

ProPath Privacy Policy

A Platform of Confluence Global Solutions

Effective Date: 26th August 2026

1. Introduction

ProPath Africa ("ProPath Africa," "we," "us," or "our") operates ProPath, a digital platform that connects young African footballers with scouts, academies, clubs, and agents. This Privacy Policy explains how we collect, use, disclose, and protect information when individuals use the ProPath platform, including our website, mobile application, and any related services (collectively, the "Platform").

By accessing or using the Platform, users agree to the collection and use of information in accordance with this Privacy Policy, and consent to the collection, storage, processing, and transfer of Personal Data in accordance with the Data Protection Act, 2012 (Act 843) of Ghana. Users who do not agree with the terms of this policy should not access or use the Platform. ProPath Africa is registered with Ghana's Data Protection Commission as required by law.

2. Definitions

For purposes of this Privacy Policy:

- "Athlete" refers to any footballer who creates a profile on the Platform for the purpose of being discovered by scouts, academies, clubs, or agents.
- "Recruiter" refers to any scout, academy representative, club official, or agent who uses the Platform to identify and evaluate Athletes.
- "Personal Data" refers to any information relating to an identified or identifiable individual.
- "Guardian" refers to a parent, legal guardian, or authorized adult representative of an Athlete who is a minor.

3. Information We Collect

3.1 Information Provided Directly

We collect information that users provide directly when creating an account or using the Platform, including:

- Full name, date of birth, gender, and nationality
- Contact information, including email address and phone number
- Physical attributes relevant to athletic evaluation, such as height, weight, and playing position
- Football history, including current or former clubs, achievements, and playing statistics
- Profile photographs and video footage submitted for evaluation
- Payment information where applicable, processed through third party payment providers
- Guardian contact and consent information, where the Athlete is a minor

3.2 Information Collected Through Use of the Platform

- Device information, including device type, operating system, and unique device identifiers
- Log data, including IP address, browser type, access times, and pages viewed

- Usage data describing how users interact with the Platform
- Location data, where enabled by the user

3.3 Video and Performance Data

The Platform employs an artificial intelligence based video analysis pipeline, including computer vision models such as YOLOv8 and tracking systems such as ByteTrack, to process video footage submitted by Athletes. This processing generates performance metrics including but not limited to movement patterns, speed, positioning, and technical actions during play. This derived performance data is treated as Personal Data and is subject to the same protections described in this Privacy Policy.

4. Legal Basis for Processing

We process Personal Data on the following legal bases:

- Consent provided by the user or, where the user is a minor, by the Guardian
- Performance of a contract, where processing is necessary to provide Platform services
- Legitimate interests, including improving the Platform and preventing fraud
- Compliance with applicable legal obligations, including obligations under the Ghana Data Protection Act, 2012 (Act 843)

Where users access the Platform from jurisdictions with additional data protection requirements, including the European Union, we process Personal Data in a manner consistent with the General Data Protection Regulation to the extent applicable.

5. How We Use Information

We use collected information to:

- Create and maintain user accounts and profiles
- Match Athletes with relevant Recruiters based on position, skill level, and other criteria
- Operate the AI powered video analysis pipeline and generate performance evaluations
- Facilitate communication between Athletes and Recruiters
- Process payments and manage subscriptions
- Improve, secure, and maintain the Platform
- Communicate updates, notices, and marketing where consent has been given
- Comply with legal obligations and enforce our Terms and Conditions

6. Special Provisions Regarding Minors

Given that many Athletes on the Platform are under the age of eighteen, we apply heightened protections to their Personal Data.

- Accounts for Athletes under eighteen years of age require verified Guardian consent prior to activation.
- Guardians may review, correct, or request deletion of an Athlete's Personal Data at any time.
- We limit the disclosure of a minor Athlete's contact information to verified Recruiters only.
- We do not knowingly collect Personal Data from children under the age of thirteen without Guardian consent, and any such data discovered without proper consent will be deleted promptly.

- Video footage of minor Athletes is used solely for evaluation and recruitment purposes and is not used for external marketing without separate Guardian consent.

7. How We Share Information

We may share Personal Data in the following circumstances:

- With Recruiters, limited to profile information, video footage, and performance data necessary for evaluation purposes
- With service providers who assist in operating the Platform, including cloud hosting, payment processing, and analytics providers, under obligations of confidentiality
- With legal or regulatory authorities where required by law
- In connection with a merger, acquisition, or sale of assets, subject to continued protection of Personal Data under this Privacy Policy
- With the consent of the user or Guardian for any other purpose

We do not sell Personal Data to third parties for their independent marketing purposes.

8. Data Storage and Security

We implement administrative, technical, and physical safeguards designed to protect Personal Data against unauthorized access, alteration, disclosure, or destruction. These measures include encryption of data in transit, access controls limiting internal access to Personal Data, restricted access to sensitive information such as biometric, video, and location data, and regular review of security practices. We maintain procedures for detecting, reporting, and managing data breaches, including notification to the Data Protection Commission and affected users as required by law.

Video footage and derived performance data are stored on secure cloud infrastructure. While we take reasonable steps to protect Personal Data, no method of transmission or storage is entirely secure, and we cannot guarantee absolute security.

9. Data Retention

We retain Personal Data for as long as necessary to fulfil the purposes described in this Privacy Policy, including satisfying legal, accounting, or reporting requirements. Athlete profiles and associated video footage are retained for the duration of an active account and for a limited period thereafter to allow for account recovery, after which the data is deleted or anonymized unless a longer retention period is required by law.

10. International Data Transfers

Personal Data may be transferred to and processed in countries outside of Ghana, including countries where our service providers operate. Where such transfers occur, we take steps to ensure that appropriate safeguards are in place to protect Personal Data in accordance with applicable law.

11. User Rights

Subject to applicable law, users and Guardians have the right to:

- Access the Personal Data we hold about them
- Request correction of inaccurate or incomplete Personal Data

- Request deletion of Personal Data, subject to legal retention requirements
- Withdraw consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal
- Object to certain processing activities, including direct marketing
- Lodge a complaint with the Data Protection Commission of Ghana or another relevant supervisory authority

Requests may be submitted using the contact details provided in Section 15.

12. Cookies and Tracking Technologies

The Platform uses cookies and similar tracking technologies to maintain user sessions, remember preferences, and analyze Platform usage. Users may manage cookie preferences through their browser settings. Disabling certain cookies may affect the functionality of the Platform.

13. Third Party Links

The Platform may contain links to third party websites or services, including social media platforms and payment providers. This Privacy Policy does not apply to such third party services, and we encourage users to review the privacy policies of any third party they interact with.

14. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices or applicable law. We will notify users of material changes through the Platform or by other appropriate means. Continued use of the Platform following such changes constitutes acceptance of the revised Privacy Policy.

15. Contact Information

Questions, requests, or complaints regarding this Privacy Policy or the handling of Personal Data may be directed to:

ProPath Africa

Attention: Data Protection Officer

Email: Godswillkofi16@gmail.com

Address: ACP

Accra, Ghana