### **Privacy Policy**

### **Privacy Notice**

Lighting Sport from BEM Ltd ("We") are committed to protecting and respecting your privacy. This policy together with any other documents referred to in it and any other terms and conditions of use sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of Irish Data Protection legislation and GDPR, Lighting Sport, acts as a Data Processor for our clients and as a Data Controller for this website.

## We may collect and process the following data about you:

Information that you provide by filling in forms on our websites lightingsport.com. This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you report a problem with our site. If you contact us, we may keep a record of that correspondence.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

### Security

Personal information (such as name, address, telephone number, email address) is protected on a computerised system to ensure that loss, misuse, unauthorised access or disclosure, alteration or destruction of this information is not probable. Sensitive information (such as credit card number, account number) is protected by secure server software. This secure software encrypts financial information provided online through the use of the Secure Sockets Layer (SSL) protocol. We use the Stripe system to process our payments. It prevents anyone else reading your personal and sensitive information while your fee is being processed online. It is your responsibility to keep your password secure at all times to avoid unauthorised use of your Lighting Sport account.

# **Advertising**

By using Lighting Sport online services and apps we may use information gathered from you, and information gathered from third parties, to provide our users with certain tailored advertising offerings through our website and other services. Lighting Sport may gather web viewing Personal Data from users across its various services, which may then be used by Lighting Sport and its service providers to deliver advertising to particular groups of users based on the preferences or interests inferred from the data collected and processed by Lighting Sport's (or a third-party service provider's) technology. For example, Lighting Sport uses cookies, web beacons, social plugins, tracking pixels and similar technologies to collect information from a mobile or other device (for further information on Lighting Sport's use of cookies and other similar technologies please refer to the Cookie section of this policy). Should a user register for Lighting Sport sign-in and consent to receive marketing communications from Lighting Sport, Lighting Sport may then combine a user's account information with this information collected by Lighting Sport, or third parties, about the user to assist Lighting Sport and its partners to provide advertising based on your preferences and viewing patterns. Lighting Sport may also measure what users opened and whether users clicked the links embedded in advertising communications to measure a campaign's success. This may also be used to ensure effectiveness in delivery and to permit Lighting Sport to control the frequency of delivery of advertisements.

Refer to the cookies section of our Privacy Policy to see how to manage your setting.

#### **Mobile App Data**

By downloading and using a Lighting Sport powered app you grant certain permission(s) for the purpose of utilising the full functionality of the app. The full set of permissions used by the app are outlined below:

### **Android App**

ACCESS\_COARSE\_LOCATION: Used to predict your address when creating your Lighting Sport app account ACCESS\_FINE\_LOCATION: Enables the Google Maps functionality on the Fixtures & Results section of the app CAMERA: Allows for upload of files from your device to Document Wallet.

READ\_EXTERNAL\_STORAGE: Determines the amount of available storage on your device WRITE\_EXTERNAL\_STORAGE: Allows the app to save information to your device storage (e.g. stay logged in)

### iOS App

NSLocationAlwaysAndWhenInUseUsageDescription NSLocationAlwaysUsageDescription NSLocationWhenInUseUsageDescription NSCameraUsageDescription NSAppleMusicUsageDescription(for files) NSAppTransportSecurity

On iOS **Create Account**, **Edit Account**, **Fixtures and Results** uses Location permissions (first three listed). **Cookies** 

Cookies are small text files that are placed on to your computer's hard drive by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

The cookies used by this website and their purpose are identified and described in the table below. We will seek your consent to use cookies the first time you visit this website (or on subsequent occasions if the cookie that records such acceptance is deleted). Denial of the cookies used by this website may prevent parts of the website from working properly.

Cookie Name Purpose
Google Analytics
_utma
_utmb
_utmc
_utmz

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in anonymous form, including the number of visitors to the site, where visitors have come to the site from pages they visited. Lighting Sport cookie acceptance consent\_ga This cookie is used to record if a user has accepted the use of cookies in relation to the Lighting Sport website.

Session Cookies ASP.NET\_SessionId These are temporary cookies that remain in the cookie folder of your browser until you leave the site. We use Session Cookies to facilitate smooth navigation and consistency throughout the website. These are defined as essential to the operation of the site and do not contain any personal data.

Most web browsers allow some user control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout.

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

There are a number of ways to manage cookies. If you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

You can easily delete any cookies that have been installed in the cookie folder of your browser. Search for "cookies" in the "Help" function on your browser for information on where to find your cookie folder and the controls to manage them.

### **Capturing session data**

As part of our Service(s) offering, you (a Customer(s)) acknowledge and accept that we may utilise a (third party) software which may record your (Customer(s)) sessions on our systems, including mouse movement, scrolls, clicks, key presses and key strokes, for the purposes of gathering analytics and /or other information about how you (a Customer(s)) interface with our systems and / or Services, so as to enable us endeavour to enhance training, Customer support and platform improvements. Personal data is not captured and / or recorded as part of these sessions.

# Where we store your personal data

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### Uses made of the information

We use information held about you in the following ways:

To ensure that content from our site is presented in the most effective manner for you and for your computer.

To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.

To carry out our obligations arising from any contracts entered into between you and us.

To allow you to participate in interactive features of our service, when you choose to do so.

To notify you about changes to our service.

Where you agree, we may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

# **Profiling**

If your club chooses to use the services of authorised consulting partners then the following additional condition applies. It ONLY applies if there is a written agreement between such a service provider and your club. If no agreement exists, the following clause does not apply.

Your club does not carry out automatic decision-making but with the consent of the club, such an entity will systematically analyse the clubs database and the information that the club holds about you, in order to improve the efficiency, cost effectiveness and relevance of their communication with you (profiling). You will be informed about this as soon as possible, but at the latest when the club makes contact with you as a result of such profiling by reference to this privacy statement.

The club may sometimes use geo-demographic and/or other personal information which may include identification of individuals' capacity to give, through a process called 'wealth screening', using publicly available information sources. The club may also carry out their own research into their supporters, again using publicly available information or information that you provide the club with. This allows the club to tailor their fundraising and marketing activities to make them as appropriate as possible for their supporters and reflect their interests as closely as possible.

If you would prefer us not to process your personal data for the purpose of wealth screening, the club will respect your wishes. If you do not wish to be subject to such profiling or wealth screening or wish to update your contact preferences, please contact Lighting Sport on 086 7926161, who will happily address your

request or email info@bem-ltd.com. **NOTE:** This condition does not apply if your club has not opted to avail of this service.

### Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may disclose your personal information to third parties: At Lighting Sport we take your privacy and your information security very seriously. Lighting Sport will not sell or rent your personally identifiable information to anyone. As a member of an organisation your personal details will be made available to the organization (This excludes bank account/credit card information). Lighting Sport declines all responsibility for the subsequent use of your personal information by the organisation. This organisation may contact you from time to time via email. The personal data provided is stored on our secure computerised database to enable us to respond to your requests. We may communicate with you in the future by mail, email and telephone.

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

If Lighting Sport or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use (if applicable) and other agreements; or to protect the rights, property, or safety of Lighting Sport, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Processing Club Data**

We will process member data for our client clubs (Data Controllers) in line with their data usage statements in support of their functions, aims and obligations. Further, we may process anonymised sets of data on our system for system testing, training, statistical analysis, and marketing purposes.

### Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@bem-ltd.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act.

### Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

# Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to info@bem-ltd.com

Call 086 7926161 for any queries or enquiries.