

# Website privacy policy

This website is operated by Gfinity Plc, 35 New Bridge St, London EC4V 6BW. Any reference in this policy to “we”, “us” or “our” is to Gfinity Plc.

We are the parent company of a group of companies known as Gfinity Group ( which includes [Gfinity PLC](#), [CEVO](#) and [RealSport101](#)). We may share your personal information with other members of our group in accordance with the terms of this privacy policy.

We are the data controller (the company that’s responsible for deciding how your personal data is used) and take your privacy very seriously. Therefore we urge you to read this privacy policy carefully because it contains important information about us and:

- The personal data we collect about you, our users;
- What we do with your information; and
- Who your information may be shared with.

If you don’t understand any part of this privacy policy, you can always contact us with questions by email using [gdpr@gfinity.net](mailto:gdpr@gfinity.net).

## What personal data do we collect?

The table below sets out what personal data we collect about you and how we collect it. We may combine any of this personal data together (for example, combining your visits to our website with your activity history) for the purposes explained in this privacy policy.

Data we collect	How we collect it
Identity data (first name, last name, username or similar identifier, gender, birth date, nationality)	Provided by you on registration or otherwise through a direct interaction with us (such as a response to a questionnaire), or sent to us by a team on your behalf
Contact data (email address, current location)	Provided by you on registration or otherwise through a direct interaction with us (such as a response to a questionnaire) or sent to us by a team on your behalf
Profile data (profile picture, social network account details, game account id’s/details, account preferences)	Optional information provided on registration or otherwise through a direct interaction with us (such

Data we collect	How we collect it
	as a response to a questionnaire) or sent to us by a team on your behalf
Technical data (IP address, browser type, hardware type, network and software identifiers, system configuration information, location data, device information)	Using automated technologies or interactions ( <a href="#">such as cookies and other similar technologies</a> )
Usage data (visits to and use of our website, activity history, engagement data including “clicks and opens”)	Using automated technologies or interactions ( <a href="#">such as cookies and other similar technologies</a> )
Marketing and communications data (marketing preferences in respect of us and third parties)	Provided by you on registration or otherwise through a direct interaction with us (such as a response to a questionnaire) or sent to us by a team on your behalf

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data is not considered personal data in law as it does not directly or indirectly reveal your identity. However, if we combine aggregated data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data and use it in accordance with this privacy policy.

## How will your personal data be used?

The table below sets out how we use your personal data and what our lawful basis for processing your personal data is. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your personal data. We will only use your personal data when the law allows us to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time in accordance with the “What about marketing communications?” section below.

Purpose/Activity	Data type	Lawful basis for processing
To register you as a user	Identity data	Performance of a contract with you
	Contact data	
	Profile data	

Purpose/Activity	Data type	Lawful basis for processing
To provide you with products and services you have registered to use	Identity data	Performance of a contract with you
	Contact data	
	Profile data	
To enable you to partake in competitions and tournaments, including in the Gfinity Elite Draft and the Gfinity Elite Series	Identity data	Performance of a contract with you  Necessary for our legitimate interests (ensuring the proper operation of our competitions and tournaments)
	Contact data	
	Profile data	
To administer and protect our website and provide customer services (including sending you service messages via email)	Identity data	Performance of a contract with you  Necessary for our legitimate interests (ensuring the proper operation of our website and our business)
	Contact data	
	Profile data	
	Technical data	
To verify your identity and to monitor and analyse the use of your account	Identity data	Necessary for our legitimate interests (to prevent and detect fraudulent activity, security incidents and criminal activities)  Necessary to comply with a legal obligation
	Contact data	
	Profile data	
	Technical data	
	Usage data	
To prevent cheating in our tournaments	Identity data	Necessary for our legitimate interests (to prevent and detect cheating and ensure the proper operation of our tournaments)
	Contact data	
	Profile data	
	Technical data	
	Usage data	

Purpose/Activity	Data type	Lawful basis for processing
To investigate complaints about our website or any tournaments	Identity data Contact data Profile data Technical data Usage data	Necessary for our legitimate interests (to ensure the proper operation of our website and tournaments)
To use data to perform statistical and trend analysis	Technical data Usage data	Necessary for our legitimate interests (to develop our business, website and products and to inform our marketing strategy)
To personalise your experience on our website by delivering relevant content and advertisements	Identity data Contact data Profile data Technical data Usage data Marketing and communications data	Necessary for our legitimate interests (to develop our business, website and products and to inform our marketing strategy)
To send you tournament updates and other Gfinity group esports news as part of our email marketing & system message activity.	Identity data Contact Data Profile data Technical data Usage data Marketing and communications data	Necessary for our legitimate interests (to develop our business, website and products and to inform our marketing strategy)  Consent
To enhance the broadcasts, facilitate the management and contribute to the promotion of our competitions and tournaments,	Identity data Profile data	Necessary for our legitimate interests (the broadcast, management and promotion of our competitions and tournaments)

Purpose/Activity	Data type	Lawful basis for processing
including the Gfinity Elite Draft and the Gfinity Elite Series		

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## How will your personal data be shared?

We may share your personal data for the purposes/activities set out in the table above with the following:

- any member of our group of companies (Gfinity Group, which includes [Gfinity PLC](#), [CEVO](#) and [RealSport101](#)), for the purpose of the business operation and administration of our group companies and for marketing purposes; and
- selected third parties including:
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with you (for example third party service providers to help us in areas such as website hosting, maintenance, digital marketing, event ticketing, email marketing and customer support operations);
  - teams who may wish to include you on their roster;
  - with your express opt-in consent, select companies outside our group for marketing purposes;
  - advertisers and advertising networks that require the personal data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience; and

- analytics and search engine providers that assist us in the improvement and optimisation of our website.

We will disclose your personal data to third parties:

- if we are required to do so by law or pursuant to a binding regulatory request (in such circumstances, such disclosure will at all times be solely to the extent required by law or the applicable regulatory request);
- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- in order to enforce or apply our terms of use and other agreements; or
- to protect the rights, property, or safety of our users, or others which may include exchanging information with third party companies for the purpose of fraud prevention or credit risk reduction.

## What about marketing communications?

Where you have given us your express consent to do so, we may from time to time contact you by email about our products and services that may be of interest to you. We may use a third party email service provider (such as MailChimp) to deliver the relevant emails to you.

We will also get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

If at any point, you would like to opt-out of receiving such marketing communications, or would like to change the channels that are used to contact you, please click on the unsubscribe link at the bottom of any emails you receive, or email us, stating your preferences, at [gdpr@gfinity.net](mailto:gdpr@gfinity.net)

Email marketing messages may contain tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of subscriber personal data relating to engagement, geographic, demographics and already stored subscriber personal data.

## Downloads & media files

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party anti-virus software or similar applications.

We accept no responsibility for third party downloads and downloads provided by external third party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

## **Security and storage of your personal data**

We have adopted strict security processes, in accordance with good industry practice, to prevent the unauthorised access to, or disclosure of, your personal data. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. In addition, we also limit access to personal data to those employees, agents, consultants and other third parties on a need-to-know basis and subject in each case to suitable obligations relating to security and confidentiality of your information.

Despite our implementation of these policies, please note that we cannot guarantee the security of any personal data that you send to us via the internet (including via email or forms on our website) or which is collected using online devices/tracking technology.

We will retain your personal data only for as long as is strictly necessary for the purposes for which such personal data was originally collected (or for such longer period as may be required by law).

## **External website links & third parties**

Although we only look to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website (External links are clickable text / banner / image links to other websites).

URL shortening is a technique used on the web to shorten URL's (Uniform Resource Locators) to something substantially shorter. Users should exercise caution before clicking on shortened URL links and verify their authenticity before proceeding.

We cannot guarantee or verify the contents of any externally linked website. Users should therefore note they click on external links at their own risk and we cannot be held liable for any loss or damage caused to you by visiting any external links mentioned.

## **Social media policy & usage**

We adopt a Social Media Policy to ensure our business and our staff conduct themselves appropriately online. While we may have official profiles on social media platforms, users are advised to verify authenticity of such profiles before engaging or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page, and the operators of those social media platforms will have access to the personal data that you disclose.

## Transfer of your personal data outside the EEA

We may transfer some of your personal data to third parties who are located in countries outside of the European Economic Area (“EEA”). This may include third parties in the United States of America and other locations where group companies of ours are based. These countries may not have equivalent data protection legislation to the UK. In each case, we will not transfer your data outside of the EEA unless we have your explicit consent to do so (or have another legal justification for doing so) and where we have ensured that all adequate protections are in place in respect of the processing of such data outside of the EEA. If you require more information about these international transfer of data, please contact us. Where relevant, you are entitled to see a copy of any safeguards which we have put in place.

## Access to your personal information

You are entitled to see the personal information that we hold about you.

If you wish to do this, you can login with your Gfinity ID and go to Account Settings >> Edit Profile >> **Manage Account**.

There you will be presented with the 2 options:

1. Download your information
2. Delete your account

You can request to download and see what personal information we hold by selecting the **Download your information** option. **Manage Account**, will also enable you to review, correct, update or change your personal information at any time. You also have the option to **Delete your account** here. If you decide to delete your account, we will store your data for a further 7 days (to allow you to change



your mind) unless you tell us that you would like your account to be deleted immediately.

Please note that in certain circumstances we may withhold access to your personal information, or retain a copy of your personal information, where we have the right to do so under current data protection legislation.

## Your rights

If the **Manage Account** tool referred to in the **Access to your personal information** section above does not meet your requirements, in certain situations you are entitled to: (i) request access to a copy of your personal data; (ii) request that we correct your personal data; (iii) request that we erase your personal data; (iv) object to processing of your personal data where we are relying on a legitimate interest; (v) request the restriction of processing of your personal data; (vi) request the transfer of your personal data to a third party; or (vii) where you have provided your consent to certain of our processing activities, in certain circumstances, you may withdraw your consent at any time (but please note that we may continue to process such personal data if we have legitimate legal grounds for doing so).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests (in each case, where we are legally entitled to take longer to respond). In this case, we will notify you and keep you updated.

In addition to the above, please note that you have the right to make a complaint at any time to the Information Commissioner's Office. We would, however, appreciate the chance to deal with your concerns first so please contact us in the first instance.

## Changes to this privacy policy

We may update this privacy policy from time to time in our discretion and will notify you of any material changes to the way in which we treat personal data, by posting a

notice on relevant areas of our website. We may also provide notice to you in other ways in our discretion, such as through contact information you have provided.

Any updated version of this privacy policy will be effective immediately upon the posting of the revised privacy policy unless otherwise specified.

Your continued use of our website after the effective date of the revised privacy policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your personal data in a manner materially different than what was stated at the time your personal data was collected.

## Contact us

If you have any questions about this privacy policy, please feel free to contact us by email at [gdpr@gfinity.net](mailto:gdpr@gfinity.net)

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## Resources & further information

- [Overview of the GDPR – General Data Protection Regulation](#)
- [Data Protection Act 1998](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Linkedin Privacy Policy](#)
- [Mailchimp Privacy Policy](#)