

# PRIVACY POLICY

## 1. General Information

### 1. Service description and provider

Esports BD Holding LLC, domiciled in Gazipur, Dhaka ("Esports BD", "we" or "our"), takes the protection of your personal data very seriously and therefore makes available to you the following information (the "Privacy Policy").

Esports BD is a Bangladeshi esports organisation based in Gazipur, Bangladesh.

Whenever you use our Service, we will be processing personal data, as described in the Processing Procedure section of this Privacy Policy. By processing the General Data Protection Regulation ("GDPR") references a very broad spectrum of operations executed on personal data – basically, whenever we or others get in contact with your personal data, we process it, according to the GDPR definition. Personal data is information that we or others can use to identify a person, i.e. information that can be linked to a particular individual.

As a company based in the Bangladeshi Union, we treat all personal data in compliance with GDPR, no matter where you are from or where you are currently located.

### 2. Scope of the privacy policy

The following Privacy Policy will provide you with information about the type of personal data that is collected and how it is processed and used during your use of the Service. Unless otherwise provided in this Privacy Policy, this Privacy Policy exclusively regulates how ESPOTS BD, including the companies that help us provide the Service (the "Vendors"), processes your personal data. In case you make use of services provided by third parties other than the Vendors, the privacy policies of these third parties apply exclusively.

### 3. Contact details of the provider

Contact Detail of the controller according to Art. 4 GDPR:

EsportsBD Holding LLC, Gazipur, Dhaka

Managing Director: (.....)

Email:(.....)

Phone number :(.....)

District Court Dhaka, Gazipur:(.....)

Unless otherwise provided in this Privacy Policy and in case you want to exercise any right pursuant to this privacy policy or applicable data protection laws and regulations or if you have any questions concerning privacy policy issues, please contact (.....). At this address, you can inquire about privacy issues and issue a request to review, change or delete your personal data stored by ESPOTS BD, as described below. Alternatively, you can also contact ESPOTS BD using the above postal address or by phone. This will cause you no other costs than the transmission costs stated in the base rates (i.e. the costs of your Internet, e-mail, mobile phone or telephone connection).

You can reach our data protection officer at the following contact details:

(.....)

### 4. Rights

In accordance with the requirements pursuant to the GDPR, you may exercise the following rights:

1. **Right to be informed** (Art. 12 GDPR) – You have the right to be informed about how ESPOTS BD processes personal data. To this end this privacy policy will provide you with

descriptions of the purpose (why we use your data), the retention policy (how long we process data) and who we share personal data with (our processors/vendors).

2. **Right of access** (Art. 15 GDPR) – You have the right to know what personal data about you we use and process. Please have a look at the Processing Procedure sections below for a comprehensive overview. If you want to know more, get in contact with us using the contact details provided above.
3. **Right to rectification** (Art. 16 GDPR) – You have the right to request, that we correct inaccurate data we process about you or that we add data, where it is incomplete. Some of the information we process is being provided by you during the account creation or during the use of the Service and may be modified through the Service itself. If you feel, that other personal data may be incorrect, simply get in touch with us, as described above.
4. **Right to erasure** (Art. 17 GDPR) – In some instances, we may ask for your consent before processing your data. If you change your mind later, you can simply change the respective setting in the Service and we will no longer process any consent based data. Please note that we automatically erase your data, if it no longer necessary for the purpose we collected or processed it for. We will also ensure that data is erased from Vendor systems. If, for example, you have contacted our customer support and requested help, we will erase all personal data once your request has been solved, since your personal data is no longer needed for the purpose of providing you with customer support. If beyond that you believe that you have a right to have your personal data deleted, please contact us as described above.
5. **Right to restrict processing** (Art. 18 GDPR) – When you exercise your right to rectification, to object or to erasure you may ask ESPOTS BD to restrict the processing of personal information to the extent necessary to review your request. If you continue using our Service(s) during such a request, we will also process your personal data to provide you with the Service. If beyond that you believe that you have the right to have your personal data use restricted, please contact us as described above.
6. **Right to data portability** (Art 20 GDPR) – You may ask us to export for you the personal data that you provided us with during the Service. This does however not include any data we have created based on the personal data you provided us with. You may also ask us to have your personal data transmitted from us to another controller. Please note that we will consider the technical feasibility on a request by request basis. If you choose to exercise this right, simply get in contact with us using the contact information provided above.
7. **Right to object** (Art. 21 GDPR) – To the extent that ESPOTS BD' data processing is based on legitimate interest, you can object the processing of data we engage into at any point. Please check the Processing Procedures below to see if the processing you are objecting to is based on legitimate interest. You can find this information under the Legal Basis subsections. If you choose to exercise this right, simply get in contact with us using the contact information provided above.
8. **Rights in relation to automated decision making and profiling** (Art. 22 GDPR) – We do not engage in automated decision making or profiling according to the definitions provided under GDPR.
9. **The right to lodge a complaint** (Art. 77 GDPR) – You may get in contact with the supervisory authority if you believe that the data concerning you is being processed by ESPOTS BD in breach of data protection provisions. The Dhaka Commissioner for Data Protection and Freedom of Information is responsible for ESPOTS BD and may be contacted as provided [here](#).

In each case mentioned in this Rights section, please always ensure that provide us with all the necessary information to process your request.

Once we receive all necessary information, we will usually get back to you no later than a month after you completed your request.

Please note, that we may require that you provide means of authentication, if we are not sure about your identity.

## 2. Processing Procedures

### 1. Website Access

Whenever you access our website (the “**Website**”), without using any additional features or services as described below, we process data that your browser and the servers on which the website is hosted, automatically exchange.

## 10. Your Data

In order for the content of the Website being displayed on your device, we process the following data, including, as applicable, personal data:

- Date and time of access;
- Amount of data sent;
- Browser used;
- Operating system used;
- IP address used (if applicable: in anonymous form).

### 1. Data transfer

1. Vendors – Vendors provide applications and services, in this case host services and content delivery service for the Website

Our Vendors for the hosting and delivery of the website are (.....)

We have contractually agreed with these Vendors that they may only use your data as instructed by ESPOTS BD and for our services. Any other use – including contact by these Vendors – is only permitted with your prior consent.

2. Authorised public authorities – Law enforcement authorities or public authorities (e.g. tax authorities, social insurance), supervisory authorities in the event of requests for or obligations to provide information in the event of legal action, preliminary proceedings and to our own tax advisors, auditors and lawyers in order to exercise our rights and our legal obligations.
3. Change in ownership – In the event of a takeover or merger with another company, we will pass on your data to that company. In such a case, we will ensure that the applicable data protection regulations are complied with and that the data will only be processed to the same extent as described in this policy.

### 2. Legal basis

Your data related to displaying the Website will be processed pursuant to Art. 6 para. 1 lit. b GDPR, which allows for the processing of personal data for the purpose of fulfilling a contract.

### 3. Data retention

Any processing of this data will cease as soon as you stop interacting with the website. Data is automatically deleted no later than 24 hours after your visit.

## 2. Cookies

Cookies are small files that are stored on a user's device. They are designed to contain a limited amount of data specific to a particular user and website and can be called up either from the web server or the client device. This allows the server to deliver a page which is tailored to a specific user, or the website itself may contain a script that understands the information in the cookie and is thus able to transfer information from one visit to the website (or a related website) to the next.

A full list of all the cookies currently used on the Website, and the choices available to you with regard to the use of the different type of cookies is made available when you first visit the Website.

### 3. Contact

We offer you the possibility to get in contact via email or the contact form provided on the Website. You may get in contact with us in order for us to fulfill applicable legal obligations such as assisting you with data protection related requests under GDPR or for other types of inquiries or requests.

### 4. Your Data

When you get in contact with us, certain personal data is processed. You are able to decide which personal data you provide us with during your request, but in general we need your contact information, to respond to your request. We therefore, process the following personal data:

- Ip addresses;
- email address;
- other contact information, as provided by you.

This contact data is stored and processed exclusively for the purpose of responding to your request, for establishing contact and the associated technical administration.

### 5. Data transfer

1. Vendors – Vendors provide applications and services, in this case host services and email provider services.

Our Vendor for the hosting and processing of all our emails is the **Google LLC** through their Google Apps for Business' service.

We have contractually agreed with this Vendor that it may only use your data as instructed by ESPOTS BD and for our services. Any other use – including contact by this Vendor – is only permitted with your prior consent.

2. Authorised public authorities – Law enforcement authorities or public authorities (e.g. tax authorities, social insurance), supervisory authorities in the event of requests for or obligations to provide information in the event of legal action preliminary proceedings and to our own tax advisors, auditors and lawyers in order to exercise our rights and our legal obligations.
3. Change in ownership – In the event of a takeover or merger with another company, we will pass on your data to that company. In such a case, we will ensure that the applicable data protection regulations are complied with and that the data will only be processed to the same extent as described in this policy.

### 6. Legal basis

Your contact data will be processed pursuant to Art. 6 para. 1 lit. b GDPR, which allows for the processing of personal data for the purpose of fulfilling a contract.

### 7. Data retention

This contact data will be deleted 30 days after your request has been processed: This is the case if it is clear from the circumstances that the matter has been finally clarified and no legal storage obligations to the contrary exist.

### 4. Social Media Plugins

The Website provides you with the opportunity to interact with websites and applications that enable users to create and share content or to participate in social networking ("Social Media").

## 8. Your Data

You generally decide which Social Media you want to engage with. In most cases you will need to either have an existing account with the Social Media, or you will need to create an account. If you choose to interact with a Social Media, then, other than the data that you provide each Social Media with, the Website will set a

- Social Media Cookie,

allowing us to aggregate many different Social Media service through one interface.

## 9. Data transfer

1. Vendors – Vendors provide applications and services, in this case the aggregation of different Social Medias into one tool.

Our Vendor for the hosting and processing of the Social Media Service Tool is the **ShareThis, Inc..**

We have contractually agreed with this Vendor that it may only use your data as instructed by ESPOTS BD and for our services. Any other use – including contact by this Vendor – is only permitted with your prior consent.

2. Authorised public authorities – Law enforcement authorities or public authorities (e.g. tax authorities, social insurance), supervisory authorities in the event of requests for or obligations to provide information in the event of legal action preliminary proceedings and to our own tax advisors, auditors and lawyers in order to exercise our rights and our legal obligations.
3. Change in ownership – In the event of a takeover or merger with another company, we will pass on your data to that company. In such a case, we will ensure that the applicable data protection regulations are complied with and that the data will only be processed to the same extent as described in this policy.

## 10. Legal basis

The data processing for the purpose of interacting with Social Media is based on your consent, which you gave through the privacy settings with the visit to the Website. Pursuant to Art. 6 para. 1 lit. a GDPR, data processing is permitted if you have given your consent for data processing for one or more specific purposes. Within the scope of the opt in you have given a declaration of consent with which you have agreed to the interaction with the respective social media plugin. A revocation is possible at any time free of charge through the Website's privacy settings.

## 11. Data retention

You can opt out from Social Media services at any point. To opt out of Social Media services on the Website on your device, simply change the respective setting in the Website's privacy settings. The data processed for interaction with Social Media is stored for up to 1 year.

## 5. Analytics

We use reports provided by analytics providers to help us understand Website and Service traffic and usage.

## 12. Your Data

When you access our Website, we will analyse how our Website is used.  
To this end

- an analytics cookie

is set on your device. This cookie enables us to track your use of the Website and your interaction with other websites.

### 13. Data transfer

1. Vendors – Vendors provide applications and services, in this case host and analytics services.

These Vendors are the **Google, LLC** through their Google Analytics service and Automatticinc..

We have contractually agreed with these Vendors that they may only use your data as instructed by ESPOTS BD and for our services. Any other use – including contact by these Vendors – is only permitted with your prior consent.

2. Authorised public authorities – Law enforcement authorities or public authorities (e.g. tax authorities, social insurance), supervisory authorities in the event of requests for or obligations to provide information in the event of legal action preliminary proceedings and to our own tax advisors, auditors and lawyers in order to exercise our rights and our legal obligations.
3. Change in ownership – In the event of a takeover or merger with another company, we will pass on your data to that company. In such a case, we will ensure that the applicable data protection regulations are complied with and that the data will only be processed to the same extent as described in this policy.

### 14. Legal basis

The data processing for the purpose of analytics is based on your consent, which you gave with the first visit to the Website. Pursuant to Art. 6 para. 1 lit. a GDPR, data processing is permitted if you have given your consent for data processing for one or more specific purposes. Within the scope of the opt in you have given a declaration of consent with which you have agreed to evaluation of your use of the website for analytic services. A revocation is possible at any time free of charge through the Website's privacy settings.

### 15. Data retention

You can opt out from analytic services at any point. To opt out of analytics services on the Website on your device, either change your setting for all websites by following this [link](#) or simply change the respective setting in the Website's privacy settings. The data retention for analytic services is 12 months.

## 6. Careers and Job application

We provide you with the opportunity to review our current job openings and to directly apply for them through our Website.

### 16. Your Data

We provide you with the opportunity to apply to open positions at ESPOTS BD. To this end we announce job openings on the Website to which you can apply through email. In this case we will process all the information, including personal data, that you supply us with, which typically consists of:

- Contact information, such as your name, your address, your email address and your phone number;

- Historical data, such as where you have previously worked at and your life history relevant to the application;
- Medical and health data, such as disabilities;
- Religious beliefs to the extent relevant for tax reasons under applicable law.

## 1. Data transfer

1. Vendor – Vendors provide applications and services, in this case host services and email provider services.

Our Vendor for the hosting and processing of all our email communication, including for the purpose of application, is the **Google LLC** through their Google Apps for Business' service.

We have contractually agreed with this Vendor that it may only use your data as instructed by ESPOTS BD and for our services. Any other use – including contact by this Vendor – is only permitted with your prior consent.

2. Authorised public authorities – Law enforcement authorities or public authorities (e.g. tax authorities, social insurance), supervisory authorities in the event of requests for or obligations to provide information in the event of legal action preliminary proceedings and to our own tax advisors, auditors and lawyers in order to exercise our rights and our legal obligations.
3. Change in ownership – In the event of a takeover or merger with another company, we will pass on your data to that company. In such a case, we will ensure that the applicable data protection regulations are complied with and that the data will only be processed to the same extent as described in this policy.

## 2. Legal basis

Your application data will be processed pursuant to Art. 6 para. 1 lit. b GDPR, which allows for the processing of personal data for the purpose of fulfilling a contract.

## 3. Data retention

All application data that you provide us for the purpose of applying to a job, will be deleted 90 days after we have filled the relevant position unless you have provided your consent for the application data to be stored for the evaluation for future job openings.

## 7. Shop

We also provide the possibility to purchase items related to our Services linked through our Website (the "Shop"). The Shop is not operated by ESPOTS BD, but run independently from our Website. The Shop provider is the We Are Nations, Inc. and any data processed during your access to the shop or a purchase made thereon is subject to the We Are Nations Terms and Conditions available [here](#) and the Privacy Policy available [here](#). ESPOTS BD does not receive or process any personal data from We Are Nations about any access to or purchases made on the Shop.

## 8. Newsletter

We offer you the possibility to receive updates and news, including articles about us with third parties, via our newsletter.

## 4. Your Data

When signing up for our Newsletter, we will need to process certain personal data in order to provide you with the information you requested. This data includes:

- your email address.

## 5. Data transfer

1. Vendor – Vendors provide applications and services, in this case newsletter delivery and content delivery services.

Our Vendor for the sending and processing of all newsletter features, including for the purpose of analytics and content delivery with their Mail service.

We have contractually agreed with this Vendor that they may only use your data as instructed by ESPOTS BD and for our services. Any other use – including contact by this Vendor – is only permitted with your prior consent.

2. Authorised public authorities – Law enforcement authorities or public authorities (e.g. tax authorities, social insurance), supervisory authorities in the event of requests for or obligations to provide information in the event of legal action preliminary proceedings and to our own tax advisors, auditors and lawyers in order to exercise our rights and our legal obligations.
3. Change in ownership – In the event of a takeover or merger with another company, we will pass on your data to that company. In such a case, we will ensure that the applicable data protection regulations are complied with and that the data will only be processed to the same extent as described in this policy.

## 6. Legal basis

The data processing for the purpose of providing newsletter functionalities is based on your consent, which you gave when you signed up for the newsletter on the Website. Pursuant to Art. 6 para. 1 lit. a GDPR, data processing is permitted if you have given your consent for data processing for one or more specific purposes. Within the scope of the sign up you have given a declaration of consent with which you have agreed to evaluation of your use of the newsletter functionalities. A revocation is possible at any time free of charge through the Website's privacy settings.

## 7. Data retention

Any processing of newsletter data will cease when you unsubscribe from receiving the newsletter.

## 9. Giveaways and Contests

From time to time ESPOTS BD may offer you the opportunity to participate in giveaways and/or contests which may include prizes.

## 8. Your Data

When taking part in giveaways or contests we process personal data, that you supply us with, which typically consists of:

- Social Media account handles
- Name
- Email addresses
- Date of birth

## 9. Data transfer



4. Vendor – Vendors provide applications and services, in this case organisation and performance of giveaway and contest services. Our Vendor is the **Crowd9 PTY LTD** with their Gleam service.

Additionally, when providing prizes through our partners, it may become necessary to share personal data with such partners to the end of providing the prize, i.e. shipping the item in question.

We have contractually agreed with this Vendor and the partners that they may only use your data as instructed by ESPOTS BD and for our services. Any other use – including contact by this Vendor or the partners – is only permitted with your prior consent.

5. Authorised public authorities – Law enforcement authorities or public authorities (e.g. tax authorities, social insurance), supervisory authorities in the event of requests for or obligations to provide information in the event of legal action preliminary proceedings and to our own tax advisors, auditors and lawyers in order to exercise our rights and our legal obligations.
6. Change in ownership – In the event of a takeover or merger with another company, we will pass on your data to that company. In such a case, we will ensure that the applicable data protection regulations are complied with and that the data will only be processed to the same extent as described in this policy.

## 10. Legal basis

The data processing for the purpose of providing giveaway and contest functionalities is based on your consent, which you gave when you signed up for the newsletter on the Website. Pursuant to Art. 6 para. 1 lit. a GDPR, data processing is permitted if you have given your consent for data processing for one or more specific purposes. Within the scope of the sign up you have given a declaration of consent with which you have agreed to evaluation of your use of the giveaway and contest functionalities. A revocation is possible at any time through getting in contact with us in the way provided above.

## 11. Data retention

All personal data provided for this purpose is either anonymised or deleted 12 months after the completion of the relevant giveaway or contest.