



# Privacy Statement

## 1. Introduction

Welcome to the Privacy Statement for Bascome Football Company (collectively, "BFC", "our", "we" or "us").

BFC is a not-for-profit, locally registered company and is committed to respecting and protecting the privacy and security of personal information in compliance with the Personal Information Protection Act 2016 ("PIPA"). This Privacy Statement outlines how we collect, use, and protect the personal information provided to us, as applicable.

Our services are almost exclusively intended for children. PIPA considers a child to be under the age of fourteen (14). FIFA and other organizations consider a child to be under the age of eighteen (18). For legitimate operational and lawful reason BFC must collect personal information relating to a child, why we will need the explicit consent of a parent or guardian, or as permitted by law. We further need the parent or guardian's personal information for communication, payments and other operational requirements.

## 2. Scope

This privacy statement applies to personal information collected and processed by BFC in the context of our operations as provider of individual age appropriate technical and positional football development for children and youth in Bermuda.

## 3. Personal Information we Collect and how we use it

How and What We Collect | How We Use It

Registering or seeking information on our programs: When you register interest for one of our programs via email to us at [registration@fcbascomebermuda.com](mailto:registration@fcbascomebermuda.com), we will collect your name, your child's age and name, address, telephone number, and email address. | We use this information to inform you about or process your application. We may need to make contact with you to progress the registration process.

Program sign-up: When you make a purchase with us, or on or through our platform we will collect your child's name, dob, school, and medical issues of importance, your name, address, telephone number, email address, medical insurance information, medical doctor of your child, guardians, emergency contacts, and payment card information, including credit card number, expiration date and security code. | We use this information to process your request and communicate with you about your child's training, events, games and other Bascome Football School wide events. Where we have engaged a third-party processor to process payments on our behalf, which includes all purchases made through a platform, your payment information is sent directly to our third-party payment processor who will only use such information for the purpose of processing your payment.

Sensitive Personal Information: gender and medical conditions. | We use this information to assign your child to an appropriate training group and in the case of medical condition so that the teachers and staff are aware of any medications or restrictions in your child's physical abilities and how to treat them in case of an emergency on the field.

Social Media: If you use the blog or comment feature on an online platform, or if you communicate with us through any of our social media (e.g. Facebook), you should be aware that any personal information you submit through comments or posts to the blog or other social networking forum can be read, collected, or otherwise used by anyone with access to the forum or who visits the URL of the web page on which the post or comment is posted.

On-going communication through a season: In order to keep a parent and his/her child updated through the season from September to the following June BFC use the following third party communication platforms: SportsEngine, WhatsApp, web site at [www.fcbascomebermuda.com](http://www.fcbascomebermuda.com) and email. When using WhatsApp and email a parent's personal information such as email address, phone number, other contact details, his/her child's name and other information might be shared with the other in the message.

Financial Information: Payments for our services are made directly via bank transfer, or via third party payment processors. BFC does not collect, use, or share any personal financial information.

#### **4. Purpose of Collection**

We collect and process personal information for the following purposes:

- i. To facilitate efficiency for student registration processes;
- ii. To provide to staff and partners for course preparation and delivery;
- iii. To comply with legal and regulatory obligations;
- iv. To maintain secure and accurate accounting and inventory management;
- v. To communicate effectively with staff, parents, league or tournament operators, and partners;

vi. To protect the safety of our staff and students.

## **5. Legal Basis for Processing**

We process personal information based on one or more of the following legal grounds:

- i. Consent, where required.
- ii. Fulfillment of contractual obligations.
- iii. Compliance with legal or regulatory requirements.
- iv. Legitimate interests pursued by BFC, such as business operations.

## **6. Security of Personal Information**

At BFC we take the protection of your personal information seriously. We make every reasonable effort to prevent unauthorized use, disclosure, loss or theft of your personal information. Employees who have access to your personal information are made aware of the importance of keeping it confidential.

Where we use service providers who have access to your personal information, we select them carefully and require them to have privacy and security standards that are comparable to ours. We use contracts and other measures with our service providers to ensure that they maintain the confidentiality and security of your personal information and to prevent such information from being used for any other purpose.

We implement appropriate technical and organizational measures to protect personal information from unauthorized access, disclosure, alteration, or destruction. These measures include:

- i. Secure storage systems.
- ii. Access controls and authorization protocols.
- iii. Regular data security assessments.
- iv. Encryption of our website for the transmission of data that includes personal information.

## **7. Sharing of Personal Information**

We may share personal information with third parties only under the following circumstances:

- i. When required to effectively operate all various teams and groups within the program. Each team will have a team manager who is responsible for the communication within the group, however, all in the group will be party to personal information about both the other players and other parents. BFC will strive to keep such information sharing at an absolute minimum.
- ii. With the operators of local league and tournaments and with international organizations who organize and operate tournaments
- iii. When required by law, or regulatory authorities.
- iv. With the consent of the individual, where applicable.

## **8. Rights of Individuals**

Under PIPA, individuals have the following rights regarding their personal information:

- i. To access and obtain a copy of their personal information.
- ii. The purpose for which the personal information is used by an organization.
- iii. The names of the persons to whom their personal information has been disclosed; and
- iv. The circumstances in which the personal information has been disclosed.
- v. Individuals may also ask in writing for inaccurate personal information to be corrected.

## **9. Protecting your Data**

Please be aware that no data security measures can guarantee complete security. You should also take steps to protect against unauthorized access to your password, phone and computer by, among other things, logging off after using a shared computer, choosing a robust password that nobody else knows or can easily guess and keeping your login and passwords secure and not sharing them. If you do not want BFC to know any particular information about you, you should not include that information in anything you submit to us.

## **10. Withdrawing your Consent to Our Processing**

Except for personal information which is required to be retained by law, or which is needed to process a purchase, or to comply with basic operational requirements such as team formation, training notification, league registration, individuals may withdraw consent to all or part of the collection, use and disclosure of their personal information at any time, by giving us reasonable notice. If you would prefer that we not collect, use, or disclose your personal information, or that we not use your personal information to contact you to promote our products or services, please contact us. We will act on your instructions as quickly as possible subject to contractual and legal restrictions, but there may be certain uses for your information that we may not be able to stop immediately. Please be advised that withdrawal of consent may make it impossible for us to provide certain services to you.

## **11. Contact Information**

If you have questions about this Privacy Statement or wish to exercise your rights under PIPA, please contact us at:

Bascome Football Company

Attn: Mr. Henrik Schroder

99 Front Street

Hamilton HM12

Bermuda

EMAIL: [henrik@fcbascomebermuda.com](mailto:henrik@fcbascomebermuda.com)

You may also enquire with the office of the Privacy Commissioner by contacting [Privcom@privacy.bm](mailto:Privcom@privacy.bm) with any questions or concerns about your personal information.

## **12. Changes to this Privacy Statement**

We may update this Privacy Statement from time to time to reflect changes in our practices or legal obligations. Any updates will be communicated and made available on our website or through other appropriate means.

Effective Date: 1st September, 2025