



## **SEMPER FORTIS ESPORTS PLC** **PRIVACY POLICY**

### **Who are we?**

We are Semper Fortis Esports Limited, a company registered in England and Wales under company number 12403380 with our registered address being CMS Cameron Mckenna Nabarro Olswang LLP 1 South Quay, Victoria Quays, Sheffield, United Kingdom, S2 5SY. We can be contacted in the following at [info@sfesports.gg](mailto:info@sfesports.gg)

We are committed to protecting the privacy of our users. We want to provide a safe and secure service where we deal with your personal information. This means information that identifies you personally such as your name, photo or contact details or data that can be linked with such information in order to identify you.

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## What personal information do we collect about you?

We collect and process your information in the following ways:

### **Information you give us**

You give us information about you when you contact or otherwise interact with us via the Website or social media.

### **Information we collect automatically**

We collect certain information by automated means, such as cookies and web beacons, whenever you visit our Website. This could include IP address, browser type, operating system, referring URLs, information on actions taken on our website, and dates and times of website visits.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## How do we use your personal information?

- to provide a necessary data for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
- to send you information you have requested us to send, such as our newsletter;
- to provide you with any products, merchandise or services that you have purchased from us; and
- to enter you into a giveaway or competition that you have entered and send you your prize if you win the giveaway or competition.

### **Where we have your consent**

- to contact you and send you marketing communications or updates from us about products, competitions, events, offers and/or the activities of Semper Fortis teams and our Esports activities.

### **Where we have a legitimate interest**

- to contact you in relation to any questions or complaints you may have with something we have done or to respond to any feedback. This is so we can ensure we give you the best possible user experience and deal with any issues or complaints in a timely manner;
- to compile statistics about the behaviour of users on our Website to ensure the best user experience when using the Website; and
- to develop and improve our engagement with you.

### **Where we have a legal obligation**

- where we are under a duty to process your information, in order to comply with (and/or where we reasonably believe we are under a duty to comply with) any legal obligation.

- where we rely on legitimate interest for processing your information, we carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. You can find out more about the information in these balancing tests by contacting us using the details below.

### How long do we keep your personal information for?

Unless we are required or permitted by law to hold on to your data for a specific retention period (for example, by rules imposed by the Data Retention and Investigatory Powers Act 2014), we only retain your information for as long as is necessary for us to use your information as described above, where it is in our legitimate interest, or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use our services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal obligation(s) under applicable law to retain data for a certain period of time;
- (c) our legitimate interest where we have carried out a balancing test;
- (d) statute of limitations under applicable law(s);
- (e) (potential) disputes;
- (f) if you have made a request to have your information deleted; and
- (g) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

### Who do we share your personal information with?

We share your personal information with trusted third parties where we have retained them to provide services that you or our clients have requested. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

We share your personal information with third parties who perform functions on our behalf and who also provide services to us, such as professional advisors, IT consultants carrying out testing and development work on our business technology systems, research and mailing houses and function co-ordinators. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

We share your personal information with our other Group companies for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or merges with us your personal information will be disclosed to such entity. Also, if any bankruptcy or reorganisation proceeding is brought by or against us, all such information will be considered an asset of ours and as such it is possible they will be sold or transferred to third parties.

Where required we share your personal information with third parties to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities

conducting an investigation; to verify or enforce our Terms of Use (insert link) or other applicable policies; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the our website, our business or the public.

### **What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If you do not provide the personal information necessary, or withdraw your consent for the processing of your personal information, where this information is necessary for us to comply with a request from you or provide services to you, we will not be able to fulfil the request or provide these services to you (as applicable).

### **Do we make automated decisions concerning you?**

No, we do not carry out automated decision making.

### **Do we use Cookies to collect personal data on you?**

To provide better service to you on our websites, we use cookies to collect your personal data when you browse.

### **Do we transfer your personal information outside the EEA?**

We do not transfer personal information out of the EEA unless:

- the country or recipient is covered by an adequacy decision of the Commission under GDPR Article 45;
- appropriate safeguards have been put in place which meet the requirements of GDPR Article 46 (for example using the European Commission's Standard Model Clauses for transfers of personal data outside the EEA); or if one of the derogations for specific situations under GDPR Article 49 is applicable to the transfer.

### **What are your rights?**

By law, you have a number of rights when it comes to your personal information. Please contact us using the contact details below to exercise any of your rights. Further information and advice about your rights can be obtained from the data protection regulator in your country.

Rights	What does this mean?
The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
2. The right of access	<p>You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).</p> <p>This is so you're aware and can check that we're using your information in accordance with data protection law.</p>
3. The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse your personal information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
7. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal information with your national data protection regulator.
8. The right to withdraw consent	If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

#### Will we update this privacy policy?

We may periodically make changes to this privacy policy. We will notify you of any significant changes where we have a relationship with you and otherwise post updated versions to the Website.

#### How will we contact you?

We may contact you by phone, email or social media. If you prefer a particular contact means over another please just let us know.

#### How can you contact us?

If you have any enquires you can contact us at: [info@sfesports.gg](mailto:info@sfesports.gg) or by writing to us at:

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#### Date of Last Revision

1<sup>st</sup> November 2020