

## Privacy Policy

[Last update: 17.08.2023]

**What is this document?** Pursuant to art. 13 European Reg. n. 679/2016 (“**General Data Protection Regulation**” or “**GDPR**”) and in compliance with the principles contained therein, Venueserve, Inc. intends to inform each user (the “**User**”) about the processing of personal data happening on its website [Vensport.com](https://vensport.com) (the “**Website**”).

### Controller and contact detail

Vensport, Inc. (hereinafter “**Controller**”, pursuant to art. 4(7) GDPR)  
with registered offices in 8 Toboggan Ridge Rd, Saddle River, NJ 07458 USA  
+1 (800) 258-0755  
[info@vensport.com](mailto:info@vensport.com)

### Data Protection Officer and contact detail

The Controller has provided for the formal appointment of a Data Protection Officer, whom you may contact at any time by writing to the following address: [dpo@vensport.com](mailto:dpo@vensport.com)

### Representative of the Controller in the European Union (Article 27, GDPR) and contact

**detail** The Controller has provided for the formal appointment of a Representative in the European Union, pursuant to art. 27 GDPR, whom you may contact at any time by writing to the following address:

Tomas Vesely  
[representative.eu@vensport.com](mailto:representative.eu@vensport.com)

### Data Privacy Framework

Venueserve, Inc. complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Venueserve, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. Venueserve, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S.

DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

The Federal Trade Commission has jurisdiction over Venueserve compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

### Purpose of processing, Legal Basis, Personal Data and Retention Period

The Controller processes Personal Data for the following purposes, as specified here in below. The table also shows the legal basis which justifies the processing and the period of data retention:

Purpose	Personal data	Legal basis	Data retention
A. Contact.	<ul style="list-style-type: none"> <li>✓ Anagraphic information</li> <li>✓ Contact details</li> </ul>	Execution of pre-contractual measures [Art. 6, 1, lett. b) GDPR]	For the period necessary for the response.
B. Allow the Controller to accomplish all formalities required by law.	<ul style="list-style-type: none"> <li>✓ Anagraphic information</li> <li>✓ Contact details</li> </ul>	Legal obligation [Art. 6, 1, lett. c) GDPR]	Until the expiry of the data retention period, as provided by the applicable law.
C. Improve the Website by analyzing how Users navigate and/or use the Website.	<ul style="list-style-type: none"> <li>✓ Website usage data</li> </ul>	Legitimate interest [Art. 6, 1, lett. f) GDPR]	Not applicable (aggregate or anonymous data)
D. Detecting or preventing fraudulent activity and exercising the Controller's rights in Court.	<ul style="list-style-type: none"> <li>✓ Anagraphic information</li> <li>✓ Contact details</li> </ul>	Legitimate interest [Art. 6, 1, lett. f) GDPR]	10 years

In case the User prefers not to communicate mandatory and/or necessary data for the fulfillment of certain purposes, Vensport reserves the right to not provide the service through its Website.

Users can ask for an explanation of the legal basis of each treatment at any time.

### **Processing modalities**

The processing of Personal Data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

### **Data Sharing**

Your Personal Data may be shared with the following subjects, on a need-to-know basis and in accordance with Applicable Privacy Laws: (i) Internet service providers and platforms used by the Controller as organization tools, channels of communication and/or promotion; (ii) authorities, government agencies, or judicial courts to meet any applicable law, regulation, legal process, or enforceable governmental request.

All of the relations with the subjects listed above are - and will be - formalized with a contract pursuant to Art. 28 GDPR (Data Protection Agreement or "DPA").

Personal data will be processed by internal staff specifically authorized under Article 29 of the GDPR. The names of all authorized personnel are available under request to the Data Controller, at [info@vensport.com](mailto:info@vensport.com).

Venueserve is responsible for the processing of personal data it receives under the EU-US DPF and Swiss-US DPF Data Privacy Frameworks and subsequently transfers to a third party acting as an agent on its behalf.

### **Data processing locations**

Personal data are processed at the headquarters of the Controller, as well as in the servers that host the website vensport.com. The Data Controller ensures that when using cloud providers established outside the EEA, the processing of personal data by these recipients is carried out in accordance with applicable law.

Transfers are carried out by means of appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards

provided by the GDPR.

### **Data Subjects' rights**

The User may exercise all the rights provided for by Articles 15-21 of EU Reg. no. 679/2016, at any time and without unjustified limitations, by contacting the Data Controller at [dpo@vensport.com](mailto:dpo@vensport.com).

Requests shall be filed free of charge and processed by the Controller within 30 days. Specifically, the User can:

- Obtain from the controller confirmation as to whether or not personal data are being processed (Art.15);
- Obtain from the controller the rectification of inaccurate personal data (Art. 16);
- Obtain from the controller the erasure of personal data (Art. 17);
- Obtain from the controller restriction of processing (Art. 18);
- Have the right to receive the personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
- Have the right to object (Art. 21);

We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit to [dpo@vensport.com](mailto:dpo@vensport.com)

### **Complaints and Arbitration pursuant to the Recourse, Enforcement and Liability Principle**

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority, under Art. 77 of the Regulation, if they believe that the Controller's processing of their Personal Data is in violation of the applicable law.

In compliance with the EU-U.S. DPF and the Swiss-U.S. DPF, Venueserve, Inc. commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the Swiss-U.S. DPF should first contact Venueserve, Inc. at:



Robin Kent

CEO

dataprivacyframework@vensport.com

In compliance with the EU-U.S. DPF and the Swiss-U.S. DPF, Venueserve commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the Swiss-U.S. DPF.

Under certain conditions specified by the principles of the EU-U.S. DPF and Swiss-U.S. DPF Data Privacy Framework, you may also be able to invoke binding arbitration to resolve your complaint. Additional information on this option is available in <https://www.dataprivacyframework.gov/s/>.

### **Amendments**

The Controller reserves the right to amend and update the Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.