# **Privacy Policy**

Pitchallo Effective Date: 26 November 2025

### 1. Introduction

Pitchallo ABN: 95415463059 ("Pitchallo", "we", "us", or "our") is committed to protecting the privacy of individuals who use our AI-powered sports facility management platform. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information in accordance with the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles ("APPs").

By accessing or using the Pitchallo platform, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree with this Privacy Policy, please do not use our services.

# 2. About This Privacy Policy

This Privacy Policy applies to all personal information collected by Pitchallo through our website, web application, mobile application, and any related services (collectively, the "Platform"). It describes our practices regarding the collection, use, disclosure, and protection of personal information.

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We will notify you of any material changes by posting the updated Privacy Policy on our Platform with a new effective date. Your continued use of the Platform after such changes constitutes your acceptance of the updated Privacy Policy.

# 3. Types of Personal Information We Collect

"Personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in a material form or not. We may collect and hold the following types of personal information:

### 3.1 Identity and Contact Information

- Full name and preferred name
- · Email address
- Phone number(s)
- · Postal address and suburb/city
- Club or organisation affiliation
- Role within the organisation (e.g., administrator, coach, coordinator)

### 3.2 Account and Authentication Information

- Username and password (encrypted)
- Account preferences and settings
- · Authentication tokens and session data
- Multi-factor authentication details (if enabled)

# 3.3 Subscription and Payment Information

- Subscription tier and billing cycle
- Payment method details (processed securely through Stripe)
- Billing address
- Transaction history and invoices

## 3.4 Usage and Technical Data

- · IP address and device identifiers
- Browser type and version
- Operating system
- · Access times and dates
- · Pages viewed and features used
- Referral URLs

### 3.5 Facility and Allocation Data

- Pitch and facility booking information
- Training and match schedules
- Team and participant details associated with allocations
- Facility sharing arrangements between clubs

#### 3.6 Sensitive Information

We do not generally collect sensitive information (as defined under the Privacy Act) such as health information, racial or ethnic origin, political opinions, religious beliefs, sexual orientation, or criminal records. If we ever need to collect sensitive information, we will obtain your explicit consent in accordance with APP 3.3, unless an exception applies under the Privacy Act.

### 4. How We Collect Personal Information

We collect personal information in accordance with APP 3 through the following means:

#### 4.1 Directly from You

- When you create an account or register on the Platform
- · When you subscribe to our services or make a payment
- When you complete forms, surveys, or questionnaires

- When you contact us via email, phone, or through the Platform
- When you use our Platform's features and functionality
- When you participate in promotions or special offers

### 4.2 From Third Parties

- · From club administrators who add you as a team member or user
- From partner organisations with whom you have a relationship
- From third-party authentication providers (e.g., Google Sign-In)
- From payment processors (Stripe) for transaction verification

## 4.3 Automatically Through Technology

- Through cookies and similar tracking technologies
- Through server logs and analytics tools
- Through Firebase and Google Analytics

Where practicable, we will collect personal information directly from you. If we collect personal information about you from a third party, we will take reasonable steps to notify you of that collection as required by APP 5.

# 5. Purposes for Collecting Personal Information

In accordance with APP 6, we only collect personal information that is reasonably necessary for, or directly related to, one or more of our functions or activities. We collect and use your personal information for the following purposes:

### **5.1 Primary Purposes**

- To provide, operate, and maintain the Pitchallo Platform
- To manage user accounts and authentication
- · To process pitch allocations and facility bookings
- To enable communication between clubs, coaches, and participants
- To process subscription payments and manage billing
- To provide customer support and respond to enquiries
- To send service-related notifications and updates

### **5.2 Secondary Purposes**

- To improve and enhance our Platform and services
- To conduct research and analytics to understand user behaviour
- To develop new features and functionality
- To send marketing communications (with your consent)
- To comply with legal obligations and regulatory requirements

- To protect our rights, property, and the safety of our users
- To detect, prevent, and address fraud or security issues

### 6. Use of Personal Information

In accordance with APP 6, we will only use your personal information for the primary purpose for which it was collected, or for a secondary purpose that is related to the primary purpose (or directly related, in the case of sensitive information) and which you would reasonably expect.

We may use your personal information for a secondary purpose that is not related to the primary purpose if you have consented to the use, or if an exception under APP 6.2 applies.

## 6.1 Direct Marketing

We may use your personal information to send you direct marketing communications about our products and services. In accordance with APP 7, we will always provide you with the ability to opt out of receiving such communications. You can opt out at any time by clicking the "unsubscribe" link in our emails, updating your preferences in your account settings, or contacting us directly.

We will not use your sensitive information for direct marketing purposes without your express consent.

### 7. Disclosure of Personal Information

In accordance with APP 6, we may disclose your personal information to third parties in the following circumstances:

#### 7.1 Service Providers

We engage trusted third-party service providers to assist us in operating our Platform. These providers include:

- Firebase/Google Cloud Platform hosting, database, and authentication services
- Stripe payment processing
- Netlify web hosting and deployment
- Google Maps API satellite imagery and mapping services
- Australian Bureau of Meteorology weather data services
- Email service providers transactional and marketing emails

We require all service providers to comply with applicable privacy laws and to only use personal information for the purposes of providing services to us.

### 7.2 Facility Sharing Between Clubs

Our Platform enables clubs to share facility information with partner clubs. When you use facility sharing features, relevant allocation and contact information may be disclosed to authorised users at partner clubs. This sharing is controlled by your club's administrators, and you should contact them if you have questions about what information is shared.

### 7.3 Legal Requirements

We may disclose personal information when required or authorised by law, including to comply with court orders, subpoenas, or other legal processes, to respond to lawful requests from government authorities, to enforce our Terms of Service or other agreements, and to protect our rights, privacy, safety, or property, or that of our users or the public.

### 7.4 Business Transfers

In the event of a merger, acquisition, reorganisation, or sale of assets, your personal information may be transferred as part of that transaction. We will notify you via email and/or prominent notice on our Platform of any change in ownership or use of your personal information.

### 8. Cross-Border Disclosure of Personal Information

In accordance with APP 8, we take reasonable steps to ensure that overseas recipients of personal information comply with the APPs or are bound by a substantially similar privacy regime.

Some of our service providers may store or process personal information in countries outside Australia, including:

- United States Google Cloud Platform/Firebase, Stripe, Netlify
- Other countries where our service providers maintain data centres

By using our Platform, you consent to the transfer of your personal information to these countries. We take steps to ensure that our overseas recipients handle your personal information in a manner consistent with this Privacy Policy and applicable Australian privacy laws.

# 9. Data Quality and Security

## 9.1 Data Quality (APP 10)

We take reasonable steps to ensure that the personal information we collect, use, and disclose is accurate, up-to-date, complete, and relevant. We encourage you to update your personal information in your account settings or by contacting us if any of your details change.

### 9.2 Data Security (APP 11)

We implement appropriate technical and organisational measures to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. Our security measures include:

- Encryption of data in transit using TLS/SSL protocols
- Encryption of data at rest in our databases
- Secure authentication mechanisms including password hashing
- Role-based access controls and user permissions

- Regular security audits and vulnerability assessments
- Firebase Security Rules to control database access
- Employee training on data protection and privacy

While we strive to protect your personal information, no method of transmission over the Internet or electronic storage is completely secure. We cannot guarantee absolute security, but we are committed to implementing industry best practices to protect your data.

### 10. Data Retention

We retain personal information for as long as necessary to fulfil the purposes for which it was collected, including to satisfy any legal, accounting, or reporting requirements. When determining retention periods, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the information, applicable legal requirements, and whether we can achieve those purposes through other means.

When personal information is no longer required, we will take reasonable steps to destroy or de-identify it in accordance with APP 11.2, unless we are required by law to retain it.

# 11. Your Rights Under Australian Privacy Law

Under the Privacy Act and the APPs, you have the following rights:

## 11.1 Right of Access (APP 12)

You have the right to request access to the personal information we hold about you. We will respond to your request within a reasonable period (generally 30 days) and will provide access in the manner requested, if reasonable. We may charge a reasonable fee to cover our administrative costs for providing access.

We may refuse to provide access in certain circumstances permitted by the Privacy Act, such as where providing access would pose a serious threat to safety, would have an unreasonable impact on the privacy of others, the request is frivolous or vexatious, the information relates to existing or anticipated legal proceedings, or providing access would be unlawful.

### 11.2 Right of Correction (APP 13)

You have the right to request correction of personal information we hold about you if you believe it is inaccurate, out-of-date, incomplete, irrelevant, or misleading. We will respond to correction requests within a reasonable period. If we refuse to correct information, we will provide you with written reasons and inform you of your right to complain.

### 11.3 Right to Opt Out

You have the right to opt out of receiving direct marketing communications from us at any time. You can do this by clicking the unsubscribe link in our emails, updating your preferences in your account settings, or contacting us directly.

### 11.4 Right to Delete Your Account

You have the right to request deletion of your account and associated personal information. You can do this through your account settings or by contacting us. Please note that we may retain certain information as required by law or for legitimate business purposes.

### 11.5 Right to Anonymity (APP 2)

Where practicable, we give you the option of not identifying yourself, or of using a pseudonym, when dealing with us. However, this may not be practicable for all of our services, particularly where account registration is required to access Platform functionality.

# 12. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to collect and store information about your use of our Platform. Cookies are small text files stored on your device that help us provide and improve our services.

### 12.1 Types of Cookies We Use

- Essential cookies: Required for the Platform to function properly, including authentication and session management
- Analytics cookies: Help us understand how users interact with our Platform (e.g., Google Analytics)
- Functionality cookies: Remember your preferences and settings

## 12.2 Managing Cookies

You can control and manage cookies through your browser settings. Please note that disabling essential cookies may affect the functionality of our Platform. For more information about cookies and how to manage them, visit allaboutcookies.org.

# 13. Children's Privacy

Our Platform is designed for use by sports clubs and their administrators, coaches, and coordinators. We do not knowingly collect personal information directly from children under 16 years of age without parental or guardian consent.

Where club administrators or coaches add information about minors (such as team members for scheduling purposes), we expect them to have obtained appropriate consent from parents or guardians. Clubs are responsible for ensuring compliance with applicable privacy laws when handling information about minors.

If we become aware that we have inadvertently collected personal information from a child under 16 without appropriate consent, we will take steps to delete such information promptly. If you believe we may have collected information from or about a child, please contact us immediately.

# 14. Third-Party Links and Services

Our Platform may contain links to third-party websites or services that are not operated by us. This Privacy Policy does not apply to those third-party sites or services. We encourage you to review the privacy policies of any third-party sites you visit.

We are not responsible for the privacy practices, content, or security of any third-party websites or services. Your interactions with third-party sites are governed by their respective privacy policies.

# 15. How to Make a Complaint

If you believe we have breached the APPs or handled your personal information inappropriately, you have the right to lodge a complaint. We take all complaints seriously and will investigate and respond to them in a timely manner.

### **15.1 Complaint Process**

- 1. Submit your complaint: Contact our Privacy Officer using the details below, providing as much detail as possible about your complaint.
- 2. Acknowledgement: We will acknowledge receipt of your complaint within 7 business days.
- 3. Investigation: We will investigate your complaint and keep you informed of progress.
- 4. Response: We will provide a written response within 30 days of receiving your complaint, outlining our findings and any actions we have taken or propose to take.

# 15.2 External Complaint Options

If you are not satisfied with our response to your complaint, or if we have not responded within a reasonable time, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

#### Office of the Australian Information Commissioner

**GPO Box 5218** 

Sydney NSW 2001

Phone: 1300 363 992

Website: www.oaic.gov.au

# 16. Australian Privacy Principles Compliance Summary

This Privacy Policy has been prepared in accordance with the 13 Australian Privacy Principles:

- 1. APP 1 Open and transparent management: This Privacy Policy explains our practices
- 2. APP 2 Anonymity and pseudonymity: See Section 11.5
- 3. APP 3 Collection of solicited personal information: See Section 4
- 4. APP 4 Dealing with unsolicited personal information: We destroy or de-identify unsolicited information we don't need

- 5. APP 5 Notification of collection: See Section 4
- 6. APP 6 Use or disclosure: See Sections 5, 6, and 7
- 7. APP 7 Direct marketing: See Section 6.1
- 8. APP 8 Cross-border disclosure: See Section 8
- 9. APP 9 Government identifiers: We do not use government identifiers as our own identifiers
- 10. APP 10 Quality of personal information: See Section 9.1
- 11. APP 11 Security and destruction: See Sections 9.2 and 10
- 12. APP 12 Access to personal information: See Section 11.1
- 13. APP 13 Correction of personal information: See Section 11.2

### 17. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our handling of your personal information, please contact our Privacy Officer:

### **Privacy Officer**

Pitchallo

ABN: 95415463059

Email: pitchalloaustralia@gmail.com

We will respond to all enquiries within a reasonable timeframe, generally within 7 business days.

— End of Privacy Policy —