

# Privacy Statement



## Athletic Skills Company

**Athletic Skills Company BV is a social enterprise responsible for the Athletic Skills Model and related concepts. It serves as the parent company of Athletic Skills Model BV and Athletic Skills Track BV. Where necessary, we may share your personal data internally between these entities to deliver the products and services offered under the Athletic Skills Company umbrella. This is done exclusively to maintain the quality and consistency of our services. You always retain the right to access your personal data and request its deletion.**

**Our privacy practices comply with Dutch privacy legislation**

### Contact.

#### Athletic Skills Company BV.

Zuideinde 9  
1121 CJ, Landsmeer (NL)

[info@athleticskillsmodel.nl](mailto:info@athleticskillsmodel.nl)

#### Athletic Skills Model BV.

Zuideinde 9  
1121 CJ, Landsmeer (NL)

[info@athleticskillsmodel.nl](mailto:info@athleticskillsmodel.nl)

#### Athletic Skills Track BV.

Zuideinde 9  
1121 CJ, Landsmeer (NL)

[info@athleticskillsmodel.nl](mailto:info@athleticskillsmodel.nl)



# 1. Services Involving the Processing of Personal Data.

## 0. General.

In general, we process certain personal data during our contact with you (either digitally or by post), such as your first name, surname, telephone number, address, and/or email address. We process this personal data because it is necessary for the performance of a contract, to comply with a legal obligation, and/or because you have given your consent. This processing is therefore lawful on the basis of Article 6(1)(a) and (b) of the UK GDPR.

We share this data with the required software providers used for our web hosting, online communication, financial administration, and customer management.

*Without your consent to process this data, your access will be limited to general information available on the public website and communication channels, such as advertisements and brochures. In such cases, we are unable to provide personalised offers or maintain direct contact regarding specific enquiries.*

### 0.1 What data we process and for what purpose:

For the handling of contact forms, newsletters, and email campaigns, we process the following personal data: **first name, surname, telephone number, and email address**. This allows us to contact you in a way that is appropriate for the type of communication and to maintain a contact history to support you more efficiently.

In certain specific contact forms, as well as for the processing of quotations, invoices, and the financial handling of assignments, we may process additional information such as your **address, invoicing details**, and optional supplementary data related to your enquiry or the offer. This information is mandatory for the lawful processing of quotations or when communication or delivery is required by post or to a specific location.

# I. ASM Academy.

At the ASM Academy, we offer workshops, training programmes, and educational courses focused on the practical application of the Athletic Skills Model. These courses consist of in-person sessions and/or online learning.

Examples of our services include: the ASM Workshop, ASM Instructor Courses, the ASM OldStars Trainer Course, the *Masters of Movement* Community of Learners, the ASM Policy Development Course, the optional ASM Instructor Module for vocational education, and the 'Schijf van 10!' (Ten Essentials) lesson module for primary schools.

In some cases, online platforms such as the ASM Campus and ASM Gallery are integrated into the programme or offered as standalone courses. All education and training from the ASM Academy is provided by Athletic Skills Model BV. If the learning offer is directly linked to Consultancy & Design services—such as activation workshops or online inspiration/training—it is provided by Athletic Skills Track BV.

## I.I What Data We Process, for What Purpose, and on What Legal Basis:

To process registrations, organise and deliver training, manage any accreditations, and administer qualifications, we process, in addition to the personal data listed in Article 0, several additional categories of personal data.

### A. Work Experience and Education.

To tailor our training offer to participants, we request relevant work experience and educational background. Where applicable, this information is also used to verify whether you meet the required prerequisites for participation and to gain general insight into the target groups utilising our services. Furthermore, we use this data to compile participant feedback and gain market insights. The processing of this data is necessary for the performance of a contract, and is therefore lawful under Article 6(1)(b) of the UK GDPR.

### B. Memberships and Registration Numbers.

If you are affiliated with professional organisations, such as sports organisations or quality assurance bodies that grant course accreditations, we process this information in order to manage such accreditations. This processing is also necessary for the performance of a contract and is therefore lawful under Article 6(1)(b) of the UK GDPR.

### C. Special Categories of Personal Data.

The use or disclosure of sensitive personal data, such as medical, ethnic, or political information, is not part of the ASM Academy's operations. We do not explicitly request, store, or otherwise process such data.

## I.II What data we share:

Personal data as described in Article 0, I.IA, and I.IB is shared with necessary software providers to facilitate registration and communication. This data is also shared internally with instructors to align the training offer with participants' needs, as well as for the processing of online content (Sections II and III). Additionally, relevant data is shared externally with professional organisations for the purpose of processing accreditations.

## II. ASM Campus.

Learning, inspiring, and developing at your own pace provide lasting benefits for the sustainable application of knowledge and skills. We aim to support this through the ASM Campus.

The ASM Campus ([campus.athleticskillsmodel.com](https://campus.athleticskillsmodel.com)) is an online learning environment with an integrated community. It features a variety of learning modules, relevant news articles, publications, and events focused on the Athletic Skills Model and related initiatives.

The ASM Campus is used as part of the ASM Academy's training programmes (Section I), as a standalone service, or as a supporting tool for Design & Consultancy services (Section IV).

### II.I What Data We Process, for What Purpose, and on What Legal Basis:

#### A. Account Information.

To create and activate an account, we collect the following account details: your first name, last name, and email address. We receive this information either via the registration form or automatically when you participate in a course provided by the ASM Academy (only applicable for courses that include access to the ASM Campus). The processing of this personal data is necessary for the performance of a contract and is therefore lawful under Article 6(1)(b) of the UK GDPR.

In addition, you will choose a password, which is stored in encrypted form within the management system. You may change your password at any time via your profile or during the login process on the ASM Campus. As the account holder, you are responsible for managing and keeping your password and account information confidential from third parties outside the ASM Campus.

You may, at your own discretion, choose to share additional personal or contact information on your profile. This is entirely optional. Any such information will be stored in the system and is only visible to admin users of Athletic Skills Company.

#### B. Usage Data.

We collect and process information about your activity on the ASM Campus. This includes your interaction with content, such as viewing and rating materials, submitting responses, and completing assessments. Although this information is not generally regarded as personal data, it may become personally identifiable in specific instances.

Where such data can be linked to an individual, it is processed as necessary for the performance of a contract - for example, to improve the user experience or where access to personal results or content interaction is part of the educational offer. This processing is therefore lawful under Article 6(1)(b) of the UK GDPR.

*Example: You open one of the learning modules on the ASM Campus as part of a training programme. You complete some sections while skipping others. This progress is stored to provide an accurate overview of the content you've covered and, indirectly, your competence and/or eligibility for certification, accreditation, or access to follow-up modules.*

Additionally, you may read individual articles and news items on the ASM Campus that match your interests. The content, topics, and related tags are logged to help us understand which content is most valuable to users and to support the development of new content on the platform.

#### C. Special Categories of Data and Personal Information.

The use or sharing of sensitive personal data, such as medical, ethnic, or political information, is not part of the ASM Campus. Such data is not explicitly requested, stored, or processed in any way.

## **II.II What Data We Share:**

### **A. With Other Users.**

For the functioning of the ASM Campus, no personally identifiable information as described in Articles II.I and II.II is shared with other users.

### **B. With Third Parties Outside Athletic Skills Company.**

We only share personally identifiable information with third parties outside Athletic Skills Company when this is necessary for the delivery of the service—such as the storage and management of data on external software providers' servers—or when required by law. In cases of suspected fraud or misuse of the ASM Campus, personal data may be handed over to the appropriate authorities. In these instances, processing is necessary for the performance of a contract or to comply with a legal obligation, in accordance with Article 6(1)(b) or (c) of the UK GDPR..

### **C. With the User's Client/Employer.**

User results may be shared for reporting purposes with the client or employer who commissioned the user's participation.

## **II.III Online community.**

The ASM Campus also includes an online community. This community is hosted by a third-party service (external software provider). Account creation and the processing of related personal data fall under the terms and privacy policy of that external provider. Athletic Skills Company does not receive or process any personal data in this context. Separate consent is required from the user, and this functionality falls outside the (data processing) responsibility of Athletic Skills Company or its subsidiaries.

## III. ASM Gallery.

We believe in the power of connection and mutual knowledge exchange. We aim to support this through an online video platform.

The **ASM Gallery** (formerly operated under the name 'Athletic Skills Platform') is designed to share instructional videos featuring sports, games, and movement activities based on the Athletic Skills Model. Its purpose is to make these resources easily accessible and systematically organised.

### III.I What Data We Process, for What Purpose, and on What Legal Basis.

To use the ASM Gallery, we need to store and process certain information about you. This includes:

- **A.** Creating an account and logging in
- **B.** Interacting with content and sharing that interaction with other users
- **C.** Uploading or sharing your own content
- **D.** Personalising your experience on the platform

The nature and extent of data processing depend on how you use the ASM Gallery. In some cases, this also determines how visible your data is to others.

This processing is necessary for the performance of our agreement with you and is therefore lawful under Article 6(1)(a) of the UK GDPR.

#### A. Account Information.

To create and activate an account on the ASM Gallery, we collect a number of account details: your first name, last name, and email address. This information is either submitted via the registration form on our website or automatically generated when you participate in an ASM Academy course (only applicable for courses that include access to ASM Gallery). The processing of this personal data is necessary for the performance of the contract and is therefore lawful under Article 6(1)(b) of the UK GDPR.

You will also be required to choose a password, which is securely stored in encrypted form within our management system. You may change your password at any time via your profile settings or during the login process. As the account holder, it is your responsibility to keep your password and personal account details confidential and not share them with third parties outside of the ASM Gallery.

You may also choose, at your discretion, to include additional personal or contact information on your profile. This is entirely optional. If provided, such information will be stored within the system and made visible to all users of the platform.

#### B. Usage Data.

We collect and process information related to your usage of ASM Gallery. This includes your interaction with other users' content—such as viewing and rating videos, clicking on tags and links, following other users, viewing specific content, and saving items to your profile in the form of playlists. It also includes how other users interact with your content or your profile. ASM Gallery does not support private interactions between users (e.g. via direct messaging or chat).

This data is processed because it is necessary for the performance of the contract.

*Example: You watch a video uploaded by another user for inspiration. To determine which videos are most valued, we track which users view the video. Additionally, we record whether you add it to a playlist, mark it as a favourite, or give it a positive rating. This also supports transparency and visibility of user interaction within ASM Gallery. More details on this can be found in Article 2.*

## C. Content You Share.

We believe that those who benefit from the platform can also contribute to its growth—by expanding the library of content on ASM Gallery. Any content you upload, such as instructional videos and associated tags or labels you assign to them, is stored and linked to your account. Depending on the content group(s) you have access to and where the videos are uploaded, your content may be visible to other users within those same content groups. This personal data is processed because it is necessary for the performance of the contract.

*Example: You upload a video to the open database of ASM Gallery and assign relevant tags. This video becomes visible to all ASM Gallery users, including your profile name and the chosen tags. If you are part of an exclusive content group—such as one focused on a specific sports facility or Athletic Skills Model application—and you upload a video to that group, the video and related information will only be visible to users who also have access to that specific group.*

## D. Special Categories of Data and Personal Information.

The use or sharing of sensitive personal data—such as medical, ethnic, or political information—is not part of ASM Gallery. This type of data is therefore not explicitly requested, stored, or otherwise processed

### III.II What Data We Share:

#### A. With Other Users.

To ensure the proper functionality of the ASM Gallery, certain data described in Article III.I is shared with other users. Below, we outline which data is shared and for what purpose:

##### **Data from Article III.IA:**

Your first name and last name are visible on your profile, alongside any content you share. These details are also shown when your interactions are visible to other users who follow you, or whom you follow. This allows users to identify the owner of a profile and the content associated with it.

##### **Data from Article III.IB:**

Information collected about your interaction with the ASM Gallery is displayed on your profile and is therefore visible to all users of the platform. This includes the users you follow, the content (created by others) that you save in playlists within your profile (only if you have opted to share this), and the content you rate. This functionality helps others explore your interests and be inspired by your activity on the platform.

##### **Data from Article III.IC:**

All content you upload to ASM Gallery is visible to all users within the relevant content group. It is not possible to upload content in a private environment or restrict visibility to individually selected users.

#### B. With Third Parties Outside Athletic Skills Company.

We only share personally identifiable data with third parties outside Athletic Skills Company when it is essential for the provision of our services—for example, for the storage and management of data on external software providers' servers—or when required by law. In cases of suspected fraud or misuse of ASM Gallery, personal data may be shared with the competent authorities. This processing is lawful under Article 6(1)(b), (c), and (f) of the UK GDPR.

##### **Data from Article III.IB:**

This data is only shared with (potential) advertisers in the form of anonymous, non-identifiable summaries. These summaries are used solely to assess the effectiveness of advertisements and/or sponsored content, without revealing individual identities.

## IV. Consultancy & Design.

To support the application of the Athletic Skills Model in the design and development of sports and physical activity facilities, we create tailored design concepts and layout plans. These are developed under various labels, including *Skills Garden*, *PLAYCE*, *ASM PowerHill*, and *#DesignedbyASM*. These services are offered by Athletic Skills Track B.V.

### IIII.I What Data We Process, for What Purpose, and on What Legal Basis:

In order to process requests and deliver these services, we only process the personal data described in Article 0. This processing is carried out either because it is necessary for the performance of the contract or because you have given your consent. As such, the processing is lawful under Article 6(1)(a) and (b) of the UK GDPR.

### IIII.II What Data We Share:

To fulfil our assignment, we share only the personal data described in Article 0 with third parties outside Athletic Skills Company, and only when necessary to carry out the service.

*Example: In preparing a cost estimate and obtaining related quotations from potential suppliers, we may share your contact and company details with those suppliers. These details may then be processed as part of the supplier's own data management procedures.*

## 2. Your Rights Regarding Personal Data.

At Athletic Skills Company, we are committed to protecting your privacy and safeguarding your personal data. As a user of our services, you have certain rights regarding the processing of your personal data. If you would like more information or wish to exercise any of these rights, please contact us at [contact@athleticskillsmodel.nl](mailto:contact@athleticskillsmodel.nl). We are happy to assist you. Below is an overview of your rights:

### Rights to Withdraw Consent

If you have given Athletic Skills Company permission to process your personal data, you have the right to withdraw your consent at any time. From that moment onwards, we will cease processing your data—unless we are required or permitted to do so under another legal basis.

### Right of Access

You have the right to request access to the personal data we hold about you. Upon request, we will provide an overview of the data we process and the purposes for which it is used.

### Right to Rectification

You have the right to request that Athletic Skills Company correct your personal data. This also includes the right to supplement incomplete data, correct inaccurate information, or block data where necessary. You may exercise this right if:

- The personal data is factually incorrect
- The data is incomplete or irrelevant to the purpose for which it was collected
- The data has been processed unlawfully

### Right to Erasure

You have the right to request the deletion of your personal data. This right enables you to ask us to remove data that is outdated, inaccurate, or no longer required. You may exercise this right under the following circumstances:

- The data is no longer necessary for the purposes for which it was originally collected or processed
- You have withdrawn your consent for its processing
- You object to the processing of your personal data
- The data has been unlawfully processed
- The legally required retention period has expired

### Right to Restriction of Processing

You have the right to request the restriction of the processing of your personal data. This means you may ask us to temporarily suspend the processing of your data under the following circumstances:

- The personal data is inaccurate
- The data has been unlawfully processed and you request restriction instead of deletion
- The data is no longer needed for the original purposes
- You have objected to the processing of your personal data

### Right to Data Portability

You have the right to receive the personal data processed by Athletic Skills Company in a commonly used, machine-readable format (e.g. a PDF file). You may use this data for your own purposes or transfer it to a third party. You may also request Athletic Skills Company to transfer your data directly to a third party. Such a transfer will only be carried out with your explicit consent and where permitted under applicable data protection laws.

## Right to Object

You have the right to object at any time to the processing of your personal data.

### Lodging a Complaint with the Supervisory Authority

In addition to the rights outlined above, you also have the right to lodge a complaint with the relevant supervisory authority if you believe your personal data has been processed unlawfully or if your rights have not been respected. In the Netherlands, this is the **Dutch Data Protection Authority (Autoriteit Persoonsgegevens)**. You can submit a complaint via: <https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/tip-us>

## Exercising Your Rights

If you wish to exercise any of the rights outlined above in relation to your personal data, you may submit a request by contacting us at: [info@athleticskillsmodel.nl](mailto:info@athleticskillsmodel.nl).

To ensure the security of your data, we may need to verify your identity before processing your request. This verification may require a copy of your identification document, although in some cases a less intrusive method may be sufficient.

Exercising your rights is generally free of charge.

Please note that the rights described above are not absolute. There may be circumstances in which Athletic Skills Company is unable to comply with a particular request—for example, where doing so would conflict with legal obligations or regulatory requirements. Each request is assessed on a case-by-case basis. If we are unable to fulfil your request, we will inform you of this, including the reasons for our decision.

### 3. Storage and Security.

Athletic Skills Company retains personal data no longer than strictly necessary to achieve the purposes for which your data is collected. Generally, this means data is kept as long as required to provide our services, subject to our legal obligations to retain certain personal data.

Data linked to your account is generally not stored longer than necessary to deliver the services or until the account is deleted.

No data is transferred outside the EU.

Furthermore, we have implemented appropriate security measures to prevent misuse of and unauthorised access to your personal data. These measures include, but are not limited to, the following (not all measures are disclosed for security reasons):

- Access to the servers and software where all data is stored is restricted to authorised personnel employed by or working for Athletic Skills Company. Confidentiality agreements regarding data access are part of their employment contract or service agreement.
- Access to your account is only possible with a username and a password chosen by you, which are stored in encrypted form.
- Secure communication protocols are in place with servers, and all websites have an active SSL certificate.
- Data processing agreements have been concluded with external parties/software providers who process personal data on our behalf. They are subject to the same obligations (or measures of equivalent protection) to ensure the same level of privacy and security is maintained.

### 4. Data Breach.

In the event a data breach is identified, we will immediately conduct an investigation into the nature and scope of the breach in accordance with the [protocol of the Dutch Data Protection Authority \(Autoriteit Persoonsgegevens - AP\)](#). This includes analysing which data has been compromised and who may have had (or currently has) access to it. Subsequently, we will assess what measures are necessary to contain the breach and mitigate any damage.

Depending on the severity of the breach and if it poses a risk to the rights and safety of you or other users, we will notify the Dutch Data Protection Authority (AP) within the mandatory 72-hour period.

In cases of high risk, we will also promptly inform affected users of our services and products. We will enable you to take appropriate follow-up actions in response to the data breach. We will act in good faith and consult with all involved parties to agree on a reasonable allocation of any costs related to complying with the notification requirements.

### 5. Applicability and Changes.

This privacy statement applies to the services and products described herein and does not apply to third-party websites or apps linked to via our platforms. We cannot guarantee that these organisations or parties handle your personal data in a reliable or secure manner.

The date of this privacy statement is indicated at the bottom. We reserve the right to make changes when products or services are renewed, modified, or expanded. For significant changes affecting the processing of your personal data, we will inform you accordingly.

## 6. Cookies.

To provide transparency about which cookies we use, their purpose, and the duration of data retention, we have prepared a separate cookie statement. For detailed information, please refer to our cookie statement at: [www.athleticskillsmodel.nl/en/cookies](http://www.athleticskillsmodel.nl/en/cookies).

## 7. Contact.

If you have any questions or comments regarding this privacy statement, wish to report a data breach, or have any other inquiries, please send a message to [info@athleticskillsmodel.nl](mailto:info@athleticskillsmodel.nl).

Landsmeer,  
May 2025

