

Privacy Notice for IJF Services

Summary of the Privacy Notice

The International Judo Federation (IJF) is committed to protecting your privacy and personal data in compliance with the General Data Protection Regulation ("GDPR"). This Privacy Notice Summary is intended for athletes and professional sportspersons, recipients of IJF services, and anyone else who interacts with our websites and applications and explains in detail how we collect and use personal data from you, and how we share that data with other organisations.

JOINT DATA CONTROLLERS AND DATA PROTECTION OFFICER

Regarding IJF Services, the *International Judo Federation* (IJF) is in charge of the processing of your personal data. We're located at 1051 Budapest, József Attila utca 1. II. em./1A., Hungary, and you can reach us at privacy@ijf.org. We manage the websites www.ijf.org, www.judobase.org, and www.judotv.com. We've designated a Data Protection Officer to handle any concerns you might have about your data, who is also available at privacy@ijf.org.

When it comes to organizing and managing judo events, we collaborate with continental unions and national federations, making decisions together about how to use some of your data for these events. This applies to the organisation, holding and management of sporting events, which we always organise jointly with the continental judo unions and national judo federations. You can find a list of these judo associations at https://www.ijf.org/countries/all/members.

If you sign up or log in through Google or Apple on our sites like www.accounts.ijf.org or www.judotv.com, we work together with Google or Apple to handle your registration and login details (like your name, email and language preference) as joint controllers of this information.

PURPOSES AND LEGAL BASES OF THE DATA PROCESSING

In connection with our operations, events and activities, we process your personal data for the following purposes:

- Organisation and Management of Sport Events: We organize sports events and handle everything from your participation
 to broadcasting, based on our legitimate interests. For these activities, we collaborate with other judo organizations as joint
 controllers.
- Issuing and Maintaining Sports Regulations: To administer and regulate judo, we issue and enforce rules based on our legitimate interests.
- Governance, Operation and Management of Organisational Functions: We manage the IJF's operations and represent judo's interests worldwide, driven by our legitimate interests.
- Legal Compliance: To comply with legal obligations, we process data for athlete health protection, sports integrity, safety, and doping prevention.
- Whistleblowing: We're legally obligated to handle whistleblowing reports and conduct internal investigations.
- Management and Public Disclosure of Sport-Specific Athlete Data: Promoting judo and sharing athlete information are
 part of our legitimate interests.
- Newsletter direct marketing: If you subscribe to our newsletter, we process your data based on your consent to send you
 updates and offers.
- Dispute Resolution and Arbitration: Handling sports-related disputes involves processing data due to legal obligations.
- Reporting and Keeping Sports Statistics: For sports improvement and research, we process data based on our legitimate
 interests.

- Providing Information Society Services: Offering online services and ensuring their security is done under our legitimate interests.
- **Providing subscription services:** We use your data to manage your subscription based on the contract terms when you sign up.
- Providing third party authentication services: By logging in through third-party services, you consent to us using your profile information for account management.
- Analytics and Website Measurement: We analyse website visits and content usage to improve our services, balancing
 our legitimate interests with your privacy rights.
- **Payment management:** We process payments for our services based on the contractual agreement, ensuring you can access our offerings.

We process certain *special categories of data* in order to protect the health of athletes and the integrity of sport, to prevent prohibited performance-enhancing substances, to ensure the safety of sporting events, to monitor compliance with doping bans, to conduct doping tests either on the basis of your explicit consent or, where applicable, on the basis of the provisions of the Hungarian Sports Act and necessary for reasons of substantial public interest.

RECIPIENTS OF DATA TRANSFER

We may share your personal data with our authorised employees, service providers, cooperating partners and national federations, anti-doping agencies operating inside and outside the territory of the European Union. In that regard, appropriate guarantees have been introduced and we maintain the security of your data.

YOUR RIGHTS

If the related data processing is based on your (explicit) consent, then you are free to withdraw your consent any time and we will not continue our data processing activity relative to you. The withdrawal of your consent does not affect the lawfulness of prior data processing.

Should you wish to exercise your rights below, you may contact us via our contact details that you may find in the section 'Joint Data Controllers and Data Protection Officer'. Furthermore, you have right to request information about, access and request a copy of your personal data we process, you have the right to rectification and the right to erasure of personal data with certain limits, to exercise your right to data portability or to request the restriction of the processing.

Should you wish to exercise your aforementioned rights, you may contact us via our contact details that you may find in the section 'Joint Data Controllers and Data Protection Officer'.

RIGHT TO OBJECT

YOU ARE ENTITLED TO OBJECT AGAINST PROCESSING YOUR PERSONAL DATA AT ANY TIME, FOR REASONS RELATED TO YOUR SPECIAL SITUATION; IN THIS CASE WE MIGHT NO LONGER PROCESS YOUR PERSONAL DATA. SHOULD YOU HAVE THE RIGHT TO OBJECT, AND YOU EXERCISE IT, YOUR PERSONAL DATA WILL NO LONGER BE PROCESSED FOR SUCH PURPOSES BY US. EXERCISING THIS RIGHT ENTAILS NO COSTS.

For further information, please read the Detailed Privacy Notice - v.1.20, 4 April 2024



Detailed Privacy Notice for IJF Services

Dated 4 April 2024 - v.1.20

The International Judo Federation (IJF) is committed to protecting your privacy and personal data in compliance with the General Data Protection Regulation ("GDPR"). The Privacy Policy is intended for athletes and professional sportspersons, recipients of IJF services, and anyone else who interacts with our websites and applications and explains in detail how we collect and use personal data from you, and how we share that data with other organisations.

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1. JOINT DATA CONTROLLERS – Who is responsible for processing your personal data?

The responsible data controller of your personal data is the **International Judo Federation** (Fédération Internationale de Judo, registered seat: 1051 Budapest, József Attila utca 1. II. em./1A., Hungary; court registration number: 01-02-0017346; registered with the Budapest Metropolitan Court, "**IJF**", "we", "us" or "our"; email: privacy@if.org). We are the data controller of any personal data we collect about you, and we are responsible for the operation of the websites and their subdomains: www.ijf.org; www.judobase.org and www.judobv.com.

Joint control: In the context of certain data processing activities, the IJF, the continental unions and the national judo federations (collectively referred to as "judo associations") also process some personal data as joint controllers within the meaning of Art. 26 of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the European Council (hereinafter: GDPR), because the IJF and the judo associations determine the purposes and means of the data processing, they jointly process. This applies to the organisation, holding and management of sporting events, which we always organise jointly with the continental judo unions and national judo federations. The detailed list of continental judo unions and national judo federations is accessible on the following link: https://www.ijf.org/countries/all/members

You may use the Apple Authentication or Google Authentication service, to register and to log into your IJF account on the www.judotv.com websites. In such case, the IJF and Google (Google Ireland Limited (Ireland) for EEA, Swiss and UK users and Google Inc for other users) or Apple (Apple Distribution International Ltd. (Ireland) for EEA, Swiss and UK users and Apple Inc for other users) will become joint controllers of your personal data related to the registration and login process (i.e., your name, email address and language preference), because we jointly determine the purposes and means of the processing.

2. PURPOSES OF PROCESSING PERSONAL DATA – Why do we process personal data about you?

In connection with our operations, events, activities and services, we process personal data for the following purposes:

- Organisation and Management of Sport Events: we organise and manage sport events in partnership with local organising committees, ensure your participation in these sport events; ensure their broadcasting, recording and transmission in any digital format and commercial exploitation and licensing of such events, based on legitimate interests; in connection with this processing activity, we act as joint controllers with the continental judo unions and the national judo federations.
- **Issuing and Maintaining Sports Regulations**: based on our legitimate interests, the IJF is responsible for administering the sport of judo and therefore we are responsible for regulating a competitive system and issuing, enforcing, and monitoring sports rules, sportsmanship rules, rules on the use of sports equipment and protective equipment.
- Governance, Operation and Management of Organisational Functions: based on our legitimate interests, we operate the IJF and its committees; represent and defend the interests of the IJF, its members and athletes inside and outside the IJF; coordinate and collaborate with national judo associations worldwide.
- Legal Compliance: we have a legal obligation to process your personal data to ensure the protection of athletes' health, maintain a high level of integrity of judo sports, ensure the safety of sporting activities and the prevention of cheating and doping control, and actively discourage prohibited performance enhancement and conduct disciplinary proceedings for violations.
- Whistleblowing: we have a legal obligation to process your personal data to operate an internal-whistleblowing system, conduct
 internal investigations and perform related risk management activities.
- Management and Public Disclosure of Sport-Specific Athlete Data: based on our legitimate interests we register and disclose athlete data in order to promote the sport of judo and to inform the public.
- Newsletter direct marketing: based on your explicit consent, which is obtained when you subscribe to our newsletter, we are processing your personal data to send you our newsletter, which contains tailored marketing communications, updates, and promotional offers that we believe may be of interest to you. This involves collecting your email address and, if applicable, your name to personalise the messages you receive. You have the right to withdraw your consent at any time, easily and without any detriment, by clicking the unsubscribe link found at the bottom of each newsletter email or by contacting us directly.
- **Dispute Resolution and Arbitration**: we have a legal obligation to process your personal data to provide dispute resolution in sports-related disputes between athletes and sports professionals.
- Reporting and Keeping Sports Statistics: based on our legitimate interests, we process your personal data to improve the quality of sports, archiving and research.



- Providing Information Society Services: based on our legitimate interests, we provide certain information society services by
 maintaining certain websites and web applications, including account management and ensuring their security.
- **Providing subscription services:** We need to use your data to identify you as a user and grant you access to the online services and features available to our registered subscribers. The legal basis for our use of your data is the execution of the terms of use being contractual provisions governing the use of our services.
- Providing third-party authentication services: When you choose to log in to our service using third-party authentication services, such as Google, we receive certain profile information necessary to authenticate your identity. This information typically includes your name, email address. By opting to use a third-party authentication service, you facilitate a smoother registration or sign-in process, allowing us to create and manage your account using these details. We rely on your consent which is manifested when you choose to log in with the third-party authentication service.
- Analytics and Website Measurement: based on our legitimate interest, essential for our business operations and service improvement, we store and analyse information regarding your recent visits and video-watching activities on our websites. This analysis helps us prevent misuse of our content and enhance the performance and quality of our services, making them more intuitive for you. We ensure that all processing is done with a high regard for your privacy, balancing our interests with your rights, and maintaining strict data security. You have the right to object to this processing. For activities involving non-essential cookies, we will seek your consent. Your data is processed only to the extent necessary for these purposes.
- Payment management: we process your personal data in relation to the payments you make to us in order to provide you with our services, including subscription services, based on the terms of use we enter into with you for the duration of our provision of services to you.
- We process certain **special categories of data** in order to protect the health of athletes and the integrity of sport, to prevent prohibited performance-enhancing substances, to ensure the safety of sporting events, to monitor compliance with doping bans, to conduct doping tests either on the basis of your explicit consent or, where applicable, on the basis of the provisions of the Hungarian Sports Act and necessary for reasons of substantial public interest.

We do not use automated decision making or profiling.

3. SOURCE AND CATEGORIES OF PERSONAL DATA PROCESSED - What personal data do we process about you?

The source of your personal data is either you directly, or continental judo unions or national judo federations being IJF member organisations. As part of our integrity activities, we also gather intelligence from relevant sources actively, including members of the public and publicly available sources. We also collect data from anti-doping organisations (such as the World Anti-Doping Agency and national anti-doping organisations) and our appointed anti-doping service provider. Where you choose to involve a third party, for example, your employer, a representative, lawyer or relative, we will receive and share data with this person or organisation.

We process the following categories of personal data:

- **Identification Data:** this is information that identifies or is identifiable to you, like your name, contact information (e-mail, phone, physical address), date of birth, gender, sport nationality, profile picture.
- Whereabouts information: this indicates where you can be found, which may be either necessary for anti-doping testing
 (for example, addresses for regular activities like training, work or school and for the location(s) where you will be available
 for testing) or for immigration and travel purposes. We will notify you if you need to provide us with this information.
- IJF membership data: this includes IJF Academy status, referee licence number, federation function, club function, judo club membership status, information on licence issuance, preferred judo technique, role in the judo community.
- Competition Data: including height, weight result, gender, category, videos / photos from the competition, PCR test status (i.e. positive/negative), vaccination status, request to participate, flight and hotel data.



- Account data: including name, username, email address, display name, flagged status, profile picture, gender, date of
 birth, country, group membership, account roles, types and IDs of roles, active status, password, subscriptions, Google
 Authentication login details (your name, email address, language preference and profile picture associated with your Google
 account), Apple Authentication login details (your user ID, your full name, email address associated with your Apple account)
- Analytical Data: this includes website interactions, total views and total watching hours of media contents, general viewing time of the videos, demographic data of users, and data on the use of certain web features.
- Transaction data: In order to process online payments, we process the transaction details (date, amount, and currency of the payments) and the account associated with the transaction.
- Special categories of data: this includes doping testing data (that is created when samples are collected from you for an anti-doping test), health status and medical information, if you need to apply for a therapeutic use exemption, disability information and investigation information if we suspect you may have broken anti-doping rules and need it to be adjudicated. The types of personal information we collect depend on your level as an athlete or your role in sport. It will also depend on how the anti-doping rules apply to you. For example, if you need a therapeutic use exemption, you will need to provide us with medical information. If you are charged with an anti-doping rule violation, you may need to provide us with evidence in your defence.

Unless you are told otherwise, providing personal data is necessary to accomplish the processing purposes identified above. If you do not provide requested information, we may not be able to secure your licence to play sport or to participate in sports events as an athlete.

4. LEGAL BASIS OF PROCESSING YOUR PERSONAL DATA - What is the legal justification for processing your personal data?

We are required to have a lawful basis on which to process your data. We explain each of these legal bases below. We also set out the purposes for which we process your data. For each purpose, we explain the lawful basis for that processing, the processing operations we carry out and the categories of data we process. We rely on the following legal bases when processing your personal data:

- The consent you provide us with pursuant to Article 6(1)(a) of the GDPR.
- The execution of the contract between you and us or to take steps to enter into a contract with us pursuant to Article 6(1)(b)
 of the GDPR.
- To comply with our legal obligation under Article 6(1)(c) of the GDPR and the Hungarian Act I of 2004 on Sports ("Sports Act").
- Vital Interests under Section 6(1)(d) GDPR- in exceptional circumstances, we may rely on the need to protect your vital interests to process certain data, particularly sharing information as needed with medical professionals for safety purposes.
- For our or third party's Legitimate Interest pursuant to Article 6(1)(f) of the GDPR.

We process special categories of personal data either based on your explicit consent ("Explicit Consent"), based on Article 9(2)(a) GDPR; under Article 9(2)(g) GDPR, where processing is necessary for reasons of substantial public interest, based on the law, under Article 4 (1) - (2) of the Sports Act and Hungarian Government Decree 363/2021. (VI. 28.) on the anti-doping activities ("Substantial Public Interest") or if processing is necessary for the establishment, exercise or defence of legal claims ("Legal Claims Enforcement"). We process your personal data based on the following legal bases for the following purposes as follows. You may also see the retention periods in the last column. To know more about data retention, typical events and examples, please see Section 5 (Duration of the storage of your personal data).

We hereby summarize the purposes of processing, the legal bases for processing with reference to the specific categories of personal data, and the periods for which we process and retain the relevant data categories, as outlined in the table below:

Purpose of data processing	Categories of personal data processed	Legal basis of processing	How long do we keep your personal data?
Organisation and management of sport events	Identification data IJF membership data Some competition data Whereabouts information Account data	Legitimate Interest	For 5 years (Statute of Limitations)
Issuing and maintaining sports regulations	Identification data IJF membership data Some competition data	Legitimate Interest	For 5 years, as a rule. Competition data is not deleted, being kept for archiving purposes.
Governance, operation and management of organisational functions	Identification data IJF membership data Some competition data	Legitimate Interest	For 5 years (Statute of Limitations)
Legal compliance	Identification data IJF membership data Some competition data Whereabouts information Special categories of data	The Hungarian Act I of 2004 on Sports, Substantial Public Interest in case of Special Categories of Data; Vital Interests	For 5 years (Statute of Limitations)
Whistleblowing	Identification data IJF membership data Some competition data Whereabouts information	Legal obligation under Section 18 to 27 of the Act XXV of 2023 on Complaints and Public Interest Disclosure	For 5 years (Statute of Limitations)
Management and public disclosure of sport-specific athlete data	Identification data Some competition data	Legitimate Interest	For 5 years (Statute of Limitations)
Newsletter direct marketing	Identification data (contact information)	Consent	Until consent withdrawal.
Dispute resolution and arbitration	Identification data IJF membership data Some competition data Whereabouts information Special categories of data	The Hungarian Act I of 2004 on Sports, Substantial Public Interest in case of Special Categories of Data and Legal Claims Enforcement	For 5 years (Statute of Limitations)
Reporting and keeping sports statistics	Identification data IJF membership data Some competition data	Legitimate Interests	This data is not deleted, being kept for archiving purposes.
Providing information society services	Account data Analytical data	Legitimate Interests	For two years from the date of your most recent visit.
	Profile picture	Consent	Until you withdraw your consent, or two years from the date of your most recent visit, whichever occurs earlier.
Providing subscription services	Identification data Account data	Contract relating to the subscription;	For 5 years (Statute of Limitations)
Providing third-party authentication services	Identification data	Consent	Until consent withdrawal.
Analytics and website measurement	Analytical data	Legitimate Interests/Consent depending on the type of data detailed in the Cookie Policy of the website	Until withdrawn, but not exceeding 24 months.
Payment management	Transaction data Account data	Contract relating to the subscription; Legal Obligation for accounting purposes	For 8 years to secure compliance with applicable accounting laws.

Most of our processing activities are based on a legitimate interest of IJF, a continental union, a national judo association or a third party. We follow a process to carefully measure our interest against yours in a legitimate interest assessment. As far as the purpose of the processing allows, your data is processed pseudonymised or anonymised.

In the event consent was given, you have the right to withdraw such consent given at any time by sending a written notice to privacy@ijf.org .

If you require further information about our legitimate interests, please contact us via our email address: privacy@ijf.org



5. DURATION OF THE STORAGE OF YOUR PERSONAL DATA – For how long do we retain personal data about you?

Data retention periods are described in the last column of the table set forth in Section 4. As a short definition of retention period, a record (data) that is retained for the period of time it is active (in use) plus an additional amount of time once it is no longer deemed active or when a triggering event occurs such as termination of service agreement or pending litigation. An event-based record is a record that requires an event to trigger the commencement of the retention period. Once this period is commenced, it becomes possible to calculate the record's eligible disposition date.

We store your personal data, and by service providers on behalf of IJF, but only as long as necessary for the performance of our obligations and strictly for the time necessary to achieve the purposes for which the information was obtained. We will retain your data until the statute of limitations under civil laws (i.e. 5 years) to the extent data is necessary for legal claims enforcement. Under Hungarian laws, at least eight years statutory data retention obligation applies to personal data in accounting documents. If we rely on your consent, we will process your data until withdrawal of consent or until we cease data processing. Where the processing is based on legitimate interests, we will process your data until that legitimate interest exists based on a consideration of interests by the IJF or third parties. In addition to the cases listed above, there is also other data that is not deleted and that we keep for archiving, scientific, and statistical purposes.

6. SERVICE PROVIDERS AND RECIPIENTS OF DATA TRANSFERS - Who has access to your data and to who do we transfer your personal data?

Within IJF, your personal data may only be accessed on a 'need-to-know basis' by authorised personnel, including our officers, administrators, and subject matter experts / specialists within the IJF.

Your data may be shared with a variety of third parties as described above. Personal data is also shared as necessary within the IJF, including with our sporting, legal, privacy and IT functions. It is possible that personal data needs to be transmitted to third parties during the outsourcing process, respecting legal requirements. The transfer is always based on legitimate legal grounds and respects the requirements of the GDPR. We perform checks on third parties chosen for the processing and assess the providers' compliance with GDPR. Data is also transferred to public authorities and audit firms when required.

We transfer your personal data for the following categories of recipients:

- Our service providers: Your personal data will be shared with the IJF's third-party service providers, who will process it on behalf of the IJF for the purposes identified above. This may include the providers of insurance services, payment service providers, IT and technology services, survey providers and event organisers worldwide where we organise events. To securely store and manage our data, we rely on leading data hosting and cloud service providers, including major global cloud infrastructure services based in the United States, known for their reliability and comprehensive security measures. This includes providers offering a range of services from cloud storage, web hosting, to cloud computing platforms and specialized hosting services that support our development and deployment infrastructure, ensuring the robust performance and security of our applications. For secure processing of payments, we partner with renowned payment processing companies, ensuring the secure and efficient handling of transaction data.
- Other third parties: We also share information with our professional advisers. We may transfer your personal data to external law firms and investigation experts so far as is necessary for the conclusion of the investigation or for the establishment, exercise or defence of legal claims.
- Government authorities: Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

7. INTERNATIONAL DATA TRANSFERS – Where are the data recipients located, and what data transfer guarantees have we implemented?

We may transfer your personal data outside of the country in which you are located. For several purposes set out above, the data sharing described is likely to result in the sharing of your data with third parties located outside your country; in principle, this may be any country in the world. Some recipients are located outside of the European Economic Area ("EEA"), in countries for which the European Commission has issued adequacy decisions. In each case, the transfer is thereby recognised as providing an adequate level of data protection from a European data protection law perspective (based Art. 45 of the GDPR).

By way of entering into appropriate data transfer agreements based on standard contractual clauses as referred to in Art. 46 (5) of the GDPR or other adequate means, which are accessible via the contact details above, we have established that all other recipients located outside the EEA will provide an adequate level of data protection for personal data and that appropriate technical and organisational security measures are in place to protect personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access, and against all other unlawful forms of processing.

Any onward transfer is subject to appropriate onward transfer requirements as required by applicable law. In some limited circumstances our transfers may be exempt from adequacy obligations, where transfers are for important reasons of public interest, such as the sharing of data for anti-doping purposes. Where we transfer based on an adequacy mechanism, a copy of the relevant mechanism can be provided for your review on request by contacting us using the details set out below.

If, in relation to data transfers abroad, an adequate level of protection of personal data cannot be ensured, then we either rely on derogations or shall request your explicit consent relating to any such data transfers abroad. Please note that such data transfers may be associated with certain risks, particularly that in the country of the data recipient, unauthorised third parties may also have unreasonable access to said data and you may not be able to exercise the rights of the data subject and/or your right to object against acts that may harm your personal data and your right to privacy.

For more detailed information on the adequacy measures and guarantees we apply, please contact us at privacy@if.org.

8. YOUR RIGHTS - What rights do you have and how can you assert your rights?

If the related data processing is based on your (explicit) consent, then you are free to withdraw your consent and we will not continue our data processing activity relative to you. The withdrawal of your consent does not affect the lawfulness of prior data processing.

You have the following rights in relation to our data processing:

- 1. Right to access: You are entitled to receive information from us regarding whether or not your personal data is being processed, and if so, you have the right to access your personal data.
- 2. Right to rectification: You have the right to rectification of your personal data on request.
- 3. RIGHT TO OBJECT: YOU ARE ENTITLED TO OBJECT AGAINST PROCESSING OF YOUR PERSONAL DATA AT ANY TIME, FOR REASONS RELATED TO YOUR SPECIAL SITUATION; IN THIS CASE IT MAY BE REQUIRED FROM US TO STOP PROCESSING YOUR PERSONAL DATA. SHOULD YOU HAVE THE RIGHT TO OBJECT, AND YOU EXERCISE IT, YOUR PERSONAL DATA WILL NO LONGER BE PROCESSED FOR SUCH PURPOSES. EXERCISING THIS RIGHT DOES NOT ENTAIL ANY COSTS.
- 4. Right to restriction of processing: You have the right to request the restriction of processing your personal data.
- 5. Right to erasure ('right to be forgotten'): You are entitled to request the erasure of your personal data.



6. Right to data portability: You have the right to receive your personal data provided and available for us, in a structured, commonly used and machine-readable format, furthermore you are entitled to transfer these personal data to another controller without hindrance.

Should you wish to exercise your above-mentioned rights, or if you have any inquiries concerning our data processing activities, you may contact our Data Protection Officer at privacy@ijf.org.

You also have the right to lodge a complaint <u>with the competent supervisory authority in the particular Member State</u> of your habitual residence, place of work or the place of alleged infringement of the GDPR.

9. DATA PROTECTION OFFICER

To ensure compliance with applicable data protection laws, we have appointed a Data Protection Officer, who you can contact at the following email address: privacy@ijf.org.

10. UPDATES TO THIS NOTICE

We regularly review and update our Privacy Notice to reflect changes in our practices, technology, legal requirements, and feedback from our community.

If we make changes that materially alter our privacy practices, we notify you by other means, such as sending an email or posting a notice on our website before the changes take effect.
