



Baseline Service Trading Co. Ltd (Reg. No. 5801480822)

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Privacy Policy

Chính Sách Bảo Mật

Effective:	26 December 2023
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Your privacy matters to us. This policy outlines the data we collect, its purpose, and how it enhances your experience. We're dedicated to safeguarding your information, adhering to Vietnamese and global data protection standards. If you have questions, we're just a message away.

Best regards,
The Baseline Team

This policy applies to all products, websites and mobile applications built and maintained by Baseline.

Please note that when we refer to "we" or "Baseline," we mean Baseline Service Trading Co. Ltd (Registration No. 5801480822); our offices are located at 216 Xô Viết Nghệ Tĩnh, Phường 7, T.P. Đà Lạt, Lâm Đồng, Việt Nam; and any Affiliates of Baseline Service Trading Co. Ltd from time to time. In this context, an "Affiliate" refers to any entity that controls, is controlled by, or is under common control with, Baseline.

For the purposes of this definition, an entity shall be considered as controlling another entity if it owns or controls, directly or indirectly, more than fifty percent (50%) of the voting equity or assets of the other entity (or a comparable ownership interest for an entity other than a corporation), or the right to appoint a majority of the directors of the other entity (or a comparable supervisory body for an entity other than a corporation).

In this policy, we lay out: what data we collect and why; how your data is handled; and your rights with respect to your data. We never sell your data.

This policy is split into sections. For your convenience, links to each of those sections is as follows:

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What we collect and why

At Baseline, our aim is to offer a personalized and enriching tennis experience. To achieve this, we collect certain types of information, which are essential for the functionality and enhancement of our services. Here's a general overview:

Personal and Contact Information

- **Basic Details:** Such as your full name, phone number, and email. These are crucial for creating your account, communication, and providing personalized service.
- **Demographic Information:** Like your date of birth, gender, and location. This helps us match you with the right content, possible tennis partners and provide you with information on playing opportunities.

Tennis-Related Details

- **Playing History and Preferences:** Information regarding your tennis experience, skills, preferences, and playing history. This data assists us in matching you with suitable players and events, and tailoring your app experience.

Usage Data

- **Interactions Within the App:** Including details about the matches you play, feedback you provide, and your engagement with other community features. This helps us understand and improve user experience and community interaction.
- **IP Address and Technical Data:** We collect your IP address, device information, and general usage data. This helps us understand how our services are used, improve app performance, and enhance security.

Multimedia Content

- **User-Generated Content:** Such as video recordings of matches and other related media. These are used for features like AI analysis to provide you with valuable insights.

Transactional Data

- **Payment Information:** Handled via third-party processors for any in-app purchases or bookings, ensuring secure and efficient transactions.

Additional Data

- We may collect additional information as required to provide new features and services, enhance user experience, or comply with legal requirements.

Purpose of Data Collection:

The information collected is integral to providing a tailored experience on our app. It enables us to offer features like personalized match suggestions, progress tracking, relevant tournament information, social connectivity, and efficient booking services.

Our commitment to your privacy means that we use this data solely for enhancing your experience with Baseline, adhering to the highest standards of data protection and privacy.

With who and why we share data

At Baseline, we respect your privacy and aim to be transparent about our data sharing practices. Our primary goal in sharing information is to enhance your experience and support the effective functioning of our app. Here are some general ways your information might be shared:

Collaboration with Third Parties

- **Tournament Organizers and Partners:** We may share certain player data with our partners, including tournament organizers, to facilitate your participation and improve event management.
- **Visibility Within the App:** Elements of your player profile, such as some personal details about you, match history and tournament participation, may be visible to other users to foster community interaction and engagement.

Analysis and Improvement

- **Analytics Providers:** We use anonymized or aggregate data with analytics providers to understand app usage patterns and improve our services. These insights help us tailor the app to better meet your needs.

Internal Sharing within Baseline Group

- **Affiliates and Business Units:** Data sharing within our corporate group, including any affiliates or subsidiaries, is done to streamline and enhance the services offered across our platforms.

Strategic Partnerships

- **Sponsorships and Collaborations:** We engage with sponsors and other partners in ways that may involve sharing data, always with the aim of bringing added value and opportunities to our user community.

Engagement with Authorities and Federations

- **Sporting and Regulatory Bodies:** To support the growth and development of tennis, we might collaborate with sports federations and governmental bodies, sharing insights and data when beneficial to the sport and our users.

While the above outlines our current data sharing practices, please note that these may evolve over time to align with new partnerships, features, or regulatory requirements. We commit to updating our users as our data sharing practices change and will continue to prioritize the protection and privacy of your personal information in all our data sharing activities.

How we obtain and record your consent

We always obtain your explicit consent for the collection and processing of your personal data. We have established clear and straightforward procedures to ensure that your consent is freely given, informed, and unambiguous.

Obtaining Consent

- **Checkbox Upon Sign-Up:** During the sign-up process for our app, we provide a checkbox for you to actively select, indicating your consent to our privacy policy and terms of use. This checkbox is a mandatory step before you can create an account.
- **Clear Disclosure:** Before you enter any personal data, we clearly disclose our privacy policy. This ensures that you are fully informed about how your data will be used, shared, and protected.

Recording Consent

- **Digital Records:** We maintain digital records of your consent, including the date and time when consent was given. This allows us to verify and reference your consent in the future if needed.
- **Account Creation:** Your consent is recorded and associated with your account, ensuring a clear link between your consent and the personal data provided during account setup.

Continuous Consent Management

- **Updates and Changes:** If there are significant changes to our privacy policy or how we use personal data, we will seek renewed consent, ensuring that your choices are up to date.
- **Withdrawal of Consent:** You have the right to withdraw your consent at any time. This can be done by contacting us directly. Following a withdrawal, we will cease processing your data and remove your account, unless there is another legal basis for processing.

Your rights with respect to your data

In compliance with the Vietnam's Personal Data Protection Decree issued in 2023, Baseline recognizes and respects your rights regarding your personal data. We are committed to ensuring that you have full control and understanding of how your information is used. Below are the key rights you are entitled to:

1. Right to Access

You have the right to access the personal data we hold about you. This includes knowing the types of data collected, the purposes for which it is processed, and whom it is shared with.

2. Right to Rectification

If you find that any information we hold about you is incorrect or incomplete, you have the right to request corrections or updates to this information. *(We do not accept direct changes to your tennis ranking & player performance, even if deemed inaccurate by yourself, instead this will be evaluated by a committee as outlined on our website.)*

3. Right to Erasure

You can request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected, or if you withdraw consent.

Please be aware that we may need to anonymize certain data instead of outright deletion and are unable to delete match history, rank changes, etc as they are tied to other players or tournament results.

4. Right to Restrict Processing

You have the right to request that we limit the processing of your personal data under certain conditions, such as if you contest the accuracy of the data or if the processing is unlawful.

5. Right to Data Portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and have the right to transmit that data to another controller. This only applies to your own personal data. You may not have the right to other people's data in such a manner.

6. Right to Object

You have the right to object to the processing of your personal data, particularly for direct marketing purposes or when processing is based on a legitimate interest of the controller.

7. Rights in Relation to Automated Decision Making and Profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.

8. Right to Withdraw Consent

If you have given consent to the processing of your personal data for certain purposes, you have the right to withdraw this consent at any time.

9. Right to Lodge a Complaint

You have the right to lodge a complaint with the appropriate data protection authority if you believe that our processing of your personal data infringes the Privacy Law.

Important Considerations When Exercising Your Rights

While we fully support and facilitate the exercise of your rights under the Vietnamese Privacy Legislation, it's important to be aware of certain implications:

- **Impact on Service Provision:** Withdrawing your consent or requesting restrictions on the processing of your personal data may impact our ability to deliver certain services to you. In some cases, this may result in the inability to access specific functionalities of our app or to fully participate in our services. We strive to balance your rights with the necessities of providing a comprehensive user experience.
- **Service Customization:** Restrictions on data processing or deletion of your data may also affect the customization and personalization of your experience within our app, as these features often rely on the use of your personal information.

We understand the importance of these rights and are committed to assisting you in making informed decisions about your data. If you have any concerns or questions about how exercising your rights might affect your use of our services, please feel free to contact us.

How we secure your data

Protecting your personal data is fundamental to us. We employ several security measures to ensure the safety and confidentiality of your information:

- **Robust Security Measures:** We use advanced encryption and secure server environments to protect data against unauthorized access.
- **Compliance with Security Standards:** Regular reviews and audits of our security practices are conducted to align with industry standards.

- **Access Controls:** Only authorized personnel have access to personal data, and they are bound by strict confidentiality agreements.
- **Continuous Monitoring:** Our systems are monitored for potential security threats, and we have procedures in place to address any breaches swiftly.
- **Ongoing Training:** We consistently train our staff in data protection and security best practices.

We encourage you to also play a role in safeguarding your data, particularly by using strong passwords, not sharing your verification codes and notifying us of any unusual account activity.

Data retention

Our data retention policy ensures that we only hold onto your personal information for as long as it is necessary for the purposes for which it was collected, or as required by law.

This duration varies depending on the nature of the data and our legal or regulatory obligations. For example, while we may delete or anonymize usage data, data on matches, rank changes and other data related to your tennis performance will not be deleted as this affects the integrity of the system.

We regularly review our data retention practices to ensure they align with current legal standards and operational requirements, balancing the need to provide our services effectively with your right to privacy.

Changes to this policy

From time to time, we may make changes to this Privacy Policy. We will not reduce your rights under this Privacy Policy without your explicit consent. We always clearly indicate the release date of the most recent changes and provide access to archived versions for your review.

If there are significant changes, we will provide you with a more noticeable notice (including, for certain services, email notifications about changes to the Privacy Policy) and seek your consent for increased data collection.

Contact Us

Please contact us if you have any questions or concerns about your personal data or require assistance in managing your choices and rights.

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