

Privacy Policy

Effective Date: 13.07.2026

Last Updated: 13.07.2026

1 Introduction

Welcome to the **HDH-IAA Competition Management Platform** ("Platform", "Service", "Website"), a cloud-based competition management system designed for sports federations, event organizers, clubs, and participants worldwide.

Website provides online services including user registration, competition management, participant registration, parent and guardian management for minors, online payment processing, rankings, results publication, communication tools, and related administrative services.

Protecting your privacy and safeguarding your personal data are fundamental principles of our organization. We are committed to processing personal information lawfully, fairly, transparently, and securely in accordance with applicable data protection legislation, including but not limited to:

- Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR);
- applicable national data protection legislation within the European Economic Area (EEA);
- applicable consumer protection legislation;
- electronic communications legislation;
- and other applicable international privacy regulations where required.

This Privacy Policy explains how we collect, use, store, disclose, transfer, and protect your personal data when you use the Platform or interact with our services.

By creating an account, registering for competitions, making payments, acting as a parent or legal guardian, organizing competitions, or otherwise using the Platform, you acknowledge that you have read and understood this Privacy Policy.

2 Scope of this Privacy Policy

This Privacy Policy applies to all personal data processed through the HDH-IAA Platform, including information collected through:

- the public website;
- user registration pages;
- athlete accounts;
- parent or legal guardian accounts;
- organizer accounts;

- federation accounts;
- competition registration forms;
- payment processes;
- customer support communications;
- newsletters and system notifications;
- mobile-compatible interfaces;
- APIs and integrations where applicable;
- any future HDH-IAA Platform services operated by the Data Controller.

This Privacy Policy applies regardless of whether you access the Platform from a desktop computer, mobile device, tablet, or any other supported device.

3 Definitions

For the purposes of this Privacy Policy, the following definitions apply:

Account means a registered user profile created within the Platform.

Competition means any sporting event, tournament, championship, league, training event, or other activity managed through Website.

Data Controller means the organization responsible for determining the purposes and means of processing personal data.

Data Processor means a third party processing personal data on behalf of the Data Controller.

Personal Data means any information relating to an identified or identifiable natural person, as defined by Article 4 of the GDPR.

Processing means any operation performed on personal data, including collection, recording, organization, storage, adaptation, retrieval, consultation, use, disclosure, transmission, restriction, deletion, or destruction.

Participant means any athlete, competitor, official, coach, volunteer, judge, organizer, or other registered user participating in a competition or using the Platform.

Minor means any participant under the age of 18 years, or another applicable age of majority under the laws of the participant's country of residence where required by law.

Parent or Legal Guardian means an adult legally authorized to represent a Minor and exercise rights on the Minor's behalf.

Competition Organizer means an individual or organization responsible for organizing competitions through the Platform.

Federation means a national or international sports federation using the Platform to administer competitions and athlete registrations.

4. Data Controller

Unless otherwise stated for a specific competition or service, the Data Controller is:

HDH-IAA International Archery Association

Margit utca 28
1163 Budapest
Hungary

Email: info@hdhiaa.net

Website: <https://hdhiaa.net>

Where competitions are organized by independent clubs, national federations, or third-party organizations using the HDH-IAA Platform, those organizations may act as independent Data Controllers or Joint Data Controllers for specific processing activities. In such cases, additional privacy information may be provided by the respective organizer.

5. Principles of Data Processing

Website processes personal data in accordance with the principles established by Article 5 of the GDPR.

Personal data shall be:

- processed lawfully, fairly, and transparently;
- collected for specified, explicit, and legitimate purposes;
- limited to what is necessary in relation to the purposes for which it is processed;
- accurate and kept up to date where necessary;
- retained only for as long as necessary;
- processed in a manner that ensures appropriate security and confidentiality;
- protected against unauthorized or unlawful processing, accidental loss, destruction, or damage through appropriate technical and organizational measures.

We regularly review our processing activities to ensure continued compliance with applicable privacy legislation.

6. Acceptance of this Privacy Policy

By accessing or using the Platform, creating an account, registering for competitions, acting as a competition organizer, registering a Minor as a parent or legal guardian, or otherwise interacting with HDH-IAA Platform, you acknowledge that your personal data may be processed as described in this Privacy Policy.

Where processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out before the withdrawal.

Your continued use of the Platform following the publication of updates to this Privacy Policy constitutes acceptance of the revised version to the extent permitted by applicable law.

7.2 Information We Collect

The categories of personal data we collect depend on your relationship with the Platform, your role, and the services you use. We collect only the information that is necessary to provide our services, comply with legal obligations, maintain the integrity of competitions, and improve the functionality and security of the Platform.

7.2.1 Account Registration Information

When you create a HDH-IAA account, we may collect:

- First name
- Last name
- Display name (if applicable)
- Email address
- Username
- Encrypted password
- Preferred language
- Country of residence
- Date of account creation
- Account status
- Account verification information

Passwords are never stored in plain text. They are securely hashed using industry-standard cryptographic algorithms.

7.2.2 Personal Profile Information

Users may voluntarily provide additional profile information, including:

- Date of birth
- Gender
- Nationality
- Postal address
- Telephone number
- Emergency contact information

- Club or organization
- Federation membership
- Athlete identification numbers
- Profile photograph
- Biography or personal description
- Social media links (optional)

Certain profile information may be visible to organizers or other participants depending on the user's privacy settings and the requirements of the competition.

7.3 Competition Registration Information

When registering for competitions, the Platform may collect:

- Competition registration details
- Division or category
- Age category
- Equipment category
- Team affiliation
- Federation affiliation
- License or membership numbers
- Qualification status
- Registration date
- Registration history
- Payment status
- Attendance status
- Check-in information
- Competition-specific requirements
- Special accommodations or accessibility requests (where voluntarily provided)

Competition organizers may request additional information necessary for the administration of a specific event.

7.4 Sporting Results and Competition History

The Platform maintains official sporting records relating to competitions managed through Website.

These records may include:

- Competition participation history
- Event results
- Rankings
- Scores
- Qualification results
- Awards
- Medals
- Records achieved
- Team memberships
- Official classifications
- Historical statistics

Because sporting results form part of the official historical record of competitions, certain information may remain publicly available even after an athlete's account has been closed, where permitted by applicable law and justified by the legitimate interests of the sporting community.

7.5 Parent and Legal Guardian Information

Where a participant is a Minor, the Platform may collect information relating to a Parent or Legal Guardian, including:

- Full name
- Email address
- Telephone number
- Country
- Relationship to the Minor
- Emergency contact details
- Verification of parental responsibility where required
- Consent records
- Guardian account information

The Parent or Legal Guardian may:

- create and manage the Minor's account;
- register the Minor for competitions;

- update the Minor's information;
 - receive official communications relating to the Minor's participation;
 - manage payments on behalf of the Minor; and
 - exercise applicable privacy rights on behalf of the Minor, subject to applicable law.
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7.6 Organizer and Federation Information

Competition organizers and federation administrators may provide additional information necessary for organizing sporting events, including:

- Organization name
 - Official address
 - Contact persons
 - Email addresses
 - Telephone numbers
 - Federation identifiers
 - Competition management permissions
 - Administrative roles
 - Organizational settings
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7.7 Payment Information

Where competitions require payment, transactions are processed through secure third-party payment providers.

The Platform may process or receive:

- Payment reference number
- Transaction identifier
- Payment status
- Amount paid
- Currency
- Payment date and time
- Invoice information
- Billing name
- Billing address
- VAT number (where applicable)

- Country for invoicing purposes

The Platform **does not store** full payment card numbers, card verification codes (CVV/CVC), or other sensitive payment credentials.

Payment card data is processed exclusively by certified payment service providers operating in accordance with the Payment Card Industry Data Security Standard (PCI DSS) and applicable financial regulations.

7.8 Communications

When communicating with us, we may process:

- Email correspondence
- Customer support requests
- Contact forms
- Competition inquiries
- Feedback
- Complaint records
- Technical support communications

Communications may be retained to improve our services, resolve disputes, and comply with legal obligations.

7.9 Technical Information

When you access the Platform, certain technical information is collected automatically, including:

- IP address
- Device identifier
- Browser type
- Browser version
- Operating system
- Device type
- Screen resolution
- Time zone
- Language settings
- Referring website
- Date and time of access

- Requested pages
- Session identifiers
- Authentication logs
- Error logs

This information is used primarily for security, diagnostics, fraud prevention, and system administration.

7.10 Cookies and Similar Technologies

The Platform uses cookies and similar technologies to:

- authenticate users;
- maintain active sessions;
- remember user preferences;
- improve website performance;
- enhance usability;
- provide security features;
- generate anonymous usage statistics.

Further information is available in the separate **Cookie Policy**.

7.11 Information from Third Parties

We may receive information from trusted third parties, including:

- payment service providers;
- sports federations;
- competition organizers;
- affiliated clubs;
- authentication providers;
- public sporting databases where legally permitted.

Such information is processed only where necessary for the operation of the Platform or to fulfil contractual and legal obligations.

7.12 Information You Choose Not to Provide

Providing certain personal data is voluntary.

However, failure to provide information required for account creation, identity verification, competition registration, payment processing, or legal compliance may prevent us from providing some or all Platform services.

8.2 Legal Basis for Processing Personal Data

Website processes personal data only where there is a valid legal basis under the General Data Protection Regulation (GDPR) and other applicable data protection laws.

Depending on the service used, one or more legal bases may apply simultaneously.

8.2.1 Performance of a Contract (Article 6(1)(b) GDPR)

We process personal data where such processing is necessary to provide the services requested by the user or to perform obligations arising from the use of the Platform.

This includes, but is not limited to:

- creating and maintaining user accounts;
- authenticating users;
- registering participants for competitions;
- managing competition entries;
- administering sporting events;
- managing athlete classifications and categories;
- publishing competition start lists;
- recording attendance and participation;
- generating competition results;
- maintaining rankings and historical records;
- processing competition-related communications;
- issuing invoices;
- processing online payments;
- providing customer support.

Without this processing, we may be unable to provide the requested services.

8.2.2 Compliance with Legal Obligations (Article 6(1)(c) GDPR)

Certain personal data must be processed in order to comply with legal obligations imposed upon the Data Controller.

Such obligations may include:

- accounting and bookkeeping requirements;
- tax legislation;
- invoicing obligations;
- fraud prevention requirements;
- responding to lawful requests from public authorities;
- compliance with judicial or regulatory proceedings;
- financial reporting obligations;
- retention of legally required business records.

Personal data processed under this legal basis will be retained for the period required by applicable law.

8.3 Legitimate Interests (Article 6(1)(f) GDPR)

We process certain personal data where such processing is necessary for our legitimate interests, provided that these interests are not overridden by the rights and freedoms of the data subject.

Our legitimate interests include:

- ensuring platform security;
- preventing fraud and abuse;
- detecting unauthorized access;
- maintaining system integrity;
- protecting user accounts;
- improving website performance;
- maintaining audit trails;
- resolving technical issues;
- investigating complaints;
- defending legal claims;
- protecting intellectual property;
- preventing duplicate or fraudulent competition registrations;
- maintaining historical sporting records;
- publishing official competition results;
- preserving rankings and championship history;
- statistical analysis of competitions and participation.

Whenever processing is based on legitimate interests, we carefully balance our interests against the rights and freedoms of the individuals concerned.

8.4 Consent (Article 6(1)(a) GDPR)

In certain circumstances, we process personal data based on your freely given consent.

Examples include:

- subscribing to newsletters;
- receiving promotional communications;
- optional marketing activities;
- publication of optional profile information;
- use of optional cookies where required by law;
- uploading optional profile photographs;
- participation in surveys.

Consent may be withdrawn at any time without affecting the lawfulness of processing carried out before the withdrawal.

Withdrawal of consent does not affect processing carried out under other legal bases.

8.5 Processing of Personal Data of Minors

The Platform supports participation by athletes under the age of eighteen (18).

Where required by applicable law, personal data relating to a Minor is processed only with the involvement or authorization of a Parent or Legal Guardian.

Depending on the circumstances, processing may rely on:

- Article 6(1)(b) GDPR (performance of a contract);
- Article 6(1)(c) GDPR (legal obligation);
- Article 6(1)(f) GDPR (legitimate interests);
- Article 6(1)(a) GDPR (parental consent, where legally required).

Parents or Legal Guardians may exercise applicable privacy rights on behalf of the Minor in accordance with applicable legislation.

8.6 Special Categories of Personal Data

Website does not intentionally collect or process special categories of personal data as defined by Article 9 GDPR unless such processing is necessary for the organization of competitions or required by law.

Where applicable, this may include information voluntarily provided regarding:

- medical conditions relevant to competition participation;
- accessibility requirements;
- disability classifications;
- emergency medical information;
- dietary or health-related requirements necessary for event organization.

Such information is processed only:

- with explicit consent;
- where necessary to protect the vital interests of the participant;
- where required by applicable sporting regulations;
- where otherwise permitted by Article 9 GDPR.

Access to such information is strictly limited to authorized personnel who require it for the safe administration of the event.

8.7 Automated Decision-Making

Website does not make decisions producing legal or similarly significant effects based solely on automated processing as described in Article 22 GDPR.

Certain automated processes may be used for administrative purposes, including:

- category assignment based on age;
- calculation of rankings;
- generation of start lists;
- payment status updates;
- eligibility validation based on predefined competition rules.

These automated processes are based on objective competition criteria and remain subject to human oversight where appropriate.

8.8 Data Accuracy

Users are responsible for ensuring that the personal information they provide is accurate, complete, and up to date.

Users may update most personal information through their account settings.

Where inaccurate or outdated information may affect competition participation, rankings, payments, or legal compliance, the Data Controller reserves the right to request verification or supporting documentation.

8.9 Changes to the Legal Basis

Where the purpose of processing changes and a different legal basis becomes applicable, we will update this Privacy Policy and, where required by law, inform affected users before the new processing begins.

Where processing requires renewed consent, such consent will be obtained before the relevant processing activity takes place.

9.2 Purposes of Processing Personal Data

Website processes personal data solely for specified, explicit, and legitimate purposes. We do not process personal data in a manner that is incompatible with the purposes for which it was originally collected, unless required or permitted by applicable law.

The purposes described below may apply depending on your role as a participant, parent or legal guardian, competition organizer, federation representative, volunteer, official, or visitor to the Platform.

9.2.1 User Account Management

Personal data is processed to:

- create and maintain user accounts;
- verify user identity where required;
- authenticate users during login;
- enable secure password recovery;
- manage account preferences;
- maintain user profiles;
- provide account-related notifications;
- prevent duplicate or fraudulent accounts.

9.2.2 Competition Administration

Personal data is processed to organize and administer competitions, including:

- accepting registrations;
- verifying eligibility;
- assigning competition categories;
- preparing start lists;
- managing event schedules;

- administering qualification rounds;
 - recording attendance;
 - managing withdrawals;
 - processing late registrations where permitted;
 - communicating competition updates;
 - issuing participation confirmations.
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9.23 Athlete Management

The Platform processes personal data in order to:

- maintain athlete profiles;
 - manage federation memberships;
 - verify age categories;
 - manage competition history;
 - calculate rankings;
 - maintain performance statistics;
 - preserve official sporting records;
 - administer championships and qualification systems.
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9.24 Parent and Legal Guardian Management

Where a participant is a Minor, personal data may be processed to:

- verify the relationship between the Minor and the Parent or Legal Guardian;
 - manage linked accounts;
 - obtain legally required parental consent;
 - allow guardians to register Minors for competitions;
 - communicate important information regarding competitions;
 - manage emergency contact details;
 - exercise privacy rights on behalf of the Minor where permitted by law.
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9.25 Competition Results and Rankings

The Platform processes competition data in order to:

- calculate official results;

- generate rankings;
- publish scoreboards;
- prepare championship standings;
- maintain historical records;
- issue certificates;
- determine qualification for future competitions;
- recognize sporting achievements.

Official sporting results may remain permanently available as part of the historical record of the sport, where permitted by applicable law.

9.6 Communication

We process personal data to communicate with users regarding:

- account activity;
- competition registrations;
- payment confirmations;
- invoices;
- schedule changes;
- event announcements;
- technical notifications;
- customer support;
- security alerts;
- changes to our legal documents;
- responses to user enquiries.

Communications essential to the operation of the Platform are considered service communications and cannot generally be disabled.

9.7 Payment Processing

Where registration fees or other charges apply, personal data is processed to:

- initiate payment transactions;
- verify payment status;
- reconcile payments with registrations;
- issue invoices or receipts;

- process refunds where applicable;
- detect fraudulent payment activity;
- comply with accounting and tax obligations.

Payment card information is processed exclusively by certified payment service providers. HDH-IAA Platform does not store or have access to complete payment card details.

9.8 Fraud Prevention and Platform Security

Personal data may be processed to:

- detect suspicious activity;
 - prevent unauthorized access;
 - investigate security incidents;
 - identify fraudulent registrations;
 - prevent abuse of the Platform;
 - enforce the Terms of Service;
 - protect users and organizers;
 - maintain audit records;
 - ensure business continuity.
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9.9 Customer Support

We process personal data when responding to:

- technical support requests;
- account recovery requests;
- payment enquiries;
- competition-related questions;
- complaints;
- bug reports;
- accessibility requests;
- feedback and suggestions.

Support communications may be retained for quality assurance, staff training, and dispute resolution.

9.10 Website Improvement

Technical information may be processed to:

- improve website usability;
- monitor system performance;
- identify software defects;
- optimize loading times;
- improve accessibility;
- evaluate feature usage;
- maintain service reliability.

Where possible, statistical information is aggregated or anonymized.

9.11 Legal Compliance

Personal data may be processed where necessary to:

- comply with legal obligations;
 - respond to requests from competent authorities;
 - comply with court orders;
 - satisfy accounting requirements;
 - fulfil tax obligations;
 - retain legally required business records;
 - investigate legal claims;
 - establish, exercise, or defend legal rights.
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9.12 Statistical Analysis

The Platform may generate statistical reports relating to:

- competition participation;
- athlete demographics;
- participation trends;
- federation activity;
- event attendance;
- competition performance;
- registration statistics.

Whenever possible, statistical reports are produced using anonymized or aggregated information that does not identify individual participants.

9.13 Research and Sport Development

Anonymized or aggregated data may be used for:

- improving competition organization;
- developing sporting regulations;
- evaluating participation trends;
- supporting federation planning;
- producing historical analyses;
- promoting the development of sport.

Such analyses do not identify individual users unless explicit consent has been obtained or another lawful basis applies.

9.14 Business Administration

Personal data may also be processed for legitimate administrative purposes, including:

- internal audits;
 - financial management;
 - contract administration;
 - insurance matters;
 - business continuity planning;
 - system maintenance;
 - compliance monitoring;
 - risk management.
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9.15 Future Processing

Should HDH-IAA Platform intend to process personal data for a purpose materially different from those described in this Privacy Policy, users will be informed before such processing begins, unless notification is not required by applicable law.

Where required, additional consent will be obtained before processing personal data for a new purpose.

10. Sharing and Disclosure of Personal Data

HDH-IAA Platform respects the confidentiality of your personal data. We do not sell, rent, or trade personal information to third parties for their own marketing purposes.

Personal data is disclosed only where necessary to provide the Platform's services, comply with legal obligations, protect legitimate interests, or where disclosure has been authorized by the data subject.

10.1 Competition Organizers

When you register for a competition, your personal data is shared with the organizer of that competition.

Depending on the event, the organizer may receive information including:

- participant name;
- athlete identification number;
- date of birth or age category;
- gender;
- nationality;
- club or federation;
- competition category;
- payment status;
- registration history;
- emergency contact information where required for participant safety;
- special accommodation requests voluntarily provided by the participant.

Competition organizers process personal data solely for the administration of the competition and in accordance with applicable data protection legislation.

Depending on the organizational structure of the event, the competition organizer may act as an independent Data Controller or as a Joint Controller with the Platform operator.

10.2 National and International Federations

Where competitions are organized under the authority of national or international sports federations, relevant participant information may be shared for purposes including:

- athlete eligibility verification;
- membership validation;
- rankings;
- championship qualification;
- official sporting records;

- disciplinary procedures where applicable;
- statistical reporting;
- historical sporting archives.

Federations are responsible for processing the information they receive in accordance with their own legal obligations.

10.3 Parent or Legal Guardian Access

Where a participant is a Minor, designated Parent or Legal Guardian accounts may access personal information necessary to:

- manage registrations;
- update participant information;
- receive official notifications;
- complete payments;
- review competition schedules;
- access competition results;
- exercise applicable privacy rights on behalf of the Minor.

Access is limited according to the permissions assigned within the Platform.

10.4 Payment Service Providers

Online payments are processed by certified third-party payment service providers.

To complete payment transactions, certain information may be shared, including:

- transaction reference;
- payment amount;
- currency;
- invoice identifier;
- payer identification;
- billing information required by applicable financial legislation.

Payment card numbers, security codes (CVV/CVC), and other sensitive authentication data are never stored or processed by HDH-IAA Platform.

Payment providers are independently responsible for complying with applicable financial regulations, including PCI DSS and relevant payment services legislation.

10.5 Hosting and Cloud Infrastructure Providers

Personal data may be processed by carefully selected hosting providers and cloud infrastructure providers acting on behalf of the Data Controller.

Such providers process personal data only:

- under written contractual agreements;
 - according to documented instructions;
 - using appropriate technical and organizational security measures;
 - in compliance with applicable data protection legislation.
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10.6 Technical Service Providers

The Platform may use specialized service providers for:

- email delivery;
- system monitoring;
- security monitoring;
- software maintenance;
- backup services;
- technical support;
- authentication services;
- logging and diagnostics;
- document generation;
- notification delivery.

Each provider is contractually required to process personal data only to the extent necessary for providing its services.

10.7 Public Competition Information

To ensure transparency and integrity of sporting competitions, certain participant information may be publicly displayed.

This may include:

- participant name;
- country;
- club or federation;
- competition category;

- start lists;
- shooting groups or heats;
- schedules;
- scores;
- rankings;
- medals;
- awards;
- championship standings;
- historical competition results.

Publication of such information is considered necessary for the legitimate operation of sporting competitions and the preservation of official sporting records.

10.3 Legal Requirements

We may disclose personal data where disclosure is required by law or where we reasonably believe disclosure is necessary to:

- comply with legal obligations;
 - respond to lawful requests by public authorities;
 - comply with court orders;
 - protect our legal rights;
 - investigate fraud;
 - prevent criminal activity;
 - protect the safety of participants;
 - enforce our Terms of Service.
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10.9 Business Transfers

In the event of a merger, acquisition, restructuring, asset transfer, or similar corporate transaction, personal data may be transferred to the successor organization, provided appropriate safeguards are implemented and users are informed where required by law.

10.10 International Data Transfers

Because HDH-IAA Platform is an international competition management platform, personal data may be transferred to organizations located outside the European Economic Area (EEA).

Where such transfers occur, appropriate safeguards will be implemented, including where applicable:

- adequacy decisions adopted by the European Commission;
- Standard Contractual Clauses (SCCs);
- legally approved certification mechanisms;
- other safeguards recognized under Chapter V of the GDPR.

Transfers will occur only where necessary for the provision of services or where otherwise permitted by applicable law.

10.1 No Sale of Personal Data

HDH-IAA Platform does not sell personal data.

We do not disclose personal information to third parties for behavioral advertising or unrelated commercial marketing purposes.

Any sharing of personal data is limited to the purposes described in this Privacy Policy or otherwise required by law.

10.2 Confidentiality Obligations

Employees, contractors, volunteers, competition officials, and service providers with access to personal data are required to maintain appropriate confidentiality.

Access to personal data is granted only where necessary for the performance of assigned duties and is subject to role-based access controls, security monitoring, and internal confidentiality obligations.

11 Data Security and Protection Measures

The protection of personal data is a fundamental responsibility of HDH-IAA Platform. We implement appropriate technical and organizational measures designed to ensure a level of security appropriate to the risks associated with the processing of personal data, taking into account the nature, scope, context, and purposes of processing.

Our security program is regularly reviewed and updated to address evolving threats, technological developments, and legal requirements.

11.1 Security Principles

HDH-IAA Platform is designed and operated in accordance with the principles of:

- confidentiality;
- integrity;

- availability;
- resilience;
- accountability;
- privacy by design;
- privacy by default;
- least privilege access;
- defense in depth.

These principles guide both the technical architecture of the Platform and our internal operational procedures.

11.2 Encryption

We use industry-standard encryption technologies to protect personal data during transmission.

Security measures include:

- HTTPS connections secured using TLS encryption;
- encrypted communication between Platform components where applicable;
- encrypted administrative access;
- secure API communications;
- encryption of sensitive configuration data where appropriate.

Passwords are never stored in plain text and are protected using secure one-way cryptographic hashing algorithms.

11.3 Access Control

Access to personal data is restricted to authorized personnel who require access to perform their assigned responsibilities.

Security measures include:

- role-based access control;
- unique administrator accounts;
- authentication requirements;
- permission-based authorization;
- separation of administrative roles;
- logging of privileged activities;
- periodic review of access rights.

Administrative privileges are granted only on the basis of operational necessity.

11.4 Authentication Security

The Platform incorporates security mechanisms designed to protect user accounts, including:

- secure password authentication;
- password hashing;
- account verification where applicable;
- password reset procedures;
- session management;
- automatic session expiration after periods of inactivity;
- protection against unauthorized login attempts;
- monitoring of suspicious authentication activity.

Users are responsible for maintaining the confidentiality of their account credentials.

11.5 Infrastructure Security

HDH-IAA Platform is hosted using professionally managed infrastructure designed to provide:

- physical security;
- network security;
- firewall protection;
- intrusion detection where available;
- malware protection;
- operating system updates;
- software security updates;
- vulnerability management;
- continuous infrastructure monitoring.

Infrastructure providers are selected based on recognized security standards and contractual data protection commitments.

11.6 Logging and Monitoring

To protect the Platform and investigate security incidents, HDH-IAA Platform maintains appropriate system logs.

Logged information may include:

- login events;
- failed authentication attempts;
- administrative actions;
- security events;
- application errors;
- system performance information;
- audit records;
- API activity where applicable.

Logs are retained only for as long as necessary for security, operational, and legal purposes.

11.7 Data Backup and Recovery

Regular backups are performed to protect against accidental loss or corruption of data.

Backup procedures include:

- scheduled backups;
- secure storage of backup media;
- controlled access to backup data;
- periodic restoration testing where appropriate;
- disaster recovery planning.

Backups are protected using security measures comparable to those applied to production systems.

11.8 Incident Detection and Response

HDH-IAA Platform maintains procedures for identifying, investigating, managing, and responding to security incidents.

These procedures include:

- incident reporting;
- incident assessment;
- containment measures;
- recovery procedures;
- documentation of incidents;
- corrective actions;
- post-incident review.

Where required by applicable law, personal data breaches will be reported to the competent supervisory authority and, where necessary, to affected individuals within the timeframes established by the GDPR.

11.9 Secure Software Development

The Platform is developed following secure software development practices designed to reduce security risks throughout the software lifecycle.

These practices include:

- code review procedures;
 - controlled deployment processes;
 - testing before production release;
 - security updates;
 - dependency management;
 - vulnerability remediation;
 - change management.
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11.10 Third-Party Security

Where third-party service providers process personal data on behalf of HDH-IAA Platform, we seek to ensure that they implement appropriate technical and organizational security measures.

Service providers are selected based on factors including:

- security capabilities;
- contractual commitments;
- regulatory compliance;
- reliability;
- operational stability.

Where required, Data Processing Agreements (DPAs) are concluded with processors.

11.11 Employee Confidentiality

Employees, contractors, volunteers, and authorized administrators with access to personal data are required to:

- maintain confidentiality;
- access only information necessary for their duties;
- comply with internal security policies;

- report suspected security incidents;
- complete appropriate security and privacy awareness training where applicable.

Unauthorized access to personal data may result in disciplinary or legal action.

11.2 User Responsibilities

Users also play an important role in protecting personal data.

Users are encouraged to:

- choose strong and unique passwords;
- keep login credentials confidential;
- avoid sharing accounts with others;
- log out from shared devices;
- keep their devices secure;
- promptly report suspected unauthorized access;
- maintain accurate account information.

Failure to protect account credentials may increase the risk of unauthorized access for which the Platform cannot be responsible where such access results from user negligence.

11.3 Security Limitations

Although HDH-IAA Platform applies appropriate technical and organizational measures to protect personal data, no system connected to the Internet can guarantee absolute security.

Accordingly, while we continuously work to protect the Platform and its users, we cannot warrant that unauthorized access, cyberattacks, technical failures, or other unforeseen events will never occur.

Users acknowledge the inherent risks associated with electronic communications and internet-based services.

11.4 Continuous Improvement

Information security is an ongoing process.

We regularly evaluate our security measures in light of:

- technological developments;
- newly identified threats;
- legal and regulatory changes;
- operational experience;

- industry best practices.

Where appropriate, additional safeguards will be implemented to maintain an appropriate level of protection throughout the lifecycle of the Platform.

12.2 Data Retention

HDH-IAA Platform retains personal data only for as long as necessary to fulfil the purposes for which it was collected, to comply with applicable legal obligations, to resolve disputes, to enforce agreements, and to preserve official sporting records where justified.

Retention periods may vary depending on the type of information, the applicable legal requirements, contractual obligations, and the nature of the services provided.

When personal data is no longer required, it will be securely deleted, anonymized, or archived in accordance with applicable laws and organizational policies.

12.3 General Retention Principles

Personal data is retained only for the period necessary to:

- provide Platform services;
- administer competitions;
- maintain sporting records;
- comply with legal obligations;
- meet accounting and taxation requirements;
- resolve complaints or disputes;
- investigate fraud or security incidents;
- protect legal rights and legitimate interests.

Where several legal obligations apply simultaneously, the longest mandatory retention period may be used.

12.4 User Accounts

Account information is retained while the account remains active.

If a user requests deletion of an account, personal data will be deleted or anonymized unless retention is required:

- by law;
- for accounting purposes;
- for unresolved disputes;
- for fraud prevention;
- to preserve official competition records.

Inactive accounts may be reviewed periodically and removed after an extended period of inactivity, subject to applicable legal obligations.

12~~2~~3 Competition Registrations

Competition registration records may be retained for up to **five (5) years** after the completion of the relevant competition, unless a longer retention period is required by:

- applicable legislation;
 - federation regulations;
 - insurance requirements;
 - dispute resolution procedures;
 - anti-doping regulations;
 - safeguarding policies.
-

12~~2~~4 Sporting Results and Historical Records

Official sporting results form part of the historical record of competitions.

Accordingly, information including:

- participant names;
- competition categories;
- rankings;
- scores;
- medals;
- awards;
- championship standings;
- records achieved;
- historical statistics;

may be retained for an indefinite period where necessary to preserve the integrity and history of the sport.

Where possible, historical archives will contain only information relevant to the sporting record.

12~~2~~5 Payment and Financial Records

Financial records, including invoices and transaction references, are retained in accordance with applicable accounting and tax legislation.

Unless a longer period is required by law, such records may be retained for up to **eight (8) years**.

Payment card information is **never stored** by HDH-IAA Platform.

12~~6~~ Parent and Legal Guardian Records

Information relating to Parents or Legal Guardians may be retained for as long as the linked Minor's account remains active and for an appropriate period thereafter where necessary to:

- demonstrate parental authorization;
- comply with safeguarding obligations;
- resolve disputes;
- satisfy legal requirements.

Where the Minor reaches the age of majority, the relationship between the Parent or Legal Guardian and the participant account may be modified or removed in accordance with Platform procedures and applicable law.

12~~7~~ Customer Support Communications

Support requests, correspondence, and complaint records may be retained for up to **three (3) years** after the matter has been resolved, unless a longer retention period is required for legal proceedings or regulatory compliance.

12~~8~~ Technical Logs

System logs and security records may be retained for up to **twelve (12) months**, unless extended retention is necessary for:

- cybersecurity investigations;
- fraud prevention;
- incident response;
- legal proceedings;
- regulatory requirements.

Where feasible, technical logs are anonymized after operational use.

12~~9~~ Marketing Communications

Where users have consented to receive marketing communications, the related contact information will be retained until:

- consent is withdrawn;
- the user unsubscribes;

- the account is deleted; or
- continued retention is no longer justified.

Withdrawal of consent does not affect previous lawful processing.

12.10 Legal Claims

Where personal data is required for the establishment, exercise, or defence of legal claims, the information may be retained until the relevant proceedings have been concluded and any applicable limitation periods have expired.

12.11 Backups

Personal data contained in secure backup systems may remain available for a limited period after deletion from active systems.

Backup copies:

- are protected by appropriate security measures;
- are not used for routine processing;
- are overwritten or securely destroyed in accordance with the Platform's backup lifecycle.

Where restoration from backups is necessary, any deleted personal data will be removed again as soon as reasonably practicable.

12.12 Anonymization

Where possible, personal data that is no longer required for identification purposes may be anonymized and retained for:

- statistical analysis;
- historical research;
- sport development;
- system improvement;
- performance reporting.

Once data has been irreversibly anonymized, it is no longer considered personal data under the GDPR.

12.13 Deletion Requests

Users may request the deletion of their personal data in accordance with Article 17 of the GDPR.

However, deletion requests may be refused or only partially fulfilled where retention is necessary:

- to comply with legal obligations;
- to establish, exercise, or defend legal claims;
- to protect the integrity of official sporting records;
- to safeguard competition history;
- for reasons of substantial public interest;
- for archiving purposes in the public interest, scientific or historical research, or statistical purposes, where permitted by applicable law.

Where complete deletion is not possible, processing will be restricted to the minimum extent required.

12.14 Periodic Review

Retention periods are reviewed periodically to ensure that personal data is not retained longer than necessary.

Where changes in legislation, sporting regulations, operational requirements, or technology occur, retention schedules may be updated accordingly.

Any material changes affecting users' rights will be reflected in this Privacy Policy.

13.2 Your Rights Under the GDPR

If you are located in the European Economic Area (EEA), the United Kingdom, or another jurisdiction providing similar legal protections, you have certain rights regarding the processing of your personal data.

HDH-IAA Platform is committed to facilitating the exercise of these rights in accordance with applicable data protection legislation.

To exercise any of the rights described below, you may contact the Data Controller using the contact details provided in this Privacy Policy.

We may request additional information to verify your identity before processing your request in order to protect your personal data from unauthorized disclosure.

13.2.1 Right of Access

You have the right to request confirmation as to whether we process your personal data.

Where personal data is being processed, you have the right to receive information including:

- the categories of personal data processed;
- the purposes of processing;
- the recipients or categories of recipients;

- the expected retention period;
- the source of the data where it was not obtained directly from you;
- the safeguards applied to international transfers, where applicable;
- the existence of automated decision-making, where relevant.

You may also request a copy of your personal data.

13.2 Right to Rectification

If your personal data is inaccurate or incomplete, you have the right to request its correction.

Many profile details can be updated directly through your HDH-IAA Platform account.

Certain competition-related information may require approval by the competition organizer or federation before changes become effective.

13.3 Right to Erasure ("Right to be Forgotten")

You may request deletion of your personal data where one of the grounds set out in Article 17 GDPR applies.

However, this right is not absolute.

We may retain certain information where processing remains necessary for:

- compliance with legal obligations;
- accounting or taxation requirements;
- fraud prevention;
- legal claims;
- safeguarding obligations;
- preservation of official sporting records;
- maintenance of historical rankings and competition results;
- archiving in the public interest;
- scientific, historical, or statistical purposes where permitted by law.

Where complete deletion is not possible, processing will be restricted to the minimum extent necessary.

13.4 Right to Restriction of Processing

You may request that we temporarily restrict the processing of your personal data where:

- you contest its accuracy;

- processing is unlawful but you oppose deletion;
- the data is required for legal claims;
- you have objected to processing pending verification of legitimate grounds.

During a period of restriction, personal data will generally be stored but not otherwise processed except where permitted by law.

13~~5~~ Right to Data Portability

Where processing is based on consent or on the performance of a contract and carried out by automated means, you may request a copy of your personal data in a structured, commonly used, and machine-readable format.

Where technically feasible, you may also request that such information be transmitted directly to another controller.

This right does not generally apply to official sporting records or information processed under legal obligations or legitimate interests.

13~~6~~ Right to Object

Where processing is based on legitimate interests, you have the right to object to such processing.

We will cease processing unless we demonstrate compelling legitimate grounds that override your interests, rights, and freedoms or where processing is necessary for legal claims.

You also have the right to object to the processing of your personal data for direct marketing purposes at any time.

13~~7~~ Right to Withdraw Consent

Where processing is based on your consent, you may withdraw that consent at any time.

Withdrawal of consent:

- does not affect processing carried out before the withdrawal;
 - does not affect processing based on other legal grounds;
 - may affect the availability of certain optional Platform features.
-

13~~8~~ Rights Relating to Automated Decision-Making

HDH-IAA Platform does not make decisions producing legal or similarly significant effects solely through automated processing within the meaning of Article 22 GDPR.

Automated calculations used for competition administration, such as rankings, category assignments, and qualification calculations, are based on predefined sporting rules and remain subject to organizer oversight where appropriate.

13.9 Rights of Parents and Legal Guardians

Where a participant is a Minor, a verified Parent or Legal Guardian may, where permitted by applicable law:

- access the Minor's personal information;
- update the Minor's profile;
- manage competition registrations;
- provide or withdraw consent where applicable;
- exercise GDPR rights on behalf of the Minor.

Once the participant reaches the age of majority, these rights may be transferred directly to the participant in accordance with applicable legislation and Platform procedures.

13.10 Right to Lodge a Complaint

If you believe that your personal data has been processed in violation of applicable data protection laws, you have the right to lodge a complaint with the competent supervisory authority.

If the Data Controller is established in Hungary, complaints may be submitted to:

National Authority for Data Protection and Freedom of Information (NAIH)

Address:

1055 Budapest, Falk Miksa utca 9–11
Hungary

Website: <https://www.naih.hu>

You also have the right to seek judicial remedies through the competent courts.

13.11 Exercising Your Rights

Requests relating to your personal data may be submitted using the contact details provided in this Privacy Policy.

To help us process your request efficiently, please include:

- your full name;
- the email address associated with your account;
- a description of the request;

- any additional information necessary to identify the relevant records.

We may request reasonable proof of identity before responding.

13.2 Response Time

We will respond to requests concerning your personal data without undue delay and, in any event, within **one (1) month** of receipt.

Where requests are particularly complex or numerous, this period may be extended by up to **two additional months**, in accordance with Article 12 GDPR.

Where an extension is necessary, you will be informed of the reasons before the initial one-month period expires.

13.3 No Fee for Standard Requests

Requests to exercise your GDPR rights are generally provided free of charge.

However, where requests are manifestly unfounded, excessive, or repetitive, we reserve the right to:

- charge a reasonable administrative fee; or
- refuse to act on the request,

as permitted by Article 12(5) GDPR.

13.4 Contact for Privacy Requests

Questions regarding this Privacy Policy or requests concerning personal data may be directed to:

HDH-IAA International Archery Association

Email: info@hdhiaa.net

Where a Data Protection Officer (DPO) has been appointed, their contact details will be published on the Platform and made available through the official website.

14. Cookies and Similar Technologies

HDH-IAA Platform uses cookies and similar technologies to provide, protect, and improve the Platform, enhance user experience, maintain security, and support the proper operation of our services.

This section provides a general overview of our use of cookies. More detailed information, including the list of cookies, their retention periods, and configuration options, is available in our separate **Cookie Policy**.

14.1 What Are Cookies?

Cookies are small text files that are stored on your computer, smartphone, tablet, or other device when you visit a website.

Cookies allow the Platform to recognize your browser, remember your preferences, maintain secure sessions, and improve the overall functionality of the Website.

In addition to cookies, HDH-IAA Platform may use similar technologies such as local storage, session storage, security tokens, and other technologies that perform comparable functions.

14.2 Types of Cookies We Use

Essential Cookies

Essential cookies are necessary for the operation of the Platform and cannot generally be disabled.

They are used to:

- authenticate users;
- maintain secure login sessions;
- remember security settings;
- protect against unauthorized access;
- prevent fraudulent activity;
- balance server load;
- ensure proper functionality of the Platform.

Because these cookies are necessary for providing the requested service, they are processed on the basis of our legitimate interest and, where applicable, the performance of a contract.

Functional Cookies

Functional cookies improve usability by remembering user preferences, including:

- preferred language;
- interface settings;
- regional preferences;
- accessibility options;
- user interface customization.

These cookies help provide a more personalized user experience.

Analytics Cookies

Subject to applicable legal requirements and your cookie preferences, analytics cookies may be used to understand how visitors interact with the Platform.

Analytics information may include:

- pages visited;
- session duration;
- navigation patterns;
- browser information;
- device type;
- approximate geographic region;
- feature usage;
- system performance metrics.

Where possible, analytics information is aggregated or anonymized.

Performance Cookies

Performance cookies help us identify technical issues and improve system reliability.

These cookies may collect information relating to:

- loading times;
- application errors;
- failed requests;
- resource utilization;
- service availability.

The information collected is generally used in aggregated form for operational purposes.

14.3 Third-Party Cookies

Certain features of the Platform may rely on services provided by trusted third parties.

Where such services are enabled, third parties may place cookies or similar technologies in accordance with their own privacy policies.

Examples may include:

- payment service providers;
- embedded maps;
- content delivery networks (CDNs);
- identity or authentication providers;

- analytics providers;
- customer support tools.

HDH-IAA Platform does not control third-party cookies and encourages users to review the privacy and cookie policies of those providers.

14.4 Cookie Consent

Where required by applicable law, users will be presented with a cookie consent mechanism allowing them to:

- accept all cookies;
- reject non-essential cookies;
- customize cookie preferences;
- withdraw previously granted consent.

Your cookie preferences may be changed at any time through the cookie settings available on the Platform.

Essential cookies remain active because they are necessary for the secure operation of the Platform.

14.5 Browser Controls

Most web browsers allow users to control cookies through browser settings.

You may choose to:

- delete stored cookies;
- block future cookies;
- receive notifications before cookies are stored;
- restrict third-party cookies.

Please note that disabling certain cookies may reduce the functionality of the Platform or prevent some services from operating correctly.

14.6 Retention of Cookie Data

Cookies remain stored for different periods depending on their purpose.

In general:

- session cookies are deleted when your browser is closed;
- persistent cookies remain until they expire or are manually deleted;

- security-related cookies are retained only for the period necessary to protect user sessions;
- analytics cookies are retained in accordance with our Cookie Policy and applicable legal requirements.

Detailed retention periods are published in the separate Cookie Policy.

14.7 Do Not Track

Some web browsers provide a "Do Not Track" (DNT) feature.

Because there is currently no universally accepted standard governing DNT signals, the Platform may not respond to all DNT requests.

Users may instead manage tracking technologies through their browser settings and the Platform's cookie preference center.

14.8 Changes to Cookie Technologies

As the Platform evolves, new cookies or similar technologies may be introduced to support additional functionality, improve security, or enhance user experience.

Where required by law, users will be informed and, where applicable, their consent will be obtained before new non-essential cookies are activated.

14.9 Cookie Policy

This section provides a general overview of the Platform's use of cookies.

A separate **Cookie Policy** forms an integral part of this Privacy Policy and contains detailed information regarding:

- individual cookies;
- providers;
- legal basis;
- storage periods;
- purposes;
- consent management;
- methods for changing cookie preferences.

15. Changes to this Privacy Policy

HDH-IAA Platform reserves the right to amend or update this Privacy Policy from time to time in order to reflect changes in applicable legislation, regulatory guidance, technological developments, business operations, Platform functionality, or data processing activities.

We encourage all users to review this Privacy Policy periodically to remain informed about how their personal data is collected, used, protected, and shared.

15.1 Reasons for Updates

This Privacy Policy may be updated for reasons including, but not limited to:

- changes in applicable data protection legislation;
- new regulatory guidance;
- implementation of new Platform features;
- introduction of additional services;
- changes to payment processing;
- implementation of new security measures;
- changes to third-party service providers;
- organizational restructuring;
- improvements to privacy practices;
- clarification of existing provisions.

Updates are made only where reasonably necessary and are intended to improve transparency and legal compliance.

15.2 Notification of Changes

Where changes materially affect the processing of personal data or the rights of users, HDH-IAA Platform will provide appropriate notice before the changes become effective.

Depending on the nature of the update, notification may be provided through one or more of the following methods:

- publication on the Platform;
- notification upon user login;
- email communication;
- in-application notification;
- updates on the official website.

Minor editorial changes or corrections that do not materially affect users' rights may be implemented without individual notification.

15.3 Effective Date

Each version of this Privacy Policy includes:

- an Effective Date;
- a Last Updated date; and
- where appropriate, a version number.

The most recent version published on the Platform supersedes all previous versions unless otherwise stated.

15.4 Continued Use of the Platform

Where permitted by applicable law, continued use of the Platform after the effective date of an updated Privacy Policy constitutes acknowledgment of the revised Policy.

Where changes require explicit consent under applicable law, the necessary consent will be obtained before the relevant processing activities commence.

15.5 Historical Versions

Previous versions of this Privacy Policy may be retained for legal, compliance, and auditing purposes.

Upon reasonable request, users may obtain information regarding material changes made between versions, where such disclosure is appropriate and permitted by law.

16. Contact Information and Final Provisions

16.1 Contact Information

If you have any questions regarding this Privacy Policy or the processing of your personal data, or if you wish to exercise your rights under applicable data protection legislation, please contact the Data Controller using the details below.

Data Controller

HDH-IAA International Archery Association

Address:

Margit utca 28
1163 Budapest
Hungary

Email: info@hdh-iaa.net

Website: <https://hdh-iaa.net>

Where a Data Protection Officer (DPO) has been appointed, the relevant contact details will be published on the Platform and on the official website.

16.2 Privacy Requests

Requests relating to personal data may include, but are not limited to:

- requests for access to personal data;
- requests for rectification;
- requests for erasure;
- requests for restriction of processing;
- requests for data portability;
- objections to processing;
- withdrawal of consent;
- questions regarding international data transfers;
- complaints regarding the processing of personal data.

To help us process your request efficiently, please include sufficient information to identify your account and describe your request.

We may request reasonable proof of identity before disclosing personal data or taking action on your request.

16.3 Applicable Law

This Privacy Policy shall be governed by and interpreted in accordance with:

- Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR);
- applicable Hungarian legislation governing data protection and electronic commerce;
- and any other mandatory laws applicable to the processing of personal data.

Nothing in this Privacy Policy limits any rights granted to data subjects under applicable law.

16.4 Supervisory Authority

If you believe that your personal data has been processed in violation of applicable law, you have the right to lodge a complaint with the competent supervisory authority.

For the Data Controller established in Hungary, the competent supervisory authority is:

National Authority for Data Protection and Freedom of Information (NAIH)

Address:

Falk Miksa utca 9–11
1055 Budapest
Hungary

Website: <https://www.naih.hu>

You also have the right to seek judicial remedies before the competent courts.

16~~5~~ Severability

If any provision of this Privacy Policy is determined by a competent court or authority to be invalid, unlawful, or unenforceable, that provision shall be interpreted to the minimum extent necessary to make it enforceable.

The remaining provisions shall remain in full force and effect.

16~~6~~ No Waiver

Failure by the Data Controller to enforce any provision of this Privacy Policy shall not constitute a waiver of any rights or provisions contained herein.

Any waiver shall be effective only if made expressly in writing.

16~~7~~ Language

This Privacy Policy has been prepared in the English language.

Where translations into other languages are provided for convenience, the English version shall prevail in the event of any inconsistency or conflict, unless otherwise required by mandatory local law.

16~~8~~ Relationship with Other Policies

This Privacy Policy should be read together with the following documents published by HDH-IAA Platform, where applicable:

- Terms of Service;
- Cookie Policy;
- Parent/Guardian Consent Policy;
- Competition Data Processing Policy;
- Refund and Payment Policy;
- Data Retention Policy;
- Data Processing Agreement (where applicable).

These documents complement one another and collectively describe the rules governing the use of the Platform and the processing of personal data.

16~~9~~ Effective Date

This Privacy Policy becomes effective on the date indicated at the beginning of this document.

It remains in force until replaced by a subsequent version published by the Data Controller.

16.10 Acknowledgement

By creating an account, registering for a competition, submitting personal data, acting as a Parent or Legal Guardian, organizing events, or otherwise using the HDH-IAA Platform Platform, you acknowledge that you have read and understood this Privacy Policy.

Where consent is required under applicable law, such consent will be requested separately and recorded through the appropriate mechanisms provided by the Platform.

Document Information

Document Title: Privacy Policy

Platform: HDH-IAA Platform Competition Management Platform

Version: 1.0

Language: English

Prepared for: HDH-IAA International Archery Association

Applicable Regulation: Regulation (EU) 2016/679 (GDPR)