

PRIVACY POLICY

for RaceNext Service

M2 NOVY PROSTYR LLC (“we”, “us”, “our”, “Company”, “NOVY PROSTYR”) welcomes you. We provide you with our RaceNext service <https://stage-org.racenext.app/> (“Service”).

This Privacy Policy describes which of your personal data the Service collects, how stores, processes, and uses it, and what happens when you use the Service.

We understand the significance of your privacy and embed the latest data security standards, continuously improve our understanding of the privacy legal framework, and adhere strictly to the General Data Protection Regulation (“GDPR”), California Consumer Privacy Act (“CCPA”), and other pertinent privacy laws.

Please note that we do not collect, track, or store any personal data beyond what is necessary for us to provide and improve our Service as described in this Privacy Policy and fulfill our legal obligations.

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About Us

Controller	M2 NOVY PROSTYR LLC
Address	Georgiou Griva Digeni, 105 STEIDES C-T, 4th floor, Office 402 3101, Limassol, Cyprus
Contact email	support@racenext.app

When processing your personal data, NOVY PROSTYR can play different roles under the GDPR and other applicable laws and regulations. We act as a data controller under the GDPR and as a business under the CCPA, respectively. It means that we determine what data, how, and for what purposes are processed.

Data Collection

We collect personal data through the Service, email, and other available means of communication while assisting you in a race organization.

To use our Service, you should register an account to review and manage information on the registered participants for your upcoming race.

Legal Basis for Processing Personal Data

We collect and process your personal data when you use our Service in accordance with the provisions of the GDPR. During personal data processing on the Service, we rely only on four legal bases provided by the GDPR, namely:

Article 6.1(b): performance of a contract

When you provide us with your personal data for registering an account on the Service, this can be considered as a request to form a contract or to perform a contract between you and us. However, we may ask you for clear consent in case of doubt.

Article 6.1(a): consent

We also collect the information you choose to give us via cookies and other tracking technologies, and we process it with your consent. You may withdraw your consent to the processing of your personal data at any time. You can find out more about our usage of cookies in our [Cookies](#) Policy

Article 6.1(c): legal obligation

We process your personal data to fulfil our legal obligations, such as complying with tax or regulatory requirements. If you request to exercise your rights under the GDPR, we may ask you for some personal data we already have to identify you and comply with the applicable law.

Article 6.1(f): legitimate interest

We process your personal data to protect our legitimate interests, such as:

- to ensure the security and functionality of the Service,
- to prevent fraud and other malicious interventions on the Service;
- to enhance user experience on the Service.

We only collect and use the strictly necessary data to achieve these purposes and do not override your fundamental rights and freedoms.

Use of Cookies

We use cookies and other tracking technologies on our Service for various purposes, including enabling its functionality, recognizing your device and saving the actions you have previously made, enhancing user experience.

We do not use cookies to identify you directly. We use the following types of cookies:

Necessary: these cookies and other tracking technologies are essential for your use of the Service and our compliance with applicable data protection laws. We can use them for specific purposes, such as checking if your browser supports cookies and determining whether you have accepted the cookie consent box.

Analytics: these cookies help us understand how you interact with our Service (e.g., page visits and page load speed) by collecting information anonymously to avoid your identification. Their sole purpose is to improve Service functions.

Marketing: These cookies and other tracking technologies deliver relevant online advertising on other websites. We and selected third parties can place them and enable adverts to be presented to you on third-party websites.

We kindly refer you to review our [Cookies](#) Policy for further information on cookies.

Use of Your Personal Data

As a data controller, we use your personal data for the purposes listed in the table below. This table also details the type of personal data processed, the reasons for processing, and the legal bases we rely on to do so.

When you register an account and use our Service, you act as a **user**, and we process the following information:

Data Type	Reasons for Processing	Legal Basis
Name, email address, password	To register an account on the Service To send you the confirmation code and activate your account To maintain an account on the Service	Performance of a contract (Article 6(1)(b)) GDPR
Identifiers (IP address, browser type, device ID, etc.)	To ensure the Service's smooth functioning	Legitimate interest (Article 6(1)(f)) GDPR
	To display the event calendar	Performance of a contract (Article 6(1)(b)) GDPR
Name, email address, technical data	To enable adding races to personal calendars	Consent of a data subject ((Article 6(1)(a)) GDPR
Payment Processing Data (Stripe Race Organiser ID, payment status, bank account details, contact details of the person in charge)	To conduct accounting activities	Performance of a contract (Article 6(1)(b)) GDPR
Name, email address, and additional information the user may provide in the request for support.	To provide technical support	Performance of a contract (Article 6(1)(b)) GDPR

Name, email address	To communicate with users regarding the events	Performance of a contract (Article 6(1)(b)) GDPR
Requests the device makes to the server, the details on the used device, IP address, date and time of access, city and country, and operating system.	To prevent fraudulent activities to ensure the technical availability and security of the Service	Legitimate interest (Article 6(1)(f)) GDPR
Payment processing data, name, identifiers	To comply with the law or legal process (only if the storage of specific personal data is mandatory by law or legal process)	Legal obligation (Article 6(1)(c)) GDPR
Necessary cookies data	The Service's smooth functioning.	Performance of a contract (Article 6(1)(b)) GDPR
Marketing and analytics cookies data	To understand how you interact with our Service and deliver relevant online advertising on other websites.	Consent of a data subject ((Article 6(1)(a)) GDPR

Please note that we do not have direct access to or possession of your banking information. Upon processing of payments using the services of a payment processor, such payment provider may collect specific personal data it considers necessary for the provision of services. Such collection of personal data is regulated under the rules and policies of payment processors. We advise you to access the payment processors' websites carefully and always check payment processors' policies and rules regarding the collection of your personal data. You can read Stripe's Privacy Policy, which outlines its commitment to protecting your personal information, [here](#).

We use the personal data we collect and the personal data you provide us with only for the purposes listed in this Policy. We may share your personal data with third parties solely for the purposes listed herein.

We DO NOT sell your data.

We DO NOT use automated decision-making, including profiling, which produces legal effects concerning a data subject or similarly significantly affects a data subject.

We DO NOT intentionally collect and process sensitive personal data in our Service.

App Data Processing

This Privacy Policy describes our data collection and usage of the Service. To learn more about how we ensure privacy in our App and on the Website, you can visit a separate Privacy Policy, where you will find all the necessary information.

Data Security, Integrity, and Retention

As a data controller, we store and process your personal data until we do not need it for any of the purposes defined in this Policy unless longer storage is required or expressly permitted by law.

We store **User Data** for the entire period when you interact with our Service and for 2 years after your last activity.

We store **Cookie Information** from the Service for the period specified in our [Cookies](#) Policy

We may not delete or anonymize your data if we are compelled to keep it under the GDPR and other applicable laws.

Notwithstanding any of the aforementioned periods of data storage, you may request to delete your account and all personal data by contacting us in any convenient way.

We have implemented appropriate organizational, technical, administrative, and physical security measures designed to protect your personal data from unauthorized access, disclosure, use, and modification. We review our security procedures and policies regularly to consider appropriate new technology and methods.

Social Media Accounts

We manage the Company's official pages on various social media sites, including, but not limited to, Facebook, Instagram. When you interact with us via our social media accounts by following our official pages, posting comments, or reacting to our content, we can collect information for marketing purposes.

When you contact us via our social media accounts for assistance or leave us feedback regarding the provision of service, we can collect this information for further communication purposes.

Please note that the operators may conduct additional processing operations depending on the social media platform. We advise checking social media platforms' privacy policies and rules regarding the collection of your personal data on their side.

Data Sharing and Disclosure

We may share your personal data as a data controller with other sole controllers, joint controllers, and data processors in accordance with the provisions specified hereafter.

Sharing data with joint controllers

In some cases, we may act as joint controllers with other joint controllers, for example, while using Meta Pixel. With respect to this personal data processing case, we are the party to the [Facebook Controller Addendum](#). In such a case, a data subject may exercise their rights under the GDPR and applicable privacy laws in respect of and against other joint controllers and us.

Sharing data with data processors

We cannot complete all the features necessary to provide you with our services ourselves; thus, we seek help from third parties. We may grant some service providers access to your personal data, in whole or in part, to provide the necessary services.

Therefore, we may share and disclose your personal data to other data processors ("**service providers**"):

- Cloud Provider (if used to store data);

- Google Analytics (Google, LLC, USA): for analytics purposes. You may read its Privacy Policy [here](#);
- Facebook (Meta Platforms, Inc., USA): to track your activities on our Service. You may read its Privacy Policy [here](#);
- Firebase (Firebase, Inc., USA) to prevent fraudulent activities on our Service. You may read its Privacy Policy [here](#).
- Stripe (Stripe Inc, USA): to process user payments. You may read its Privacy Policy [here](#).

As part of our business operations, we may engage various specialists who may receive your personal data, including technical, sales, legal, and marketing professionals, to provide you with better client service and ensure the accuracy and transparency of our business. Collectively, these specialists and partner websites are referred to as **Contractors**.

We may transfer your personal data to countries outside the European Union (EU) and the European Economic Area (EEA) that are not deemed to provide an adequate level of data protection under Article 45 of GDPR (adequacy decision). In such cases, we will ensure that appropriate safeguards are implemented in accordance with the GDPR to protect your personal data.

When we transfer your personal data to third parties, we always comply with the requirements of the GDPR. Where possible, we always enter into Data Processing Agreements (DPAs) and Non-Disclosure Agreements (NDAs) with these third parties to ensure that your personal data is adequately protected. If a Contractor has an appropriate data processing agreement, we may join that agreement. If so, the Company and the Contractor may regulate the transfer of the personal data to such Contractor by means of such data processing agreement.

NOVY PROSTYR had adjoined the publicly available data processing agreements of the following Contractors:

Contractor	Data Processing Agreement
Google (Google Analytics)	https://support.google.com/tagmanager/answer/7207086?hl=en
Facebook	https://www.facebook.com/legal/Workplace_GDPR_Addendum
Stripe	https://stripe.com/legal/dpa
Firebase	https://firebase.google.com/terms/data-processing-terms

International Data Transfers

We may need to transfer your personal data to countries outside the EU and EEA that do not meet the requirements of Article 45 of GDPR on the adequacy of data protection. In such cases, we will transfer your personal data to third countries under Article 46 of GDPR with the appropriate safeguards, including Standard Contractual Clauses (SCC).

We follow internal procedures when disclosing your personal data to countries outside the EU and EEA to ensure adequate safeguards for protecting your privacy and fundamental rights and freedoms.

We take additional technical and organisational measures when transferring data outside the EU and the EEA, such as assessing the reliability and personal data protection practices of the service provider, encrypting the transferred personal data, promptly responding to any threats to confidentiality, integrity, and availability of personal data, and conducting Transfer Impact Assessments (TIA) when necessary, etc.

Your Rights Under the GDPR

You may exercise the following rights by submitting your request at support@racenext.app

Rights under the GDPR

- **right of access** means that you may ask us to send you a copy of your personal data collected together with information regarding the nature, processing, and disclosure of that personal data;
- **right to rectification** means that you may ask us to update and correct the false data, missing or incomplete personal data.
- **right to erasure** (“right to be forgotten”) means that you may ask us to delete your personal data collected, except insofar it is prohibited by appropriate laws. You can use the ‘Delete account’ button in the App’s Settings section or contact us in another convenient way to ask for your account deletion.
- **right to restriction** of processing means that you may ask us to restrict processing where:
 1. your personal data is not correct or outdated;
 2. the processing is unlawful.
- **right to object** to the processing means that you may raise objections on grounds relating to your particular situation;
- **right to data portability** means that you may ask us to transfer a copy of your personal data to another organization or you;
- **right to withdraw the consent** when your personal data is processed on the basis of your consent;
- **right to lodge a complaint with the supervisory data protection authority** about processing your personal data.

You may submit the complaint to the supervisory authority of your place of residence within the EU or to the data protection authority stated in this Policy.

Please note that we may need to confirm your identity to process your requests to exercise your rights under the GDPR. Thus, we may not be able to satisfy your request if you do not provide us with sufficient detail to allow us to verify your identity and respond to your request.

Data Protection Authority under the GDPR

We kindly invite you to share your concerns with us in the first place regarding any issue related to your personal data processing. You may use the following channels to address your inquiries: support@racenext.app

In some cases, you have the right to lodge a complaint with a data protection authority about our use of your personal data.

Commissioner for Personal Data Protection

15, Kypranoros Street
1061 Nicosia
P.O. Box. 23378
1682 Nicosia
Tel. +357 22 818 456
Fax +357 22 304 565
Email: commissioner@dataprotection.gov.cy
Website: <http://www.dataprotection.gov.cy/>

For more information, you can also contact your national data protection authority. We will cooperate with the appropriate governmental authorities to resolve any privacy-related complaints that cannot be amicably resolved between you and us. You can find a full list of EU supervisory authorities through this [link](#).

California Residents: Your Rights under the CCPA and the CPRA

This section applies to the processing of the personal information of California residents.

Under the California Consumer Privacy Act (the “CCPA”) and the California Privacy Rights Act (the “CPRA”, “CCPA, as amended”), California residents have certain rights regarding the collection, use, and sharing of their personal information.

We may collect various categories of personal information when you use our Service, including information you provide when you want to receive our services, provide us with any additional information, and automatically collect data (regarding the technical details of your device, etc.).

In particular, depending on actual circumstances, we may collect the following categories of personal information specified in the CCPA when you use the Service:

- Category A – Identifiers;
- Category B – Personal information categories listed in the Cal. Civ. Code § 1798.80(e);
- Category C – Protected classification characteristics under California or federal law;
- Category D – Commercial information;
- Category F – Internet or other similar network activity;
- Category K – Inferences drawn from any of the information identified above to give you a more personalized web experience (i.e., this may involve the use of cookies in accordance with our [Cookies](#) Policy)

You can find a detailed description of the personal information that we may collect from you above in the ‘**Data Collection**’ section of this Policy. The purposes of the collection and/or use of personal information are stated in the ‘**Use of Your Personal Data**’ section of this Policy. Note that in the ‘**Data Sharing and Disclosure**’ section of this Policy, you can review the categories of third parties with whom we may share your personal information. The terms used within those sections of this Policy are taken from the GDPR in consideration of the definitions established in the CCPA as amended.

If you are a California resident, to the extent provided for by the CCPA and subject to applicable exception, you have the following rights in relation to the personal information we have about you:

- Right to obtain information. You can request information about what personal information has been collected about you and how we have used that personal information during the preceding 12 months.

- Right of access. You can request a copy of the personal information we collected about you during the preceding 12 months.
- Right to deletion. You can request us to delete the personal information that we have collected from you unless it is necessary for us to maintain your personal information in certain cases under the CCPA, such as protection against malicious, deceptive, fraudulent, or illegal activity.
- Right to be free from discrimination relating to the exercise of any of your privacy rights.

The CPRA amended the CCPA and added new additional privacy protection rights for California residents, such as:

- Right to correct inaccurate personal information. You can request us to correct the inaccurate personal information about you.
- Right to limit the use and disclosure of sensitive personal information. This right allows you to limit the use and disclosure of your sensitive personal information by the company. We don't intentionally collect any sensitive personal information about you.

We do not sell your personal information to third parties for monetary or other valuable consideration. Additionally, we do not offer any financial incentives associated with our collection, sharing, or retention of your personal information.

We take the protection of your privacy seriously, so we will not discriminate against you for exercising any of your rights granted by the CCPA, as amended.

You can exercise your rights under the CCPA, as amended, by sending us an email by any other means of communication convenient for you, including those listed in the '**Contact Us**' and '**About Us**' sections of this Policy.

Please note that we may need to confirm your identity to process your requests to exercise your rights under the CCPA, as amended. Thus, we may not be able to satisfy your request if you do not provide us with sufficient detail to allow us to verify your identity and respond to your request. You may exercise the following rights by submitting your request at support@racenext.app

Data Subject Age under the GDPR and COPPA

Our Service is intended for general audiences and is not directed to children under the age of 18.

By submitting your personal data to us, you acknowledge that you have reached the age of 18, and under the laws of your country of residence, you have all rights to provide us with your personal data for processing.

Under the GDPR, we do not knowingly collect personal information from children under sixteen (or a lower age if provided by EU member state law, provided that such lower age is not below 13 years).

We do not knowingly collect personal information from children under 13 without seeking parental approval in accordance with applicable legal and regulatory obligations, such as the U.S. Children's Online Privacy Protection Act ("COPPA").

If you know that a child has provided us with personal information without parental consent, please contact us at support@racenext.app

Changes to the Privacy Policy

This Policy may be changed occasionally due to the implementation of new updates, technologies, laws' requirements or other purposes. We will notify you if these changes are dramatic, and where required by applicable laws, we will obtain your consent for the subsequent processing. In any case, we encourage you to review this Policy to check for any changes regularly.

Such notification may be provided via your email address, announcement published on the Service and/or by other means consistent with applicable law.

Contact Us

If you have a question related to this Privacy Policy, our processing activities, or your data subject rights under the GDPR, CCPA, as amended, and other applicable laws, you can contact us directly using the following details:

Our email: support@racenext.app