



GRID - ESPORTS PLAYER PRIVACY NOTICE

This privacy notice informs you how GRID esports GmbH and its subsidiaries (**GRID, we, our, us**), collect, process and share personal data relating to esports players / athletes who compete in esports events and other related persons who participate in those events (such as broadcasters, streamers, owners, directors, managers or other relevant persons involved in the esports event (**you and your**)).

We update this privacy notice from time to time, and this version is dated July 2023.

Who is GRID?

Trusted by leading game publishers and tournament organisers, GRID unlocks the value of official data assets, establishing an ecosystem that facilitates sustainability and growth.

The GRID gaming and esports data platform has partnered with more esports rightsholders than any other platform. We utilise our proprietary technology to extract official data assets directly from the game server, where we provide downstream data services to our customers in the media, gaming, betting and entertainment sectors.

To provide GRID services, we process certain personal data about esports players and related persons as a controller under the applicable data protection law, in particular the EU General Data Protection Regulation. This means that we are responsible for deciding how we use your personal data.

What information does GRID collect?

GRID collects personal data of the type set out below from esports events:

Name and identity data: which includes player nickname, name, gender, nationality and date of birth, social media handles and websites.

Player profile: the portrait headshot of players in their team uniform that is used in broadcasts.

Professional team data: which includes the esports played by the individual (or previous esports), their team (or previous teams) and images of that person in their professional capacity as an esports player.

Gameplay and performance data: includes appearances, playing history, statistics related to player performance (such as kills, deaths, team results) and other player history data that may consist of other derived statistics relating to performance.

Audio-visual data: we collect the audio-visual feeds from live esports events that encompass these data set out above.

No Sensitive Personal data: GRID does not collect sensitive personal data.

What is the purpose of processing your personal data?

We process your personal data for several purposes as set out below:

- Providing live gameplay data, tournament scheduling and statistics to our clients, which include regulated betting clients (who set markets/odds for esports events) and non-betting customers which include entertainment/media customers and fantasy esports products.
- The provision of gameplay data and statistics to approved users under the GRID Open Platform and GRID Portal services. Those users build products based on gameplay statistics and data.
- For our GRID integrity services. Where we identify matches or events that have integrity concerns, which may include further investigations into a particular team or player.
- Audiovisual footage of gameplay, that is used to broadcast events live or delayed, via streaming platforms, or where the gameplay footage is utilised in software products for betting, media and entertainment purposes.

The basis for which GRID processes personal data is the following:

- To enable GRID to comply with our legal obligations; and/or
- Pursuing legitimate interests of our own or of third parties, provided that the resulting impact on your interests and fundamental rights does not outweigh our interests or those of third parties.

How we share your personal data

We disclose esports players' information to game publishers (specific to the relevant esports title), media partners and betting operators under our contractual and commercial obligations to those parties.

As part of GRID's integrity services, we may also share information relating to investigating integrity investigations regarding an Event.

We may also share your personal data within GRID's group of companies for operational purposes and to subcontractors and/or licensed third parties who are contractually obligated to comply with this policy.

We may also be required to disclose personal data when legally required to do so (such as to comply with law enforcement or legal proceedings). If GRID undertakes a corporate transaction, such as a share sale or asset sale, your personal data will likely be transferred or made available to the purchaser.

In addition, we combine your personal data with those of other users to share aggregate user statistics with third parties in aggregated and anonymised form.

GRID has global operations, and therefore we may need to transfer your personal data outside of the country where it was collected. For example, the event may take place in one country, that data is transferred to GRID in Germany for processing within GRID's platform, then subsequently the data is transferred to companies within our corporate group, service providers and commercial customers based in other countries. We have an office in Poland where personal data is processed daily.

How long do we retain your personal data?

GRID retains personal data as long as required to fulfil the purposes for which it was collected.

There are some circumstances we may retain personal data for more extended periods if necessary to comply with our legal obligations, which include legal, tax or accounting requirements, or if we are required to do so by a court, regulator or other regulatory or legal body with sufficient authority to make such a request to GRID.

When determining the retention period for personal data, we consider the nature of the personal data, which includes the amount, sensitivity, and the risk of harm to you if there was an unauthorised use or disclosure of these data. GRID also considers whether we can achieve the purposes set out in this notice by other means.

Your rights to your personal data

You have the following data protection rights, under certain circumstances:

- Right to request access to your personal data.
- Right to rectification of any mistakes in your personal data.
- Right to request the erasure of your personal data.
- Right to request restriction of the processing of your personal data.
- Right to object to GRID processing of personal data.
- Right to withdraw your consent to GRID's use of your personal data, where the lawful basis of processing is consent.

If you wish to exercise these rights, please contact us using the contact details in the Contact Us section below. If there is a legal or regulatory reason why the above rights cannot be exercised, we will inform you why that is the case.

Contact us

GRID is the controller of your personal data. Should you have any questions regarding the processing of your personal data, or you wish to exercise your rights under this notice, please contact us at the below:

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