

Privacy Policy for residents of the European Economic Area (EEA)

In this Privacy Policy, any reference to "we", "us" or "our" is a reference to Sport for Creating Pathways Japan (S.C.P. Japan), (hereinafter "**SCP**").

We are aware of the importance of your personal data (hereinafter "**Personal Data**"), and we assure you that it will be treated with care and in a reasonable manner.

The purpose of this Privacy Policy and any other document to which it refers is to outline to you how we collect, use and transfer (collectively, "**process**") your Personal Data.

1. Data Controller

The controller is SCP, which means that we are the ones who determine how and why your Personal Data is processed.

For our contact information, please see the "**Questions and Information**" section below.

2. Processing of Personal Data

The Personal Data we collect allows us to:

- Manage and administer the activities of SCP.
- Contact you and maintain the directory of SCP members.
- Subject to your prior consent, to send you regularly our Newsletter and all emails.
- To meet our legal obligations.

These processing activities are sometimes carried out by third parties.

3. Categories of Personal Data we process and how we obtain it

A. Personal Data that you provide directly to us

The Personal Data we process is obtained from you when you complete and submit a membership application.

Some of the information you provide to us is so-called "sensitive" data.

As per the General Data Protection Regulation (GDPR), the following personal data is in particular considered to be sensitive:

- personal data revealing racial or ethnic origin;
- health-related data;
- data concerning a person's sex life or sexual orientation.

B. Personal Data we process when you use our website

Other categories of Personal Data are obtained simply by browsing our website. This information may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies, namely the frequency and duration of your visits to our website as well as details of your visit, including, but not limited to, traffic data, location data, logs and other communication data, as well as information about your computer and your Internet connection, including your IP address, operating system and browser type.

4. Legal basis for processing Personal Data

SCP process your Personal Data only when such processing is lawful under applicable law.

The legal basis for processing your Personal Data are as follows:

A. When you have consented to the processing of your Personal Data for the following purposes:

- To manage and administer the activities of SCP.
- To contact you and to keep the private directory of our members.
- To send you regularly our Newsletter and emails.

In these cases, you may withdraw your consent at any time by following the instructions provided to you when you gave your consent, or by contacting us as indicated below (see section "Questions and Information").

B. Where processing is necessary for the purposes of our legitimate interests which are:

- Analyzing your use of our website <https://scpjapan.com/>
- To review and continually improve our website.
- To protect the confidentiality, integrity of your Personal Data.

C. When processing is necessary to comply with legal obligations to which we are subject:

- To respond to your requests to exercise your rights under applicable data protection laws (see "**Rights under applicable laws regarding the protection of Personal Data**" below)

From time to time, your Personal Data might be shared with agencies assisting us in specific projects. When it is the case, the agencies having access to the your Personal Data are obliged to respect the confidentiality of the information and to use it only for the specific purpose for which it is to be used.

We take every precaution to preserve the integrity of your Personal Data, its confidentiality and to prevent disclosure to unauthorized parties.

5. Does SCP transfer Personal Data outside the EEA?

As a Japan based entity, SCP will securely process your Personal Data in Japan.

On January 23, 2019 the European Commission has adopted an adequacy decision on Japan, allowing personal data to flow freely between the two economies on the basis of strong protection guarantees.

6. Security of Personal Data

SCP maintains physical, electronic and procedural safeguards to protect the confidentiality, integrity and availability of your Personal Data. In particular, we have taken appropriate security measures against unauthorized or unlawful disclosure of Personal Data, as well as against accidental loss, alteration, or destruction of Personal Data.

7. How long does SCP keep your Personal Data

SCP will keep your Personal Data for as long as necessary to fulfill the purposes for which it was collected (see above) and to comply with legal and regulatory requirements. This may mean that some Personal Data will be retained longer than others.

As part of our processing for the purpose of sending you our newsletter, your Personal Data is kept for a period of three years from the date of collection or last contact. At the end of this three-year period, we may contact you again to find out if you wish to continue receiving this information. In the absence of an explicitly positive response from you, your Personal Data will be deleted.

8. Rights under applicable laws regarding the protection of Personal Data

You have the right to access, rectify, or delete your Personal Data, the right to request data portability, as well as the right to give instructions on the fate of your Personal Data after your death. You also have the right to object to the processing of your Personal Data in certain cases.

Simply send a request to: info@scpjapan.com

When we process your Personal Data with your consent, you have the possibility to withdraw this consent at any time, for the future. You also have the possibility to lodge a complaint with the competent Supervisory Authorities For all questions and inquiries, please contact us as indicated in the "Questions and inquiries" section below.

9. Questions and Information

For more information on your rights regarding the protection of Personal Data, you can contact us by sending an email to: info@scpjapan.com

10. Modification of the Privacy Policy

We may decide to make changes to this Privacy Policy. If the change is material or if the change is likely to affect you significantly, we will provide you with the updated Privacy Policy before the change becomes effective.

Organization's name : Sport for Creating Pathways Japan (S.C.P. Japan)

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