DYF (Do Your Football) Platform – Privacy Notice

We, DYF Corporation SA, Carrefour de Rive 2, PO Box 3232, 1211 Geneva 3, are the controller of the personal data which we collect and process via the Do Your Football digital ecosystem including web applications, mobile applications, APIs, and all related services our application (the “App” of “DYF”).

We respect your privacy and are committed to full transparency with regard to how we collect, use, and share your personal data.

This privacy notice informs you of how we process the personal data and personal information which we collect from you, which you provide to us, or which we may collect from other sources when using DYF.

DYF fully complies with the General Data Protection Regulation (EU) 2016/679 ("GDPR").

1. Lawful Basis for Processing

Our processing of your personal data is lawful as long as there are legal grounds for doing so. There are four main legal grounds on which we rely when we collect and process your personal information via DYF:

- **Contract**: Processing necessary for service delivery
- **Legitimate Interest**: Platform security, fraud prevention, service improvement
- **Consent**: Explicit consent for marketing and non-essential features
- **Legal Obligation**: Compliance with applicable laws and regulations

A detailed account of our collecting and processing of your personal data, including the purposes for doing so, as well as the legal bases on which we rely for each processing can be found in Appendix A of this privacy notice.

We process certain personal data because it is necessary to perform our contract with you and to provide the App and the features you request. Without your personal information, we may be unable to deliver the service, respond to your actions in the App, or otherwise perform the agreement you enter into when you use the App.

We also use limited personal information to keep the App secure, prevent fraud and misuse, and maintain the integrity of our systems. Where appropriate, we may additionally use some personal data to improve and develop the App (for example, by diagnosing errors or understanding how features perform). When processing is based on our legitimate interests, you may object as described in section 6 this privacy notice.

Where the App collects or otherwise processes health data (or other special category data), we do so only with your explicit consent. If we use your personal information for marketing purposes, we will do so based on your consent as well, and you can withdraw your consent at any time with effect for the future. A detailed account of parental consent when collecting and processing youth payers' personal information can be found in section 2 of this privacy notice.

In some circumstances, we may process and disclose personal data to comply with legal obligations, including responding to lawful requests from public authorities. This may include disclosures to law enforcement or competent authorities, and—where required or permitted by law—child protection services, for example if we have to report or address concerns relating to a child's safety.

2. Special Provisions for Youth Players

Our App may be used by and for youth players. Accordingly, we take particular care in how we collect and process their personal data, and the App has been specifically designed to safeguard minors' rights and to comply with applicable legal requirements.

2.1 Under 13 (U6-U12)

- No direct data collection from children
- All data managed through Parent/Guardian accounts
- No marketing communications to children
- Enhanced privacy settings by default

2.2 Ages 13-17 (U13-U17)

- Parental consent required for registration
- Parents have oversight rights
- Limited data sharing capabilities
- No targeted advertising

2.3 Age-Appropriate Design

- Platform features adapted to user age group
- Enhanced safety features for Youth Players
- Age-appropriate privacy defaults

2.4 Parental Controls

Parents/Guardians can:

- Monitor all Platform activity
- Restrict communication features
- Control data sharing settings
- Request account deletion

2.5 Coach-Player Communications

- All communications logged and reviewable
- Group communications preferred over individual
- Parents copied on individual messages to players under 16

2.6 Safeguarding

- Mandatory background checks for Coaches
- Reporting mechanisms for concerns
- Cooperation with child protection authorities

3. Direct and Indirect collection of your personal data

We collect your personal information directly from you. Furthermore, players' personal data may also be collected from third parties, such as professional and amateur clubs, as well as federations.

Please note that, as described in section 2 of this privacy notice, youth players' personal data can be collected indirectly from the players' parents or guardians, when required. As a rule, youth players' personal data are collected only with the parents' or guardians' consent. A detailed description of Age-Specific Consent Requirements can be found at Appendix B of this privacy notice.

4. Data Sharing and International Data Transfers

We do not sell your personal data to third parties, and we do not transfer your personal data outside of Switzerland or the European Economic Area (EEA), without appropriate safeguards.

If needed, we may share your personal data with some of our providers (e.g. our IT hosting company, our billing company, our security control officer, and our data inputting officer) or with authorities, if needed. Most of your providers are located in Switzerland or countries of the European Economic Area (EEA). For providers located outside of these territories, we privilege working with providers located in territories benefiting from an adequacy decision issued by the European Commission and, if this impossible, we will ensure that we have put in place alternative safeguards, such as Data Processing Agreements, which include the European Commission Standard Contractual Clauses. If you require more information on our providers, please contact us.

5. Data Storage and Security

5.1 Infrastructure

- **Primary Data Centers**: Switzerland (ensuring Swiss Federal Data Protection Act compliance)
- **Cloud Infrastructure**: Amazon Web Services (AWS) Europe regions
- **Encryption**: AES-256 encryption at rest, TLS 1.3 in transit
- **Backup**: Daily automated backups with 30-day retention

5.2 Access Controls

- Role-based access control (RBAC)
- Principle of least privilege
- Regular access audits
- Employee background checks and confidentiality agreements

5.3 Data Retention

- Active accounts: Data retained for duration as specified in table in Appendix A
- Inactive accounts: Notification after 2 years, deletion after 3 years
- Legal holds: Data preserved as required by law
- Youth Player data: Automatic review upon reaching age of majority

A detailed account of retention periods in relation to processing categories can be found at Appendix A of this privacy notice.

6. Data Subject Rights and Contact Information

You can exercise your rights in relation to your personal information by contacting us at **dpo@dyf-football.com** or by writing to us at DYF Corporation SA, Carrefour de Rive 2, PO Box 3232, 1211 Geneva 3 (ATTN: DPO).

You have the following rights in relation to your personal data:

- You have the **right to be informed** about how your personal data are processed and the **right to access** to your personal data at any time;
- You have the **right to rectify** your personal data or to have your personal data **erased** under certain conditions;
- You have the **right to restrict** the processing of your personal data under certain conditions and, when based on our legitimate interests, you have the **right to object** to the processing of your personal data;
- When based on your consent, you have the **right to withdraw your consent** at any time for future processing;
- You have the **right to data portability**, that is, to receive your personal data in a structured, commonly used format and to transmit those data to another controller without hindrance from us;
- You have the right to ask for an **automated decision** to be **reviewed** by human intervention and the right to share your point of view or contest the decision.

If you are not satisfied with how we process your personal data, you have the **right to make a complaint** to a supervisory authority. For EU/EEA residents, the list of supervisory authorities can be accessed here. In Switzerland, a complaint with the Federal Data Protection and Information Commissioner (FDPIC) can be lodged here. In the United Kingdom, a complaint with the Information Commissioner's Office (ICO) can be lodged here. If you feel that we are not respecting your rights or our obligations, you can lodge a complaint directly with your data supervisory authority at any time.

7. Changes to Privacy Notice

We reserve the right to make any changes and corrections to this Notice. Please refer to this page from to time to review these and any new additional information.

DYF – January 2026

APPENDICES

Appendix A: Data Processing Categories

A.1 Club Account Data Processing

A.1.1 Club Owner Data

Category	Data Types	Purpose	Legal Basis	Retention
Identity	Full name, DOB, Nationality, Government ID	Verification, Legal compliance	Contract, Legal obligation	Account duration + 7 years
Contact	Email, Phone, Business address	Communication, Notifications	Contract	Account duration + 1 year
Financial	Bank details, Tax ID, Payment history	Billing, Accounting	Contract, Legal obligation	Account duration + 10 years
Business	Company registration, Ownership documents	Verification, Compliance	Contract, Legal obligation	Account duration + 7 years
Activity	Login history, Platform usage, Audit logs	Security, Service improvement	Legitimate interest	2 years

A.1.2 Club Administrator Data

Category	Data Types	Purpose	Legal Basis	Retention
Identity	Full name, Employee ID, Role	Access control, Audit	Contract	Employment + 3 years
Contact	Work email, Work phone	Communication	Contract	Employment + 1 year
Permissions	Access levels, Action history	Security, Compliance	Legitimate interest	Employment + 5 years
Activity	Login times,	Audit, Training	Legitimate	2 years

Category	Data Types	Purpose	Legal Basis	Retention
	Features used, Changes made		interest	

A.1.3 Club Staff Data

Category	Data Types	Purpose	Legal Basis	Retention
Identity	Name, Staff ID, Department	Access control	Contract	Employment + 1 year
Contact	Work email	Communication	Contract	Employment + 1 year
Activity	Limited platform usage	Service delivery	Contract	1 year

A.2 Coach Account Data Processing

Category	Data Types	Purpose	Legal Basis	Retention
Identity	Full name, DOB, Photo, Nationality	Profile, Verification	Contract	Account duration + 3 years
Professional	Role, Team affiliation, Experience	Profile information	Contract	Account duration + 1 year
Contact	Email, Phone, Address	Communication	Contract	Account duration + 1 year
Training Data	Session plans, Methodologies, Tactics	Service delivery	Contract	Account duration
Performance	Player evaluations, Team statistics	Service delivery	Contract	3 years
Financial	Payment details (if individual subscription)	Billing	Contract	Account duration + 7 years
Communication	Messages, Feedback, Reports	Service delivery, Safety	Contract, Legal obligation	3 years

A.3 Player Account Data Processing

A.3.1 Adult Players (18+)

Category	Data Types	Purpose	Legal Basis	Retention

Category	Data Types	Purpose	Legal Basis	Retention
Identity	Full name, DOB, Photo, Player ID	Profile, Team management	Contract	Playing career + 2 years
Image	Photo and Video	Performance Management, Training, Evaluation	Consent	Account duration or until consent withdrawn
Physical	Height, Weight, Dominant foot	Performance tracking	Contract	Playing career
Performance	Training attendance, RPE, Evaluations	Development tracking	Contract	5 years
Fitness	General fitness status only	Team selection	Contract	3 years
Contact	Email, Phone	Communication	Contract	Account duration + 1 year
Game Data	Minutes played, Goals, Assists, Cards	Statistics	Contract	Career duration

A.3.2 Youth Players (13-17)

Category	Data Types	Purpose	Legal Basis	Retention
Identity	Full name, DOB, Photo	Profile, Age verification	Consent (parental)	Until 18 + 2 years
Physical	Height, Weight (growth tracking)	Development monitoring	Consent (parental)	Until 18 + 1 year
Performance	Training data, Evaluations	Development	Consent (parental)	Until 18 + 3 years
Education	School, Academic schedule	Training coordination	Consent (parental)	Until 18
Parental	Parent contact details	Communication, Consent	Contract	Until 18 + 1 year
Fitness	General fitness status only	Training adaptation	Consent (parental)	Until 18 + 1 year

A.3.3 Youth Players (Under 13)

Category	Data Types	Purpose	Legal Basis	Retention
Identity	First name, Age category only	Team organization	Parental consent	Until 13
Physical	Basic development metrics	Age-appropriate training	Parental consent	Until 13

Category	Data Types	Purpose	Legal Basis	Retention
Performance	Attendance, Basic progress	Development	Parental consent	Until 13
No Direct Contact	Managed via parent account	Child protection	Legal obligation	N/A

A.4 Parent/Guardian Account Data Processing

Category	Data Types	Purpose	Legal Basis	Retention
Identity	Full name, Relationship to child	Verification	Contract	Child reaches 18 + 1 year
Contact	Email, Phone, Address	Communication, Emergency	Contract	Child reaches 18 + 1 year
Consent Records	Consent forms, Timestamps	Legal compliance	Legal obligation	Child reaches 18 + 7 years
Access Logs	Account activity, Settings changes	Security, Audit	Legitimate interest	2 years
Communication	Messages with coaches/club	Child safety	Legal obligation	5 years

A.5 Special Categories of Data (GDPR Article 9)

Category	Data Types	User Types	Purpose	Legal Basis	Additional Safeguards
Health	Basic injury status (fit/unfit), type of injury, injury stage and duration	Players	Team selection	Explicit consent	Encrypted, Limited access
Biometric	Photos for identification	All users	Profile display	Explicit consent	Not used for automated decisions

A.6 Automated Processing and Profiling

Process	Data Used	Purpose	User Rights
Performance Analytics	Training data, Game statistics	Player development insights	Right to object, Human review
Team Selection Suggestions	Performance metrics, Fitness data	Coach assistance (not binding)	Transparency, Human override
Training Load Calculation	RPE, Session intensity, Frequency	Injury prevention	Explanation available, Adjustable

Process	Data Used	Purpose	User Rights
Talent Identification	Age, Performance trends	Development pathways	Opt-out available, No sole decisions

Appendix B: Age-Specific Consent Requirements

B.1 Youth Players Under 13 (U6-U12)

Parental Consent Requirements:

- Parent/Guardian must create and manage account on behalf of child
- Child has no direct access to Platform
- All communications directed to Parent/Guardian
- Minimal data collection (name, age category, attendance only)
- No performance metrics or detailed evaluations
- Parent can withdraw consent at any time via account settings

B.2 Youth Players Ages 13-15

Parental Consent Requirements:

- Parent/Guardian must provide consent during account creation
- Parent maintains oversight dashboard access
- Parent receives copies of individual coach communications
- Player can access limited features with parental controls
- Privacy settings managed by parent
- Parent can modify settings or withdraw consent via account dashboard

B.3 Youth Players Ages 16-17

Parental Consent Requirements:

- Parent/Guardian consent required at account creation
- Graduated autonomy based on age and parent preference
- Parent can choose level of oversight (full, moderate, minimal)
- Player gains more independence approaching age 18
- Automatic transition to adult account at 18
- Parent retains emergency access until player reaches 18

B.4 Consent Management for All Youth Players

Consent Withdrawal Process:

- Parents can withdraw consent at any time through account settings
- Option to export data before deletion

- Deletion request processed within 30 days
- Some data may be retained for legal obligations
- Statistical/anonymized data may be retained

Age Transition Protocols:

- At age 13: Option to create limited youth account with parental consent
- At age 16: Increased autonomy options available
- At age 18: Automatic conversion to adult account with full control

Parental Rights Include:

- Access all child's data
- Modify privacy settings
- Restrict features
- Delete account
- Export data
- Object to specific processing