

## Ironman Licensee Event Privacy Policy

Privacy protection is important to us. This Ironman Licensee Event Registration and Participation Privacy Policy ("**Privacy Policy**") describes how we process personal data through your registration and participation in our Events.

When we use the term "**personal data**" we mean any data that identifies you or makes you identifiable as a natural person.

When we use the term "**Events**" we mean the Enea IRONMAN 70.3 Gdynia organized by Sport Evolution Group Sp. z o.o. ("**Event Organizer**"). These Events might be part of our sport event series, including the IRONMAN and IRONMAN 70.3 series, Rock'n'Roll series, Velothon series and Cycclassic series.

Your Event registration is conducted by the Event Organizer or a third-party event registration service provider engaged by the Event Organizer. The Event Organizer transfers the registration data to us for the purposes further described in this policy. This Privacy Policy applies only to our processing of your personal data after the data has been transferred to us from the Event Organizer.

Please note that this Privacy Policy does not apply to the Event Organizer's processing of your personal data, nor does it apply to any other of our processing activities, including the ones in connection with organizing our own sport events. We maintain a separate privacy policy for the processing of data related to the use of our websites.

### 1. Who is data controller of your personal data?

World Triathlon Corporation, located at Ironman Germany GmbH, Höchster Straße 90, 65835 Liederbach, Germany ("**WTC**") is the data controller for all Events. WTC is responsible for, and controls, the processing of your personal data.

If you wish to contact WTC, you can find additional contact details at the end of this Privacy Policy.

For the purposes described below WTC will share personal data with WTC's local subsidiaries and affiliates ("**Ironman Entities**"), in particular Ironman Sweden AB, Box 9, 391 20 Kalmar, Sweden; Ironman Denmark ApS, Hannovergade 8, 2300 Copenhagen S, Denmark; and Ironman Austria GmbH, Alter Platz 12/2, 9020 Klagenfurt am Wörthersee, Austria. WTC and these Ironman Entities therefore act as joint controller (WTC and the respective Ironman Entity collectively "**Joint Controller**", "**Ironman**", "**we**", "**us**" or "**our**").

### 2. What personal data do we collect?

The Event Organizer shares certain registration and event data with us. Please see the **Annex** for a detailed description on the personal data we receive. On a more general level, the personal data we collect, can include the following:

- **Registration Data.** Name, e-mail address, phone number, address, birth date, place of birth, gender, information on medical condition and medications, emergency contact information, relay information and other information you provide during registration.
- **If, in the course of registration, you subscribe to our newsletter.** Name, e-mail address, marketing campaign information such as your reaction to our marketing and your interest in our Services.

- **In the course of preparing the Event and during the Event**, the Event Organizer might share with us, and we might add, other information, such as your registration number and the age group to which you are allocated as well as your performance in the Event.
- **If you contact us directly**, (for example with questions regarding the Event series or Ironman's involvement in the Event) we will collect the personal data provided by you, which might include your name, contact information, your question or feedback, information on your previous participation in Ironman sport events and any other information you share with us.

### 3. How do we collect your personal data?

Potentially, we receive your personal data from different sources:

- **Personal data we receive from others:** We receive most of the personal data about Event registrants from the Event Organizer.
- **Personal data you provide to us:** If you contact us, we will collect personal data from you directly.

You are free to choose which information you want to provide to us or whether you want to provide us with personal data at all. Without providing certain personal data to us, however, we might not be able to answer your questions, especially in regard to your participation in the overall sport event series.

### 4. Why and on which legal basis do we collect and use your personal data?

The reasons for using your personal data may differ depending on the purpose of the collection. Please see the **Annex** for a detailed description on the purposes for which we use your personal data received from the Event Organizer. On a more general level, we regularly use your personal data for the following purposes and on the following legal grounds:

- **We use your personal data if justified by our legitimate interests.** After you have registered for an Event of the Event Organizer, we use your personal data to support the Event Organizer in the organization and execution of the Event and make your participation in the Event possible. As the licensors of the Event, it is our paramount task to make sure that the Event is conducted in line with our Ironman standards, especially as regards Athlete services and safety.

Most of the Events are part of bigger sport event series and are therefore interlinked with other sport events organized by Ironman or other Ironman licensees. By participating in an Event of the Event Organizer, you can qualify for other Ironman sport events and accumulate points for our overall Ironman rankings. For this reason, personal data collected in the Events of the Event Organizer (such as the race results and ranking) will potentially be used for the qualification of other sport events and in the context of our overall sport event series.

In addition, we may use some of your personal data to evaluate and review the Events, the demographics of our athletes and our overall business performance (such as Event participation, cancellations, Event related incidents) and improve and individualize your experience and enjoyment of our Ironman sport events. If necessary, we may also use your personal data to pursue or defend ourselves against legal claims.

- **We use your personal data for the performance of our contractual services.** In the context of the registration with the Event Organizer, you may have the opportunity to buy and order

certain Ironman products. If you buy our products, we will use your name and contact details, as well as all necessary information on your sale to fulfil our contract with you. In addition, if you already participated in a sport event organized by Ironman, adding your scores to your overall Ironman ranking is part of our contractual services to you. If you are a member of the TriClub or Ironman's All World Athletes Group, your performance in the Event will be added to your profile and used for providing you with benefits, according to our membership rules.

- **We use your personal data after obtaining your consent.** In some cases, we may ask you to grant us separate consent to use your personal data. Where we ask you for your consent, you are free to deny your consent and the denial will have no negative consequences for you. You are also free to withdraw your consent at any time with effect for the future. If you have granted us consent to use your personal data, we will use it only for the purposes specified in the consent form.

This also includes our e-mail marketing activities. If you sign up to our e-mail newsletter during registration, we will use your personal data for our e-mail newsletters. You may unsubscribe from our e-mail newsletter at any time [[unsubscribe from this list](#)]. You may also contact us via e-mail, phone or mail at the address provided at the end of this document to request that we remove you from our e-mail list.

- **We use your personal data to comply with legal obligations.** We are obligated to retain certain personal data because of legal requirements, for example, tax or commercial laws or we may be required by law enforcement to provide personal data on request.

We will only use your personal data for the purposes for which we have collected them. We do not use your personal data for automated individual decision-making.

## 5. With whom do we share your personal data?

As required in accordance with how we use it, we will share your personal data with third parties. Please see the **Annex** for a detailed description of the third parties and the personal data we might share with them. On a more general level, we share your personal data with the following categories of third parties:

- **Ironman Entities.** WTC works closely together with the Ironman Entities around the world in regard to event organization and marketing activities. As WTC and other Ironman Entities support the Event Organizer together in the organization of the Event, all personal data provided by the Event Organizer will be accessible to WTC and the Ironman Entities.
- **Service providers and advisors.** Third-party vendors and other service providers that perform services for us, which may include, depending on our involvement in the Event organization, marketing campaign services, providing mailing or e-mail services, medical support, event surveillance, time keeping, services related to the organization of the Events, data enhancement services or fraud prevention. If applicable, such service providers will, by appropriate data processing agreements, be bound to process personal data only on our behalf and under our instructions.
- **Purchasers and third parties in connection with a business transaction.** Personal data may be disclosed to third parties in connection with a transaction, such as a merger, sale of our assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business, or in the event of a bankruptcy or similar proceedings.

- **Law enforcement, regulators and other parties for legal reasons.** Personal data may be disclosed to third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our legal claims or to protect the security or integrity of our Services; and/or (c) to exercise or protect the rights, property, or personal safety of WTC, the Ironman Entities, our partners, employees, athletes, visitors or others.
- **The public.** The official rankings and information justifying the ranking will be disclosed to the visitors of the Events and on our websites.

## 6. How long do we keep your personal data?

We will store personal data for as long as necessary to fulfill the purposes for which we collect personal data, in accordance with our legal obligations and legitimate business interests. Afterwards, or at the end of the statutory retention times, the personal data will be deleted as applicable. For example, national commercial or financial codes may require us to retain certain information for up to 10 years.

## 7. How do we protect your information?

We implement a variety of security measures to maintain the safety of your personal data. However, no system of security can be 100% secure and so we cannot guarantee in all cases the security of the information that we process. In the event we learn that personal data is compromised as a result of a breach of security, we will take steps to investigate and comply with notification obligations and take other steps, in accordance with applicable laws and regulations.

## 8. How do we safeguard your personal data when there is an international transfer?

As WTC is located in the United States, we transfer personal data from other countries to the United States. Depending on your place of residence or location, this may mean that your personal data will be stored in a jurisdiction that offers a level of protection that may, in certain instances, be less protective of your personal data than your resident jurisdiction.

For this reason, we have entered into guarantees to ensure appropriate safeguards. The Event Organizer, WTC and Ironman Entities have entered into contracts based on the EU Standard Contractual Clauses for the benefit of the affected data subjects to safeguard any transfer of personal data from the European Union or the European Economic Area to other countries as well as the direct collection of such personal data by WTC. Please contact [datenschutz@ironman.com](mailto:datenschutz@ironman.com) for more information.

Before transferring your personal data to a third party outside the European Union and European Economic Area, we will enter into contracts based on the EU Standard Contractual Clauses to safeguard your personal data.

## 9. What rights and choices do you have?

We want you to understand your rights and choices regarding how we may use your personal data.

**Individual Rights.** You have specific rights under applicable privacy law in respect to your personal data that we hold, including a right of access and erasure and a right to prevent certain processing activities.

**Choices.** If you do not want to participate in an Event using your real name, you can contact our data protection team at [datenschutz@ironman.com](mailto:datenschutz@ironman.com), which will discuss with you the possibility to participate under an alias.

### **a) Your European Union Rights**

If you are **located in the European Union or if your Event takes place in the European Union**, you have the following rights in respect to your personal data that we hold:

- **Right of access.** The right to obtain access to your personal data.
- **Right to rectification.** The right to obtain rectification of your personal data without undue delay where that personal data is inaccurate or incomplete.
- **Right to erasure.** The right to obtain the erasure of your personal data without undue delay in certain circumstances, such as where the personal data is no longer necessary in relation to the purposes for which it was collected or processed.
- **Right to restriction.** The right to obtain the restriction of our data processing in certain circumstances, such as, where you contest the accuracy of your personal data, for a period of time enabling us to verify the accuracy of that personal data.
- **Right to portability.** The right to portability allows you to move, copy or transfer personal data easily from one organization to another. It only applies to personal data that you have directly provided to us.
- **RIGHT TO OBJECT.** YOU HAVE A RIGHT TO OBJECT TO ANY PROCESSING BASED ON OUR LEGITIMATE INTERESTS WHERE THERE ARE GROUNDS RELATING TO YOUR PARTICULAR SITUATION. YOU CAN OBJECT TO THE USE OF YOUR PERSONAL DATA FOR MARKETING ACTIVITIES FOR ANY REASON WHATSOEVER.

If you wish to exercise one of these rights, please contact us using the contact details below.

For e-mail marketing, we provide the following easily usable option:

- **E-Mail Settings and Preferences.** If you no longer want to receive marketing e-mails from us, you may choose to unsubscribe at any time [[unsubscribe from this list](#)].

In addition to the foregoing listed rights, you also have the right to lodge a complaint with a data protection authority. Further information about how to contact your local data protection authority is available at [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

### **b) Your Nevada Privacy Rights**

If you are a Nevada resident, you may have certain rights with respect to the sale of your personal information. Please contact us by emailing [legal@ironman.com](mailto:legal@ironman.com) to exercise your rights under Nevada law.

## **10. How to contact us?**

If you have any questions or concerns about our Privacy Policy or if you want to exercise your rights, please contact WTC or the involved Ironman Entities using the address at the beginning of the Privacy Policy. You can also send an e-mail to [datenschutz@ironman.com](mailto:datenschutz@ironman.com).

## **11. Data Protection Officer**

For all enquiries regarding activities of Ironman Germany, you may also want to contact our Data Protection Officer who can be reached at [datenschutz@ironman.com](mailto:datenschutz@ironman.com).

## **12. Online Privacy Policy Updates**

We may make changes to our Privacy Policy from time to time. Please review our Privacy Policies regularly as updated Privacy Policies will apply to future Events.

## Annex – Ironman Licensee Events

Categories of Personal Data	Purposes of Use and Legal Basis for Processing ( <i>in brackets –legal basis in the EU</i> )	Recipients
<p>Name</p> <p>Home address (address country, city, postal code)</p> <p>E-mail address</p> <p>Phone number</p> <p>Membership in a national triathlon/endurance sport organization</p>	<ul style="list-style-type: none"> <li>• Preparation and operation (<i>legitimate interest: support of Event Organizer in organization and execution of the Event</i>).</li> <li>• Name used for rankings (<i>legitimate interest: support of Event Organizer in organization and execution of the Event; adding rankings to overall Ironman sport event rankings</i>).</li> <li>• Address used for demographic analysis (<i>legitimate interests: analyzing demographics for marketing and business development</i>).</li> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/legitimate interest: include Event in overall Ironman sport event series</i>).</li> <li>• Name and e-mail address are used in marketing e-mails (<i>consent</i>).</li> </ul>	<p><u>Business Support Vendors:</u> Vendors that provide Ironman with business support software, including e-mail account applications, spreadsheet and word editors, presentation programs, data storage and management applications, and IT security software. These vendors may, by contract, only process data on behalf of Ironman.</p> <p><u>Marketing Vendors:</u> Vendors that provide marketing services for Ironman – either by marketing software applications or by external marketing management. These vendors may, by contract, only process data on behalf of Ironman.</p> <p><u>Analytics Vendors:</u> Vendors that provide Ironman with applications or software to analyze or enhance personal data. These Vendors may, by contract,</p>

		<p>only process data on behalf of Ironman.</p> <p>Name is made public in rankings.</p>
<p>Gender</p> <p>Date of birth</p> <p>Team registration</p>	<ul style="list-style-type: none"> <li>• Preparation and operation (<i>legitimate interest: support of Event Organizer in organization and execution of the Event</i>).</li> <li>• Analysis of customer groups (demographics) (<i>legitimate interests: analyzing customers for marketing and business development</i>).</li> <li>• Gender used in rankings (<i>legitimate interest: support of Event Organizer in organization and execution of the Event; adding rankings to overall Ironman sport event rankings</i>).</li> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/legitimate interest: include Event in overall Ironman sport event series</i>).</li> </ul>	<p>Business Support Vendors</p> <p>Analytics Vendors</p> <p>Gender is made public in rankings</p>
<p>Bib number</p> <p>Race category classification</p>	<ul style="list-style-type: none"> <li>• Event preparation and operation (<i>legitimate interest: support of Event Organizer in organization and execution of the Event</i>).</li> <li>• Identify you during a race (<i>legitimate interest: support of Event Organizer in organization and execution of the Event</i>).</li> <li>• Race category classification used for rankings (<i>legitimate interest: support of Event Organizer in organization and execution of the Event; adding</i></li> </ul>	<p>Business Support Vendors</p> <p>Event Photographer for allocation of photos</p> <p>Medical Teams for medical support</p> <p>Race category classification is made public in rankings</p>

	<p><i>rankings to overall Ironman sport event rankings).</i></p> <ul style="list-style-type: none"> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/legitimate interest: include Event in overall Ironman sport event series).</i></li> </ul>	
Information on incidences occurring during or in the context of the Event	<ul style="list-style-type: none"> <li>• Help you during the Event (<i>legitimate interest: support of Event Organizer in organization and execution of the Event).</i></li> <li>• After race used, if needed, for legal issues related to the incident (<i>legitimate interests/exercise of defense of legal claims).</i></li> </ul>	<p>Local Medical Team, hospitals, lawyers, other athletes and others: only to the extent needed for the medical treatment and legal issues resulting from an incident during the Event.</p> <p>Business Support Vendors</p>
Nationality  Additional "Tell Us Your Story" – Information shared by you during registration (optional)	<ul style="list-style-type: none"> <li>• Used for commentating the Event, honoring champions (<i>legitimate interest: support of Event Organizer in organization and execution of the Event).</i></li> <li>• Nationality used for ranking (<i>legitimate interest: support of Event Organizer in organization and execution of the Event; adding rankings to overall Ironman sport event rankings).</i></li> <li>• Nationality used for demographic analysis (<i>legitimate interests: analyzing customers for marketing and business development).</i></li> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/legitimate interest: support of Event Organizer in organization and execution of</i></li> </ul>	<p>Nationality and ranking are made public</p> <p>Business Support Vendors</p>

	<i>the Event and include Event in overall Ironman sport event series).</i>	
Race results (race time)	<ul style="list-style-type: none"> <li>• Used for rankings (of the individual Event and overall Ironman rankings), qualification for Kona or other races (<i>legitimate interest: support of Event Organizer in organization and execution of the Event; adding rankings to overall Ironman sport event rankings</i>).</li> <li>• Add your data to your existing customer file (<i>performance of a contract/legitimate interest: support of Event Organizer in organization and execution of the Event and include Event in overall Ironman sport event series</i>).</li> </ul>	<p>Race results are made public (public rankings)</p> <p>Business Support Vendors</p>
<p>Member of a TriClub</p> <p>Member of Ironman All World Athletes (AWA)</p>	<ul style="list-style-type: none"> <li>• Send special marketing, send links for priority registration (<i>consent</i>).</li> <li>• provide other membership benefits in context of the Events (<i>performance of a contract</i>).</li> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/legitimate interest: support of Event Organizer in organization and execution of the Event and include Event in overall Ironman sport event series</i>).</li> </ul>	<p>Marketing Vendors</p> <p>Business Support Vendors</p>
Subscription to e-mail newsletter (optional)	<ul style="list-style-type: none"> <li>• Send marketing material (<i>consent</i>).</li> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/ legitimate interest:</i></li> </ul>	<p>Marketing Vendors</p> <p>Business Support Vendors</p>

	<p><i>include Event in overall Ironman sport event series and offer customers individualized services).</i></p>	
<p>Additional purchases (Event photos, engraved medals, Ironman merchandise) (optional)</p>	<ul style="list-style-type: none"> <li>• Provide you with merchandise products (<i>performance of a contract</i>).</li> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/legitimate interest: support of Event Organizer in organization and execution of the Event and include Event in overall Ironman sport event series</i>).</li> </ul>	<p>Business Support Vendors</p> <p>Provider of Ironman Product Warehouse. Provider may, by contract, only process data on behalf of Ironman.</p> <p>Merchandise Partners providing Ironman with products or sending products directly to you. These partners may, by contract, only process data on behalf of Ironman.</p>
<p>Occupation (optional)</p> <p>Employer (optional)</p> <p>Job title (optional)</p>	<ul style="list-style-type: none"> <li>• Analysis (demographics) (<i>legitimate interests: analyzing customers for marketing and business development</i>).</li> <li>• Contact you or your employer to gain new sponsors for our events (<i>consent</i>).</li> <li>• Create your customer file or add your data to your existing customer file (<i>performance of a contract/legitimate interest: support of Event Organizer in organization and execution of the Event and include Event in overall Ironman sport event series</i>).</li> </ul>	<p>Business Support Vendors</p> <p>Analytics Vendors</p>
<p>Information on your communication with us (such as asking questions,</p>	<ul style="list-style-type: none"> <li>• Providing you with support and customer service. (<i>depending on the reason for our communication: performance of a contract/legitimate interest:</i></li> </ul>	<p>Business Support Vendors</p>

cancelling a registration)	<i>communicate with interested third parties).</i>	
Information collected in the context of anti-doping testing	<ul style="list-style-type: none"> <li>• Anti-doping tests are conducted in compliance with the World Anti-Doping Code. Information collected in this context is only used to test for prohibited substances and, where applicable, impose sanctions on athletes using such drugs (<i>depending on jurisdiction at the venue: legal obligation/task carried out in the public interest/performance of a contract or consent</i>).</li> </ul>	All information is uploaded in the Anti-Doping Administration and Management System, in accordance with the rules of the World Anti-Doping Organization. Results are potentially visible to other Anti-Doping Organizations
Name Nationality Race time Location Picture	<ul style="list-style-type: none"> <li>• Name, nationality, location during the race, race time used in race tracking app, such as IRONMAN Tracker (<i>performance of a contract/legitimate interest: support of Event Organizer in organization and execution of the Event and include Event in overall Ironman sport event series; allowing fans to follow the athletes' race</i>).</li> <li>• If participating in first full Ironman: Name, nationality, picture and race result used for first timer celebration on the "become one" website (<i>consent</i>).</li> </ul>	Tracking App Provider, which may, by contract, only process data on behalf of Ironman.  Made public on "become one" website.