

# Privacy Policy

## PRIVACY POLICY – FOOTBALL PATH X

**Football Path X GmbH**

**Last Updated on September 27, 2025**

Football Path X GmbH, a company based in Vienna, Austria, developed and owns the Football Path X website and its corresponding web applications and mobile applications (collectively, the “Mobile App”). The Mobile App serves as a social, learning, scheduling, and tracking platform intended for football and/or soccer players, coaches, scouts, and clubs.

This Privacy Policy shall come into effect on September 19, 2024.

### 1. DEFINITIONS

In this Privacy Policy, the following capitalized terms shall have the meanings set forth below, unless the context suggests otherwise:

- **“Affiliate”** refers to any party requiring access to Personal Data for purposes listed in this Privacy Policy, including Football Path X’s employees, contractors, consultants, or third-party service providers.
- **“Content”** refers to all information, data, images, trademarks, logos, and content published on the Mobile App which is owned by Football Path X.
- **“Football Path X”** refers to Football Path X GmbH, the company that developed and owns the Mobile App.
- **“GDPR”** refers to the General Data Protection Regulation (Regulation (EU) 2016/679).
- **“Personal Data”** refers to personal information relating to an identified or identifiable natural person, also known as a data subject under the GDPR. Personal Data may include name, location data, online identification numbers, and other identifiers.
- **“Privacy Policy”** refers to this latest version of the Privacy Policy and any subsequent amendments.
- **“Services”** refers to all services offered on the Mobile App, including:
  - (i) creating a public profile,
  - (ii) viewing public profiles,
  - (iii) scheduling games and training sessions,

- (iv) tracking progress,
- (v) adding game or training statistics.
- **“Subscription”** refers to a subscription available for purchase on the Mobile App, granting access to premium features and Content.
- **“Terms and Conditions”** refers to the latest published version on the Mobile App.
- **“User Account”** refers to the account created by Users on the Mobile App.
- **“Users”** refers to all users of the Mobile App.
- **“User Content”** refers to all content, images, videos, and other media published by Users on the Mobile App.

## 2. APPLICATION

This Privacy Policy sets forth the terms governing Football Path X’s collection, protection, usage, and disclosure of Personal Data obtained from the Mobile App.

Upon downloading, accessing, or otherwise using the Mobile App, Users are deemed to have read and agreed to this Privacy Policy in full. Users who do not agree must refrain from using the Mobile App.

## 3. APPLICABLE LEGISLATION

This Privacy Policy is drafted in compliance with:

- The **GDPR**, applicable to all processing of Personal Data of individuals in the EU/EEA.
- Data protection laws applicable in **North America**, which were also taken into account.

## 4. MINOR USERS

### 4.1 Minimum Age to Use the Mobile App

The Mobile App may be used by Users aged **four (4)** or older. Users under **18** must use the Mobile App with the consent and supervision of a parent or legal guardian.

### 4.2 Representation by Parent or Legal Guardian

Each minor User must be represented by a parent or legal guardian. They shall be responsible for managing and approving:

- The minor’s User Content
- Financial matters
- Compliance with this Privacy Policy

### 4.3 Parent or Guardian Responsibilities

Parents/guardians must:

- Oversee the minor's use of the Mobile App
- Approve User Content uploaded by minors
- Manage payment-related activities

## 4.4 Consents Granted by Parent or Guardian

By allowing minors to use the Mobile App, the parent/guardian consents to:

- Football Path X's collection and processing of the minor's Personal Data
- Public display of the minor's name (e.g., leaderboards, achievements)
- Use of User Content for marketing purposes

## 4.5 Requests to Limit Usage of Minor Personal Data

Parents may restrict Football Path X from displaying a minor's:

- Name
- User Content

Such requests must be submitted in writing. Football Path X will reasonably comply with these restrictions.

# 5. PERSONAL DATA PROVISION

## 5.1 Required Personal Data for User Accounts

To create a User Account, Users must provide:

1. First name
2. Last name
3. Date of birth
4. Nationality
5. Gender
6. Weight and height
7. Preferred foot
8. Playing position
9. Current team
10. Profile photo
11. License type (if Scout or Coach)

Not providing required Personal Data prevents account creation.

## 5.2 Optional Personal Data

Users may optionally provide:

- Phone number

- Date they began playing football
- Favourite formation
- Transfer history
- Skill evaluations (1–100)
- Favourite team
- Achievements
- Career goals
- Strengths and weaknesses
- Languages spoken

Scouts and Coaches may also provide:

- Favourite player type
- Geographical focus
- Age groups coached/scouted
- Gender groups coached/scouted

## **6. PERSONAL DATA COLLECTION**

Football Path X shall collect only Personal Data voluntarily provided by Users.

### **6.1 Personal Data Provided on User Accounts**

Personal Data submitted during onboarding or profile editing is collected and stored.

### **6.2 Personal Data for Payment Purposes**

If Users purchase a Subscription, payment information (credit card, billing details) may be processed by Football Path X's secure third-party payment processor.

### **6.3 Personal Data from Third-Party Logins**

If Users log in with Gmail, Apple, or email (and potentially Facebook/X), Football Path X may collect:

- Login credentials
- Publicly available account information

### **6.4 Indirect Identifiers (Non-personal Metadata)**

Football Path X may collect:

- IP addresses (not used for individual tracking)
- Purchase history
- Usage history

Such data is used for:

- Analytics
- Recommendations
- Service improvement

## **7. PERSONAL DATA PROTECTION**

### **7.1 Security Measures**

Football Path X shall protect Personal Data using:

- Firewalls
- Encryption
- Secure storage systems

### **7.2 Limited & Parametered Disclosures**

Personal Data may only be disclosed:

- On a need-to-know basis
- To Affiliates bound by confidentiality
- To facilitate Services or payment processing

### **7.3 Disclaimer on Data Transmission**

Although Football Path X employs protective measures, Users understand:

- No internet-based transmission is fully secure
- Use of the Mobile App is at their own risk
- Football Path X cannot guarantee complete security
- Liability applies only where required under law (e.g., GDPR obligations)

## **8. PERSONAL DATA USAGE**

Football Path X shall use Personal Data solely for the purposes set out herein.

### **8.1 Usage for Legal Purposes**

Personal Data may be disclosed:

- When required by law or court order
- To investigate policy violations
- For matters of public interest

## 8.2 Provision of Services and Subscriptions

Personal Data may be used to:

- Create public profiles
- Schedule games or trainings
- Track progress and statistics
- Process payments

## 8.3 Marketing and Promotional Purposes

Football Path X may use Personal Data to:

- Send newsletters
- Conduct giveaways
- Display winners

Users may opt out at any time.

## 8.4 Notifications

Users may receive:

- Push notifications
- Alerts regarding account activity

Notifications can be disabled from the Mobile App.

## 8.5 Analytical and Statistical Purposes

Football Path X may collect and analyze:

- Usage data
- Performance statistics

SDKs (e.g., Google Analytics, Facebook SDK) may be used.

## 8.6 Usage Pursuant to Consent

Consent must be:

- Written
- Specific
- Withdrawable at any time

Withdrawal requests must be emailed to [info@footballpathx.com](mailto:info@footballpathx.com).

# Public Profile Consent

Users acknowledge that public profiles include:

- Age
- Residence city/country
- Name
- Football history
- Nationality
- Gender
- Physical attributes
- Preferred foot & position
- Team and transfer history
- Skill evaluations
- Achievements
- Career goals
- Languages spoken
- Profile photo

Users may hide profiles at any time.

## 9. MOBILE APP MAINTENANCE

Football Path X maintains the Mobile App internally, with assistance from trusted partners bound by NDAs.

## 10. USER RIGHTS (GDPR)

Users benefit from the following rights:

### 10.1 Right to Be Informed

Users may request details regarding collection and use of Personal Data.

### 10.2 Right to Access

Users may request information regarding:

- Transmission of Personal Data outside the EU
- Processing activities

### 10.3 Right to Rectification

Users may correct or update Personal Data:

- Directly in their account
- By emailing Football Path X

## 10.4 Right to Be Forgotten

Users may request:

- Deletion of their Personal Data
- Removal of their User Account

Deletion may occur only **30 days after Subscription cancellation or expiration.**

## 10.5 Right to Data Portability

Users may request a machine-readable copy of their Personal Data.

## 10.6 Right to Revoke Consent

Users may withdraw any previously granted consent at any time.

# 11. RIGHTS OF USERS IN SPECIFIC JURISDICTIONS

## 11.1 California Users (CCPA & CPRA)

California Users may:

- Request deletion
- Request information about data collection
- Opt out of sale of Personal Data
- Restrict use of their data to service provision

## 11.2 Nevada Users

Nevada Users may prohibit the sale/licensing of their Personal Data.

## 11.3 Canadian Users (PIPEDA)

Rights include:

- Remaining anonymous where possible
- Access and correction rights
- Consent-based data processing

## 11.4 Brazilian Users (LGPD)



Rights include:

- Data access
- Information on consent processing

## 11.5 Users in Other Jurisdictions

- **China (PIPL)** – access, rectification, deletion, processing restriction
- **Singapore (PDPA)** – similar rights to GDPR
- **Mexico (General Law of Protection of Personal Data)** – access, correction, withdrawal, objection

## 12. PERSONAL DATA RETENTION

Football Path X shall retain Personal Data indefinitely unless:

- Required otherwise by law
- A deletion request is submitted

Upon valid request, Football Path X shall delete Personal Data from its servers.

## 13. DATA TRANSFERS

Football Path X shall not transfer Personal Data outside the EU unless:

- The receiving country has adequate protection (per European Commission)
- A legitimate and necessary purpose justifies the transfer

## 14. COOKIES

Football Path X may use:

- Session cookies
- Functional cookies
- Performance cookies
- Other cookies

Cookies may collect non-personal information and store user preferences.

Users may:

- Disable or delete cookies
- Understand that doing so may affect app functionality

Non-essential cookies may require User consent.

## 15. PRIVACY POLICY UPDATES

Football Path X may update this Privacy Policy to comply with changes in law or internal policies. The latest version shall be published on the Mobile App and becomes binding upon publication.

## 16. QUESTIONS AND COMMENTS

Football Path X welcomes questions and feedback regarding this Privacy Policy. Users may contact us at:

[info@footballpathx.com](mailto:info@footballpathx.com)

or through the Mobile App.

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