

Privacy Policy

SPORT HEROES ACCOUNT

Effective Date: May 25th, 2018

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" under the website 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 platform developed by Sport Heroes Group. Once registered on Sport Heroes, Members benefit from the technology developed by Sport Heroes Group and can participate in any platforms developed by Sport Heroes Group. These platforms can be administered on our own behalf (Running Heroes, Cycling Heroes, Skiing Heroes and United Heroes) or on behalf of third parties (“Partners”).

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

The Sport heroes account can be used across all the Sites.

Sport Heroes Group is committed to protecting and respecting your privacy and shares any concerns you may have about the security of the data you may submit to your Sport Heroes account via our platforms or Partner websites (the “Sites”).

The following statement (the “Privacy Policy”) discloses the guidelines Sport Heroes Group has established for protecting the information you provide to Sport Heroes Group 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

Information we collect about you and how is it used?

Sport Heroes Group only collects personal information about you if you voluntarily choose to share it with us. Sport Heroes Group 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 first name, last name and email address.

There are several other opportunities on the Sites for you to share personal information about yourself with your Sport Heroes Account. This may include all the information listed in the Data Map in Appendix. If you choose to share any personal information with your Sport Heroes account, Sport Heroes Group may store it and use it for internal research, product updates and information about Sport Heroes Group platforms developed on Sport Heroes Group own behalf (Running Heroes, Cycling Heroes, Skiing Heroes and United Heroes). If the information is sent as part of a website evaluation, Sport Heroes Group 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. Sport Heroes Group 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

Sport Heroes Group may use your IP address to identify you, to administer the Site and to assist in diagnosing problems with Sport Heroes Group's servers. 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, Sport Heroes Group uses Google Analytics as a method of tracking site statistics and user behaviour on the Sites.

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

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.

Sport Heroes Group 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.

Disclosure of your information to third parties

We do not disclose any information unless:

- We ask and receive your consent;
- We determine that it is required to do so by law; such as in response to a court order or subpoena;
- We find that you are in breach of our terms and conditions or any of our policies or usage guidelines for specific products or services;
- It is necessary in our opinion to do so to prevent, investigate, detect or prosecute criminal offenses or attacks on the technical integrity of the Sites or our network;
- It is necessary in our opinion to do so to protect the rights, property, or safety of Sport Heroes 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 do we do to protect your data transmitting to your Sport Heroes account?

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

What can you 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. Sport Heroes Group 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. Sport Heroes Group encourages you to use this to check the validity of any site you connect to using secure communications.

Do we offer opt-out or opt-in services?

Your Sport Heroes account does not offer opt-in services.

However our platforms offer opt-in and opt-out services. If you choose to stop receiving emails from one of our Site, please follow the unsubscribe instructions within each email communication or change your email preference within the Site.

Sport Heroes Group will not provide or share any mailing lists or other information about you to another company or service for promotional purposes unless a prior consent has been given on one of our Sites.

Request erasure of your personal data

To delete your Sport Heroes account, login to connect.sportheroes.group and click on delete account from the setting page. All your personal and sport data will be deleted immediately with the exception of data in backups that require a maximum of one month to be deleted.

Request correction of the personal data that we hold about you

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

Request the transfer of your personal data to you or to a third party

You can request a copy of your data by sending an email to contact@sportheroes.group. We will provide to you, your personal data in a JSON file, which you can then transfer to an applicable third party.

Object to processing of your personal data

You have the right to object the automatic processing of your data such as sport data from third party applications. If you object to the processing of certain data then we may not be able to provide the services and it is likely we will have to terminate your account. If you want to do so, please send us an email to contact@sportheroes.group.

Privacy Policy changes

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

Sport Heroes Group reserves the right to modify this Privacy Policy at any time, so please review it frequently.

Data Breach Notification

In the event of a data breach impacting any Sport Heroes account, users will be notified within 72 hours of the data breach.

Contact Us

Sport Heroes Group welcomes your questions and comments about security and privacy. Please send any questions or comments via email to contact@sportheroes.group or reach out to our DPO, Alex Auroux, alex@sportheroes.group.

Appendix

Data map

Data we may collect about you:

1. Users

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

2. Activities - public or private (user choice)

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

Cookie list

We use cookies to distinguish you from other users of the App or the Site. This helps us to provide you with a good experience when you use the App or browse our Site and also allows us to improve the App and our Site. Below is the data we collect and may use:

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

The below third parties are used to provide you with the full service Sport heroes Group offers you. It includes:

- 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