

## **International Olympic Committee – Let’s Move Street Challenge Privacy Policy**

### **1. Introduction**

Your privacy is very important to us and we believe that you should always keep control over your personal data. Please take a few minutes to read and understand the contents of this Let’s Move Street Challenge Privacy Policy.

This Let’s Move Street Challenge Privacy Policy, as updated from time to time, informs you about how we, the International Olympic Committee (“IOC”), as data controller, collect and process personal data related to your use of the Let’s Move Street Challenge competition platform (otherwise referred to here as “Let’s Move Street Challenge” or the “Platform”) and applies in addition to the [IOC Privacy Policy](#). Use of the Platform is governed by Terms of Service which can be accessed here: <https://olympics.com/en/terms-of-service>.

If you have any questions regarding the processing of your personal data by the IOC, please contact the IOC’s Data Protection Officer at the following address:

Data Protection Officer  
International Olympic Committee  
Maison Olympique  
1007 Lausanne  
Switzerland

Alternatively, you may use the [IOC dedicated portal](#).

### **2. Who we are**

The IOC is a private, not-for-profit, international organisation recognized to be of public interest by the Swiss authorities and constituted in the form of a Swiss law association, having its registered office at Maison Olympique, 1007 Lausanne, Switzerland.

The mission of the IOC is to promote Olympism throughout the world, to lead the Olympic Movement and to ensure the regular celebration of the Olympic Games. To know more about the IOC, our goals and our activities, please consult the [Olympic Charter](#) and other information provided on the webpage <https://olympics.com/ioc/principles>.

The IOC has appointed Olympic Broadcasting Services S.L. Calle Torrelaguna 75, Madrid, Spain as a European Union representative pursuant to Article 27 of the EU General Data Protection Regulation 2016/679 (“GDPR”).

When we refer to “we”, “our” or “us” in this Let’s Move Street Challenge Privacy Policy, we are referring to the IOC. When we refer to “you” or “your” we refer to you as a user (either a participant or a fan) of the Let’s Move Street Challenge competition platform.

### **3. What personal data do we collect and process?**

#### **3.1. Personal data that you directly provide to us**

##### **Participants**

To access the Let's Move Street Challenge participation page that sits within the technical infrastructure of olympics.com, participants must register for an Olympic ID. If you don't already have one, you can create an Olympic ID at <https://olympics.com/en/sign-in>. You can then log into the Let's Move Street Challenge participation page using your Olympic ID credentials.

When participating in the Let's Move Street Challenge, the following categories of personal data will be collected:

- Name
- Surname
- Nickname
- Email
- Country of Residence
- Nationality
- Age
- IP Address
- Video
- Data that identifies an Olympic ID registered participant/voter, specifically email and country of residence
- Sport
- Discipline
- Gender
- Choice to participate in for a creative award or sports performance award
- Any consent you have given to us. For example, your consent to us sending you marketing by electronic means.

Participants who are resident in the People's Republic of China ("PRC") may register and submit their video for the initiative via the Olympic WeChat Mini Program instead of via the mechanism described above. In which case, personal data necessary for participation in and promotion of the initiative shall be sent by an IOC China-based supplier to Hurricane, acting on behalf of the IOC.

##### **Fans**

To visit the Let's Move Street Challenge gallery page that sits within the technical infrastructure of Olympics.com, participants must register for an Olympic ID. If you don't already have one, you can create an Olympic ID at <https://olympics.com/en/sign-in>. You can then log into the Let's Move Street Challenge gallery page using your Olympic ID credentials.

When casting a vote, the following categories of personal data will be collected:

- Name
- Surname
- Email
- IP Address
- Data that identifies an Olympic ID registered fan, specifically email and country of residence
- Any consent you have given to us. For example, your consent to us sending you marketing by electronic means.

We may also collect personal data from you when you communicate with us and/or request any information related to the Platform. We will process your Olympic ID information and any other information that you provide when communicating with us (such as email address, phone number, and any information you disclose to us) to answer your queries.

### **3.2. Personal data collected through third parties**

As mentioned in the privacy policy (<https://olympics.com/en/privacy-policy>) that is available when you register for an Olympic ID, you can register for such an account by using the information of an account you hold with third-party services such as Facebook, Google, Twitter or Apple. If you choose this option, you will authorise these organisations to provide us with some personal data they hold about you so that we can use this information to create your Olympic ID and subsequently verify your account. This information will depend on the third-party services used to register with us and on the specific pieces of personal data you share but this generally includes your first name and last name, username, phone number, unique identifiers and access tokens, e-mail address, date of birth and preferences (e.g., pages you have made a favourite or saved). You understand that certain personal data we collect through these third parties may constitute sensitive personal data. We will process sensitive personal data with extra care as required by the applicable laws. Your acceptance of the Let's Move Street Challenge Privacy Policy will constitute your consent to our processing of such sensitive personal data (to the extent your consent is required by law).

Please note, the privacy policy mentioned above, which is available when you register for an Olympic ID, continues to apply. It applies to the processing of personal data in connection with the Olympic ID as well as your wider use of the Olympics.com website and associated mobile application. If you would like to be reminded of that privacy policy, please see here: <https://olympics.com/en/privacy-policy>.

### **3.3. Personal data collected during use of the Platform**

#### **3.3.1 Device and system information**

We collect information about the device(s) you use to access the Platform, in particular:

- Device attributes, including operating system, hardware and software versions, browser type or language
- Unique device identifier (UID)

- Network connections (information such as your Internet Service Provider, language, time zone, IP address)

### 3.3.2. Cookies

We use cookies or similar tracking technologies (“cookies”) to store information on, and retrieve information from, your device.

To learn more about cookies, please see our **Cookie Policy** at <https://olympics.com/en/cookie-policy>.

## 4. For what purposes and on what legal grounds do we process your personal data?

We will process your personal data for the following purposes:

- **Creation of an Olympic ID and giving you access to the Let’s Move Street Challenge competition platform:** We will process your personal data for the purpose of providing you with an Olympic ID and giving you access to the Let’s Move Street Challenge competition platform. Certain information is made available on your Let’s Move Street Challenge profile.
- **User verification process:** When you access the Let’s Move Street Challenge competition platform, we process your personal data in order to verify your Olympic ID.
- **Managing your participation in the Let’s Move Street Challenge and providing you with prizes:** We process your personal data to assess your eligibility to take part in the Let’s Move Street Challenge and to receive prizes. Where you are eligible to take part and receive prizes, we will process your personal data for the purpose of managing your participation in the Let’s Move Street Challenge and providing you with the corresponding prizes that you unlock during your game play.
- **Maintenance of your Olympic ID account and service communications with Let’s Move Street Challenge users:** We will process your personal data in order to maintain your Olympic ID account and Let’s Move Street Challenge competition platform access, and to send you (via electronic means) service communications for the purposes of keeping you informed about the Let’s Move Street Challenge as well as solving or mitigating any Let’s Move Street Challenge competition platform issues.
- **Gathering insights:** We will process your personal data to gather insights about Let’s Move Street Challenge participants’ and fans’ behaviour during the use of the Platform as well as information on the Platform performance. This information helps us to analyse Platform traffic, provide a good user experience and improve the performance of the Platform. Insight into your interactions with the Platform are also necessary for us to understand levels of awareness of important Games-related topics, and to determine the most effective way of providing information about these topics to Athletes and Entourage.

We also gather insights when you interact with any surveys that are presented to you via the Platform.

- **Sending of promotional communications by electronic means:** We will send you promotional communications by electronic means if we have collected your prior consent.
- **Maintaining records:** We need to maintain records related to the Let's Move Street Challenge competition platform. For example, records of those people to whom we have provided prizes.

The primary legal grounds that support the processing activities described above are compliance with our legal obligations and performance of the contractual obligations between you and the IOC when providing you with certain services, such as the Olympic ID and your access to the Let's Move Street Challenge competition platform. Furthermore in certain non-GDPR jurisdictions a supplementary consent may also be sought.

In the case of participants based in countries like India and the Republic of Korea where a supplementary consent of the data subjects is required, participants are hereby informed that due to the nature and the structure of the contest and the data processing attached to it, they have the statutory right to refuse providing such consent, but this refusal would prevent participants from taking part in the contest. For participants residing in India who have not attained the age of 18 years, we will not:

- a. process personal data such that is likely to cause any detrimental effect on the well-being of such participant; and
- b. undertake tracking or behavioral monitoring of such participant, or provide targeted advertisements to such participant.

## 5. Who do we share your personal data with?

To deliver the Let's Move Street Challenge competition platform, we rely on a network of service providers who process your personal data on our behalf and with each of them we share your personal data from time to time via an online network. In particular:

- **Hurricane (France)** will develop the user journey and (for those elements that sit outside of the technical infrastructure of olympics.com) provide the platforms to collect, store and make available to certain third parties the personal data of (a) participants in the Let's Move Street Challenge, and (b) Let's Move Street Challenge fans. Hurricane will process the personal data listed in article 3:
- **Spiriit (France)** provides us the hosting and platform development. Spiriit will process the following personal data listed in article 3:
  - In respect of participants and voters: name, surname, nickname, email, country of residence, age, nationality, video, Olympic ID-derived data, sport, discipline, gender and choice to participate in creative award or sports performance award.
- **OVH (France)** supports us with hosting. OVH will process the following personal data listed in article 3:

- In respect of participants and voters: name, surname, nickname, email, country of residence, age, nationality, video, Olympic ID-derived data, sport, discipline, gender and choice to participate in creative award or sports performance award.
- **Vimeo, Inc. (USA)** is used for the video hosting and streaming services for video contests. Vimeo, Inc. will process the following personal data listed in article 3:
  - Videos uploaded by participants.
- **Brevo (France)** will send transactional emails, such as “Thank You” messages, communications to winners, etc. Brevo will process the following personal data listed in article 3:
  - In respect of participants and voters: email, name, surname, nickname, country of residence, video, sport, discipline, gender and choice to participate in creative award or sports performance.
- **Judges**, appointed by Hurricane, to judge and moderate the participants’ submissions. Judges will receive through Hurricane and process the following personal data listed in article 3:
  - In respect of participants: email, name, surname, nickname, country of residence, video, sport, discipline, gender and choice to participate in creative award or sports performance.

These service providers shall retain your personal data for no longer than the duration set forth in Article 8.

## 6. How do we protect your personal data?

We use technical and organisational measures to protect your personal data against the risks of damage, destruction, loss or unauthorised access, in accordance with applicable laws.

## 7. International transfers of personal data

We may process your personal data in a country other than your place of residence. We adopt measures as required under applicable law to ensure your data will be given the relevant protection.

While the information we collect will usually be processed in the European Union or in Switzerland (which provides a level of protection equivalent to the European Economic Area according to the Commission Decision of 26 July 2000), we may also transfer your personal data for the purposes highlighted in this Let’s Move Street Challenge Privacy Policy to the above-mentioned recipients (see the above section “Who do we share your personal data with?”). Some of those recipients may be based in countries that, like the United States of America, do not provide in their laws for a level of protection of your privacy equivalent to that applied within the European Union and Switzerland. This will happen when some of the organisations helping us to operate the Let’s Move Street Challenge competition platform (see above “Who do we share your personal data with?”) access your information from countries located outside Europe. Before transferring data from Switzerland or the European Union

to other countries, we implement safeguard mechanisms recognized by Swiss and European regulators, in particular the European Commission's Standard Contractual Clauses.

If you are located in the People's Republic of China ("PRC") when using the Platform, you understand that your personal data will be processed in countries outside of PRC as described in the preceding paragraph.

For participants residing in the Republic of Korea, you have the statutory right to refuse providing consent to the international transfer of personal data by means of not consenting to the processing of your personal data under this Privacy Policy, but this refusal would prevent participants from taking part in the contest.

## **8. Data retention**

We will store and process your personal data only for the duration necessary to achieve the purposes described in this Let's Move Street Challenge Privacy Policy or as required to meet our legal obligations. We are also entitled to store your personal data for the applicable statute of limitation period for the establishment, exercise or defence of legal claims when necessary.

## **9. Your rights and how to exercise them**

You can exercise your rights of access, rectification, deletion and portability of your personal data, limitation and objection to its processing, as well as your right to not be subject to decisions based solely on the automated processing of your personal data, where appropriate, before us. You also have the right to withdraw your consent at any given moment. Please note, however, that we may not be able to provide you with full access to the Application or the relevant services if you withdraw your consent.

In order to be able to respond to your rights requests, and if we have reasonable doubts concerning your identity, we may request you provide a copy of an official document that can prove your identity.

We reserve the right to decline a request where the legal conditions are met and, in particular, where the request made to us is manifestly unfounded or excessive.

In cases where the GDPR applies, you have the right to lodge a complaint with a European Union supervisory authority, in particular, in the country of your habitual residence, place of work or place of the alleged infringement. Where the UK Data Protection Act 2018 applies, you have a right to lodge a complaint with the UK's Information Commissioner's Office.

To exercise the abovementioned rights you can contact us through the [IOC's dedicated contact portal](#) or write to our Data Protection Officer at the address detailed below.

Data Protection Officer  
International Olympic Committee  
Maison Olympique

1007 Lausanne  
Switzerland

## **10. Changes to the Let's Move Street Challenge Privacy Policy**

This Let's Move Street Challenge Privacy Policy is dated August 30, 2023.

When we make changes to this Let's Move Street Challenge Privacy Policy, we will adequately inform you in advance where such changes impact your rights as a user of the Platform or where required by law. For example, by posting a notice in the Platform or by sending you an email communication. You can then review our revised policy and decide whether to continue to use the Platform. Your continued use of the Platform after the entry into force of the revised Let's Move Street Challenge Privacy Policy will constitute your acceptance of such changes. We encourage you to review our Let's Move Street Challenge Privacy Policy regularly.