ELK as a Service
- Compose - Cloud hosted databases
- Mailjet - Email as a Service