

Privacy Notice for Napoleon Score

Introduction

The Privacy Notice was last updated on the 6th of December 2024.

We reserve the right to change and/or update our Privacy Notice at our discretion and at any time. You will be notified accordingly and in advance about these changes and or updates, which we kindly ask you to read carefully and make sure you understand the changes.

1. General information

The companies mentioned in the “[Terms of Use](#)” are the Data controller of your personal data and processes it in accordance with the General Data Protection Regulation 2016/679/EU.

2. What personal data we collect about you and why?

As used in this Privacy Notice, ‘personal data’ means any information that can be used to individually identify you (directly or indirectly), alone or along with other information. Generally, we will collect your personal data in the following manner:

- when you use the app
- you contact us for various purposes (customer support, feedback, questions, or comments through a ‘contact us’ form)
- It is generated through different tracking technologies such as cookies, IP address recording, geographical location data.

We will process the following data about you: IP address and age category. We will process user data depending on the used functionality e.g. conversation history.

By law, we must have a lawful reason for processing your personal data. The data we collect about you will only be used for the purposes stated below in this Privacy Notice.

The purposes of processing your personal data is to:

- Napoleon Score services accordance with the “[Terms of Use](#)” of the App

4. Who do we share your personal data with?

In certain circumstances described below, we will share a minimum amount of personal data as follows:

1. Service providers authorized to process personal data who are acting as our contractors, for the purpose of managing our activities, such as:
 - Service providers that offer technical support to our IT infrastructure, data center, analytics, hosting providers, etc.
 - Companies who provide services for the purposes of marketing communications, e.g. e-mail campaign.

- Companies that support us in our marketing activities on the Internet and on social media platforms.

We may also share your data based on legal obligations. We may also share your personal data in good faith in order to protect, secure or prevent the loss of our rights or in the legitimate interests of The controller, its customers or the general public, or to respond to complaints from others.

In the event of our reorganization, merger or acquisition by another company or in the event of the transfer of our business on the basis of our legitimate interest in consolidating, expanding or streamlining our business. In any of the situations listed, the person receiving the data may have access to the data we store, including your personal data, always in accordance with applicable law.

Based on consent in cases where your personal data is transferred to any other third party where you have consented or requested that we do so.

5. Where is your personal data stored?

Your personal data will be kept, processed and stored by us and our service providers in the European Economic Area and USA.

Each of our service providers who process and store your personal data has an obligation to keep it protected and secured, in accordance with applicable industry standards and whether less stringent legal provisions apply in their jurisdiction.

Where such recipients of data are located in third countries for which the European Commission has not issued an adequacy decision, The controller has in place contractual relationships with each such recipient that include standard contractual clauses as approved by the European Commission or other supervisory authority where required, intended to ensure an adequate level of protection and will always conduct rigorous due diligence to ensure there are no risks to such transfers. A copy of the standard contractual clauses used by The controller can be found at: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj

6. How long we keep your personal information for?

We will only retain your information for as long as necessary to fulfil the purposes we collected it for which is providing you access to our services and functionalities.

Generally, this means we will keep your personal data until the end of the business relations with you on the application, plus a reasonable period of time after that where necessary to deal with legal obligations and to respond to any inquiries, complaints or legal claims, which is 3 years.

Upon expiration of the applicable deadlines, your personal data will be deleted.

7. How we keep your personal data secure?

The controller has implemented all necessary state of the art and industry standard technical and organizational measures, whether physical, electronic or procedural, to protect the confidentiality and security of the personal data you share with us. These measures have been implemented to protect data against unauthorized access, destruction, loss, alteration, access, disclosure or use.

Our security controls are designed to maintain an adequate level of confidentiality, integrity and data availability. Information transmitted and received through the Controller's site and in our applications is encrypted using Secure Socket Layer (SSL) technology. The controller has a 24/7 network traffic monitoring system to detect signs of attacks or intrusions.

Despite the security measures mentioned above, we want you to know that IT and the internet are not perfectly secure mediums and there will always be the chance that your personal data could potentially be subject to unauthorized acts by third parties. Although we take reasonable steps and employ appropriate security measures to safeguard your personal data, no method of transmitting or storing data is completely secure.

8. Automated decision making and profiling

We may perform certain automated profiling activities to analyse, predict or evaluate aspects concerning the characteristics of your behaviour on our services by using special automated programs, in order to better understand how you interact with our services in accordance with our legitimate interests and legal obligations applicable to us.

The reason we do this, is because we want to:

- enhance your interaction with our services
- protect our business against fraudulent activities and service abuse
- improve our marketing activities

We want you to understand that we do not make decisions about you through solely automated means that could produce legal or similarly significant effects on you. We ensure our staff are always involved in such profiling through automated means to protect your privacy and your rights in accordance with the law.

You have the right to object to such profiling in situations where we rely on legitimate interest as a ground for processing your personal data. If you choose to exercise this right, we will assess the situation and, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, we will no longer process your personal data for this reason.

9. Your rights

At any given time, you will have the following rights regarding your personal data processed by us. Please note, other than your right to object to us using your information for direct marketing (and profiling for the purposes of direct marketing), your rights are not absolute in case of other applicable laws.

(A) The right to information: you have the right to be provided with information on the identity of the personal data controller, on the reasons for processing your personal data and other relevant information necessary to ensure the correct and transparent processing of your personal data.

(B) The right of access: you have the right to make a request for details of your personal data and a copy of that personal data.

(C) The right of rectification: you have the right to have inaccurate data about you corrected or removed without undue delay.

(D) The right of erasure ('right to be forgotten'): you have the right to have certain personal data about you deleted from our records. If your requests to delete your personal data violate our legal or regulatory obligations, or the data related to the request for deletion are necessary to exercise or defend our legal claims, we may not be able to act upon your request and we will notify you of this decision.

(E) The right to restriction of processing: you have the right to ask us to restrict the use of your personal data.

(F) The right to data portability: you have the right to ask us to transfer the personal data you have given us to you or to someone else in a format that can be read by computer.

(G) The right to object: you have the right to object to us processing (including profiling) your personal data in cases where our processing is based on a task carried out in the public interest or where we have let you know it is necessary to process your data for our or a third party's legitimate interest. You can object to us using your information for direct marketing and profiling purposes in relation to direct marketing.

(H) The right in relation to automated decisions: you have the right to not be subject of a decision which produces legal effects which concern you or which has a significant effect on you based only on automated processing, unless this is necessary for entering into a contract with you, it is authorized by law or you have given your permission for this.

You can request the deletion of your user data by contacting us directly on the email help-belgium@sportening.com.

Your request will be reviewed and answered within one calendar month from receipt, in accordance with GDPR. If we receive a large number of requests, or particularly complex requests, the deadline can be extended by a maximum of another two months. In certain circumstances as prescribed by data protection law (i.e. excessive requests), we might refuse to act upon your request

You also have the right to lodge a complaint to Belgian Data Protection Authority (GBA) Rue de la Presse 35, 1000 Brussels or any competent court to defend the rights guaranteed by the applicable legislation.

10. Protection of children

The services and products are intended only for adults (that is persons over 18 years). The does not knowingly collect personal data from minors.

By registering to our services you confirm that you are at least 18 years old and are fully able to enter into, comply with and be legally bound by any of our terms and conditions made available to you and this Privacy Statement. If we are notified or learn that a minor person has submitted personal data to us by any means of communication, we will immediately delete their personal data.

11. How to contact us

If you have any questions, comments, complaints or suggestions relating to this Privacy Notice, or any other concerns about the way in which we process information about you, please contact us help-belgium@sportening.com.