

PRIVACY POLICY

1. Purpose and Scope

This Privacy Policy governs the processing of the personal data provided in connection with the registration for and participation in the **CURSA BOMBERS BARCELONA** (the "Event"), as well as any processing activities related to its organisation, safety, timing, rankings, communications, audiovisual coverage and, where authorised by the data subject, promotional activities and commercial communications.

This Policy applies to participants and, where applicable, their legal representatives, accompanying persons, volunteers and other users of the channels made available for the Event.

2. Data Controller

- **Data Controller:** RELAY EVENTS, S.L. - SPORT LIFE IBERICA, S.A. - PRENSA IBERICA 360, S.L., TEMPORARY JOINT VENTURE (UNIÓN TEMPORAL DE EMPRESAS), LAW 18/82, OF 28 MAY
- **Tax Identification Number (NIF):** U88709142
- **Registered Address:** Ronda General Mitre, No. 93, 3-1B, 08022 Barcelona, Spain
- **Data Protection Officer:**
- **Joint Organisation / UTE:** Relay Events, S.L., Sport Life Ibérica, S.A., Prensa Ibérica 360, S.L.

3. Personal Data Processed

The following categories of personal data may be processed:

- **Identification and contact details:** first name, surname, identification document where required, date of birth, postal address, telephone number and email address.
- **Registration data:** race modality, category, bib number, club or team, T-shirt size, expected finishing time, accreditations and any other information necessary to manage participation.
- **Financial and transactional data:** information relating to payments, invoicing, refunds and payment receipts. Full payment card details will be processed exclusively by the payment service provider and not by the organiser, unless expressly stated otherwise.

- **Sporting data and results:** official times, split times, ranking position, incidents, penalties, withdrawals and official classifications.
- **Image and voice:** photographs, audiovisual recordings and interviews taken during the Event and related activities.
- **Health data strictly necessary:** allergies, relevant medical conditions, disabilities or emergency information, only where requested and where an appropriate legal basis exists. Such data shall be subject to enhanced protection measures.
- **Data relating to legal representatives and emergency contacts,** where applicable.
- **Technical data** generated through the use of the website or application, in accordance with the Cookies Policy and the settings selected by the user.

4. Purposes of Processing, Legal Bases and Data Retention

Personal data will be processed for the following purposes:

- **To manage registration and participation in the Event,** including payment processing, bib collection, access control, operational communications, incident management, race organisation, safety management, emergency assistance, insurance matters and claims handling, as well as compliance with applicable legal obligations. Where necessary to ensure the participant's safety, health data provided by the participant or required in emergency medical situations may also be processed in accordance with the circumstances provided for in Article 9(2) of the General Data Protection Regulation (GDPR).
Legal basis: performance of the registration agreement, compliance with legal obligations and, where applicable, Article 9(2) GDPR.
- **To provide official race timing services and publish race results and rankings,** including the publication of participants' names and surnames, bib numbers, race category, club affiliation, official times and finishing positions.
Legal basis: performance of the registration agreement and the organiser's legitimate interest arising from the sporting nature of the Event.
- **To capture and publish photographs and audiovisual material** of the Event for informational, documentary and, where applicable, promotional purposes. General images of the Event will be processed on the basis of the organiser's legitimate interest, while close-up images, interviews or individual portraits will be processed on the basis of the participant's or, where applicable, their legal representative's consent.

- **To send commercial communications** regarding future editions of the Event, activities or services organised by the organiser and, where expressly indicated, to disclose personal data to identified sponsors for the purpose of carrying out their own commercial activities.

Legal basis: consent and, where legally applicable, legitimate interest arising from a previous relationship. Refusal to grant or withdrawal of consent shall not affect registration for or participation in the Event.

- **To respond to enquiries, complaints and requests concerning the exercise of data protection rights.**

Legal basis: compliance with legal obligations and, in relation to general enquiries and complaints, the organiser's legitimate interest.

Personal data will be retained for as long as necessary to fulfil the purposes described above and, thereafter, for the legally required retention periods and any applicable limitation periods. The provision of data identified as mandatory is necessary to process the registration and enable participation in the Event.

5. Minor Participants

Where the participant is under **14 years of age**, consent for any processing activities based on consent as the legal basis must be given by the person exercising parental authority or legal guardianship.

Participants aged **14 to 17** may generally consent to the processing of their personal data themselves, without prejudice to any additional authorisations that may be required under the Event Regulations, applicable sports regulations, contractual requirements or the use of their image.

Any person registering a minor declares that they have the necessary legal capacity or authority to do so and that the information provided is accurate. Where necessary, the organiser may request reasonable documentation to verify the participant's age or the authority of the person acting on the minor's behalf.

6. Images, Voice and Audiovisual Coverage

The Event may be photographed or recorded by the organiser, accredited audiovisual service providers and media organisations.

The processing of image and voice data will be carried out for the purposes and on the legal bases set out in Section 4. Participants will be informed before completing their registration and through visible signage displayed throughout the Event venue.

- General, environmental or panoramic images may be used to report on the Event, publish race reports, results and institutional content.

- Close-up photographs, interviews or audiovisual material focusing on an identifiable individual for specific advertising or promotional purposes shall be subject to separate authorisation where required.
- Where minors are involved, enhanced safeguards shall be adopted and any use that may adversely affect their best interests shall be avoided.
- Requests for the removal of images or recordings will be assessed on a case-by-case basis, taking into account the circumstances, the applicable legal basis, freedom of information, technical feasibility and the rights of other affected individuals.

7. Recipients and Service Providers

Personal data may be disclosed or made available to the following categories of recipients where necessary:

- The companies forming the **Temporary Joint Venture (UTE)**, under the terms established, where applicable, in the joint controllership agreement or the relevant internal arrangements.
- Registration or ticketing platform providers, payment gateway providers, timing companies, technology service providers, web hosting providers, courier and messaging services, participant support services, insurance providers, medical services, security providers, logistics companies and audiovisual production companies, insofar as they act as service providers necessary for the organisation of the Event and, where applicable, as **data processors**. In particular, the registration or ticketing platform may access and process the personal data required to manage registrations on behalf of the Data Controller, acting as a data processor and strictly in accordance with the Controller's instructions.
- Sports federations, sports authorities, law enforcement agencies, emergency services, public authorities and courts where disclosure is required by law or necessary to protect rights or legitimate interests.
- Media organisations and the general public in relation to personal data and images lawfully published.
- Identified sponsors, only where the participant has provided their specific consent after having received the relevant information.

8. International Data Transfers

- Some technology service providers or social media platforms may process personal data outside the **European Economic Area (EEA)**.

- Where international data transfers take place, appropriate safeguards shall be implemented in accordance with the **General Data Protection Regulation (GDPR)**, including, where applicable, adequacy decisions adopted by the European Commission, Standard Contractual Clauses (SCCs) or any other legally recognised transfer mechanisms.

9. Data Subject Rights

- Data subjects are entitled to exercise their rights of access, rectification, erasure, objection, restriction of processing and data portability, where applicable. They may also withdraw any consent previously given at any time, without affecting the lawfulness of processing carried out prior to such withdrawal.
- To exercise these rights, requests should be submitted to **info@cursadebombers.barcelona**, specifying the right to be exercised and providing sufficient information to verify the identity of the applicant.
- The withdrawal of consent for marketing communications, disclosure of personal data to sponsors or the promotional use of images shall not result in cancellation of the participant's registration for the Event where participation can continue to be managed on another lawful basis.
- If you believe that your rights have not been properly addressed, you may lodge a complaint with the Spanish Data Protection Agency (Agencia Española de Protección de Datos – AEPD) via www.aepd.es.

10. Security and Confidentiality

- The Data Controller shall implement appropriate technical and organisational measures, taking into account the level of risk, to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access.
- Access to personal data shall be restricted to those members of staff and service providers who require such access for the purposes described in this Privacy Policy.