

# PRIVACY POLICY

# Third Eye Archery

# GDPR

Last updated [ September 12, 2020]

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## INTRODUCTION

Thank you for choosing to be part of our community at Third Eye Archery (“company”, “we”, “us”, or “our”). We are committed to data transparency, protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [info@thirdeyearchery.com].

When you visit our website [www.thirdeyearchery.com](http://www.thirdeyearchery.com) (“Site”) and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our site and our services.

This privacy policy applies to all information collected through our website (such as [INSERT URL]), [our mobile] [or] [our Facebook applications] (“**Apps**”), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “**Sites**”).

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

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## **1. WHAT INFORMATION DO WE COLLECT?**

### ***1.1. Personal information you disclose to us***

*In Short: We collect personal information that you provide to us such as name, address, contact information, health and sports-related lifestyle data, video material filmed and shared by you to the service provider, payment information.*

We collect personal information that you voluntarily provide to us when [registering at the Sites or Apps,] expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites [(such as posting messages in our online forums or entering competitions, contests or giveaways)] or otherwise contacting us, as well as electronic forms that you fill in when signing up for our Services.

The personal information that we collect depends on the context of your interactions with us and the Sites, the choices you make and the products and features you use. The personal information we COLLECT can include the following:

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

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**Video Material.** Though such occasions are rare, video material can lead to a person's identification, hence why it is classed as 'personal information'. This clause discussed in more detail below (Clause 3.)

**Payment Data.** We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

## **1.2. Information automatically collected**

*In Short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our websites.*

We automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

## **1.3. Site Browsing/Visiting Security**

Our Site operates under cover of HTTP (Hyper Text Transfer Protocol Secure). When using HTTP sites, any data that is transferred can potentially be accessed or manipulated by attackers. However, when using HTTPS sites, data is encrypted and authenticated and therefore secured. Our Site visitors' information is encrypted, and therefore more secure.

Our Site operates under A Secure Sockets Layer, or SSL certificate, which allows Our Site visitors to view Our site over an HTTPS connection. It secures the connection between your browser and the site you're visiting.

### **1.3.1. Site Cookies**

Like many businesses, we also collect information through cookies and similar technologies. We use essential cookies: security, anti-fraud, and other purposes related to the specific functionality of Our service. To opt out simply click the relevant button on the 'Cookies' pop up. To find out about the kind of cookies used on Site, click the 'lock' button by the Site's URL in the search bar.

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## 2. HOW DO WE USE YOUR INFORMATION?

**2.1. In Short:** *We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Sites for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **Fulfill and Manage Your Orders** [for Contractual reasons]. We may use your information to fulfill and manage your orders, payments made through the Sites.
- **To Enforce Our Terms, Conditions and Policies** [for Business Purposes, Legal Reasons and/or possibly Contractual].
- **Personal Information and Data are Essential for the Services We Provide. [for Business Purposes]** Materials like your videos, personal data specifics you provide in your Athlete's Questionnaire are essential for providing tailored service, as advertised, they make the service what it is.
- **To Respond to Legal Requests and Prevent Harm** [for Legal Reasons]. If we receive a witness summons or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To Send Administrative Information to You** [for Business Purposes, Legal Reasons and/or possibly Contractual]. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies
- **Deliver Targeted Advertising to You** [with your Consent]. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and to measure its effectiveness. Same goes for our requests of your Service reviews and video

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material requested for testimonials, to be displayed on our Website/Social Media [For more information, see our Cookie Policy [HYPERLINK]].

- **Administer Prize Draws and Competitions** [for our Business Purposes and/or with your Consent]. We may use your information to administer prize draws and competitions when you elect to participate in competitions.
- **To Post Testimonials** [with your Consent]. We post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your video material and testimonial. We will ask for your consent to Testimonials with anonymity (without your name, unless you want your name to be known publicly). If you wish to update, or delete your testimonial, please contact us at [info@thirdeyearchery.com](mailto:info@thirdeyearchery.com) and be sure to include your name, testimonial location, and contact information.
- **Request Feedback** [for our Business Purposes and/or with your Consent]. We may use your information to request feedback and to contact you about your use of our Sites.
- **To Protect Our Sites** [for Business Purposes and/or Legal Reasons]. We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- **For Other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

### 3. HOW IS VIDEO MATERIAL HANDLED AND SHARED?

**3.1.** The service We provide, relies heavily on the video material you share for assessments. Your safety and integrity are a priority. Here is a breakdown on what we do to ensure the safe handling of the video material you share with us:

- Video exchange takes place through sync.com 100% private 'cloud' storage, that operates on end-to-end encryption platform, without third party involvement. Sync is safe to use, no matter where your business operates, with USA, EU / UK GDPR, and Canadian compliance built-in, including Canadian data residency.

Only you and the service provider will be able to view, access and download video material from this storage platform. This clause will be revised in the Consent Form before you sign up for the service and you will be asked to use this platform and agree to respect the privacy and safety of your service

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provider when they share video material with you in return. We do not work under any advertising contract with sync, We selected it with your and our privacy in mind.

For more information on platform safety and privacy visit [<https://www.sync.com/your-privacy/>]

### **3.2. When you share your video material with us you allow us to:**

- 1) **View the video material**
- 2) **Make Adjustments** through software\*
- 3) **Insert notes and visuals** through software\*
- 4) **Share your video material on our Sites**, anonymously or otherwise [for our Business Purposes and **with your Consent always**]

5) **Store video content.** *We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law, for up to the period of maximum of 2 years, due to the nature of the service/ and for recordkeeping/accounting purposes.*

\* **We use Dartfish Software for video analysis.** For terms of use and privacy please consult: [<https://www.dartfish.com/terms>] and [<https://www.dartfish.com/privacypolicy>]

## **4. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

**4.1. In Short:** *We only share information with your consent, to comply with laws, to protect your rights, or to fulfil business obligations.*

We only share and disclose your information in the following situations:

- **Compliance with Laws.** *We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a witness summons (including in response to public authorities to meet national security or law enforcement requirements).*
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

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- **Third-Party Service Providers.** We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, **we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.**
  - **Third-Party Advertisers.** *We may use third-party advertising companies to serve ads when you visit the Sites. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you. [See our Cookie Policy [\[Hyperlink\]](#) for further information]*
  - **Affiliates.** *We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.*
  - **Business Partners.** *We may share your information with our business partners to offer you certain products, services or promotions.*
  - **With your Consent.** *We may disclose your personal information for any other purpose with your consent.*

## **5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

- 5.1. In Short:** *We may use cookies and other tracking technologies to collect and store your information.*

Our Site uses cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies by checking the relevant clause 1.3.1. of this document.

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## 6. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

**6.1. *In Short:*** *We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.*

The Sites may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Sites. You should review the policies of such third parties and contact them directly to respond to your questions.

## 7. HOW LONG DO WE KEEP YOUR INFORMATION?

**7.1. *In Short:*** *We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 1 year; for video material provided to us by you -no longer than 2 year period of time/ or longer period- subject to your consensual agreement.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 8. HOW DO WE KEEP YOUR INFORMATION SAFE?

**8.1. *In Short:*** *We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

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**8.2. Video Material Storage-** We conduct our video and other material exchange with the service recipients through sync.com; video and other materials exchanged are stored in the 100% private 'cloud', both short-term and long-term storage. By long-term, We mean materials We store for a maximum of 1 and 2 year retention as mentioned in clause 7.1.

## **9. DO WE COLLECT INFORMATION FROM MINORS?**

**9.1. In Short:** *We do not knowingly collect data from or market to children under 18 years of age and are concerned about the safety of children when they use the Internet.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Sites [and Apps], you represent that you are at least 18 years of age. If we learn that personal information from users less than 18 years of age has been collected, we will take reasonable measures to promptly delete such data from our records/ or contact appropriate authorities depending on the set of circumstances. If you become aware of any data we have collected from children under age 18, please contact us at [info@thirdeyearchery.com].

## **10. WHAT ARE YOUR PRIVACY RIGHTS?**

**10.1. For information on your Privacy Rights please visit UK'S Independent Commissioner's Office [<https://ico.org.uk/your-data-matters/>]  
For Data Protection Act 2018 visit: [<https://www.gov.uk/data-protection>]**

### **10.2. Termination of Service Agreement**

You may at any time terminate your service agreement:

You can do so by contacting us: [info@thirdeyearchery.com]

**\*\*Note that in the event of termination, the fees you paid for the service are non-refundable\*\***

*Upon your request to terminate you service agreement, we will delete all of your personal information/ video material from our active databases.* However, some information may be retained

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in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites.

Click the relevant option when the cookies pop-up appears. ‘Lock’ symbol on search bar will list all the cookies used by the Site.

## **11. DO WE MAKE UPDATES TO THIS POLICY?**

**11.1. In Short:** *Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

## **12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, email us at [info@thirdeyearchery.com] with the title ‘Privacy Policy’.