

Privacy Statement – Vortex

1. Who we are

Vortex, based in Lagos, Portugal (“we”, “us”, “organiser”) is the controller of personal data processed in connection with Vortex events.

Contact: info@hybridvortex.com

Website: hybridvortex.com

2. Scope

This Privacy Statement explains what personal data we collect, why we collect it, how long we keep it, who we share it with, and the rights you have under the EU General Data Protection Regulation (GDPR) and Portuguese data protection law (Lei n.º 58/2019). It applies to participants, parents/legal guardians of minor participants, ticket purchasers, spectators interacting with us, and visitors of hybridvortex.com.

This Privacy Statement forms an integral part of the Vortex Terms & Conditions. In case of conflict between the two, this Privacy Statement prevails on data protection matters.

3. What we collect, why, and our legal basis

We collect the minimum data necessary to deliver the event and meet our legal obligations. The table below summarises what we process.

Data collected	Purpose	Legal basis (GDPR Art. 6)	Retention	Opt-in?
Full name, email, date of birth, emergency contact	Registration, communication, identification at check-in, safety	6(1)(b) contract	Up to 24 months after the event	No
Payment data (handled by payment processor)	Process ticket payment	6(1)(b) contract; 6(1)(c) legal/tax obligations	10 years (tax law); we only see the last 4 digits / token	No
Health-relevant declarations (fitness to participate, allergies, injuries you choose to disclose)	Safety, medical response on site	6(1)(d) vital interests; 9(2)(a) explicit consent for health data	Deleted within 30 days after the event	Yes
Parent/guardian name, signature on minor waiver	Verify consent for minor participation	6(1)(c) legal obligation; 8 GDPR (children)	Up to 24 months after the event	No
Live results, scores, workout times, heat assignment	Run a fair competition; on-site display	6(1)(b) contract; 6(1)(f) legitimate interest in event integrity	Live during the event	No (live, on-site only)

Data collected	Purpose	Legal basis (GDPR Art. 6)	Retention	Opt-in?
Online publication of results (name + result)	Public results page on hybridvortex.com and social channels	6(1)(a) consent	Published as part of the public competition record; removed from public listings promptly on request	Yes
Heat lists with gym/team affiliation linked to your name	Promote teams; community visibility	6(1)(a) consent	Published with results; removed on request	Yes
Identifiable photo/video of you (close-ups, portraits)	Marketing and promotion	6(1)(a) consent	Up to 24 months from the event	Yes
Incidental crowd footage	Event coverage and reporting	6(1)(f) legitimate interest in documenting the event	Up to 24 months from the event	No
Marketing emails about future events	Inform you of future Vortex editions	6(1)(a) consent	Until you unsubscribe	Yes
Website analytics (pseudonymised)	Improve the site	6(1)(a) consent (cookie banner) or 6(1)(f)	Up to 14 months	Yes (non-essential cookies)

4. Recipients of your personal data (named partners)

We share only the minimum data needed for each partner to perform their role. We have signed data processing agreements (DPAs) where the recipient acts as a processor on our behalf. Joint controllers, where applicable, are identified as such. The list below is current as at the publication date of this Privacy Statement and will be updated when partners change.

Partner	Role	Data shared	Legal basis
Multicrono	Processor – timing, scoring, results page	Name, category, heat, scores, ranking	6(1)(b) contract
ProFotoSport	Processor – official photo and video partner	Photographs and video of participants at the event	6(1)(f) for crowd footage; 6(1)(a) for identifiable images used in marketing
Stripe	Processor – payment processing	Name, email, billing data, payment data	6(1)(b) contract; 6(1)(c) tax/anti-fraud obligations
hybridvortex.com (our own platform)	Registration, participant communications, and marketing emails	Full registration data set; marketing consent status	6(1)(b) contract; 6(1)(a) consent for marketing
Sponsors as named on hybridvortex.com	Independent controllers; only aggregated, non-identifying statistics shared unless you opt in	Aggregated participation numbers; identifiable data only on opt-in	6(1)(f) for aggregates; 6(1)(a) consent for identifiable data

Partner	Role	Data shared	Legal basis
Portuguese tax & regulatory authorities	Statutory recipient – on lawful request only	Information required by law	6(1)(c) legal obligation

We do not sell personal data. We do not use your data for automated decision-making or profiling that produces legal effects.

5. International transfers

Where any of our processors are established outside the European Economic Area (EEA), we transfer personal data only on the basis of an adequacy decision of the European Commission, or under the European Commission's Standard Contractual Clauses (SCCs) supplemented by appropriate safeguards. A list of relevant transfers and the safeguards in place is available on request via info@hybridvortex.com.

6. How long we keep your data

Retention periods are listed in the tables in sections 3 and 4. We do not retain personal data on public channels indefinitely. After the retention period ends, we either delete the data, irreversibly anonymise it, or, where required by law, archive it with restricted access.

7. Your rights

Subject to the conditions in the GDPR, you have the right to:

- access – obtain confirmation of whether we process data about you, and a copy of that data;
- rectification – correct inaccurate or incomplete data;
- erasure – the “right to be forgotten”, subject to our legal obligations;
- restriction – ask us to limit processing in certain situations;
- objection – object to processing based on legitimate interests, including direct marketing;
- data portability – receive your data in a structured, commonly used, machine-readable format and have it transmitted to another controller where technically feasible;
- withdraw consent at any time – without affecting the lawfulness of processing carried out before withdrawal;
- lodge a complaint with a supervisory authority – in particular the Comissão Nacional de Proteção de Dados (CNPD) in Portugal, or the supervisory authority in your country of residence.

To exercise any of these rights, send a written request to info@hybridvortex.com. To protect your data, we will ask you to identify yourself appropriately before we respond. We will respond within one (1) month of a verified request, extendable by a further two (2) months for complex requests in line with Article 12(3) GDPR. There is no fee unless your request is manifestly unfounded or excessive.

8. Opt-in choices and how to withdraw consent

Any data we ask for that is not strictly required to deliver the event is collected on an opt-in basis, including: online publication of results, heat lists with gym/team affiliation, marketing use of identifiable images, marketing emails, and non-essential cookies. You can change or withdraw any opt-in consent at any time via your registration account, the unsubscribe link in any email, the cookie banner, or by emailing info@hybridvortex.com. Withdrawing consent does not affect your right to

participate in the event and does not affect the lawfulness of processing carried out before withdrawal.

9. Security

We use technical and organisational measures appropriate to the risk, including encrypted transport (HTTPS/TLS), access controls, role-based permissions, signed data processing agreements with our processors, and a documented procedure for handling personal data breaches. We notify the CNPD of any qualifying breach within 72 hours and notify affected participants without undue delay where legally required.

10. Minors

We process personal data of minors aged 14–17 only with the prior written consent of a parent or legal guardian, on the basis of the Parent/Guardian Waiver & Consent Form. We do not require copies of identification documents to be sent by email; the parent or legal guardian verifies their identity in person at on-site check-in. Participants under 14 may not register or attend.

11. Changes to this Privacy Statement

We may update this Privacy Statement from time to time. The current version is always available at hybridvortex.com/privacy. Where changes are material, we notify registered participants by email.

12. Contact

Questions, requests, or complaints about how we handle your personal data: info@hybridvortex.com.

Supervisory authority in Portugal: Comissão Nacional de Proteção de Dados (CNPD), www.cnpd.pt.