

## Privacy Policy

Our goal is to provide you with an amazing fan experience, with a clear and comprehensive privacy policy that enables us to deliver fan engagement with the highest level of transparency and trust.

This Privacy Policy outlines how we process your personal data in compliance with the General Data Protection Regulation (GDPR) and other applicable laws.

By accessing or using the Fan Zone, you agree to the terms of this **Privacy Policy**. If you do not agree with any part of this policy, please do not use the Fan Zone.

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### 1. Data Controller and Contact Information

AEL Fan Zone.' This platform is operated by Σωματείο ΑΘΛΗΤΙΚΗ ΕΝΩΣΗ ΛΕΜΕΣΟΥ ("A.E.L.") in collaboration with VYCTO (Vycto Tech LTD).

For any data protection concerns, please contact us:

- **Email:** [marketing@aellimassolfc.com](mailto:marketing@aellimassolfc.com)
  - **Address:** Agias Zonis 12 3027 Limassol, Cyprus
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### 2. Data We Collect

We collect and process the following categories of personal data:

1. **Data You Provide Directly:**
    - Registration information: Name, email address, date of birth, phone number,
    - Fan preferences: Nation, favorite players, and engagement preferences.
  2. **Data Collected Automatically:**
    - Device information: IP address, browser type, operating system, and device identifiers.
    - Usage data: Pages visited, time spent, interactions within the Fan Zone.
  3. **Data from Third Parties:**
    - Social media profiles (if you log in via third-party platforms like Facebook or Google).
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### 3. Purpose of Data Processing

We process your personal data for the following purposes:

- To provide and manage the Fan Zone services.
  - To personalize your experience, including customized content and rewards.
  - To communicate with you about updates, promotions, and events.
  - To analyze and improve our services through aggregated data insights.
  - To ensure security and prevent unauthorized access or misuse.
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#### 4. Legal Basis for Processing

We process your personal data based on the following legal grounds:

- **Contractual Necessity:** To fulfill our obligations under the Fan Zone Terms of Use.
  - **Consent:** For specific activities like sending marketing communications (you can withdraw your consent at any time).
  - **Legitimate Interests:** To improve our services and ensure platform security.
  - **Legal Obligations:** To comply with applicable laws and regulations.
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#### 5. Data Sharing and Recipients

We may share your personal data with:

- **Service Providers:** Trusted third parties who support the operation of the Fan Zone (e.g., cloud hosting, analytics providers).
- **Sponsors and Partners:** Limited and anonymized data to facilitate engagement activities and rewards (only with your consent) (explicit opt-in).
- **Legal Authorities:** If required by law or to protect our legal rights.

**We do not sell your personal data to third parties.**

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#### 6. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this policy or to comply with legal obligations. Once the retention period expires, your data will be securely deleted or anonymized. If you delete your account, and would like to delete all raw data associated with your account please reach out to [info@vycto.com](mailto:info@vycto.com)

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#### 7. Your Rights

Under GDPR, you have the following rights:

- **Access:** Request a copy of your personal data.
- **Correction:** Rectify inaccurate or incomplete data.
- **Erasure:** Request the deletion of your data (subject to certain conditions).
- **Restriction:** Limit the processing of your data.
- **Portability:** Receive your data in a structured, machine-readable format.
- **Objection:** Object to processing based on legitimate interests.
- **Withdraw Consent:** Withdraw consent for specific processing activities.

To exercise any of these rights, please contact us at [info@vycto.com](mailto:info@vycto.com)

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## 8. Data Security

We implement robust technical and organizational measures to protect your personal data against unauthorized access, loss, or misuse. These measures include encryption, secure servers, and regular security audits.

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## 9. International Data Transfers

Personal data is not transferred outside the European Economic Area (EEA), in the case that it needs to appropriate safeguards and measures will be in place, such as Standard Contractual Clauses (SCCs).

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## 10. Cookies and Tracking Technologies

The Fan Zone uses cookies to enhance your experience. For detailed information, please refer to our **[Cookie Policy]**.

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## 11. Updates to this Privacy Policy

We may update this Privacy Policy from time to time. Any changes will be communicated via the Fan Zone or other appropriate means. Please review this policy periodically.

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## 12. Complaints

If you have any issues or complaints, please don't hesitate to reach out to us at [info@vycto.com](mailto:info@vycto.com) . We're committed to improving your experience and addressing your concerns promptly.

If you believe your rights have been violated, you can file a complaint with your local data protection authority or the supervisory authority in Cyprus: Office of the Commissioner for Personal Data Protection.

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## Contact Us

If you have any questions about this Privacy Policy or how we process your personal data, please contact us at:

- **Email:** [marketing@aellimassolfc.com](mailto:marketing@aellimassolfc.com) ; [gdpr@vycto.com](mailto:gdpr@vycto.com)
- **Address:** Agias Zonis 12 3027 Limassol, Cyprus

By using the AEL Vycto Fan Zone, you acknowledge that you have read and understood this Privacy Policy

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Updated: January 2025