Team 02 (Rumble Realm) DPIA

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

Rumble Realm is a new website for organizing teams and tournaments for Overwatch, this is primarily targeted at players and event organisers.

On the website all users can search for Overwatch players, teams or tournaments and view information about them.

Our use of collecting personal data would involve user's names, email addresses, biographies, profile pictures and some users may choose to enter their BattleNet usernames. We will also be collecting other data including devices that a user uses, tournament history, team information and tournament information. Team information would include collecting team name, banner, description, and team members. Tournament information would include collecting tournament name, banner, participants, entry fee prize, location, and the start/end times.

Our main use for the personal data will be for account creation and searching for users via their BattleNet username. Other data will be used for searching and viewing teams and tournaments.

We only collect personal details from individuals over the age of 13, when creating an account individuals must declare themselves to be over the age of 13 to be able to create an account.

We identified the need for a DPIA as we will be collecting personal details such as email addresses, name, profile picture, biography and BattleNet usernames which could result in identifying an individual.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

We collect data in the following ways:

- Direct interactions with users such as when creating an account, team or tournament, submitting match results and joining a team or tournament.
- Indirect actions from users submitting match results that other players and teams took part in.

We use data for the following purposes:

- To register users to our service.
- For tracking tournaments.
- To enable users to view match information.
- To enable users to create and join teams.
- To enable users to create and join tournaments.
- To enable users to view a player's stats page.
- To enable teams to participate in tournaments.
- To enable users to share tournaments.

We use essential cookies, which are not subject to the consent requirement, for the following purposes:

- Keeping track of a user's session.

Storage and deletion:

- The data we collect is stored on a Virtual Machine on an Amazon Web Service in the EEA.
- Personal data will only be kept until the end of the Summer Examination Period after which it will be removed from the database.

Data sharing:

- We do not share any data with third party providers.

Security measures:

- We require users who create an account to have at least 8 characters and encourage them to use numbers, symbols and a combination of upper and lowercase.

- We use SSL protection on our login and sign-up pages.
- An account token is required to make API calls.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

Data processed:

- Identity data: name, BattleNet usernames, website username.
- Contact data: email address.
- Profile data: website username and password.
- Usage data: information about user's session.

Special categories of personal data:

We do not process any special category of personal data.

Volume of personal data:

We anticipate that we will have around 50 users.

Retention of data:

We have a retention period that lasts until the end of the Summer Examination Period. Once the retention period has expired, we will remove any data collected.

Geographical area:

The website and all personal data are located in the EEA. We do not use any location services. The site language is UK English and there are currently no options to change the language.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Nature of service and users:

Our organization engages with individuals who interact with our web application for tracking Overwatch tournaments. The relationship is primarily that of service provider to users who voluntarily engage with our platform to access information and participate in gaming-related activities. Users do not require an account to use the search feature and view a player, team or tournament.

In our GDPR policy there are contact detail where users can contact us.

Level of control:

Individuals have significant control over their data within our web application. They can choose to provide consent for the processing of their personal data, access and manage their data, and withdraw their consent at any time. Transparency and user empowerment are central tenets of our data processing practices.

User's expectations:

Individuals using our web application would expect their data to facilitate participation in Overwatch tournaments, such as registration and match scheduling. Clear communication and consent mechanisms ensure that users understand how their data will be used within the platform.

Inclusion of vulnerable groups:

While our primary user base consists of gaming enthusiasts, it's possible that individuals of various age groups, including children, may access our platform. We take special care to implement appropriate safeguards for the protection of minors' data, such requiring users to confirm that they are over the age of 13 to prevent young children from having their personal data collected and processed.

Prior concerns or security flaws:

There have been no prior concerns raised regarding the type of processing or security flaws within our web application. However, we maintain vigilance and conduct regular security assessments and audits to identify and mitigate any potential risks or vulnerabilities.

Novelty of Processing:

While the concept of tracking esports tournaments is not novel, our web application will introduce innovative features or functionalities to enhance user experience and engagement, by focusing specifically on Overwatch. We continuously monitor industry trends and technological advancements to ensure that our platform remains competitive and secure.

Issues of public concern:

While there are no specific issues of public concern related to our web application at present, we remain attentive to broader discussions surrounding data privacy, cybersecurity, and ethical considerations within the gaming and esports communities. We are committed to addressing any emerging concerns proactively and transparently.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

Aim of our service:

Our aim is to offer an online Overwatch teams and tournaments organiser that will enable users to create and manage teams and tournaments.

Intended effect on individuals:

We intend to make organising Overwatch tournaments easier for event organisers, and streamline joining and creating teams for players.

Benefits of the processing:

Our service benefits Overwatch players as we are creating a service that caters specifically to Overwatch players, whereas other E-sports event organiser websites cater to a large variety of games so are less able to be specific to the needs of an Overwatch player.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

We have conducted website user-testing and consultations with players themselves to help develop our website.

We also consult with team leaders, coaches and tournament organisers through surveys which include questions on website usability and services, quality of content and general user experience. This consultation is conducted online with users i.e. players, coaches and event organisers who have a user account.

We have not consulted with any experts as we do feel the site represents a significant risk to the players, teams, coaches, or organisers.

We note that where residual risks have been identified, we are satisfied that they are limited, and appropriate measures are in place to mitigate potential harm.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Lawful bases for processing:
The lawful basis for processing personal data within our organization is primarily based on the consent of the individuals, as outlined in Article 6(1)(a) of the General Data Protection Regulation (GDPR). Consent is obtained transparently and explicitly for specific purposes related to the provision of services through our web application.

Necessity and proportionality:
We believe that our processing achieves the purposes that we have set out in step 2 and does go beyond these purposes than reasonably necessary.

To avoid function creep, we only use data for the purposes set out in this DPIA.

To ensure data minimisation and proportionality we will only ask for data that we need for the current specified purpose.

Transparency and data subject rights:
Individuals are given information about our processing through our privacy notice which is accessible through our website footer. Our cookie policy, which is accessible from our website footer. Our cookie policy and privacy notice should be understood by most people over the age of 13.

We explain about individuals' rights in out privacy notice and include an email address which individuals can use to contact us about any questions pertaining to their rights and exercising them.

Processors:
We use no 3rd party processors.

International transfers:
There are no international transfers of data.

Best interests of the child:
The best interests of the child are reflected through only allowing users who declare themselves to be over the age of 13 to be able to make an account and only they will have personal data be collected and processed. Best interests of the child are also reflected in our limited collection and use of personal data.

Age-appropriate application:
We use a self-declaration process to establish user age, where users confirm that they are over the age of 13 by filling a checkbox on account creation. This is appropriate as we only collect and process limited personal data from all users, and our use of data is limited to what an individual would expect of an Overwatch tournament manager. We carry out the same processing activities and apply the same standards to all users.

Transparency:
We provide a privacy notice and cookie policy explaining how we use personal data and how cookies are used on our website. In addition, we provide additional specific bite-sized explanations about how we use personal data at the point at which we collect it. Our privacy notice is also written in a clear and easy to understand language.

Detrimental use of data:
We do not use data in any way that could be detrimental to a person's well-being.

Policies and community standards:
We follow our privacy notice and only use data in accordance with these documents. We will remove accounts of users that do not follow out standards, we will also remove all data collected from these accounts.

Default settings:
We do not use privacy settings unless an individual creates an account. When creating an account users have the option to make their account public or private same will be done when creating tournaments and teams.

No cookies are placed before a user consents to the cookies.

Data minimisation:
We only collect and process the minimum amount of personal data needed for activities. Users have a choice on whether to accept cookies.

Data sharing:
We do not engage in the sharing of personal data with third parties, except where explicitly authorized by individuals or required by law.

Geolocation:
We do not collect or otherwise process geolocation data.

Profiling:
We do not carry out any profiling.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
1. Sharing of user's personal data including names and profile pictures with other service users may lead to identification, exposing users to the risk of being targeted for physical or emotional harm (for example through stalking, bullying or harassment).	possible	significant	medium
2. Sharing of user's BattleNet usernames with other users may allow for a user's social media handle to be inferred from their BattleNet username which may result in online harassment, exposing users to emotional harm.	probable	minimal	low
3. Signing up with existing or incorrect user or team data by nefarious service users that exposes individuals to identity theft, fraud or reputational damage (for example by entering player/team information using another person/team's details or entering bad information).	possible	minimal	low
4. Online tools for users to exercise their data rights that are not transparent, not specific to the rights they support, or not provided, and that risk the user's right to respect their views.	Possible	Severe	High
	remote	severe	low
5. Unauthorized access of user accounts and			

passwords via security penetration of the databases, resulting in fraud, identity theft, or reputational damage.			

Step 6: Identify measures to reduce risk

	Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5			
Risk	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved**
1.	A reporting system has been set up such that any service users found to be breaching the code of conduct can be reported and have their account details removed. Players are also able to remove their real name and profile pictures from their profile.	Eliminated reduced accepted Reduced	Low medium high Low	Yes/no No
2.	Sharing of user's BattleNet usernames with other users may allow for a user's social media handle to be inferred from their BattleNet username which may result in online harassment, exposing users to emotional harm.	Reduced	Low	Yes
3.	Each player, team and tournament has a unique visible ID, clearly differentiating them. Players, teams and tournaments cannot be set up with the same name.	Eliminated	Low	Yes
4.	The use and processing of all user data is clearly outlined in a privacy policy which each user must consent to in order to use the service. A data access system has been set up so that any user may request access to their data and for its erasure as	Eliminated	Low	Yes

	per Article 12-23 of the GDPR.			
5.	We use the Amazon Web Services to store our data, which is end-to-end encrypted and complies with Article 32 of the GDPR.	Eliminated	Low	Yes

Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:	Garance Allaire-Rousse 05/06/2024	Integrate actions back into project plan, with date and responsibility for completion

Residual risks approved by:	Garance Allaire-Rousse 05/06/2024	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Garance Allaire-Rousse 05/06/2024	DPO should advise on compliance, step 6 measures and whether processing can proceed

Summary of DPO advice:

Ensure we ask for consent for cookies, provide privacy and cookie policy. Implement a reporting system. Ensure that each team and user have a UUID. Processing can proceed as only required data will be processed and the measures in step 6 allow for appropriate risks mitigation.

DPO advice accepted or overruled by:	Haiwei He 05/06/2024	If overruled, you must explain your reasons

Comments:

Reporting system which was suggested in step 6 should not be implemented as user's can't interact between each other, instead we need to administrate team, user and tournament names as well as any pictures uploaded with it.

Consultation responses reviewed by:	Ogieltaziba Douglas 05/06/2024	If your decision departs from individuals' views, you must explain your reasons

Comments:

We consulted with some Overwatch players to find what features we would need and therefore what personal data we would require and that they would be ok with being collected.

This DPIA will kept under review by:	Garance Allaire-Rousse	The DPO should also review ongoing compliance with DPIA