POLICIES

Privacy Policy.

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COMPANY	COMPANY NUMBER
GoFathom Ltd	14466293
ICO REGISTRATION	CONTACT
ZB631188	team@gofathom.app

Introduction

Welcome to GoFathom Ltd. We are committed to protecting your privacy and the privacy of young athletes using our platform. This Privacy Policy explains how we collect, use, store, and protect your personal information when you use our services.

If you work at a school or other sports organisation and we've contacted you about GoFathom, see Business Contacts and Prospects.

By using GoFathom App, you agree to the terms outlined in this Privacy Policy.

Who Is Responsible for Your Data

GoFathom is used by sports organisations, such as clubs, schools, county pathways and academies, to coach and support their players. Who is responsible for your information depends on what it is.

Information your organisation records about its players. This covers wellbeing check-ins, assessment results, attendance and coaches' internal notes. The organisation decides what to record and why. It is the **data controller**, and GoFathom is its **data processor**: we store and process the information on the organisation's behalf, under a written data processing agreement (Version 1.1).

The player feed is a shared responsibility. The feed is the posts, feedback, comments, media and reports published to it. For the feed, the organisation and GoFathom are **joint controllers**. The organisation's coaches decide what to post. GoFathom decides how the feed is shared with the family and, unless a post is marked private, with coaches in other organisations, and how long it is kept. Under our arrangement:

- GoFathom is your main point of contact for the feed. We handle requests to see, correct or delete feed content, and consult the organisation where needed.
- The organisation is responsible for what its coaches post, and for having permission to post photos and video.
- GoFathom is responsible for keeping the feed secure, and for the sharing and deletion rules described in this policy.

GoFathom alone is the data controller for:

- running your account, signing you in, billing, support and service messages;
- keeping the platform secure, preventing misuse and meeting our legal obligations;
- our own analysis of how the platform is used, to improve it.

You can contact your organisation or us about any of your information, and we will make sure your request reaches the right place.

Business Contacts and Prospects

This section is for people who work at schools and other sports organisations that GoFathom thinks might want to use its platform. If we've emailed you about GoFathom without you signing up first, this explains why we have your details and what you can do about it.

Who we are

GoFathom Ltd (company number 14466293, ICO registration ZB631188) is responsible for your information. You can contact us at

team@gofathom.app, or our Data Protection Officer at gary@gofathom.app.

Why we have your details

We build a list of organisations that run sport for young people, and of the people there who are responsible for it, so that we can tell them about GoFathom. We contact you because of your role, not as a private individual.

What we hold

About your organisation:

- its name, website, address and county;
- its phone number;
- its general and admissions email addresses;
- the type of school or organisation, and the sports it offers;
- a short summary of its public website.

About you:

- your name and job title;
- your work email address;
- the sports you cover;
- where we found your details;
- which member of our team looks after the contact;
- the date, sender and subject of our emails to and from you;
- whether you've asked not to hear from us;
- whether email to you has bounced.

We don't set out to collect personal email addresses, or information about pupils or players. If we find any, we delete it.

Where we got them

We only use information that organisations publish about themselves, or that you give us:

- your organisation's own website, and its public sports pages (for example a SOCS sports portal);
- web and map searches for organisations;
- Companies House;
- published lists of schools;
- details our team finds while researching, such as a public professional profile on LinkedIn, added by hand;
- emails you send us.

Our first email to you says where we found your details.

Our legal basis

We rely on **legitimate interests**: our interest in telling organisations about a service that may help them coach young people, balanced against your interest in not being bothered.

We only email work addresses at organisations, and every marketing email lets you opt out in one click. Where the law needs your consent first, for example if you're a sole trader or we only have a personal address for you, we won't send you marketing without it.

How we use AI

We use Google's Gemini AI to read an organisation's public website and write a short summary of it, such as the sports it offers. The AI is not used to make decisions about you.

Who we share it with

We don't sell your details or share them for anyone else's marketing. These companies process them for us under contract:

- Supabase, which stores our records (UK, London);
- Google Workspace, our email;
- Resend, which sends some of our emails (EU, Ireland);
- Google, for AI summaries and map search;

- Netlify, which hosts our internal tools;
- Capsule CRM, which holds some of our sales records (UK).

Some of these may process data outside the UK. When they do, it's protected by UK adequacy regulations, or by the UK International Data Transfer Addendum to the EU Standard Contractual Clauses.

How long we keep it

What	How long
Your details, if you never reply	36 months after our last email to you, then deleted
Your details, if you tell us GoFathom isn't for you	Deleted within 3 months, apart from the opt-out record below
Our emails to and from you	We keep only the date, sender and subject, for as long as your details are kept. We don't store the text of messages.
If you opt out	We keep a scrambled (hashed) copy of your email address for as long as we send marketing, so that we never email you again. It can't easily be turned back into your address.

Stop us emailing you

You can tell us to stop at any time, and we will. Click "Unsubscribe" in any of our marketing emails, or email team@gofathom.app. You don't need to give a reason. If you've written to us, we may still reply to that email thread, but we won't add you to any mailing again.

Your other rights

You can ask us to:

- give you a copy of what we hold about you;
- correct it;

- delete it;
- restrict how we use it.

You can also object to any use based on legitimate interests. We will reply within one month.

Complaints

If you're unhappy with how we've handled your information, please tell us first. You can also complain to the Information Commissioner's Office: ico.org.uk, 0303 123 1113.

Information We Collect

Personal Information

We may collect personal information from you when you visit our website, register for an account, or interact with our services. Depending on how your organisation uses GoFathom, this may include:

- **Players:** first and last name, date of birth, gender, a profile photo, an optional email address (for players who sign in themselves), their family, the groups and sports they belong to, and whether and how they use the app
- **Parents and guardians:** name, email address, relationship to the player, an optional phone number, and a record of the consent you gave when registering
- **Coaches and organisation staff:** name, email address, phone number, the date you joined, your groups and roles, and how you use the platform (for example, how much feedback you post)
- Any other information you voluntarily provide to us

Wellbeing Check-ins and Attendance

If your organisation turns on wellbeing check-ins, players are asked short questions before and after a session:

- **Before a session:** how they slept, their mood, how their body feels (including any knock or injury, and which body part), their motivation, and anything causing them stress
- **After a session:** their mood, how their body feels, how hard they worked, and how they rated the session
- **Notes:** players can add a short note at either point

We also record when a player checks in and out, and their attendance (present, late or absent). From these answers the platform works out simple measures, such as session load and the change in mood across a session.

This is health information, which the law treats as special category data. Your organisation is responsible for having a lawful condition for collecting it, normally explicit consent from a parent or guardian. Parents and guardians give consent to wellbeing check-ins in the app when they register, and can withdraw it at any time from their profile. Every check-in is optional: players choose whether to complete it, and can skip questions. GoFathom processes this information only on the organisation's behalf. It is never used for marketing, advertising, or any purpose other than supporting the player.

Flags. Some answers, such as reporting an injury or a very low mood, automatically flag the check-in for a coach to look at. A flag is a prompt for a person to check in with the player. It is not a decision about them, and nothing happens to a player automatically because of a flag. Check-ins are not monitored around the clock and are not a way to report an emergency.

Who can see it. The coaches of the player's group, and the organisation's administrators. If an answer raises a worry about a player's safety, the organisation's safeguarding lead may also see it. Players are told this on the check-in screen. Wellbeing answers are never shown to other players or to coaches in other organisations.

Assessments and Leaderboards

Organisations can record assessments, such as a sprint time, a skills score or a coach's rating. The organisation chooses which assessments to record.

Each result is stored with the date it was recorded, who recorded it, and any note.

Players may see how a result compares with their group's average. We only show a group average where at least three players have a result, so that no one player's result can be worked out from it.

Leaderboards. Leaderboards only ever show results from assessments your organisation has set up. GoFathom does not create assessments or add data to them. An organisation can choose to show a leaderboard for an assessment, either within a group or across the organisation. Other players in that group or organisation can then see the results. The organisation also chooses how names appear on leaderboards: first name, first name and initial, or full name.

Organisations can mark an assessment as internal, in which case it is visible only to coaches and staff, not to players or families.

Coach Notes and Reports

Coaches can keep internal notes about a player, typed or recorded as voice notes. Voice notes are transcribed by AI as described in How We Use AI to Support Coaching. Internal notes are visible only to coaches and staff at the organisation. They are not shown to the player or family, but they are included if you ask for a copy of your data.

Coaches can also produce development reports, which may be drafted with AI help and are reviewed by a coach. Reports can be marked private to the organisation.

Media Content

Coaches and authorised users may upload media content to player feeds, including:

- Photographs of players during training or matches
- Video recordings of player performance, technique, or training sessions
- Audio recordings of coaching feedback

- Screenshots or images of technique analysis

This media is uploaded to support player development and coaching feedback. We do not collect or permit media unrelated to sports coaching and development purposes.

Usage Information

We collect information about how you use our platform, including:

- Feedback posts and comments
- Training session data
- Coaching observations and insights
- Account activity and preferences
- Wellbeing check-ins and attendance (see above)
- Assessments (see above)

Technical Information

We may collect technical information such as:

- IP addresses
- Browser type and version
- Device information
- Log data and usage statistics

How We Use Your Information

Primary Purposes

We may use the information we collect from you for various purposes, including:

- Providing and improving our products and services
- Delivering coaching feedback and development tracking
- Personalising your experience on our website and mobile applications

- Communicating with you about your account and any updates or promotions
- Analysing platform usage to enhance our offerings
- Facilitating coach-family communication for player development
- Safeguarding children using our platform
- Using AI to support the drafting and analysis of coaching feedback (see "How We Use AI to Support Coaching" below)
- Complying with legal obligations and regulatory requirements

Communication

We may use your contact information to send you:

- Important account notifications
- Coaching feedback updates
- Platform updates and new features
- Educational content and resources
- Marketing communications (with your consent, which you can withdraw at any time)

How We Use AI to Support Coaching

Why we use AI

We use artificial intelligence (AI) to help coaches deliver more consistent, comprehensive feedback to players and families. AI assists with — but does not replace — the work of human coaches. A qualified coach reviews all AI-assisted content before it is published to a player's feed.

What AI is used for

We use AI to support the following coaching activities:

- **Drafting player development reports** — AI generates an initial draft of framework-based reports (covering areas such as technical, tactical,

physical, and personal development), which the coach reviews, edits, and approves before publication.

- **Transcribing and structuring coach voice notes** — When a coach records voice notes about a player or session, AI is used to transcribe the audio and organise the observations into structured feedback. The coach reviews the output before it is added to a player's feed.
- **Analysing media for coaching insight** — Where coaches upload video, images, or audio for review, AI may be used to help identify and describe coaching points. Any resulting feedback added to a player's feed is reviewed by the coach.

We do not use AI to make decisions about a player without a human coach in the loop.

Who provides the AI service

AI processing is performed by Google's Gemini service, accessed through the paid Gemini API. Google acts as our data processor for these activities under the Gemini API Additional Terms of Service for paid services and Google's data processing terms, which include:

- **No training on your data** — Google is contractually prohibited from using GoFathom prompts, content, or media to train its AI models.
- **Encryption in transit and at rest** — All data sent to and returned from Google's AI service is encrypted.
- **Access controls** — Google personnel access to customer data is tightly restricted and audited.
- **International transfer safeguards** — Where data is processed outside the UK, transfers are protected by Standard Contractual Clauses (SCCs) and the UK International Data Transfer Addendum.

Read the Gemini API Additional Terms of Service →

Family rights regarding AI processing

All the rights described in "Your Rights and Choices" apply equally to AI-processed content, including:

- The right to access any AI-assisted feedback or reports about your child
- The right to request correction of AI-generated content you believe to be inaccurate
- The right to request deletion of AI-generated content (subject to the deletion and anonymisation timelines elsewhere in this Policy)
- The right to object to AI processing — contact us at team@gofathom.app and we will discuss alternatives

Legal basis for AI processing

We rely on legitimate interests for AI-assisted coaching, on the basis that AI support helps coaches deliver better, more consistent player development. For AI processing involving photographs, videos, or audio of children, we additionally rely on parental consent as set out in the Media Content and Child Images section.

Player Feed Ownership and Access Rights

Ownership of Player Feeds

Each player's feed belongs exclusively to the player and their parent(s)/guardian(s) (collectively referred to as "the family").

- For players under 18, the parent(s)/guardian(s) maintain primary control over the player's feed
- For players 18 and over who use the platform independently, the player maintains full ownership and control
- The family has the right to view, download, and request deletion of all content on their player feed, subject to the deletion and anonymisation timelines outlined below

Family Control

- Parents/guardians can manage which groups their player joins
- Parents/guardians can control privacy settings for individual posts

- Parents/guardians have the right to request removal from any group at any time
- All content posted to a player's feed remains accessible to the family regardless of other access permissions

Media Content and Child Images

Parental Consent for Media

By joining a group on the GoFathom platform and accepting these terms, parents/guardians provide consent for coaches to:

- Capture and upload photographs and videos of their child during coaching sessions, training, and matches
- Share this media within the player's feed according to the privacy settings selected
- Use media for legitimate coaching and development purposes only

This consent can be withdrawn at any time by contacting us or removing your child from the relevant group. Previously uploaded media will be subject to the deletion and anonymisation timelines outlined below.

Acceptable Media Guidelines

Coaches and users uploading media must ensure:

- All media is directly related to sports coaching and player development
- Media is captured in appropriate settings (training grounds, match venues, coaching facilities)
- Players are appropriately attired for sporting activity
- Media does not include changing rooms, bathrooms, or other private areas
- Media respects the dignity and wellbeing of the child

We reserve the right to remove any media that does not comply with these guidelines without notice.

Media Visibility and Sharing

Media uploaded to a player's feed follows the same visibility rules as text-based posts:

- **Public posts:** Media visible to all coaches with access to that player's feed (across organisations)
- **Private posts:** Media visible only to coaches within the same organisation
- **Family access:** Parents/guardians always have full access to all media of their child

Coaches should exercise particular care when deciding whether to mark media as private, especially for individual technique analysis, performance assessments, or any media that could be sensitive if shared widely.

Media Storage and Security

- All media is stored securely on servers located in the UK (London)
- Media is encrypted in transit and at rest
- Media is held in a private, access-controlled storage system — it is never publicly accessible or searchable
- Access to media is controlled through the same permission system as other feed content
- We do not use player media for marketing, advertising, or any purpose other than the coaching services provided

Family Rights Over Media

Parents/guardians have the right to:

- View all media uploaded to their child's feed at any time
- Download copies of media for personal records
- Request deletion of specific media items
- Request that future media uploads be restricted or disabled for their child

To exercise these rights, contact us at team@gofathom.app.

Media Retention

Media follows the same staged deletion and anonymisation timeline as all other player feed content — see Data Retention and Account Deletion below.

Coach Responsibilities for Media

Coaches uploading media acknowledge and agree that:

- They have appropriate authority to capture the media in their coaching capacity
- The media is appropriate for the platform and complies with our guidelines
- They will not share media outside the platform without explicit parental consent
- They understand media may be visible to coaches from other organisations unless marked private
- They will report any concerns about inappropriate media immediately

Prohibited Media

The following media is strictly prohibited and will be removed immediately:

- Any media of a sexual or inappropriate nature
- Media captured in changing rooms, bathrooms, or private areas
- Media that could be used to identify a child's home address or school (other than the coaching venue)
- Media that depicts bullying, harassment, or inappropriate behaviour
- Media unrelated to sports coaching and development

Uploading prohibited media may result in immediate account termination and reporting to relevant authorities.

Coach Access to Player Feeds

Voluntary Access Provision

By joining a group on the GoFathom platform, the family voluntarily provides access to coaches within that group to:

- View the player's feed content
- Post feedback, observations, and coaching insights
- Access player performance information relevant to development
- View comments and interactions from other authorised coaches

Scope of Coach Access

- Coach access is automatically granted when a player joins a group coached by that individual
- Access is limited to active coaching relationships only
- Coaches can only access feeds of players in groups they actively coach
- When a coach's role in a group ends, their ability to post new content ceases immediately
- Previously posted content by that coach remains visible as part of the player's historical record

Active Coaching Relationship Defined

A coach has an "active coaching relationship" when:

- They are assigned as a coach to a group
- The player is an active member of that group
- The coaching role has not ended or expired
- Neither the coach nor player has been removed from the group

Content Visibility and Privacy Controls

Public posts (default setting)

When a coach creates a post without marking it as private:

- The post is visible to the player and their family

- The post is visible to all coaches who have access to that player's feed (across different groups and organisations)
- This allows for collaborative coaching and comprehensive player development insights

Important notice to coaches: Your feedback may be viewed by coaches from other organisations unless you mark the post as private.

Private posts

When a coach marks a post as private:

- The post is visible to the player and their family
- The post is visible only to coaches from the same organisation as the posting coach
- The post is not visible to coaches from other organisations

Coach-only comments

- Coaches can add coach-only comments to any post
- These comments are never visible to players or parents
- Coach-only comments are visible to other coaches with access to the player's feed

Privacy Best Practices for Coaches

Coaches must understand and acknowledge that:

- Unless explicitly marked as private, their feedback will be shared across all authorised coaches
- They should exercise professional judgment in determining what content should be marked private
- They should avoid including sensitive or confidential information in public posts
- They should respect the collaborative nature of the platform while maintaining appropriate professional boundaries

Coach Content After Departure

When a coach stops using the GoFathom platform or their coaching role ends:

- All previously posted content by that coach remains on player feeds
- The content continues to be attributed to the coach by name
- The coach loses the ability to post new content or edit existing content

This preserves the integrity and continuity of player development records.

Data Security

Security Measures

We take data security seriously and employ industry-standard measures to protect your personal information from unauthorised access, disclosure, alteration, or destruction. Our security measures include:

- Encryption of data in transit and at rest
- Secure servers located in the UK (London)
- Regular security audits and updates
- Access controls and authentication requirements
- Employee training on data protection

Security Limitations

No method of transmission over the internet or electronic storage is 100% secure, and we cannot guarantee absolute security. You acknowledge and accept the inherent security risks of providing information and dealing online over the internet.

Third-Party Disclosure

No Sale of Personal Information

We do not sell, trade, or otherwise transfer your personal information to third parties without your consent, except as required by law or as necessary to

provide our services.

Trusted Service Providers

We may share your information with trusted third-party service providers who assist us in operating our platform and conducting our business. All such service providers are contractually required to keep your information confidential and use it only for the purposes we specify.

Our Subprocessors

We work with a small number of trusted service providers who process personal data on our behalf. Each is bound by a written data processing agreement that requires confidentiality, appropriate security, and use of data solely for the purposes we specify. Our current subprocessors include:

- **Supabase** — authentication, database, file storage, edge compute (UK, London)
- **Google (Gemini API, paid tier)** — AI processing, as described in How We Use AI to Support Coaching (global Google infrastructure; transfers governed by Google's data processing terms, SCCs and UK IDTA)
- **Firebase** — push notification delivery (global Google infrastructure)
- **Resend** — transactional email delivery (EU, Ireland)
- **Gleap** — in-app support and user feedback (EU, Germany)

A current list of our subprocessors is available on request by contacting team@gofathom.app. We will notify customers of material changes to this list.

Legal Requirements

We may disclose your information when required by law, court order, or government regulation, including for safeguarding investigations, law enforcement requests, protection of our legal rights, and prevention of fraud or illegal activity.

Cross-Organisation Coach Visibility

Coaches from different organisations may view content posted to a player's feed unless that content is marked as private. This is an intentional feature designed to support collaborative player development.

Data Retention and Account Deletion

Active Account Data Retention

We retain your personal information for as long as your account remains active or as needed to provide you with our services. This includes all player feed content and coaching feedback, account information and preferences, usage history and activity logs, and training session records. Wellbeing check-ins and assessment results follow the same deletion and anonymisation timeline as feed content.

Account Deletion Request

You may request deletion of your account at any time by emailing team+data@gofathom.app or contacting our support team.

How Deletion Works

Account deletion happens in two stages:

Stage 1 — Account data deleted within 30 days

Your personal account data (name, email address, credentials, profile information) is deleted within 30 days of your deletion request, and your access to the platform is terminated immediately.

The 30-day window also allows you to reactivate your account should you close it before realising you are joining another organisation that uses GoFathom. To reactivate, contact us at team@gofathom.app within this period.

Stage 2 — Feed content anonymised within 6 months

Feed content, coaching feedback, and media associated with your account are anonymised within 6 months of your deletion request. Anonymisation

removes all personal identifiers from this content — after this point no identifiable data is retained in any system.

Feed content exists in a shared record that is also associated with coaches and other accounts. The 6-month window allows this content to be cleanly anonymised rather than abruptly deleted, and ensures the coaching record remains coherent for the families and organisations it involves.

After the anonymisation window

All personally identifiable information has been permanently removed from all systems. Only anonymised aggregate data with no personal identifiers may be retained for platform improvement and safeguarding purposes.

Backups

Backup systems may retain data for up to 90 days before permanent deletion.

Exceptions to Deletion

We may retain certain information longer when required by legal obligation or court order, necessary for ongoing legal proceedings, essential for regulatory compliance, or needed to resolve disputes or enforce agreements.

Your Rights and Choices

Data Subject Rights (UK GDPR)

You have the following rights regarding your personal information:

- **Right to Access:** Request a copy of the personal information we hold about you
- **Right to Rectification:** Request correction of inaccurate or incomplete information
- **Right to Erasure:** Request deletion of your personal information. Account data is deleted within 30 days; feed content and media is anonymised within 6 months.

- **Right to Restrict Processing:** Request that we limit how we use your information
- **Right to Data Portability:** Receive your data in a structured, commonly used format
- **Right to Object:** Object to processing based on legitimate interests
- **Right to Withdraw Consent:** Withdraw consent at any time (where processing is based on consent)
- **Right to Media Access:** Request copies of all photographs and videos of your child
- **Right to Media Deletion:** Request removal of specific media items. Processed within 30 days; any residual identifiable traces anonymised within 6 months.
- **Right to Restrict Media:** Request that coaches be prevented from uploading new media of your child

Where your organisation is the controller, for example for wellbeing check-ins and assessments, we will help it respond to your request, and you can also contact the organisation directly.

How to Exercise Your Rights

Email team@gofathom.app with your request. Include sufficient detail to help us locate your information and provide identity verification as required. We will respond within one month of receiving your request.

Right to Lodge a Complaint

If you believe your privacy rights have been violated, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Website: www.ico.org.uk
Phone: 0303 123 1113

Account Settings and Controls

Within your account, you can:

- Update personal information and preferences

- Manage notification settings
- Control which family members have access
- Review player feed content
- Download copies of your data
- Request account deletion (account data deleted within 30 days; feed content and media anonymised within 6 months)

Communication Preferences and Marketing

Types of Communications

- **Transactional emails:** Account notifications, feedback alerts (cannot be opted out)
- **Platform updates:** New features and improvements
- **Educational content:** Coaching resources and development tips
- **Marketing communications:** Promotional offers and announcements (opt-in required for app users)

Marketing Consent

App users. We only send marketing emails to people who use the GoFathom app if they've agreed to receive them. We never send marketing to players.

Business contacts. We may email staff at schools and other organisations about GoFathom at their work address, relying on our legitimate interests. Every marketing email lets you unsubscribe in one click. See Business Contacts and Prospects.

You can stop marketing at any time using the unsubscribe link or by emailing team@gofathom.app.

Coach and Family Access to Historical Content

When a new coach gains access to a player's feed, they can view the complete historical record of feedback and posts, including content from

coaches who have left the platform or changed roles. Historical access supports comprehensive player development.

When a player moves to a different group or organisation, new coaches gain access to the complete historical feed. Families are notified when new coaches gain access to their player's feed and can review and manage these permissions in account settings.

Cookies and Tracking Technologies

Our website may use cookies to enhance your browsing experience. You can adjust your browser settings to refuse, manage, or delete cookies. Please note that some features of the platform may not function properly without cookies.

Within our mobile apps, cookies function primarily as app states — they help the app understand where in the app the user is and pass data through the app securely.

Some cookies may be set by third-party service providers. These are governed by the respective third-party privacy policies.

Children's Privacy

Age Requirements

GoFathom App is designed for use by young athletes under 18 (with parental consent and supervision), parents and guardians, and coaches working with youth players.

Parental Consent

Parental or guardian consent is required to create an account for a player under 18. Parents maintain control over their child's account and data and can request deletion of their child's data at any time, subject to the deletion and anonymisation timelines described above.

Protection Measures

We implement additional protections for young users including:

- Feeds are private to the player, their family and their coaches; players cannot see each other's feeds
- Wellbeing answers and internal notes are never shown to other players
- Results are only shared between players where an organisation chooses to show a leaderboard, and the organisation controls how names are shown
- Parental oversight and control
- Regular safeguarding reviews
- GoFathom staff with access to children's data hold a current basic DBS check, renewed every three years
- Age-appropriate content guidelines

Media of Children

- **Restricted access:** Media is only visible to authorised coaches and the child's family
- **No public profiles:** Player media is never publicly accessible or searchable
- **No social features:** Players cannot share media with other players
- **Profile photos:** Players aged 13 and over can upload their own profile photo. Profile photos can be reported, and we remove any that break our guidelines
- **Parental oversight:** Parents can view, download, and request deletion of all media
- **Coach accountability:** All media uploads are logged with the uploading coach's identity
- **Safeguarding review:** We may review media if concerns are raised
- **AI processing:** media may be processed by AI for transcription, organisation, or coaching analysis, as described in How We Use AI to Support Coaching. AI providers are contractually prohibited from using this media to train their models.

International Users and Data Transfers

Personal data stored by GoFathom is held on secure servers located in the UK (London). Email delivery (Ireland) and in-app support (Germany) are handled by providers in the EU.

Some processing activities involve trusted subprocessors who may transfer data outside the UK or EU. In particular, Google's Gemini AI service (used as described in How We Use AI to Support Coaching) may process data outside the UK and EU. These transfers are protected by:

- Google's data processing terms, which incorporate Standard Contractual Clauses (SCCs)
- The UK International Data Transfer Addendum (UK IDTA)
- Equivalent technical and organisational safeguards required by UK GDPR

We comply with UK GDPR and applicable UK data protection laws. For users outside the UK, data access is protected by appropriate technical and organisational safeguards.

Legal Basis for Processing

Where your organisation is the controller, it decides the legal basis for the information it asks us to process. For the player feed, where we are joint controllers with the organisation, and where GoFathom is the controller, we rely on:

- **Consent:** When you agree to specific processing activities, including parental consent for media capture and marketing emails
- **Contract Performance:** To provide our services to you
- **Legal Obligations:** To comply with applicable laws, including safeguarding duties
- **Legitimate Interests:** For platform security and improvement, safeguarding, AI-assisted coaching support, and telling staff at schools and other organisations about GoFathom (see Business Contacts and Prospects)

For health information, such as wellbeing check-ins, the organisation relies on a condition under Article 9 of the UK GDPR, normally the explicit consent of a parent or guardian.

Changes to This Privacy Policy

We reserve the right to update this Privacy Policy at any time. When we make material changes, we will post the updated policy on this page, update the "Last Updated" date, and notify you by email if the changes materially affect your rights. By continuing to use GoFathom App after changes are posted, you accept the updated Privacy Policy.

Contact Information

General enquiries and data requests

Email: team@gofathom.app

Urgent media concerns or removal requests

Email: team@gofathom.app (mark as URGENT — Media Concern)

We aim to respond to media concerns within 24 hours.

Data Protection Officer

Email: gary@gofathom.app

Definitions

"Platform" means the GoFathom website, mobile applications, and related services.

"Family" means the player and their parent(s) or guardian(s).

"Player Feed" means the collection of posts, feedback, and content associated with a specific player.

"Coach" means an authorised coaching user with access to player feeds.

"Active Coaching Relationship" means when a coach is assigned to a group, the player is an active member, the coaching role has not ended, and neither has been removed.

"Organisation" means a sports club, school, county pathway, academy, or other sports institution.

"Personal Information" means any information that identifies or can be used to identify an individual.

"Anonymisation Window" means the period of up to 6 months following account deletion within which all personally identifiable information in feed content, posts, and media is anonymised. Account data (name, email, credentials) is deleted within 30 days. After the anonymisation window, no personal data is retained in any system.

"AI-Assisted Content" means any draft report, transcription, or coaching observation produced with the help of an AI system and reviewed by a coach before publication to a player's feed.

Legal Framework and Compliance

This Privacy Policy and our data practices comply with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- The ICO's Age Appropriate Design Code (the Children's Code)
- Relevant safeguarding legislation

Our lead supervisory authority is the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Website: www.ico.org.uk.

We conduct regular reviews of our privacy practices to ensure ongoing compliance, alignment with industry best practices, effectiveness of safeguarding measures, and adequacy of security controls.