

Privacy Policy

Last updated: June 2026

1. Data Controller

Coach ID — Team Sports Management, Lda., tax identification number (NIPC) 514674121, with registered office in Moura, Portugal (hereinafter “Coach ID”), is the entity responsible for processing the personal data collected through the Coach ID platform.

Contact for data protection matters: privacidade@coachidapp.com

Coach ID is not currently required to formally appoint a Data Protection Officer (DPO) under Article 37 of the GDPR, considering its size and the nature of the processing. Coach ID undertakes to reassess this obligation periodically.

2. Who Is Responsible for What

Coach ID provides a platform that involves different roles in data processing, as defined by the General Data Protection Regulation (GDPR):

2.1. Coach ID as Controller

Coach ID is the controller for the processing of data relating to:

- Platform Users — people who create an Account and use the Service (coaches, fitness coaches, analysts, etc.)
- Website visitors — browsing data and strictly necessary cookies
- Business contacts — people who interact with us through forms or email

2.2. Coach ID as Processor

When a User (coach, club, organisation) enters players' personal data (including health data) or data of other members of the coaching staff on the platform, Coach ID acts as a processor. The controller of that data is the User or the entity they represent (club, academy).

This distinction is important:

- The legal basis for processing players' data is the responsibility of the User (club)
- Obtaining consent (including from minors and the holders of their parental responsibility) is the responsibility of the User
- Coach ID provides the technical tool and is responsible for the security and integrity of the processing at its level

For B2B clients (clubs, academies) that require it, Coach ID provides a Data Processing Agreement (DPA) upon request to privacidade@coachidapp.com.

3. Data Collected and Purposes

3.1. Platform Users' data

Type of data	Purpose	Legal basis
Email, name	Account creation and management	Performance of a contract (Art. 6(1)(b) GDPR)
Credentials (managed by Auth0)	Authentication	Performance of a contract
Subscription and billing data (managed by Stripe)	Payment processing	Performance of a contract

Type of data	Purpose	Legal basis
IP address, access logs, date and time of operations	Platform security, fraud prevention, audit	Legitimate interest (Art. 6(1)(f) GDPR)
Usage history (sessions created, exercises, monitoring data)	Provision of the Service	Performance of a contract
Support communications	User support	Performance of a contract

3.2. Players' data (processed by Coach ID as processor)

When a User enters players' data on the platform, Coach ID processes namely:

- Identification data: name, date of birth, photograph
- Anthropometric data: weight, height, position on the field
- Contacts: the player's email address (for sending questionnaires)
- Health data (special category – Art. 9 GDPR): information on injuries, Rating of Perceived Exertion (RPE) data, Wellness questionnaires (fatigue, sleep quality, muscle soreness, stress level, hydration, mood), and, in the future, GPS and physical performance data

Important: the processing of health data requires a strengthened legal basis under Art. 9(2) of the GDPR. That legal basis is obtained by the User (club) from the data subject (player), typically through explicit consent included in the player's contract or registration form.

3.3. Minors' data

The platform may contain data of players who are minors. The processing of this data depends on the consent of the holders of parental responsibility, obtained by the User (club). Coach ID does not collect minors' data directly and does not establish a contractual relationship with minors.

4. Sub-processors

To provide the Service, Coach ID uses the following sub-processors:

Sub-processor	Purpose	Location	Safeguards
Auth0, Inc. (Okta)	Authentication and identity management	European datacenter (Frankfurt/Dublin)	EC Standard Contractual Clauses (SCCs); signed DPA
Stripe Payments Europe, Ltd.	Payment processing	Ireland (EU)	GDPR-compliant; signed DPA
SendGrid (Twilio, Inc.)	Sending transactional and marketing emails	USA with EU replication	EC SCCs; signed DPA
European datacenter	Application and data hosting on a VPS	Germany (EU)	Located exclusively in the EU

The list of sub-processors may be updated. Material changes will be communicated to Users with an active Account.

Coach ID ensures, by contract with each sub-processor, that they offer adequate data protection safeguards, namely through a DPA (Data Processing Agreement) and, where applicable, standard contractual clauses approved by the European Commission.

5. International Transfers

Some sub-processors may be based outside the European Economic Area (EEA). To ensure an adequate level of protection:

- Whenever possible, services with a datacenter in the EU are contracted
- Where there is a transfer outside the EEA, it is covered by standard contractual clauses approved by the European Commission (SCCs) and, where applicable, by supplementary measures (encryption, pseudonymisation)
- No transfers are made to countries without an adequacy decision or adequate safeguards

6. Data Retention

6.1. Active Account

While the Account is active, data is retained for as long as necessary to provide the Service.

After subscription cancellation

In the event of subscription cancellation (without Account closure), data is retained indefinitely to allow future reactivation of the Account, in read-only mode. The User may at any time request the complete closure of the Account.

6.2. After Account closure

After an Account closure request:

- 30 days in export mode (read access to download data)
- 30 additional days for complete deletion (total: 60 days)
- Tax exception: billing and transaction data is retained for 10 years, as required by law

6.3. Security logs

Access and audit logs are retained for a maximum period of 12 months, unless a longer retention period is necessary for the investigation of security incidents.

7. Data Subjects' Rights

Under the GDPR, the data subject has the right to:

- Access to their personal data (Art. 15 GDPR)
- Rectification of inaccurate or incomplete data (Art. 16 GDPR)
- Erasure ("right to be forgotten") under Art. 17 GDPR
- Restriction of processing in certain circumstances (Art. 18 GDPR)
- Data portability in a structured, commonly used and machine-readable format (Art. 20 GDPR)
- Objection to processing based on legitimate interest (Art. 21 GDPR)
- Withdrawal of consent at any time, where the processing is based on consent

7.1. How to exercise your rights

To exercise these rights, contact: privacidade@coachidapp.com. Coach ID responds to requests within 30 days, a period that may be extended by a further 60 days in complex cases, with notice to the data subject.

7.2. Rights relating to players' data

Requests to exercise rights relating to players' data (where Coach ID acts as a processor) must be addressed to the User (club or coach) who entered the data, in their capacity as controller. Coach ID will provide the User with the necessary cooperation to respond to such requests.

Complaints

The data subject has the right to lodge a complaint with the competent supervisory authority, in Portugal the National Data Protection Commission (CNPd):

- Website: www.cnpd.pt
- Email: geral@cnpd.pt
- Address: Av. D. Carlos I, 134, 1.º, 1200-651 Lisboa

8. Security

Coach ID implements appropriate technical and organisational measures to protect data against unauthorised access, loss, destruction or alteration, including:

- Encryption in transit (TLS 1.2+)
- Encryption at rest of the databases
- Access controls based on the principle of least privilege
- Multi-factor authentication available to Users
- Regular backups with a defined retention
- Audit of administrative access logs
- Periodic vulnerability assessments

In the event of a personal data breach that poses a risk to the rights and freedoms of data subjects, Coach ID will notify the CNPD within 72 hours of becoming aware of the breach, in accordance with Art. 33 of the GDPR, and the affected data subjects when the risk is high.

9. Cookies

The Coach ID website uses exclusively cookies that are strictly necessary for the operation of the Service (authentication, session, security). These cookies do not require prior consent.

For more information about the cookies used, see the Cookie Policy.

10. Marketing Communications

Coach ID may send marketing communications to its Users and to people who have expressly consented to receive its communications.

- Existing Users: may receive communications about new features, promotions and platform news, based on legitimate interest ("soft opt-in" rule). They may object at any time.
- Non-users: only receive communications with express consent, given in a dedicated form.

How to unsubscribe: all marketing communications include a link to unsubscribe (opt-out). Alternatively, contact privacidade@coachidapp.com.

11. Changes to This Policy

Coach ID may update this Privacy Policy. Material changes will be communicated:

- By email to Users with an active Account, 30 days in advance
- Through a prominent notice on the platform and website

Continued use of the Service after the changes come into force implies acceptance thereof. If you do not agree, you may close the Account under clause 7 of the Terms and Conditions.

12. Contact

For any question relating to this Privacy Policy or the processing of your data:

