

PRIVACY POLICY FOR FULL-TIME AND PART-TIME - EMPLOYEES OR TRAINEES AT SILKEBORG IF A/S

1. Introduction and Data Controller

This privacy policy describes how Silkeborg IF A/S ("SIF", "we", "the club") processes personal data about you as a contracted football player at the club, including to the extent that you participate in other activities for the club that are related to your player engagement. The policy meets the requirements of the General Data Protection Regulation ("GDPR") and supplementary Danish data protection legislation.

Silkeborg IF A/S, DK – Ansvej 104, 8600 Silkeborg, CVR no. 26397731, is the data controller for the processing of the personal data that we process about you as a player. If you have any questions about our processing of your personal data, or wish to exercise your rights, you are always welcome to contact us by phone at 86804477 or by e-mail: sif@silkeborgif.com.

The privacy policy applies in parallel with your player contract with the club and the relevant rules in the main agreement and the collective agreement between the employers' association of Divisionsforeningen (Divisionsforeningens Arbejdsgiverforening) and the Players' Association (Spillerforeningen).

2. Categories of personal data

As part of the administration of your contractual relationship and the performance of your tasks as a professional or contract footballer, we process various categories of personal data about you.

We process general personal data such as name, address, contact information, date of birth, citizenship, information about your football career and educational background, information from application or scouting material, references, parent club affiliation, position and player function in the club (for example full-time, part-time, sideline player or trainee), information about working hours and participation in training and matches, salary conditions, tax conditions, account number, pension and insurance conditions, holidays and other absences as well as information about contract terms, bonus schemes, employee benefits, sponsorships and similar agreements.

We also process sports and performance-related information, including information about your physical training and load, test results from physical and fitness tests, strength and running tests, GPS and tracking data from training and matches, technical and tactical analysis information, video material from training and matches, and internal sports assessments that management and coaching staff make as part of sports planning and development. This information is related to you as an identifiable player and is personal data.

When necessary, we process special categories of personal data (sensitive information) in the form of health information. This may include information about injuries and their extent, injury history, recovery process, general health conditions, illness, long-term illness, work-related injuries, information in medical certificates and from healthcare personnel affiliated with the club or external practitioners, as well as other health information, if relevant.

We may also receive and process information resulting from doping control and other sports law regulations to the extent that such information is received by the club as part of disciplinary proceedings or sanctions, and the processing is necessary for employment law reasons.

We process your CPR number, among other things, in connection with salary payments and settlements, reports to SKAT and other authorities, administration of pensions, insurance and statutory insurance schemes, as well as any collection of child certificates or other types of certificates, if this follows from legislation or tournament rules.

To the extent necessary, we also process information about criminal offences. This will typically occur in connection with obtaining a child certificate or processing cases where there is a relevant criminal issue and where the law permits or requires the processing of such information. We limit the processing as much as possible, including by only registering whether a certificate is without relevant remarks, as far as possible.

3. Purpose and legal basis

We process your personal data for several purposes related to your involvement as a player at the club as well as our obligations as an employer and as a company.

A central purpose is personnel administration and fulfillment of the player contract with you. We process information in order to enter into, administer and fulfill your player contract in accordance with DBU's standard contract and the collective agreement, including planning training and matches, administration of salary and other salary components, bonuses, employee benefits and other agreed services, registration of participation in training, training camps and matches, internal communication with you and general HR and contract administration. This processing is based on GDPR Article 6, paragraph 1, letter b on fulfillment of contract and GDPR Article 6, paragraph 1, letter f on legitimate interests, where our interest in an efficient and responsible administration of the player squad outweighs opposing considerations. When we process your CPR number in this connection, it is based on Section 11 of the Data Protection Act.

Another purpose is to fulfill legal obligations incumbent on us. This includes, among other things, reporting to tax authorities and other public authorities, compliance with the rules of the Danish Accounting Act on the storage of accounting materials, compliance with employment, working environment and occupational injury legislation, rules on holidays, pensions and mandatory insurance, as well as requirements arising from tournament rules and sports law regulations, where these entail legal or regulatory requirements for data processing. This processing is based on GDPR Article 6, paragraph 1, letter c and Section 11 of the Danish Data Protection Act.

We process sports and performance-related data in order to plan and carry out training, matches and other sports activities at a professional level, to develop you as a player and to assess and manage sports and commercial matters on an informed basis. This includes the use of video analysis, GPS data, physical test results and internal sports assessments. The processing is based on GDPR Article 6(1)(b) when the data is directly related to the performance of your player contract, and GDPR Article

6(1)(f) when the processing is part of our legitimate interest in developing and optimizing the team and the individual player.

We process health information and other special categories of information to the extent necessary to manage sick leave, injuries, work-related injuries, long-term illness and rehabilitation, as well as to be able to adapt training and load to take due account of your health. This includes, among other things, cooperation with doctors, physiotherapists and other healthcare professionals, obtaining medical information, reporting and handling work-related injuries, and applying for reimbursement of benefits. The processing is based on GDPR Article 9, paragraph 2, letters b and h, in combination with GDPR Article 6, paragraph 1, letters c and f and relevant national legislation. To the extent that health information is part of disputes, disciplinary proceedings or is necessary to establish, exercise or defend a legal claim, the processing is also based on GDPR Article 9, paragraph 2, letter f.

In relation to doping and match fixing, the club may receive information about you from the relevant sporting authorities if cases of doping or match manipulation are initiated or concluded. Such information could be health information or information about possible criminal offences. The club only processes this information to the extent necessary to comply with the sports law rules and agreements to which the club is subject and to be able to handle employment law and contractual consequences. The processing is based on GDPR Article 6, paragraph 1, letters b and f and, where applicable, GDPR Article 9, paragraph 2, letter f and Section 8 of the Data Protection Act.

We also process personal data about you in connection with travel activities, for example when you participate in away matches, training camps, European matches or other events at home and abroad. In this connection, we process, among other things, identification information, contact information and, where necessary, passport information and other travel documents. The purpose is to be able to plan and implement transport, accommodation and logistics responsibly and efficiently. The processing is based on GDPR Article 6, paragraph 1, letters b and f and, where national or international requirements require it, GDPR Article 6, paragraph 1, letter c.

We may also process personal data about you to handle potential or pending disputes and legal claims, for example in connection with employment law disputes, compensation cases, disciplinary cases, transfer cases, insurance cases, tax cases or other matters where it is necessary to be able to document relevant facts. This processing is based on GDPR Article 6(1)(f) and, when special categories of data are processed, on GDPR Article 9(2)(f).

Finally, in some cases we process your personal data on the basis of consent, for example if we want to use your image, name or other personal characteristics for marketing purposes that go beyond what is necessary under the player contract and the general marketing rights that the club has under the DBU standard contract and the collective agreement. This may also be in connection with special sponsorship activities or commercial campaigns where your participation cannot be considered a necessary part of the employment relationship. In such cases, you will receive separate information and be asked to give consent pursuant to GDPR Article 6(1)(a) and, if special categories of data are processed, GDPR Article 9(2)(a). You can withdraw your consent at any time, as described below.

4. Recipients of personal data

As part of your contractual relationship and the sporting and commercial activities in which the club participates, your personal data may be disclosed to or made available to external parties.

We use, among other things, external suppliers who process personal data on our behalf as data processors. This includes suppliers of payroll and HR systems, IT, hosting and operating partners, systems for training and performance analysis (for example, GPS and video analysis platforms), systems for working time and attendance registration, travel and booking systems, as well as suppliers who assist with the administration of pension and insurance schemes. These data processors act only on our instructions and have entered into data processing agreements that require security and confidentiality.

We may also disclose your personal data to other data controllers when necessary and lawful. This may, for example, be to SKAT and other public authorities in connection with statutory reporting, to pension and insurance companies in connection with the mandatory insurance and pension schemes mentioned in the player contract, to banks in connection with salary payments and other payments, to healthcare professionals, doctors, physiotherapists and clinics in connection with the treatment of injuries and health conditions, as well as to lawyers, auditors, courts, dispute resolution bodies under the DBU, the Divisionsforeningen, FIFA or CAS and other advisors in connection with disputes, transfer cases or other legal matters.

By virtue of the fact that you play for a professional club, your name and certain sporting information may also be published and passed on to tournament organizers, media, statistics providers, league and tournament partners and similar third parties, for example in connection with match schedules, team lineups, results reporting, statistics and press coverage. This is a natural part of being a professional football player and is done on the basis of GDPR Article 6, paragraph 1, letters b and f.

As part of the group structure, certain personal data may also be disclosed to Trivela Group, LLC ("Trivela"), in USA. These transfers are described in more detail in Section 5.

5. Transfer to third countries

some cases, we may transfer your personal data to recipients outside the EU/EEA, including the USA. This applies in particular in relation to Trivela, which is established in Alabama, USA, and is the majority owner of SIF.

In this context, certain personnel-related and sporting information about you as a player may be made available to or exchanged with the parent company, for example in connection with group reporting, strategic and financial management, long-term sporting planning, financial and commercial management, compliance and risk management or other legitimate group purposes. This includes general personal information such as name and salary range, as well as sports-related information.

When we transfer personal data to Trivela or other recipients in third countries, we ensure that the transfer takes place in accordance with GDPR Chapter V. Transfers to the USA are made on the basis

of the EU Commission's Standard Contractual Clauses (SCCs) pursuant to GDPR Article 46(2)(c), supplemented by appropriate technical and organizational security measures, which are determined after an assessment of the level of protection in the recipient country.

If we use other data processors or partners outside the EU/EEA, transfers will also take place on the basis of a valid transfer basis, for example SCCs, and with necessary security measures.

You can contact us if you would like more information about the relevant transfer bases, or if you would like a copy of the SCCs we use, to the extent that this can be done without infringing the rights of others or compromising confidential information.

6. Storage and deletion

We store your personal data for as long as necessary for the purposes for which the data was collected, and for as long as necessary to fulfill our legal obligations, ensure documentation and take into account relevant limitation periods.

As a rule, we store the most important information about your contractual relationship, including contract information, salary information and central personnel data, until the end of the calendar year that is 5 years after the contractual relationship has ended. This is done, among other things, to comply with the requirements of the Danish Accounting Act for the storage of accounting material and to be able to document matters in connection with any claims for late payment, disputes or other legal claims.

Health information and injury-related information is only stored for as long as it is necessary for the specific purpose, for example, as long as a treatment or rehabilitation course is ongoing and for a period thereafter where the information is necessary for documentation, including in connection with work injury cases, insurance cases and any legal claims. We continuously assess whether such information is still necessary and delete it when this is no longer the case.

Sports performance data, including test results, GPS data and video analysis, are stored to the extent that they are relevant for ongoing sports planning and development, as well as for documentation and analysis of progress over time. After termination of the contract, such data will typically be reduced to a level where we only store the information that is necessary for documentation and any legal claims, while detailed training and analysis data is gradually deleted or anonymized.

Information about criminal offences, including child certificates, is processed and stored as limited as possible and in accordance with applicable regulations. We only aim to retain documentation that a certificate has been obtained and whether it was without relevant annotations and delete the certificate and any details when it is no longer necessary to store them.

Information processed in connection with travel, including passport information and other travel documents, is generally only stored until the trip has been completed and relevant settlements, reports and checks have been completed, unless there is a special need for longer storage, for example for documentation or disputes.

Information processed on the basis of consent, for example certain forms of use of images or names in marketing, is stored until the purpose is no longer relevant or until you withdraw your consent. If you withdraw your consent, we will stop using the information for the purpose in question and delete it, unless we are legally able or required to store it for a longer period, for example for documentation purposes.

If a case is pending or if a dispute or legal claim can reasonably be expected to arise, we may retain personal data for a longer period when necessary to establish, exercise or defend legal claims, in accordance with GDPR Article 6(1)(f) and GDPR Article 9(2)(f).

7. Security

We process your personal data in a manner that ensures an appropriate level of security. We have established technical and organizational measures that protect the data against unauthorized access, misuse, alteration, disclosure, loss or destruction.

Access to your data is limited to those employees and functions that have a legitimate need to know the data. This applies, for example, to administration, finance, sports management, coaching staff and healthcare personnel, to the extent necessary for their tasks. Access is role-based as far as possible and supported by access control, logging, user management and, where applicable, encryption and other technical security mechanisms.

We have internal policies and guidelines for the processing of personal data and information security, and relevant employees receive instruction and ongoing attention to data protection.

8. Your rights, complaints and contact

Under the data protection regulations, you have a number of rights in relation to our processing of information about you.

You have the right to access the personal data we process about you and to receive information about the processing. If you believe that information about you is incorrect, incomplete or misleading, you have the right to have it corrected or supplemented so that it is correct.

In certain cases, you have the right to have information about you deleted before our general deletion deadlines. This may be, for example, if the information is no longer necessary in relation to the purposes for which it was collected, or if the processing is based on consent that you have withdrawn and there is no other legal basis for the processing. You may also have the right in some situations to have the processing of your information restricted, for example while the accuracy of the information is being investigated or while an objection is being processed, so that during this period we may primarily only store the information.

You may object to our processing of your personal data in certain cases, including when the processing is based on GDPR Article 6(1)(f) on legitimate interests. If you object, we will make a

specific assessment of whether our legitimate interests in continuing the processing outweigh your interests and rights, or whether the processing should be terminated or restricted.

If we process your data on the basis of consent, you may withdraw your consent at any time. The withdrawal has effect for the future and does not affect the lawfulness of the processing that took place before the consent was withdrawn. When you withdraw your consent, we will cease the processing based on the consent, unless there is another legal basis.

If you wish to exercise one or more of your rights, or if you have any questions about our processing of your personal data, you can contact us by email sif@silkeborgif.com or by phone at 86804477.

If you disagree with the way we process your personal data or with our handling of your rights, you have the right to file a complaint with the Danish Data Protection Authority (Datatilsynet). The Danish Data Protection Authority (Datatilsynet) can be contacted at Borgergade 28, 5., DK-1300 Copenhagen K (København K), via e-mail dt@datatilsynet.dk or via www.datatilsynet.dk.

We may update this privacy policy from time to time, for example if there are changes to our processing of personal data or to the relevant legislation.

The version in force at any time will be available at SIF's homepage.