

## **St. Albans Sporting Club Privacy Policy**

**Effective Date: May 4, 2026**

Welcome to the Web site of St. Albans Sporting Club. This Privacy Policy (“Privacy Policy”) describes what kind of personal information we collect, how it is handled, and with whom it may be shared. St. Albans Sporting Club is committed to protecting your privacy. By using the St. Albans Sporting Club Web site, located at [www.stalbanssc.com](http://www.stalbanssc.com) (the “Web site”), you consent to this policy and you expressly consent to the processing of your Personal Information (defined below).

### **Notification of Privacy Policy Changes**

We reserve the right to change the Privacy Policy at any time. If we decide to revise the Privacy Policy, we will use commercially reasonable efforts to post a notice at least thirty days prior to making any material changes. If you are a member of the St. Albans Sporting Club, we will also use commercially reasonable efforts to notify you by email and by posting a notice on this Web site. Your continued use of the Web site, including use after the posting of any changes to these terms, will be deemed acceptance by you of the Privacy Policy.

### **Information We Collect and How We Use It**

This section applies to data we collect from St. Albans Sporting Club’ online applications, our services and our Web site at [www.stalbanssc.com](http://www.stalbanssc.com).

#### **PERSONAL INFORMATION**

“Personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to, directly or indirectly, a particular consumer or household. We collect various types of personal information depending on how you use our Web site. We may also record calls made to us. The following are categories (with non-exhaustive examples) of personal information we may collect about you and for each category the purpose for which it may be used:

<b>Categories</b>	<b>Examples</b>	<b>Purpose of Processing</b>
A. Individual Identifiers and Demographic Information.	A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, address, telephone number, account name, or other similar identifiers.	<ul style="list-style-type: none"> <li>• Responding to inquiries.</li> <li>• Management of accounts, compiling details of visitor engagement.</li> <li>• Sending marketing materials (including offers and other information we feel may be of interest to you).</li> </ul>
B. Internet or Network Activity.	Browsing history, type of browser you are using, search history, terms you enter into the search functions of our Web site, information on visitor's interaction with a Web site, application, or advertisement, and the Web site you visit immediately before and immediately after you visit our Web site.	<ul style="list-style-type: none"> <li>• To evaluate trends and usage related to our Web site and to improve our Web site content and offerings accordingly.</li> <li>• Sending marketing materials (including offers and other information we feel may be of interest to you).</li> </ul>

Personal information does not include:

- Publicly available information – Publicly available information from government records.
- Deidentified or aggregate information – “Deidentified Information” means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular individual, and for which St. Albans Sporting Club has implemented technical safeguards and business processes that prohibit reidentification of the individual. “Aggregate Information” means information that relates to a group or category of individuals, from which individual identities have been removed, that is not linked or reasonably linkable to any individual or household.

- Excluded information – Certain laws require separate privacy notices or are exempt from general personal information privacy policy disclosure requirements. Such laws include health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and data covered under the Fair Credit Reporting Act (FCRA).

## SOURCES OF PERSONAL INFORMATION

We obtain the categories of personal information listed above from the following categories of sources:

- Personal information you provide – St. Albans Sporting Club collects personal information when you voluntarily submit it to us. For example, we may collect or receive personal information from forms you complete or requests you submit, any interactions you have with us through the Web site.
- Consent for SMS Communications. By providing your mobile number, you agree that St. Albans Sporting Club may send you periodic SMS or MMS messages. You may unsubscribe at any time by texting the word STOP. You may receive a subsequent message confirming your opt-out request. Message and data rates may apply.
- Automatically collected personal information – St. Albans Sporting Club collects other information from you automatically through the Web site. For example, we receive personal information from you when you visit and navigate our Web site on any device. St. Albans Sporting Club collects some personal information automatically using cookies or other online tracking technologies as described below in this Privacy Policy. We may use third-party companies to help us tailor Web site content to users or to serve ads or messages on our behalf. These companies may employ cookies and web beacons to measure advertising or messaging effectiveness (such as which web pages are visited, which messages are responded to, or what products are purchased and in what amount). Any information that these third parties collect via cookies and web beacons is not linked (by them) to any personal information collected by us.
- Personal information obtained from third parties – St. Albans Sporting Club may obtain or receive personal information about you from other third party sources. For example, we receive personal information from our business partners or other third party companies. We may merge or combine such personal information with the personal information we collect from you directly or automatically.

## USE OF PERSONAL INFORMATION

We process personal information for the following purposes:

<b>Purpose of Processing</b>	<b>Legal Basis</b>
Responding to inquiries	Our legitimate interest, which is the proper functioning of our commercial activity
Management of member accounts, compiling details of user engagement	Our legitimate interest, which is the proper functioning of our commercial activity
To evaluate trends and usage related to our Web site and allow us to improve our Web site content and offerings accordingly	Your consent
Sending marketing materials (including offers and other information we feel may be of	Your consent

We believe the risk to your data protection rights in connection with personal information that we process on the basis of our legitimate interests is not excessive or overly intrusive. If you choose not to give us personal information, we may not be able to provide you with any products you may request or require, or enter into a contract with you.

## **How We Share Your Information**

### THIRD-PARTY PROVIDERS

We may share your personal information with outside companies that provide services for us, including without limitation our technology providers, payment processors and professional and technical advisors, and we endeavor to require that these parties agree to process your personal information based on our instructions and in compliance with this Privacy Policy and applicable laws.

### OTHER DISCLOSURES

We may disclose your personal information in response to subpoenas, court orders, or other lawful requests by public authorities, including to meet national security or law enforcement requirements. We may also disclose personal information in order to enforce or apply our rights and agreements, or when we believe in good faith that disclosing this information is necessary or advisable, including, for example, to protect the rights, property, or safety of our businesses, our Web site, our members, customers, our users, or others, as permitted under the applicable laws, or as otherwise required by law or by government and regulatory entities. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

We may share aggregated and de-identified information with third parties for analytical, research or other similar purposes. St. Albans Sporting Club does not share end-user information with third parties/affiliates for marketing/promotional purposes.

St. Albans Sporting Club may obtain your written consent from time to time in electronic form by using online agreements or other acknowledgements related to our club or this Web site, including for any other contemplated uses of your personal data not addressed in this Privacy Policy. Please read all online agreements carefully before accepting them.

We may share or transfer your data with a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, liquidation or other disposition of all or any portion of our business, assets or stock with such third party.

### **Storage and Protection of Your Personal Data**

We retain the personal data we collect for so long as reasonably necessary to fulfill the purposes for which the data was collected and to fulfil our contractual and legal obligations. We take reasonable administrative, physical and technical precautions to protect your personal data and communications between us. This includes obtaining commitments from third parties that may have access to your data that they will protect the data with safeguards that are substantially equivalent to those used by St. Albans Sporting Club.

No Internet or e-mail transmission is ever fully secure or error free, however. We therefore cannot guarantee absolute security of your data, and we are not responsible for processes and networks that we do not control. Users assume the risk of security breaches and the consequences resulting from them. Please be careful in deciding what information you send to us via email or over the Internet.

### **Children's Privacy**

Our Web site is not intended for use by, and it is our policy not to knowingly collect personal information from children under the age of 18 years old. We do not knowingly distribute such information to third parties or otherwise process such information. If you are a parent/guardian and you suspect that your child may have submitted personal information to us, please contact us as described below. If we become aware that a child has provided us with personal information, we will strive to delete such information from our files as soon as possible.

### **Your Privacy Rights**

This Web site is currently intended for users in the United States, and are not intended for users in other locations. We are committed to facilitate the exercise of your rights granted by the laws of your jurisdiction, which may include the right to request the correction, modification or deletion of your personal information and the right to opt out of the sale of your personal information (as applicable). We will do our best to honor your requests subject to any legal and contractual obligations.

Subject to local law, you may have additional rights under the laws of your jurisdiction regarding your personal data, such as the right to complain to your local data protection authority and the right to appeal our decision regarding a data rights request. However, you understand and declare that this Privacy Policy and all documents related hereto, either present or future, be drawn up in the English language only. *Les parties déclarent par les présentes qu'elles exigent que cette entente et tous les documents y afférents, soit pour le présent ou la future, soient rédigés en langue anglaise seulement.* Although our Web site may be accessible worldwide, not all features or services discussed, referenced, provided, or offered through the Web site are available to all persons or in all geographic locations, or appropriate or available for use outside the United States. **If you choose to access or use our Web site outside the United States, you do so on your own initiative and you are solely responsible for complying with applicable local laws.**

At the present time, we do not believe that we are subject to any of these local laws, including the laws of California or other states that have enacted privacy legislation, although we may provide accommodation to residents of states that have enacted privacy laws. Note also that there are specific provisions for data subjects that reside in other countries as noted below.

Some residents have certain rights including:

- The right to request whether we are collecting and processing personal data about you (including sensitive personal information if applicable) and to obtain data we have collected about you in a readable format;
- The right to correct inaccuracies in your personal data, taking into account the nature of the data and the purposes for processing the data;
- The right to delete personal data provided by or obtained about you;
- The right to opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or specific pieces of personal information we have collected about you.

California residents may have additional rights.

California “Shine the Light” Information-Sharing Disclosure: California residents may request a list of all third parties with respect to which we have disclosed any information about you for direct marketing purposes and the categories of information disclosed. If you are a California resident and want such a list, please send us a written request by email to the contact addresses listed below in Section 15 of this Privacy Policy with “California Shine The Light Rights” in the subject line.

California Do Not Track Disclosure: We do not respond to Do Not Track browser settings.

California Privacy Rights Act. St. Albans Sporting Club is not a “business” subject to the CPRA (formerly CCPA) .

You may exercise any of these rights by contacting us at the addresses and phone number listed below.

### Texas Privacy Rights

Effective July 1, 2024, the Texas Data Privacy and Security Act (the “Texas Act”) regulates the collection, use, processing, and treatment of consumers’ personal data by certain business entities. It grants specific rights to users to determine whether an entity processes their personal data, to access it, to correct inaccuracies in the data, and to opt out of the processing of their personal data for certain purposes. The Act also imposes duties on entities subject to the Act to limit the collection of personal data, to provide notice about information collected, and to respond to user requests for access and correction of information, among other responsibilities. St. Albans Sporting Club does not believe that it is subject to the Texas Act

#### *Rights Under The Texas Act Include:*

- Right to know whether a company is processing the user’s personal data and to obtain the personal data in a readable format;
- Right to correct inaccuracies in the user’s personal data, taking into account the nature of the data and the purposes for processing the data;
- Right to delete personal data provided by or obtained about the user;
- Right to opt out of the processing of personal data for purposes of targeted advertising, the sale of personal data, or profiling in furtherance of a decision made by the company concerning the user that results in the provision or denial by the company of the following:
  - financial and lending services;
  - housing, insurance, or health care services;
  - education enrollment;
  - employment opportunities;
  - criminal justice; or
  - access to basic necessities, such as food and water.
- Right to not face retaliation or discrimination for exercising these rights.

Companies that operate exclusively online and have a direct relationship with a user are required only to provide an email address for the submission of requests.

- Responding to an authenticated user’s request to exercise any right without undue delay but no later than 45 days after receiving the request.

The time period to substantively respond to a request may be extended by an additional 45 days when reasonably necessary – provided the company responds within the initial 45 days and provides a reason for the extension. A company’s response to a user request must be free of charge, up to twice annually per user – unless the request is unfounded, excessive, or repetitive, in which case the user may be charged a reasonable administrative cost. A company that declines

a user's request must provide the user with notice of that decision, including a justification for the declination and instructions on how to appeal the decision.

## **Cookies**

When you visit or interact with our Web site, we (or our third-party providers) may use "cookies" or other similar technologies to personalize and enhance your experience. A "cookie" is a small piece of information sent to a visitor's computer or other Internet-connected devices to uniquely identify the visitor's browser or to store information or settings in the browser. Cookies are used to make our Web site work, or work more efficiently, as well as to provide data to the Web site owners. Our Web site use required cookies, functional cookies, and analytics and performance cookies.

Except for technical cookies, the storing of cookies on the device of a visitor may require consent. By continuing browsing the Web site after having seen the cookies banner displayed on the home page of the Web site, the visitor consents to the storing of cookies on his/her device. Where such consent is required, this consent is valid for a period of 13 months.

Required cookies enable you to move from page to page and to use features on our Web site while your browser remains open. Functional cookies last from visit to visit. For example, functional cookies may be used to recognize you as a previous user to provide a more personalized experience. They are stored in your computer, device, or browser until you choose to delete them.

Analytics and performance cookies allow us to collect data concerning the Web site, including the number of visitors, where the visitors have come from, and the length of time visitors spend on the Web site, which allows us or third-party providers to analyze how our Web site are used and how our Web site are performing. We may use third-party providers for analytics and performance tracking, and you can learn more about their privacy policies and how to opt-out of their cookies by clicking on the appropriate link below:

Google Analytics:

We may use Google Analytics, a web analytics service of Google Inc. ("Google") which uses cookies to identify the frequency of use of certain areas of our Web site and to identify preferences. For more information regarding how Google collects, uses, and shares your information please visit <http://www.google.com/policies/privacy/partners/> . You can deactivate Google Analytics using a browser add-on if you do not wish the analysis to take place. You can download the add-on here: <https://tools.google.com/dlpage/gaoptout?hl=en> .

To opt out: <https://tools.google.com/dlpage/gaoptout>

To learn more: <https://policies.google.com/technologies/partner-sites>

Our Web site may also provide connections to social media sites. You can learn more about the privacy policies of these third-party sites and how to opt-out of their cookies on those sites.

## **Access Control and Security of the Information We Collect**

The security of your personal information is important to us. We maintain reasonable administrative, technical, and physical safeguards to secure the personal information we collect. Your personal data is protected by strict safeguards through a combination of access control, security audits, and back-up practices in order to ensure the security and integrity of the platform.

There is always some risk in transmitting information electronically. As such, we cannot guarantee the security of our databases, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. If we forward your personal information to any third party, we require that the third parties have appropriate technical and organizational measures in place to comply with this Privacy Policy and applicable laws.

St. Albans Sporting Club is committed to responding as quickly and effectively to any data breaches in order to minimize the potential impact on users and the platform. In the event of any data breach, St. Albans Sporting Club follows industry-standard procedures to contain, investigate, and resolve the issue at hand. We would promptly notify any and all affected users including details about the breach, the data that may have been compromised, and any recommended actions of users. We would take immediate steps to contain the breach and prevent any further unauthorized access or data loss. An investigation would be conducted to determine the scope and causes of the breach, followed by implementing measures to remediate vulnerabilities and restore the security of the Web site. By strictly adhering to the aforementioned process, St. Albans Sporting Club ensures that any data breaches are handled swiftly and responsibly, thereby minimizing risks to users and the integrity of the platform.

## **Exercising Your Privacy Rights**

When exercising the rights or options described in this Privacy Policy, the following guidelines apply:

- No fee usually required – You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive.
- What we may need from you – When exercising your rights or otherwise assisting you, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure we do not disclose personal information to any person who is not entitled to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- Time to respond – We will respond to all legitimate requests within any statutorily required timeframes. We may need to request additional time to respond, for instance if your request is particularly complex or you have made a number of requests. In this case,

we will notify you of the delay, and may continue to update you regarding the progress of our response.

### **Questions and Contact Information**

St. Albans Sporting Club welcomes your comments regarding this Privacy Policy. If you believe that St. Albans Sporting Club has not adhered to this Privacy Policy, or have any questions about the management of your Personal Information, please contact St. Albans Sporting Club at [Contact@StAlbansSC.com](mailto:Contact@StAlbansSC.com)