

PRIVACY NOTICE

Noisefeed S.r.l.

Notice pursuant to Article 14 of Regulation (EU) 2016/679 (the “GDPR”)

This notice describes how Noisefeed S.r.l. processes the personal data of professional football players in connection with the “Noisefeed Injuries” platform (the “Platform”). Such data are not collected directly from the players, but from journalistic sources or, in any event, from publicly accessible sources in the context of professional sporting activity, as further described in Section 3 below.

Pursuant to Article 14(5)(b) of the GDPR, information on the processing is provided in a general form because providing individual notice to each data subject would be impossible or would involve a disproportionate effort, considering the number of players whose data are processed, the public nature of the sources and the absence of a direct contact channel between the Controller and the individual players. This notice is made available on the Controller’s website in the section dedicated to players.

1. DATA CONTROLLER

The Data Controller is Noisefeed S.r.l., with registered office at Via D. Gagliardo no. 7, 16043 Chiavari (GE), Italy, VAT No. 02432000996 (hereinafter “Noisefeed”, the “Company” or the “Controller”).

To exercise your rights or for any request relating to the processing of personal data, you may use the form available at the site link or write to info@noisefeed.com.

2. CATEGORIES OF DATA PROCESSED

The Platform processes the following categories of personal data relating to professional football players, all obtained exclusively from journalistic sources or, in any event, publicly accessible sources (e.g. press releases issued by football clubs) in the context of professional sporting activity, as indicated from time to time on the Platform:

- i. Identification data: first name, surname, date of birth, nationality, height and weight.
- ii. Professional sporting data: current team, playing position, preferred foot, appearances, minutes played, availability/unavailability.
- iii. Injury information: broad injury category, body part affected, contact type, injury start and end dates, recovery days, context (match/training).
- iv. Injury videos: short clips lasting a few seconds or links to public videos showing the circumstances of the injury.

3. SOURCE OF PERSONAL DATA

Personal data are not collected directly from the players. The information is obtained exclusively from public or publicly accessible sources, including:

- i. public statements, interviews and press conferences given by players;
- ii. official communications from clubs and federations;
- iii. articles published by news outlets;
- iv. content published on the official social media channels of players and clubs;
- v. publicly accessible videos relating to sporting events.

For each item of data entered on the Platform, a link to the original source is retained, including the URL, identification of the source (news outlet, official communication or social media channel), publication date and, where available, extracts or textual references. If no public source is available, the information is not entered on the Platform.

4. PURPOSES, LEGAL BASIS FOR PROCESSING AND NATURE OF THE PROVISION OF DATA

Personal data are processed for the purpose of providing a controlled-access information, documentation and sports analysis service for registered, subscribed or otherwise authorised users. The service concerns the collection, organisation, indexing and consultation of information already published or otherwise accessible in the context of professional sporting activity regarding sporting events, injuries, player unavailability and returns to play, as well as the preparation of aggregated statistics on appearances, availability and starting-player indicators.

The Platform is not intended for medical, diagnostic or therapeutic purposes. The information made available is derived from publicly accessible third-party sources and may not be complete, up to date or accurate; accordingly, it cannot, on its own, form the basis of technical, sporting, contractual or medical/healthcare decisions concerning a player. If a data subject identifies information that is inaccurate or out of date, Noisefeed, once notified, will promptly rectify it in accordance with the procedures set out in Section 8.

The processing is based on the following legal grounds:

- a) For identification, professional and sporting data: the Controller's legitimate interest pursuant to Article 6(1)(f) GDPR, consisting in the provision of a controlled-access information, documentation and sports analysis service based on information already published or otherwise accessible in the context of professional sporting activity.
- b) For injury information and related videos (which may constitute health data within the meaning of Article 9 GDPR): in addition to legitimate interest, the processing is based on the exception under Article 9(2)(e) GDPR, insofar as the information processed has been manifestly made public by the data subject himself or herself - through statements, interviews, press conferences or content published on his or her own social media channels - or has been disclosed by the relevant club as part of official sporting communications, including in fulfilment of sporting regulatory obligations (such as mandatory communications to federations regarding player availability) and on the basis of the contractual arrangements in place with the relevant player.

Processing based on legitimate interest has been preceded by a balancing assessment that considered: (a) the legitimacy and specificity of the interest pursued by the Controller, consisting in the provision of a sector-specific information service; (b) the necessity of the processing for that purpose, as no less intrusive alternative means are available to provide the service; and (c) the balancing of that interest against the rights and freedoms of data subjects, taking into account the public origin of the information, its prior disclosure in the context of professional sport, the traceability of the source, controlled access to the Platform limited to professional operators in the sector, the minimisation of clinical detail and the possibility for the data subject to correct, restrict or remove inaccurate records. For the purposes of this balancing exercise, particular importance is given to the assessment of the reasonable expectations of data subjects. Professional football players operate in a context characterised by high media exposure and established practices of public communication concerning their sporting activity, including information on injuries and recovery times. Such expectation does not, however, extend to the collection of confidential health information, medical reports, medical records or data obtained from non-public sources, all of which remain outside the scope of the processing. The data subject's right to object to the processing at any time pursuant to Article 21 GDPR remains unaffected and may be exercised using the contact details set out in Section 1 or the procedures described in Section 8.

5. RETENTION PERIOD FOR PERSONAL DATA

Personal data are retained for as long as the player remains professionally active and the relevant profile is present on the Platform. When the player ceases professional activity, the player's profile and the information associated with it are removed from the Platform.

During the retention period, any requests for erasure, rectification or restriction are assessed on a case-by-case basis, taking into account the source, accuracy, currency and relevance of the data.

6. CATEGORIES OF RECIPIENTS OF THE DATA

The data are accessible exclusively to clubs, federations and data-analysis companies operating in professional football that have a contractual relationship with Noisefeed and undertake to use the data in compliance with applicable law, without any right to disclose the information contained on the Platform to third parties.

Personal data may also be accessed by third parties that provide services to the Company (for example, IT service providers for database management, cloud storage and/or file-transfer service providers, such as, by way of example, Amazon Web Services - AWS).

Where they do not act as independent controllers, such parties have been specifically appointed as processors of personal data, and their names are available from the Controller upon request.

7. TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

The Controller does not transfer personal data outside the European Union. The Platform's main infrastructure is hosted on Amazon Web Services (AWS) in data centers located in Ireland and Frankfurt, within the European Union.

Where such a transfer is necessary to achieve the purposes set out in Section 4 of this notice, the Controller will make the transfer only to recipients located in countries for which an adequacy decision has been adopted by the European Commission, or by implementing the appropriate safeguards referred to in Article 46 GDPR.

8. RIGHTS OF THE DATA SUBJECT

Football players, as data subjects, have the rights granted by the GDPR pursuant to Articles 15-22. In particular, data subjects have the right to request and obtain, at any time: (i) access to their personal data; (ii) information concerning the processing carried out; (iii) rectification and/or updating of personal data; (iv) erasure of personal data; (v) restriction of processing; (vi) the right to object to processing; (vii) data portability (i.e. to receive personal data in a structured, commonly used and machine-readable format); (viii) the right to withdraw consent to the processing of personal data, where consent constitutes the legal basis for the specific purpose for which the processing is carried out (without affecting the lawfulness of processing based on consent before its withdrawal); and, finally, (ix) the right to lodge a complaint with a data protection supervisory authority (in Italy: the Garante per la Protezione dei Dati Personali).

The above rights may be exercised at any time using the form available in the section dedicated to players on Noisefeed's website, or by writing to info@noisefeed.com

For further information or clarification regarding the above rights, the Controller may be contacted using the same contact details.

Notice last updated on 01/10/2026