

Privacy Policy

隐私政策

Catapult China Privacy Policy

开特普中国隐私政策

Introduction – Who Are We?

引言-我们是谁?

Catapult Sports Technology Beijing Co., Ltd. (“we,” “us,” or “our”) respects your privacy and is committed to complying with the privacy principles contained in the applicable privacy laws and regulations in the People’s Republic of China (“China”).

开特普体育科技（北京）有限公司（下称“我们”）尊重您的隐私，并致力于遵守中华人民共和国适用的隐私法律法规中所包含的隐私原则。

This policy sets out the manner in which we collect, hold, process, use and disclose your personal and sensitive information.

本政策载明了我们收集、持有、处理、使用和披露您的个人信息及敏感信息的方式。

What does “personal information” and “sensitive information” mean?

“个人信息”和“敏感信息”是指什么？

Personal information is any information in electronic or any other form that, solely or in combination with other information, identifies you or by which your identity may be reasonably determined. Information about your health is categorised as sensitive information.

个人信息是指以电子或者其他方式记录的、能够单独或者与其他信息结合识别您的身份或可被用于合理确定您的身份的任何信息。您的健康信息被归类为敏感信息。

What type of information do we collect or process and what is our basis for collecting or processing that information?

我们收集或处理哪些类型的信息？我们收集或处理该等信息的依据是什么？

The type of information we collect or process from or about you will depend on how you or your organization interacts with us. Generally, we collect or process the following types of information, along with the corresponding basis for collection:

我们收集或处理的、从您处获得或与您相关的信息类型，将取决于您或您所在的组织与我们的互动关系。一般情况下，我们收集或处理的信息类型及收集该等信息的相应依据如下：

(a) for our **Catapult Group International Ltd (“Catapult”) workers, internal contractors, and potential candidates** to work for us we collect personal details including name, contact details and information provided to us and collected by us that is relevant and necessary for our engagement with those people and in order to fulfil our obligations.

如果您是我们 **Catapult Group International Ltd (“开特普”)** 的员工、**内部承包商**或将要为我们工作的**潜在候选人**，我们会收集您的个人详情，包括姓名、联系方式，以及提供给我们的或我们收集的、对于我们聘用您和履行义务而言相关且必要的信息。

(b) for athletes who use our **PlayerTek Product (“PlayerTek”)**, we collect your account details, payment instructions where relevant, and sports performance data during times when the device is activated including field location, speed and distance covered. Our ability to collect, process, and use this information for the reasons stated in this document is a key part of the

functionality of the **PlayerTek** product, without it the **PlayerTek** product cannot be considered fully functional. In addition, we will be obtaining your specific consent to use the information in this manner.

如果您是使用我们 **PlayerTek** 产品（“**PlayerTek**”）的运动员，我们会收集您的账户详情、付款指令（如相关）及设备运行期间的运动表现数据（包括球场位置、速度及跑动距离）。对于 **PlayerTek** 产品的正常运行而言，我们能够基于本文件所载原因而收集、处理和使用该等信息是至关重要的；如果缺少了该等信息，则 **PlayerTek** 产品就不能被视为可以完全正常运行。此外，针对以该等方式使用信息的情况，我们会取得您的明确同意。

- (c) for athletes whose information is processed in our **OpenField** and **GPSports** product, we only collect information from individual athletes as our customers allow it, and those customers determine what information we process from their athletes. Generally, this information about you is related to your training and gameday performance data including field location, speed, acceleration, distance covered, heart rate and player load. The information is controlled by our customers/clubs, collected by them through the use of our products, and is processed and used by us as you see below. We use and process the information in this fashion as it is necessary to perform our part of our contracts with our customers/clubs. In addition, where our customers/clubs have obtained athlete consent for our use and processing of the information in this fashion, that consent also becomes part of our basis for our use and processing of this information.

对于个人信息将由我们 **OpenField** 和 **GPSports** 产品进行处理的运动员而言，我们只会从个人运动员处收集我们的客户允许收集的信息，并且我们处理的运动员信息类型将由该等客户决定。一般情况下，此类与您相关的信息是与您的训练和比赛日表现数据（包括球场位置、速度、加速度、跑动距离、心率和球员负荷）有关的信息。该等信息由我们的客户/俱乐部控制，客户/俱乐部通过我们的产品收集该等信息，我们则按照下文载明的方式处理和使用该等信息。我们会以对我们履行与客户/俱乐部签订的合同而言必要的方式，使用和处理该等信息。此外，如果我们的客户/俱乐部已就我们以此方式使用和处理信息征得运动员的同意，则该同意也将成为我们使用和处理该等信息的部分依据。

- (d) For our **Athlete Management System (“AMS”)**, we only collect information as you and our customers allow it or as you allow through your consent, and those customers determine what information we process from their athletes. Generally, this information about you is related to your sports performance, health data, wellness data and club related activity information. The information is controlled by our customers/clubs, collected by them through the use of our products, and is processed and used by us as you see below. We use and process the information in this fashion as it is necessary to perform our part of our contracts with our customers/clubs. In addition, we will be obtaining your specific consent to use the information in this manner.

对于我们的**运动员管理系统 (“AMS”)**而言，我们只会收集您和我们的客户允许收集的信息，或您通过作出同意而允许收集的信息，并且我们处理的运动员信息类型将由该等客户决定。一般情况下，此类与您相关的信息是与您的运动表现、健康数据、身心健康数据和俱乐部相关活动数据有关的信息。该等信息由我们的客户/俱乐部控制，客户/俱乐部通过我们的产品收集该等信息，我们则按照下文载明的方式处理和使用该等信息。我们会以对我们履行与客户/俱乐部签订的合同而言必要的方式，使用和处理该等信息。此外，针对以该等方式使用信息的情况，我们会取得您的明确同意。

- (e) For our **customers and their internal (non-athlete) representatives and personnel**, we only collect the following information: name and contact details and information related to our professional work with you. Our legal basis for collection, use, and processing of this information is that we collect, use, and process the information types listed above to perform our legitimate business of maintaining necessary employee, contractor, and applicant information for the operations of our company.

如果您是我們的**客戶或客戶的內部（非運動員）代表或人員**，我們只會收集以下信息：姓名、联系方式，以及與我們和您一同開展的專業工作有關的信息。我們收集、使用和处理該等信息的法律依據為：我們是為了開展合法業務（即維護對於我們公司經營而言必要的僱員信息、承包商信息和申請人信息）才收集、使用和处理上文列明的信息類型。

- (f) For our suppliers, consultants and contractors we only collect the following information: name and contact details, account and payments arrangements and information related to and reasonably required for our professional work with you. Our legal basis for collection, use, and processing of this information is that we collect, use, and process the information listed above to perform our legitimate business of maintaining necessary employee, contractor, and applicant information for the operations of our company.

如果您是我們的**供應商、顧問或承包商**，我們只會收集以下信息：姓名和联系方式、賬戶和付款安排，以及與我們和您一同開展的專業工作合理需要的相关信息。我們收集、使用和处理該等信息的法律依據為：我們是為了開展合法業務（即維護對於我們的公司經營而言必要的僱員信息、承包商信息和申請人信息）才收集、使用和处理上文列明的信息。

How do we collect your personal information?

我們如何收集您的个人信息？

When *you directly* use our products or services, you, or someone on your behalf can enter information about yourself into Catapult software (**PlayerTek, AMS**).

當您**直接**使用我們的產品或服務時，您或您的代表可將您的相关信息輸入開特普軟件（**PlayerTek、AMS**）中。

When our *customers* use our **OpenField** and **GPSports** products, certain information about you is processed in our software.

當我們的**客戶**使用我們的 **OpenField** 和 **GPSports** 產品時，我們的軟件會處理某些關於您的信息。

We will always try to collect your personal information directly from you where possible.

在可能的情况下，我們始終會盡量直接向您收集您的个人信息。

Regardless of how your personal information is collected – whether it is directly from you, from your interactions with us or from third parties – we will deal with your personal information in accordance with this policy.

不論我們以何種方式收集您的个人信息——無論是直接向您收集、通過您與我們的互動收集還是從三方處收集——我們都會按照本政策處理您的个人信息。

How do we use your information?

我們如何使用您的信息？

Generally, we use your information for:

一般情況下，我們將會將您的信息用於以下用途：

Providing and Maintaining the Services That Relate to this Product (Services): Using the information we collect, we are able to deliver the Services to you and honour our contract with you (in the case of PlayerTek) and our contracts with our customers (in the case of OpenField and AMS).
提供和维护与本产品有关的服务（服务）：通过使用收集到的信息，我们能够向您交付服务并履行我们与您签订的合同（针对 PlayerTek 的情况）以及我们与我们的客户签订的合同（针对 OpenField 和 AMS 的情况）。

Examples: For **PlayerTek**, we need to use your information to enable you to track your training and gameday activity and to give you customer support and for performance reporting within the Playertek community.

示例如下：就 **PlayerTek** 而言，我们需要使用您的信息，以便使您能够跟踪您的训练和比赛日活动及为您提供客户支持，并且用于 PlayerTek 社区内的表现报告。

For **GPSports** and **OpenField**, we use the information for fulfilling our contractual terms as product and service providers to your club or team, for product development and enhancement and we may use player data for commercial applications and enhancement of other **Catapult** product data feeds where that use is consistent with our contractual terms.

就 **GPSports** 和 **OpenField** 而言，我们会将该等信息用于履行我们（作为产品和服务提供商）与您的俱乐部或球队签订的合同条款，以及用于开发和改进产品，我们可能还会将球员数据用于其他**开特普**产品数据源的商业应用与改进，前提是该用途符合我们合同条款的规定。

For **AMS** we use the information for fulfilling our contractual terms as product and service providers to your club or team and for product development and enhancement.

就 **AMS** 而言，我们会将该等信息用于履行我们（作为产品和服务提供商）与您的俱乐部或球队签订的合同条款，以及用于开发和改进产品。

Improve and Develop the Services

改进和开发服务

We use the information we collect to improve the Services and to develop new ones. For example, we use the information to troubleshoot and protect against errors; perform data analysis and testing; conduct research and surveys; and develop new features and Services.

我们会将收集到的信息用于改进现有服务及开发新服务。例如，我们会将信息用于以下用途：排除故障和预防发生错误；进行数据分析和测试；进行研究和调研；以及开发新功能和服务。

Communicate with You

与您进行交流

We use your information when needed to send you notifications and respond to you when you contact us. With respect to **PlayerTek**, we also use your information to promote new features or products that we think you would be interested in. You can control marketing communications and most Service notifications by using your notification preferences in account settings or via the “Unsubscribe” link in an email. We use your information to provide customer service or assistance to you or (in the case of **OpenField**, **GPSports** and **AMS**) with our customers about their instances of our products and Services.

必要时，我们会使用您的信息，以便向您发送通知，并在您联系我们时向您作出回应。就 **PlayerTek** 而言，我们还会使用您的信息，以便推送我们认为您会感兴趣的新功能或产品。您可以通过账户设置中的通知偏好或电子邮件中的“退订”链接，控制推广通知及大部分服务通知。我们会将您的信息用于向您提供客户服务或协助，或者（针对 **OpenField**、**GPSports** 和 **AMS**）向我们的客户提供其使用我们的产品和服务的情况。

Promote Safety and Security

提升安全性

We use the information we collect to promote the safety and security of the Services, our users, and other parties. For example, we may use the information to authenticate users, protect against fraud and abuse, respond to a legal request or claim, conduct audits, and enforce our terms and policies. 我们会将收集到的信息用于提升服务的安全性及保障我们的用户和其他方的安全。例如，我们可能会将信息用于验证用户身份、防范欺诈和滥用、对合法要求或权利主张作出回应、开展审计以及执行我们的条款和政策。

Internal Business Purposes

内部商业目的

We use the information that we collect from our **workers, internal contractors, potential candidates, customers and their internal (non-athlete) representatives and personnel, suppliers, consultants, and contractors** for our internal business purposes, including (as applicable) to better operate our business and to communicate with customers and prospects.

我们会将从我们的**员工、内部承包商、潜在候选人、客户及其内部（非运动员）代表及人员、供应商、顾问和承包商**处收集的信息用于内部商业目的，包括（在适用的情形下）更好地经营我们的业务以及与客户和潜在客户进行交流。

Will we disclose your personal information to others?

我们是否会向他人披露您的个人信息？

In the case of **PlayerTek**, performance data of players in the **PlayerTek** community is shared through features in the app which enable comparisons and rankings of player performance.

就 **PlayerTek** 而言，**PlayerTek** 社区中的球员表现数据会通过应用程序上的功能进行共享，以便进行球员表现比较和排名。

For **GPSports** and **OpenField**, we may disclose the information for fulfilling our contractual terms as product and service providers to your club or team, for product development and enhancement and we may share player data for commercial applications and enhancement of other Catapult product data feeds where that use is consistent with our contractual terms.

就 **GPSports** 和 **OpenField** 而言，我们可能会为了履行我们（作为产品和服务提供商）与您的俱乐部或球队签订的合同条款或为了开发和改进产品而披露信息，并且我们可能会为了其他**开特普**产品数据源的商业应用与改进而共享球员数据，前提是该用途符合我们合同条款的规定。

In the case of athlete information in **AMS** we limit disclosures of your information to others within our company with a need to know in order to carry out the utility of our products and Services.

就 **AMS** 中的运动员信息而言，我们只会在我们公司内部、向为实施我们的产品和服务的功用而需要知晓的人士披露您的个人信息。

In the instances of other individuals (such as employees, customer employees, suppliers, etc.) we do not send your information outside of our company for any reason which is not necessary to further run the operations of the company. We limit these disclosures to those we believe absolutely necessary and limit the scope of such disclosures where feasible.

就其他个人（例如雇员、客户的雇员、供应商等）而言，我们不会因任何理由而向我们公司以外的任何人士发送您的信息，除非是公司继续经营所必要的情况。我们只会向我们认为绝对有必要向其披露的人士进行披露，并在可行的情况下，限制该等披露的范围。

Sometimes we'll need to disclose your personal information to other people or entities that we collaborate with to provide our products or services (third parties) for the purposes set out in this policy.

某些情况下，基于本政策所载之目的，为了提供我们的产品或服务，我们可能需要向与我们合作的其他人士或实体（第三方）披露您的个人信息。

We will do our best to ensure that we do not disclose your personal information to a third party if you have not approved it. Your consent to the disclosure of your personal information may be given expressly, or it may be implied from your interaction with us.

我们将尽最大努力，确保我们不会在未经您同意的情况下擅自向第三方披露您的个人信息。您对您个人信息披露的同意，可以通过明示方式作出，也可通过您与我们之间的互动沟通予以暗示。

In addition to the reasons above, we will need to disclose your personal information where the law requires us to.

除上述理由之外，我们还会在法律要求的情况下披露您的个人信息。

Will we disclose your personal information to people or entities outside of China?

我们是否会向中国境外的人士或实体披露您的个人信息？

If your data is processed within our **OpenField, AMS and GPSports** products, we will not *transfer* your personal information to any person or organisation outside China, without your permission. Your information will only be accessible to persons outside China as follows:

如果您的数据经由我们的 **OpenField、AMS 和 GPSports** 产品处理，那么，未经您的允许，我们不会向中国境外的任何人士或组织 *传输* 您的个人信息。中国境外的人士仅可在以下情况下访问您的信息：

For our **PlayerTek, GPSPORTS, OpenField, and AMS** products and Services, we may disclose personal information outside China for the purposes of customer service and product support and consistent with agreement terms in place, for example **PlayerTek** data may be disclosed in different regions as part of the performance reporting within the **PlayerTek** community.

就我们的 **PlayerTek、GPSPORTS、OpenField 和 AMS** 产品及服务而言，我们可能会为了提供客户服务和产品支持而在中国境外披露个人信息，且该等披露应符合已签订的协议条款。例如，在 **PlayerTek** 社区内，**PlayerTek** 数据可能会作为表现报告的一部分而在不同地区予以披露。

For our **Catapult workers, internal contractors, and potential candidates**, we will generally disclose personal information outside China for the purposes of personnel evaluation and general business operations.

就我们的 **开特普员工、内部承包商、潜在候选人** 而言，我们通常会为了人员评估和一般业务经营而在中国境外披露个人信息。

For our **customers and their internal (non-athlete) representatives and personnel**, we only allow access of your information outside of China for reasonable and permitted purposes related to our work with you.

就我们的 **客户及其内部（非运动员）代表和人员** 而言，我们只允许出于与我们与您的合作有关的、且经过允许的合理目的，而在中国境外访问您的信息。

For our **suppliers, consultants and contractors** we only allow access of your information or transferal of your information outside of China for reasonable and permitted purposes related to our work with you.

就我们的 **供应商、顾问和承包商** 而言，我们只允许出于与我们与您的合作有关的、且经过允许的合理目的，而在中国境外访问或传输您的信息。

If we do allow access to or transferal of your information to persons outside China we will take steps designed to ensure that such persons handle your personal information with the same level of protection as set out in this privacy policy and in a manner compliant with applicable laws and regulation.

如果我们允许中国境外的任何人士访问您的信息或向其传输您的信息，我们会采取相关措施，以确保该等人士按照与本隐私政策中规定的保护等级相同的保护等级及符合适用法律法规的方式处理您的个人信息。

How do we keep your personal information secure?

我们如何确保您个人信息的安全性？

We will take all reasonable precautions designed to safeguard personal information that is processed or used by us from loss, misuse, unauthorised access, modification or disclosure.

我们将采取一切合理预防措施，以保护由我们处理或使用的个人信息免遭丢失、不当使用、未经授权的访问、修改或披露。

To ensure that your personal information is secure, we employ several means, including:

为确保您个人信息的安全性，我们采用了若干手段，包括：

We contract reputable data storage service providers in locations that meet with relevant regulatory requirements. Within our organisation we apply our Information Security Policy which includes a range of measures including:

我们与各地满足相关监管要求的、声誉良好的数据存储服务提供商签订了合同。我们在组织内部实施了信息安全政策，其中包括以下一系列措施：

- (1) External and internal premises security;
在场所内外实施安保措施；
- (2) The requirement for all employees to enter into a confidentiality agreement;
要求所有雇员签订保密协议；
- (3) Computer firewall protection;
采用计算机防火墙保护；
- (4) Restricted access to personal files and information;
对个人文件和信息的访问权限加以限制；
- (5) Computer maintenance to prevent unauthorised access;
对计算机进行维护，以防范未经授权的访问；
- (6) Document handling and shredding procedures with respect to personal information;
设置与个人信息有关的文件处理和粉碎程序；
- (7) Limiting access to your personal information.
对您的个人信息的访问权限加以限制。

What are your rights?

您享有哪些权利？

Accessing and Exporting Information. In the case of **PlayerTek**, by logging into your account, you (or your team manager) can access your personal information.

信息访问权和导出权。就 **PlayerTek** 而言，您（或您的球队经理）可通过登录您的账号访问您的个人信息。

For all other individuals: you may access the personal information used, collected or processed by us by contacting privacy@catapultsports.com

对于所有其他人士而言：您可通过联系 privacy@catapultsports.com 访问我们使用、收集或处理的个人信息。

Editing and Deleting Information. In the case of **PlayerTek**, your settings let you change and delete your personal information.

信息编辑权和删除权。就 **PlayerTek** 而言，您可通过您的设置更改和删除您的个人信息。

For all other individuals: you may request the editing or deletion of your information by contact us by email at privacy@catapultsports.com

对于所有其他人士而言：您可通过向 privacy@catapultsports.com 发送电子邮件的方式与我们联系，向我们申请编辑或删除您的个人信息。

We may also preserve information for legal reasons or to prevent harm.

我们也可能出于法律原因或为了预防损害而保留信息。

If you consider use of your information by us is inappropriate you may object to that Information use by emailing us at privacy@catapultsports.com

如果您认为我们对您信息的使用不妥当，您可以通过向 privacy@catapultsports.com 发送电子邮件的方式，提出反对我们使用该信息。

You have a general right to object to the use of your information for direct marketing purposes.

针对将您的信息用于直接营销目的的情况，您享有一般反对权。

Please note that you can always delete your account at any time.

请注意，您可随时删除您的账号。

To exercise your rights above, please contact us by email at privacy@catapultsports.com

如需行使您的上述权利，请通过向 privacy@catapultsports.com 发送电子邮件的方式联系我们。

If you need further assistance regarding your rights, please contact our Data Protection Officer at privacy@catapultsports.com, and we will consider your request in accordance with applicable laws.

如果您就您所享有的权利需要进一步协助，请通过 privacy@catapultsports.com 联系我们的数据保护专员，我们将根据适用法律对您的要求予以考量。

Direct marketing

直接营销

We may use your personal information, such as your address or contact details, to provide you with information about services that we offer.

我们可使用您的个人信息（例如您的地址或联系方式），以便向您提供与我们所提供有关的信息。

If at any time you do not wish to receive any information about these services please feel free to contact us and we will not send you any further material.

如果您在任何时候不再希望收到关于该等服务的任何信息，请随时联系我们，我们不会再向您发送任何材料。

We will not transfer or allow access to your personal information to any other entity or person for the purposes of allowing them to market their products or services to you.

我们不会将您的个人信息传输给任何其他实体或人士或允许其访问您的个人信息，以便其向您营销其产品或服务。

Our Policies for Children

我们的儿童保护政策

We appreciate the importance of taking additional measures to protect children's privacy.

我们非常重视采取额外措施保护儿童隐私。

Persons under the age of 14, or any higher applicable minimum age in China, are not permitted to create accounts unless their parent or guardian has consented in accordance with applicable law. If we learn that we have collected the personal information of a child under the relevant minimum age without parental or guardian consent, we will take steps to secure parent or guardian consent in a way required by applicable law or delete the information as soon as possible. Parents who believe

that their child has submitted personal information to us and would like to have it deleted may contact us at privacy@catapultsports.com.

未满 14 周岁（或在中国适用的最低年龄，以较高者为准）的人士不得创建任何账户，除非其家长或监护人已按照适用法律同意其创建账户。如果我们得知，我们在未经父母或监护人同意的情况下收集了未满相关最低年龄的儿童的个人信息，我们将尽快采取措施，以取得适用法律所要求的家长或监护人的同意，或删除该等信息。如果家长认为他们的孩子向我们提交了个人信息，并且希望删除该等信息，则可通过 privacy@catapultsports.com 联系我们。

For How Long Do We Store Your Information?

我们存储您的个人信息的期限？

We store information for the duration in accordance with any applicable contractual term and retain or delete that data as we are required to do under applicable privacy rules.

我们会按照根据任何适用的合同条款确定存储信息的期限，并根据适用隐私规则项下的要求保留或删除该等信息。

We may retain de-identified data for research and product and service development.

我们可保留无法识别特定个人的数据，用于研究和产品与服务的开发。

Changes to this privacy policy

对本隐私政策的变更

We monitor regulations, policies and procedures to ensure that we are up to date with changes in the law and market practices. As a result, we will change this privacy policy from time to time.

我们密切关注相关法规、政策和程序，以确保我们了解法律和市场实践中的最新变化。为此，我们将不时变更本隐私政策。

How do you access the personal information we store?

您如何访问我们存储的个人信息？

Should you wish to access your personal information, contact us by emailing us at privacy@catapultsports.com.

如果您希望访问您的个人信息，请通过向 privacy@catapultsports.com 发送电子邮件的方式联系我们。

We will respond to all requests as quickly as is reasonably possible (and within any timelines imposed by applicable laws and regulations).

我们将在合理可行的情况下尽快（并在适用法律法规要求的任何期限内）就所有要求作出回应。

Complaints about breaches of privacy

就违反本政策的行为提起投诉

If you believe that we have wrongfully disclosed your personal information or have breached this privacy policy, then you may lodge a complaint with us by email to privacy@catapultsports.com.

如果您认为我们不当披露了您的个人信息或违反了本隐私政策，您可以将您的投诉通过电子邮件发送至 privacy@catapultsports.com。

We will respond to you within 30 days of receiving your complaint outlining: what we have or will do in response to your complaint, or explaining why we believe there is no breach of our policy or the law.

我们将在收到您的投诉后 30 天内回复您，并说明我们针对您的投诉已经或将要采取哪些措施，或阐述我们自认为并未违反我们的政策或相关法律的理由。

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