# PRIVACY POLICY

United States Soccer Federation, Inc. ("U.S. Soccer" or "we" or "us" or "our") respects your privacy and is committed to protecting your personal data.

### WHO WE ARE

U.S. Soccer has its headquarters at 1801 S. Prairie Avenue, Chicago, Illinois 60616. We are the National Governing Body for the sport of soccer in the United States, a member of the U.S. Olympic Committee and the FIFA member association for the United States. We do not maintain offices outside of the Continental United States, nor do we provide services or products in the European Union. You can contact us by mail at the above addresses, by email at <a href="mailto:dataprotection@ussoccer.org">dataprotection@ussoccer.org</a> or by telephone at +1 (312) 808.1300 (US) and ask for the Data Privacy Manager.

## THIS WEBSITE

The U.S. Soccer website (www.ussoccer.com, and the subdomains thereof, our official U.S. Soccer app, and any related website controlled by U.S. Soccer and on which this Privacy Policy is posted (collectively, the "Website")). This Privacy Policy ("Privacy Policy") explains our privacy practices regarding the collection, use, and disclosure of information collected through the use of the Website and through our various online services and applications provided by U.S. Soccer through the Website (the "Services"). It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice U.S. Soccer may provide on specific occasions when we are collecting or processing personal data so that you are fully aware of how and why we are using personal data. This Privacy Policy supplements the other notices and is not intended to override them.

By visiting the Website or using any Services, you are consenting to the practices and procedures described in this Privacy Policy and in the <u>U.S. Soccer Terms of Use</u>.

This Privacy Policy is available for download as a pdf version <a href="here">here</a>.

# **OUR POLICY TOWARDS CHILDREN**

This Website is not intended for children and we do not knowingly collect data relating to children under the age of 13 unless the parent or guardian of the child has

given explicit consent. Please see the section entitled, "**Special rules for children**," below, for more information.

## CHANGES TO THIS PRIVACY POLICY

You should review this Privacy Policy periodically as we may modify it from time to time, and such changes will be effective upon our posting them to the Website. To avoid inundating you with communications for insubstantial changes, we will expressly communicate only material changes to this Privacy Policy.

Where consistent with applicable law, your continued use of the Website and/or the Services after we have changed the Privacy Policy signifies your acceptance of the revised terms. Under certain circumstances (e.g., with respect to certain material changes to this Privacy Policy), we may also elect to notify you through additional means, such as posting a notice on the Website or by means of an email or other notification.

This version was last updated on May 14, 2019, with the public release of the redesigned Website. As we update this notice, we will maintain copies of past versions, and these historic versions can be obtained by contacting us.

### LINKS TO OTHER WEBSITES AND SERVICES

The Website may contain links to other websites and online services. When you link to such other sites and services (including by means of clicking on hyperlinks, logos, widgets, banners, or advertisements), you become subject to their terms of use and privacy policies posted thereon and/or applicable thereto. Please note that we are not responsible for the privacy practices of third-party websites. We encourage you to be aware of this when you click on a link and leave the Website, and to read the privacy policies of every website that collects Personal Data from you.

For more information, you may <u>review the FTC's guide to opting out</u> of online tracking for computers and mobile devices. You can also see the "Choice" section below for ways to opt-out.

In some cases, we have arrangements with third-parties, such as authorized Service Providers, agents, or representatives, to collect and store the foregoing information on our behalf, to provide services in connection with hosting or the operation of our Website, or to facilitate reporting of analytics (such as with Google Analytics).

Although the Device ID Information that we share, including the Device ID Information that is not linked to your mobile device, does not identify you personally, there is a risk that third parties who receive such information from us may be able to re-identify you through other information they gather.

Except for IP Addresses, we may match Device ID Information with Personal Data that we may have from or about you, which would allow us to identify you, we may use this information to provide you with offers that are available where you physically are located.

## INFORMATION WE COLLECT

"Personal Data" is information that allows us to identify you. While some of the information collected is required for Insider membership or business engagement purposes, other information is voluntarily given by you. The types of Personal Data that we may collect from you includes, but is not limited to, the following:

- Your full name, address, phone, and email contact information
- Country of residence
- Your age, birthdate, gender
- Other Information included in your U.S. Soccer Insider Program Profile:
  - o Favorite WNT player, favorite MNT player, favorite club team
- Social Network account IDs
- Marital status
- American Outlaw chapter (if applicable)
- Preference information, such as the communications you would like to receive from us
- Information you provide to us for the purposes of attending matches, tournaments, meetings, events, webinars, and other programs
- Any other information relating to you (or other individuals), which you may provide to us

### WHY DO WE COLLECT THIS PERSONAL DATA?

We collect from Website visitors to:

- Operate, provide, improve, and maintain the Website and the Services;
- Customize and/or personalize your communications;
- Communicate with you about our events, and for other promotional purposes;
- Administer contests, promotions, surveys, or other Website features;
- Conduct research on how to further our development of the sport of soccer in the United States.

### HOW WE COLLECT PERSONAL DATA

We may collect person information from you on or through the Website or Services in a variety of ways, including, but not limited to, through direct interactions, such as when you use the "contact us" feature on the Website, register on the Website, purchase a Service, participate in online contests, surveys or games, sign-up for a newsletter or subscription, purchase merchandise, purchase tickets to U.S. Soccer events, join U.S. Soccer as an Insider, or otherwise communicate with us (such as by email or via our social media pages).

Please note that if you choose to post, comment, or participate in any discussion forum on our Website, you may disclose personal information about yourself to other participants. If you do so, this is at your own risk.

#### DEVICE IDENTIFIABLE INFORMATION

We may also collect information that does not identify you personally, but is linked to your computer or device ("Device ID Information"). We collect Device ID Information from you in the normal course of operating our Website. When you visit our Website to browse, read, or download information, we automatically collect information about your computer that your browser sends, such as your IP address, browser type and language, access times, pages visited, and referring website addresses. We may use Device ID Information we collect to analyze trends, help administer the Website, track the movement of visitors, learn about and determine how much time visitors spend on each page of the Website, determine the ways visitors navigate throughout the Website or the Service, and to gather broad demographic information for aggregate use as described below under the heading "Aggregated Data".

We may also collect Device ID Information through "cookies" or "web beacons" as explained below under the heading "Cookies."

We may also collect information about your mobile device such as the type and model, operating system (e.g., iOS or Android), carrier name, mobile browser (e.g., Chrome, Safari), applications using our Website, and identifiers assigned to your device, such as its iOS Identifier for Advertising (IDFA), Android Advertising ID (AAID), or unique device identifier (a number uniquely given to your device by your device manufacturer), sometimes referred to as a mobile carrier ID.

We may also collect your location information, such as your zip code or the approximate geographic area provided by your Internet service provider (ISP) or location positioning information provided by the location services and GPS features of your mobile device when location services have been enabled.

### COOKIES

When you visit our Website, our Website places a small, removable data file on your computer. This file is known as a "cookie." Cookies allow us to distinguish you from other users of our Website, which helps us to provide you with a good experience when you browse this Website and also allows us to improve our Website. Some of the cookies we use are "analytics" cookies. These cookies allow us to recognize and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way our Website works, for example by ensuring that users are finding what they are looking for easily.

We may also use cookies to make the Website work better by, for example, remembering your preferences, keeping track of your login name, password and, if you want to buy things while on the Website, your "cart."

Similarly, we use pixel tags – tiny graphic images – to help us analyze your online behavior. Pixel tags also allow us to send you email in a format you can read and let us know when you have opened an email message from us. We may use pixel tags to collect information about your visit, including the pages you view, the links you click and other actions taken in connection with our website. We also collect certain standard information that your browser sends to every website you visit, such as your IP address, browser type and language, username, system type, whether you have enabling software to access certain Website features, access times and referring website addresses.

In this regard, we use Google Analytics to better understand how our customers navigate to and through our Website and Services, how long customers spend visiting our content items, and how often they return to visit our Website. To opt out of Google's use of cookies visit <u>Google's Ads Settings</u> or the <u>Network Advertising</u> <u>Initiative opt-out page</u>.

Cookies operate in the background, and you can turn them off, if you wish, by adjusting your Web browser settings, but doing so may impair your ability to use some of the features on the Website.

For more information on the Cookies we use, please see our Cookie Policy here.

### **SOCIAL MEDIA**

When using the Services or when using certain third-party social networking services (e.g., Facebook, Twitter, Google +) (each a "Social Network"), you may have the

option to connect your Service information and activity with your Social Network information and activity. If you authorize such a connection, you permit us to share or publish information about your Service activity with that Social Network and its users, and to access certain of your Social Network information, as disclosed to you at the time you consent to the connection. Information we may share with a Social Network may include, but is not limited to: technical information about your Service activity, your Service comments or the videos you watch on the Service. Information we may access about you, with your consent, from a Social Network may include, but is not limited to, your basic Social Network information, your location data, your list of contacts, friends or followers and certain information about your activities on the Social Network. If you permit a connection between a Social Network and a Service, we (and that Social Network) may be able to identify you and to associate information received pursuant to the connection with information we already have about you. For more information, please review the privacy disclosures and terms of your Social Network account, which govern how that account information is collected and shared with us. Please note that we are not responsible for the data collection or privacy practices of third-party Social Networks.

### OTHER DATA WE COLLECT

We also may, from time to time, receive Personal Data about you from third party sources to improve the Website and our Services, and for the various purposes outlined herein.

We also collect and use anonymized **Aggregated Data** such as statistical or demographic data for any purpose, including without limitation fan research, audience analysis, to help us understand Website traffic and usage, and otherwise to further our mission to develop the sport of soccer in the United States. Aggregated Data may be derived from your personal data but is not considered personal data under applicable law because this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the overall number of Insiders registered in a given state or other locality. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

### A SPECIAL NOTE REGARDING CERTAIN TYPES OF PERSONAL DATA

In the limited instances when we do collect information about your race or ethnicity, it is wholly voluntary on your part, and it is because we are the not-for-profit national governing body for the sport of soccer in the United States, tasked with promoting the development of soccer at all levels throughout the United States, and we are working to ensure our developmental efforts are reaching all interested

stakeholders. Please know that these categories of Personal Data are only collected from individuals with whom we have regular contact in connection with our mission and these categories of Personal Data generally are not disclosed. Specifically, we will disclose these categories of Personal Data *only* in the following instances: 1) as part of anonymized Aggregate Data, as noted above; or 2) if disclosed outside of U.S. Soccer, only with your express consent.

U.S. Soccer is an equal opportunity employer and does not discriminate on the basis of protected characteristics.

### DATA THAT WE DO NOT COLLECT

Except as expressly disclosed above as to information about race and ethnicity, we do no collect "special categories" of Personal Data about you (this includes details about your religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your physical or mental health or condition, or genetic and biometric data). Nor do we collect any information about criminal convictions and offenses without independent justification and express consent.

## HOW WE MAY USE OR DISCLOSE YOUR INFORMATION

We handle your data with care and respect. Because many of our systems are located in the United States, information provided to U.S. Soccer will be transmitted to U.S. Soccer and stored in the United States. We will share your information with our affiliates and third-party Service Providers only if this is necessary or reasonably required for any of the purposes above. Some of these third parties may be located outside of the United States, including in countries where data protection laws might not exist or be of a lower standard than the United States or the EU. We will not use the information to make any automated decisions that might affect you.

The Personal Data and Device ID Information we collect from you may also be used by us and by third-parties, such as hosting providers, data management companies, address list hosting companies, email service providers, analytics companies, distribution companies, fulfillment companies, and payment processors (collectively, "Service Providers") for a variety of purposes, including to:

**Purpose** 

Legal Basis

- To provide the Website and Services to you;
- To determine membership eligibility and enroll a member in the U.S. Soccer Insider Program;
- To register individuals for U.S. Soccer events (i.e., annual meeting, online educational courses, conferences, etc.);
- To provide individuals who sign up for the U.S. Soccer Insider Program with member benefits, products, or services that they have requested and related information about those products and services;
- Insiders may send information or gift memberships about our Insider Program, our products, our Services and/or our Website to their friends and family members by using an "Email to Friend" or similar feature on the Website or in an email that we have sent them. We do not

- For our legitimate business purposes (i.e., the provision of the Website) and, depending on the circumstances, to perform a contract between you and us
- For our legitimate business purposes (i.e., the provision of the Website and Insider Program member services) and, depending on the circumstances, to perform a contract between you and us
- For our legitimate business purposes (i.e., the provision of the Website and services, including events) and, depending on the circumstances, to perform a contract between you and us
- For our legitimate business purposes (i.e., the provision of the Website and Insider Program member services) and, depending on the circumstances, to perform a contract between you and us
- For our legitimate business purposes (i.e., the provision of the U.S. Soccer Website and Services)

further contact those individuals without their consent to do so.

- To communicate with you and to respond to questions that you have raised with us;
- To develop membership directories and related information for both U.S. Soccer and its Organization Members;
- To facilitate the operation, administration, maintenance or improvement of our Website, our Services, our operations, and internal record keeping;

- To provide your information to a Service Provider to process your payment for U.S. Soccer Services, products, the Insider Program, merchandise, matches, and other events;
- To confirm or fulfill an order you have made or to provide you with Services or information you

- For our legitimate business purposes (i.e., the provision of the U.S. Soccer Website and Services)
- For our legitimate business purposes (i.e., the provision of the U.S. Soccer Website and Services and to support services to our members)
- For our legitimate business purposes (i.e., the provision of the U.S. Soccer Website and member services, as well as to improve and ensure the security of those products and services)
- We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law (e.g., in relation to our use of certain cookies)
- For our legitimate business purposes (i.e., the provision of the Website and Services) and, depending on the circumstances, to perform a contract between you and us
- For our legitimate business purposes (i.e., the provision of the Website and Services) and,

have requested, or products or services you have ordered or signed up for, such as newsletters: depending on the circumstances, to perform a contract between you and us

- To administer and provide you with the benefits of membership;
- For our legitimate business purposes (i.e., the provision of the U.S. Soccer Website and Services)
- To send you, or for our thirdparty partners to send you, information about products, services, and events that may be of interest to you based on your preferences;
- For our legitimate business purposes (i.e., the provision of the U.S. Soccer website and member services)
- We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law
- To administer your participation in a contest, sweepstakes, promotion, survey, or voting;
- For our legitimate business purposes (i.e., the provision of the U.S. Soccer Website and member services)
- We may request your consent in circumstances where a legal justification over and above legitimate interests is required by applicable law
- To prevent and detect fraud; and
- For our legitimate business purposes and for compliance with legal obligations to which we are subject
- To protect and enforce our legal rights
- For our legitimate business purposes and for compliance

with legal obligations to which we are subject

We may also use or share your Personal Data as permitted by law to protect our rights or property, our Website or Services, or its users and their safety. In addition, we may also use or share Personal Data and Device ID Information with government, law enforcement agencies, and regulatory bodies when we consider the disclosure to be legally required, or at a minimum, fair, reasonable, and legal.

### THIRD-PARTY MARKETERS

With your express permission, we may share some of your Personal Data with our sponsorship or marketing partners and other third parties so that they may contact you directly regarding special promotions or offers (such as subscriptions to and promotions for goods and services, including, for example, through participation in a co-sponsored sweepstakes or contest). We are not responsible for how these third parties may use your Personal Data, and such uses are subject to their own policies. If you have consented to receive messages from or share your Personal Data with third parties for such third parties' marketing purposes, you can change your mind at any time and may let us know by following the instructions in the "Communication Choices" section below.

# OTHER DISCLOSURES

### YOUR PRIVACY RIGHTS UNDER CALIFORNIA LAW

Learn about your California Privacy Rights here.

#### INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA

YOUR INFORMATION IS PROCESSED IN THE UNITED STATES, AND MAY BE STORED AND USED ELSEWHERE DEPENDING ON THE LOCATION OF AFFILIATES, BUSINESS PARTNERS, AND OTHER ENTITIES WHO ARE PERMITTED TO ACCESS SUCH INFORMATION UNDER THE TERMS OF THIS PRIVACY POLICY (AND SUCH LOCATIONS MAY INCLUDE COUNTRIES WHICH MAY NOT AFFORD THE SAME LEVEL OF PROTECTION OF SUCH DATA AS THE COUNTRY FROM WHICH YOU PROVIDED THE INFORMATION). FOR EXAMPLE, BECAUSE U.S. SOCCER IS A FIFA MEMBER ASSOCIATION, WHERE NECESSARY TO COMPLY WITH ANY RULE, REGULATION, OR POLICY OF FIFA.

YOUR INFORMATION MAY BE TRANSMITTED TO FIFA IN SWITZERLAND. BY ACCESSING OR USING U.S. SOCCER'S WEBSITE OR DIGITAL PLATFORMS OR SUBMITTING PERSONAL INFORMATION TO US, YOU SPECIFICALLY AGREE TO THAT TRANSFER AND ANY RELATED PURPOSES.

### CHAT ROOMS, FORUMS, AND MESSAGE BOARDS

The Website may make chat rooms, forums, blogs, message boards, and other community features and activities available to you and other users. If you post Personal Data online, it will be publicly available and you may receive unsolicited messages from other parties. We cannot ensure the security of any information you choose to make public in a chat room, forum, or message board. Also, we cannot ensure that parties who have access to such publicly available information will respect your privacy. Please exercise caution when deciding to disclose Personal Data in these areas. We reserve the right (but assume no obligation) to review and/or monitor any such community areas on the Website.

### THIRD PARTY ADVERTISING

As discussed above and in our Cookie Policy, we may allow other companies (e.g., 24/7 Real Media) that are presenting advertising or promotional content, social networking, or providing services on our pages to set and access cookies and other tracking technologies on your computer. These companies may collect information about your visits to the Website in order to measure and assess the effectiveness of online advertising and to provide and better target advertisements about goods and services of interest to you. While the information collected by these third parties from you while you are visiting our Website is not personally identifiable, some of these third parties may also combine such non-personal information with other information they have collected from various other sources, such as their own past online and/or offline purchase information and Web usage from other sites. Such other information may include Personal Data, as well as demographic and behavioral information. Those companies' use of cookies, and the information collected, are governed by those companies' privacy policies, not ours.

### SHORT MESSAGE SERVICE

We may make available a service through which you can receive messages on your wireless device via short message service ("SMS Service"). You understand that your wireless carrier's standard rates apply to these messages.

If you subscribe to one of our SMS Services, you may be required to register and provide Personal Data. We may also collect the date, time, and content of your

messages in the course of your use of the SMS Service. We will use the information we obtain in connection with our SMS Service for the purpose of sending the SMS messages. If fees are charged to your wireless account invoice, we may provide your carrier with your applicable information to facilitate the transaction in connection therewith. Your wireless carrier and other service providers may also collect data about your wireless device usage, and their practices are governed by their own policies. We may also contact your carrier, which may access the content of your wireless account, for the purpose of identifying and resolving technical problems and/or service-related complaints. We do not guarantee that your use of the SMS Service will be private or secure, and we are not liable to you for any lack of privacy or security you may experience. You are fully responsible for taking precautions and providing security measures best suited for your situation and intended use of the SMS Service. You may change your mind and unsubscribe to SMS Services at any time by following the instructions in the "Communications Choices" section below.

### **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

If you have given consent, we will continue to use your information to send you further communications until you unsubscribe or for so long as we continue to have a business purpose for it. In order to ensure the accuracy of our records, we may keep your information in our database unless you ask us to erase it.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

# YOUR RIGHTS OVER YOUR PERSONAL DATA

Under certain circumstances, you can ask us what Personal Data we hold about you, and you can ask us to correct it if it is inaccurate. You can also ask for it to be erased (except for information that we keep for record-keeping purposes), and you can ask for us to give you a copy of the Personal Data. The simplest way to do this is by emailing us at <a href="mailto:dataprotection@ussoccer.org">dataprotection@ussoccer.org</a>, or write to us at 1801 S. Prairie Avenue, Chicago, IL 60616 USA Attn: Privacy Administration / Legal. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Please note that we may request certain Personal Data for the purposes of verifying the identity of the individual seeking access to their personal information records.

You can also ask us to stop using your information—you can change your mind at any time and may let us know by following the instructions in the "Communication Choices" section below.

### **CHANGE OF PURPOSE**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at: <a href="mailto:dataprotection@ussoccer.org">dataprotection@ussoccer.org</a>

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law or legal obligation.

### COMMUNICATION CHOICES

You have various choices with respect to certain of our uses of the Personal Data we collect from you on or through the Website or Services. If you have not consented to us using your Personal Data as described in this Privacy Policy, we will only use it to complete the transaction or provide the service or product you have requested.

If you have agreed to receive communications or solicitations from us, but you later change your mind, you can revise your preferences in your profile (www.ussoccer.com/login) section of the Website or email us at dataprotection@ussoccer.org. You also may opt out of receiving all future promotional emails from us by clicking on an opt-out or "unsubscribe" link within the promotional email you receive. Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions, and communications with us.

You may always opt out of our SMS messages by texting "STOP" or another applicable keyword to the short code applicable to the particular SMS Service (as further described below).

If you agree to have us share your Personal Data with third parties so that they may contact you about promotions, offers, and other information, you can subsequently revise your preferences in your profile (www.ussoccer.com/profile/my-profile) section of the Website or email us at dataprotection@ussoccer.org. If you do request to have us stop sharing your Personal Data with other entities for their direct marketing purposes, such request will only apply as of the date of your request, we will do our best to honor it within ten days, and we will not be responsible for any communications that you may receive from entities that received your Personal Data prior to such request. In these cases, please contact that entity directly or click on the opt-out or "unsubscribe" link that should be included within the promotional email you receive from such third party.

You may opt-out of receiving ads from network advertisers by clicking the AdCommunication Choices icon on advertisements that are sent to you, visiting the opt-out pages on the NAI website (access the NAI's opt-out tool) and the DAA website (access the DAA's opt-out tool). Opting out through these methods does not prevent you from seeing ads; it simply means that network advertisers will no longer collect data for the purpose of providing you targeted ads. The DAA and NAI opt-out tools are cookie-based. They signal network advertisers so that they do not collect data online or deliver specific ads targeting you, and only affect the Internet/web browser on the computer where the cookies are installed. These opt-out tools will only function if your browser is set to accept third-party cookies. If you delete an opt-out cookie or all your cookies from a browser's cookie files, change web browsers, or change computers, you will no longer be opted out of our data collection and ad targeting, and we may place a new cookie unless an opt-out cookie is again reset on that browser. Opting out using one browser on one computer will not opt you out using any other browser on the same or another computer.

## PROTECTION OF INFORMATION

We are committed to protecting your privacy and we implement various security measures in relation to our processing and transfer of Personal Data. However, the nature of the Internet is such that the data may in some circumstances flow over networks without full security measures and could be accessible to unauthorized persons. No website, service, or method of transmission to/from the website can be absolutely secure, and third parties may unlawfully intercept or access transmissions or private communications, and other users may abuse or misuse your personal information. Therefore, although we work very hard to protect your privacy, we will not be responsible for any damage that results from a security breach of data or the unauthorized access to or use of information, whether Personal Data or Device Identifiable Information. To the extent we provide your Personal Data to any third parties, we will request that they use reasonable security measures to protect your information.

### ADDITIONAL INFORMATION

Our Website and Services are operated and maintained within the U.S. We make no assurances or representations of any kind that the Website and Services are suitable for use outside the U.S. or in the country in which you reside. The information we collect is kept on servers in the U.S. and may be transferred to servers in other countries, subject to the terms of this Privacy Policy.

By accessing the Website, using a Service, establishing an account or making a purchase, you consent to the processing of your Personal Data as provided in this Privacy Policy. You may withdraw that consent by contacting us as provided above. You are required to provide certain Personal Data in order to use a Service, to make a purchase, or to take advantage of certain features available through the Website. Your failure to provide such information may preclude you from using the Services or Website or may subject your account to termination, prevent you from making a purchase, or prohibit you from using certain features.

If you wish to object to or raise a complaint on how we have handled your Personal Data, you may contact us at dataprotection@ussoccer.org. You may also be able to have your Personal Data transferred by contacting us at <a href="mailto:dataprotection@ussoccer.org">dataprotection@ussoccer.org</a>.

# **PHISHING**

Identity theft and the practice known as "phishing" are of great concern to all Internet users. We encourage you to take an active role in protecting your personal information from theft by using a unique password for each account and by safeguarding your information at all times. Please note that U.S. Soccer does not, and will not, at any time, request your credit card information, your account ID, login password, or other Personal Data in a non-secure or unsolicited email or telephone communication

# SPECIAL RULES FOR CHILDREN

U.S. Soccer remains committed to protecting the privacy of children who use our Website and Services. This section explains our information collection, disclosure, and parental consent practices with respect to information provided by children under the age of 13 ("child" or "children").

In adopting our special rules for children, U.S. Soccer engaged in a thoughtful analysis of applicable U.S. law as well as standards around the world. Our rules are

consistent with practices followed by each of our governing bodies, the <u>USOC</u> and <u>FIFA</u>, and comply with the United States Children's Online Privacy Protection Act ("**COPPA**"). For more information about COPPA and general tips about protecting children's online privacy, please visit the Federal Trade Commission's page on <u>Protecting Your Child's Privacy Online</u>.

In view of the fact that U.S. Soccer operates over 20 National Teams at varying age levels, including two U-15 national teams and a U-14 development program, we take seriously our role in educating and developing the future of soccer. In particular, we concur with the explanatory notes to the UK Data Protection Act 2018, which, when setting the UK's minimum age at 13, noted: "As long as a child is capable of understanding the processing to which they are consenting and is capable of making a free and informed decision, then it is considered that the child is capable of consenting to any processing of personal data." Accordingly, based on not just applicable law but our experience as a governing body, we believe 13 to be the appropriate age for a young person to evaluate their interactions with the Website and Services. If you are a parent and you have questions about any of the information in this section, please contact us at <a href="mailto:dataprotection@ussoccer.org">dataprotection@ussoccer.org</a>.

If you are a parent looking for information regarding U.S. Soccer's practices in promoting athlete safety and preventing misconduct, we invite you to visit <a href="https://www.safesoccer.com">www.safesoccer.com</a>.

### **GENERAL RULES**

Although most portions of the Website are directed to general audiences, we do not knowingly collect Personal Data from children under 13. If we learn we have collected or received Personal Data from a child under 13 without verification of parental consent, we will endeavor to delete that information.

#### INFORMATION COLLECTED AND PARENTAL RIGHTS.

If we later offer activities aimed at children under 13, and if your child wants to register on or participate in these certain activities in the areas of the Website that are directed to children under 13, we will only do so if we have your consent. During the registration process, we may collect certain information from your child, including Personal Data such as their name or email address, gender, the child's member or account username, and password, as well as a parent or guardian's email address in order to obtain your consent. We will then send you an email (which will include a link to this Privacy Policy), advising you about the portion of the Website in which your child has expressed interest, and request that you reply by email if you consent to your child's participation. In the reply email, we may request further Personal Data

from you (as defined in the main part of this Privacy Policy) about you and/or your child, but we will not request such information from your child. We will then send you a confirmatory email of your child's registration. Once your child is registered, we may request them to provide general information such as their favorite player. To the extent that we collect it, you have the right to review your child's Personal Data, to have that information deleted, and/or to refuse to permit its further collection or use. Parents can contact the Data Privacy Officer at the address or email set forth at the end of this Policy.

### INFORMATION USE AND DISCLOSURE

We may use the Personal Data to provide the child with the special services for which he or she has registered, such as membership in a kids club, receipt of newsletters, or participation in contests or sweepstakes. We do not condition a child's participation in any of our online activities on the disclosure of more information than is reasonably necessary to participate in the activity.

Portions of our Website that are directed to children under 13 do not have unscreened chat rooms, blogs, or other similar community functionality that would permit your child to disclose information to others or publicly. In addition, any "postcard" or "share with a friend" feature that may be available on these portions of our Website will collect the recipient's email address, but not the sender's; permit the sender to type in a first name and last initial; supply the content or allow the sender to select a pre-determined message from a menu; and be sent immediately, at which time the recipient's email address as collected from the sender is deleted from our records.

Personal Data collected on or through any portions of our Website that are directed to children under 13 may be shared with Service Providers (as defined above) with whom we contract to operate this Website and some of our Services. These Service Providers will use such Personal Data of Website visitors only for the purposes of carrying out these operations. To the extent required or permitted by law, we may also collect, use, and disclose such Personal Data in connection with security-related or law enforcement investigations or in the course of cooperating with authorities or complying with legal requirements. We may also use Website users' information as permitted by law to protect our rights or property, our Website, or its users and their safety. As set forth above, we endeavor to maintain the confidentiality, security, and integrity of the Personal Data collected from your child. Other than our Service Providers and as described above, we will not share your child's Personal Data with third parties.

### **GDPR APPLICABILITY**

A privacy law is in effect in the European Union (EU) and the European Economic Area (EEA) called the General Data Protection Regulation or the GDPR. The GDPR expands privacy rights granted to individuals in the EU and the EEA. Even though U.S. Soccer is headquartered in the United States and generally does not do business in the EU or the EEA, we are nonetheless implementing GDPR compliance across the Website and Services in an effort to better serve our visitors.

The GDPR imposes certain requirements on "data controllers" and "data processors." A "data controller" is the individual or entity that determines the purposes for and the manner in which personal data is collected, used, and processed. U.S. Soccer generally is the data controller of the personal information we collect. A "data processor" is a person or entity that processes personal information on behalf of a data controller. Data controllers and data processors are required, among other things, to enter into an agreement with one another to protect the personal information that the data processor obtains from the data controller. We are working with our vendors that process personal data of EU and EEA members on behalf of U.S. Soccer to implement such agreements.

EU residents have the following rights under the GDPR:

- the right to be informed about our collection and use of information;
- the right of access to the information we hold about you;
- the right to rectification if any information we hold about you is inaccurate or incomplete;
- the right to be forgotten, meaning the right to ask us to delete Personal Data we hold about you;
- the right to restrict the processing of your information;
- the right to obtain a copy of your information to re-use with another service or organization;
- the right to object to us using your information for particular purposes; and
- rights with respect to automated decision-making and profiling.

If you are an EU resident and wish to object to or raise a complaint on how we have handled your Personal Data, you may contact us at dataprotection@ussoccer.org. You may also be able to have your Personal Data transferred by contacting us at dataprotection@ussoccer.org. In each case, we may require you to provide verification of your identity. You also have the right to make a complaint with the competent Information Commissioner in the EU. Please note that in certain circumstances, we may withhold access to, or refuse to delete portions of your information where we have the right to do so under applicable law.

Data protection is an on-going process. We continue to take steps to enhance data privacy and security for users of our Website and Services, and we will continue to review our practices as additional guidance under the GDPR is issued by the relevant authorities.

# **CONTACT US**

If you have questions or concerns about this Privacy Policy, you can contact us at: U.S. Soccer

1801 S. Prairie Avenue

Attention: Privacy Administrator/Legal Department

Phone: 312-808-1300

Email: dataprotection@ussoccer.org

# ADDITIONAL TERMS OF USE APPLICABLE

Your use of the Website, Services and any disputes arising from it, remain subject to this Privacy Policy as well as our Terms of Use. Please visit our <u>Terms of Use</u> section that explains other terms governing the use of our Website.

Last Updated: May 23, 2019