



# PRIVACY POLICY

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## 1. Introduction

This Privacy Policy explains how TFF ("we", "us", "the Controller") collects, uses, discloses and protects personal data when you visit our website at **thefootballfactory.ai**, request access to our data room, express interest in investing, or otherwise interact with us. It also explains your rights under the EU General Data Protection Regulation (Regulation (EU) 2016/679, "GDPR") and any applicable local data protection law.

We recommend that you read this Policy in full before submitting any personal data to us. By using our website and services, you acknowledge that you have read and understood this Policy.

## 2. Data Controller

THEFOOTBALLFACTORY LTD, a company incorporated under the laws of England, company number 17166985, with registered address at 128 City Road, London, United Kingdom ("TFF") — hereinafter "the Controller".

Contact for privacy matters: [privacy@thefootballfactory.ai](mailto:privacy@thefootballfactory.ai).

No DPO has been appointed, all privacy-related requests should be sent to the contact above.

## 3. Scope of This Policy

This Policy applies to personal data processed in connection with:

- our public website and any related sub-domains or landing pages;
- the data room access request form and investor communications;
- newsletters, marketing communications and events, where you have opted in;
- any third-party platform used to facilitate a fundraising campaign (e.g. a crowdfunding platform), to the extent data is shared with us.

It does not apply to third-party websites or services that we do not control, even where they are linked from our website (see Section 13, "Links to Third-Party Websites").

## 4. Categories of Personal Data We Collect

We collect and process the following categories of personal data:

thefootballfactory.ai



| Data                                                                  | Source                                                 | Purpose                                                             | Legal Basis                                                              |
|-----------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------------------------|--------------------------------------------------------------------------|
| Name, surname, email, country, role/occupation                        | Data room request form                                 | Evaluate and manage access requests                                 | Pre-contractual measures (Art. 6.1.b GDPR)                               |
| Investment-related data (e.g. indicative amount, investor category)   | Investment / subscription forms, crowdfunding platform | Manage the investment relationship and applicable legal obligations | Contract performance (Art. 6.1.b) and legal obligation (Art. 6.1.c GDPR) |
| Communications you send us (emails, contact-form messages)            | Contact form, email                                    | Respond to enquiries and manage the relationship                    | Legitimate interest (Art. 6.1.f GDPR)                                    |
| Marketing preferences and contact details for newsletters             | Opt-in subscription form                               | Send newsletters and updates about the project                      | Consent (Art. 6.1.a GDPR)                                                |
| Navigation data (IP address, browser type, pages visited, timestamps) | Automatic, upon website access                         | Site security, fraud prevention and operation                       | Legitimate interest (Art. 6.1.f GDPR)                                    |
| Technical / necessary cookies                                         | Browser                                                | Core site functionality                                             | Legitimate interest (Art. 6.1.f GDPR)                                    |
| Analytics and, where consented, marketing/profiling cookies           | Browser, upon consent                                  | Measure site performance and, where applicable, personalise content | Consent (Art. 6.1.a GDPR)                                                |

Provision of the data marked as necessary for a given purpose is required to complete the corresponding action (e.g. submitting the data room form); where this data is not provided, we may be unable to process your request. Provision of marketing-related data is always optional.

## 5. How We Collect Your Data

- Directly from you, when you fill in a form, contact us, or subscribe to our communications;
- Automatically, through cookies and similar technologies when you browse our website (see Section 7);
- From third parties, such as a crowdfunding or fundraising platform used to run an investment campaign, where you have interacted with that platform and it shares your data with us under its own privacy policy.



## 6. Purposes and Legal Basis for Processing

In addition to the purposes listed in the table in Section 4, we may process personal data to: comply with legal, tax, anti-money-laundering or regulatory obligations; establish, exercise or defend legal claims; and, on the basis of your explicit consent, carry out marketing communications or profiling activities to understand and better serve our audience. Where processing is based on consent, you may withdraw it at any time with future effect, without affecting the lawfulness of processing carried out before withdrawal.

## 7. Cookies and Similar Technologies

Our website uses cookies and similar technologies to ensure core functionality, understand how the site is used, and, where you consent, personalise content or measure marketing activities. We use the following categories:

- Strictly necessary / technical cookies — required for the website to function and cannot be disabled; no consent is required.
- Analytics / performance cookies — help us understand site usage and improve the experience; used only upon your consent, where required by law.
- Marketing / profiling cookies — used, upon consent, to measure and personalise communications; may be set by third-party providers.

When you first visit our website, a cookie banner allows you to accept, reject, or customise non-essential cookies. You can change your preferences at any time through the cookie-settings link in the website footer, or by configuring your browser to block or delete cookies (noting that this may affect site functionality). Further details are provided in our separate Cookie Policy, available at [\[link to Cookie Policy\]](#).

## 8. Disclosure and Categories of Recipients

Your personal data is never sold. It may be shared, on a need-to-know basis and under appropriate contractual safeguards, with the following categories of recipients:

- Technical service providers (hosting, email delivery, IT maintenance, analytics), acting as Data Processors pursuant to Art. 28 GDPR;
- The crowdfunding or fundraising platform used for an ongoing campaign, where applicable, under its own Privacy Policy;
- Professional advisers (legal, accounting, tax, or financial advisers), where necessary to manage our business and legal obligations;



- Payment and identity-verification providers, where necessary to process an investment or subscription;
- Competent public authorities, regulators or law-enforcement bodies, where required by applicable law.

## 9. International Data Transfers

Some of our service providers may process personal data outside the European Economic Area (EEA), including in the United States. In such cases, we ensure that transfers are carried out on the basis of an applicable safeguard, such as an adequacy decision issued by the European Commission or the European Commission's Standard Contractual Clauses, together with any additional technical and organisational measures required. You may request further information on these safeguards by contacting us using the details in Section 2.

## 10. Data Retention

We retain personal data only for as long as necessary for the purposes described in this Policy, and in particular:

| Data Category                        | Retention Period                                                                                                                                         |
|--------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Data room access requests            | Up to [24 months] from collection, unless renewed or required for a longer period by law                                                                 |
| Investment / subscription records    | For the duration of the relationship and thereafter for the period required by applicable civil, tax or anti-money-laundering law (typically [10 years]) |
| Newsletter / marketing contacts      | Until you unsubscribe or withdraw consent, and in any case no longer than [24 months] of inactivity                                                      |
| Navigation and technical cookie data | Session or up to [13 months], depending on the cookie (see Cookie Policy)                                                                                |

At the end of the applicable retention period, personal data is securely deleted or anonymised.

## 11. Security Measures

We adopt technical and organisational measures appropriate to the risk, including access controls, encryption of data in transit, restricted staff access on a need-to-know basis, and regular review of our service providers' security practices. No system is completely secure; if we become



aware of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the competent supervisory authority and, where required, the affected individuals, in accordance with Arts. 33–34 GDPR.

## **12. Automated Decision-Making and Profiling**

We do not use your personal data for any form of solely automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you. Should this change in the future, we will update this Policy and, where required, obtain your prior consent.

## **13. Links to Third-Party Websites**

Our website may contain links to third-party websites or services, including the crowdfunding platform used for an investment campaign. We are not responsible for the privacy practices of those third parties. We encourage you to read the privacy policy of any third-party site before providing personal data to it.

## **14. Your Rights**

Pursuant to Arts. 15–22 GDPR, you have the right to:

- Access your personal data and obtain a copy of it;
- Rectify inaccurate or incomplete data;
- Request erasure of your data ("right to be forgotten"), where applicable;
- Object to processing based on legitimate interest, including for direct marketing purposes;
- Request restriction of processing in certain circumstances;
- Request data portability, where processing is based on consent or contract and carried out by automated means;
- Withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal.

To exercise these rights, contact us at [privacy@thefootballfactory.ai](mailto:privacy@thefootballfactory.ai). We may ask you to verify your identity before responding. We will respond to your request without undue delay and, in any event, within one month, as required by Art. 12 GDPR.

## **15. Right to Lodge a Complaint**

You also have the right to lodge a complaint with the competent supervisory authority. If you are located in Italy, the competent authority is the Garante per la Protezione dei Dati Personali



([www.garanteprivacy.it](http://www.garanteprivacy.it)). If you are located in another EU/EEA country, you may contact your local data protection authority.

## **16. Minors**

This website is intended for adult users. We do not knowingly collect personal data from individuals under the age of 18. If you become aware that a minor has provided us with personal data without appropriate consent, please contact us so that we can take the necessary steps to delete such data.

## **17. Changes to This Policy**

This Privacy Policy may be updated from time to time, in particular to reflect changes in the applicable law or in our processing activities. Any significant changes will be communicated on this page with an updated "Last updated" date. We encourage you to review this page periodically.

## **18. How to Contact Us**

For any question about this Privacy Policy or about how we process your personal data, please contact us at [privacy@thefootballfactory.ai](mailto:privacy@thefootballfactory.ai) or write to [Company Name], [Address], [City], [Country].