

## **Intergalactic Gaming Privacy Notice**

### **Summary of how we use your data**

- Intergalactic Gaming Ltd (also referred to as "**IG**", "**we**" or "**us**") uses your personal data to operate the 'Intergalactic Gaming' platform (currently available at [ [www.iggalaxy.com](http://www.iggalaxy.com) ], the "**Platform**") and, if you are a Participant (as defined in the [Global Rules](#)), to carry out its responsibilities as the administrator and organiser of the esports competitions that are hosted on the Platform (the "**Competitions**").
- If you are a Participant, IG will in particular use your data to ensure that you are appropriately registered in a Competition, to manage your involvement in Competitions, to promote and retain records of the Competitions, ensure that Competition and out-of-Competition discipline is maintained in accordance with the Global Rules and that the integrity of the Competitions is upheld.
- IG will process some sensitive personal data in carrying out these functions. This will usually be done for the purposes of protecting the integrity of the Competitions.
- If you are a Participant, data may be shared with a number of third parties. Data, whether about your registration or your conduct, may need to be shared with your team (if applicable). Information may be shared with the police or other authorities where there is evidence of criminal conduct or where required by civil proceedings. Data is also shared with IG's disciplinary officers as necessary for disciplinary and other proceedings.
- Where we rely on your consent, such as for direct marketing or (if you are a Participant) for involving a third party in a disciplinary or integrity matter, you can withdraw this consent at any time.
- If you are a Participant, sensitive personal data may be processed in connection with the investigation and management of disciplinary and/or integrity issues.
- Where you wish to purchase/withdraw IGG tokens, we will carry out "know your customer" checks to prevent fraud and illegal activity. This is required by our banking partners and professional advisors. We will do this by using a third-party provider, Credas, to confirm your identity, and may ask you to provide additional information for these checks. Credas may send you a text message to initiate this process. This information may then be shared with our banks as necessary to demonstrate the source of our funding.
- Our privacy policy sets out more details of this processing, including details of your data protection rights, including your right to object to certain processing.

### **What does this policy cover?**

This policy describes how IG will make use of your data when you use the Platform and, if you are a Participant, how we will make use of your data when you participate in a Competition.

It also describes your data protection rights, including a right to object to some of the processing which IG carries out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

### **What information do we collect?**

We collect and process personal data about you when you interact with us and the Platform, when you purchase goods and services from us, when we carry out market research and when you enter any fan

sweepstakes or fan competitions. This will typically be provided directly by you, and may include information you provide on registration or in the process of a purchase, such as your name, address, email address, marketing preferences and payment details. The details being provided by you will be made clear in forms you complete or will be provided directly by you in surveys, in entering sweepstakes or competitions or in volunteering information in communications or content you provide us.

If you are a Participant then, in addition to the above, IG collects and processes personal data about you in forms that are completed and submitted by you, or that are submitted on your behalf by your team. This particularly includes details that are submitted when registering for a Competition, and information submitted in response to disciplinary complaints, as well as any other data you choose to provide when you contact us. IG also collects information as part of its administration and management of the Competitions and as part of its collection of data for promotional use.

### **What information do we receive from third parties?**

Sometimes, we receive information about you from third parties. We particularly use a third-party provider Credas to carry out “know your customer” checks as required by our banking partners, and they will provide us with relevant information following these checks. Credas may send you a text message to initiate the collection of this information.

If you are a Participant, we might receive information from third parties such as other Participants and teams. When we carry out disciplinary activities, we might receive information from witnesses, other parties involved in the disciplinary process and from other Participants involved in any relevant incident. As part of our integrity activities, we also actively gather intelligence from relevant sources, such as the media and members of the public. Where you choose to involve a third party in any disciplinary process, such as a representative or lawyer, we will receive and share data with this person.

### **How do we use this information, and what is the legal basis for this use?**

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a purchase from us or enter a fan sweepstake or other fan competition we run. This includes:
  - verifying your identity, as required by our banking partners;
  - taking payments;
  - communicating with you; and
  - providing customer services and arranging the delivery or other provision of products, prizes or services;
- As required by IG to conduct our business and pursue our legitimate interests, in particular:
  - we will carry out “know your customer” checks where you purchase or register interest in purchasing IGG tokens, to prevent fraud and illegal activity;
  - we will use your information to provide products and services you have requested, and respond to any comments or complaints you may send us;
  - we monitor use of our websites and online services, and use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline;
  - we use information you provide to personalise our website, products or services for you;

- if you provide a credit or debit card as payment, we also use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud (see data sharing below);
- we monitor customer accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law;
- we use information you provide to investigate any complaints received from you or from others, about our website or our products or services;
- we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation);
- we use data of some individuals to invite them to take part in market research; and
- if you are a Participant, in addition to the above:
  - carrying out IG's role as organiser of the Competitions, including registration of Participants, and administering and managing these Competitions;
  - maintaining intelligence, we receive on Participants on integrity matters to ensure that we carry out appropriate investigations into possible breaches of the Global Rules;
  - carrying out IG's disciplinary role in enforcing the terms of the Global Rules, including sharing information with relevant third parties as necessary and described below;
  - publishing the decisions made in disciplinary or similar cases to ensure transparency (and the assurance of enforcement) in accordance with the Global Rules, and sharing decisions with others as necessary to ensure these decisions are upheld; and
  - using information such as photographs and gameplay footage collected in the Competitions, or as arranged alongside the Competitions, in order to promote the Competitions, the Platform and our related products and services.
- Where you give us consent:
  - we will send you direct marketing in relation to our relevant products and services, or other products and services provided by us, our affiliates and carefully selected partners;
  - we place cookies and use similar technologies in accordance with our [Cookies Policy](#) and the information provided to you when those technologies are used;
  - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time; and
  - if you are a Participant, where you wish to involve a third party in a matter, investigation, complaint or charge, we may share your details with a relevant representative or lawyer.
- For purposes which are required by law:

- where we need parental consent to provide online services to children under 16. However, most of our websites are not designed for children under 16;
- in response to requests by government or law enforcement authorities conducting an investigation; and
- maintaining records as required by law, such as records of payments made.

If you are a Participant, for some of these purposes, particularly on disciplinary and/or integrity-related processing, we may be required to process your sensitive personal data – this can include information relating to (for example) ethnicity where this is important to investigate an allegation of racial discrimination. Unless we state otherwise, we will process this for the purposes of enforcing the measures we have put in place to ensure the integrity of the Competitions.

### **Relying on our legitimate interests**

We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on our balancing tests by contacting us using the details set out later in this notice.

### **Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

### **How is data shared, where and when?**

We will share your data with our banks, professional advisors and Credas in relation to "know your customer" checks carried out to prevent fraud and illegal activity.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of IG for the purposes identified above. In particular, we use third party providers of website hosting, maintenance, call centre operation and "know your customer" identity checking as described earlier in this policy.

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request using the contact details set out below.

If you are a Participant, data may be shared with a number of third parties. Data, whether about your registration or your conduct, might need to be shared with teams. Information may be shared with the police or other authorities where there is evidence of criminal conduct or where required by civil

proceedings. Data is also shared with disciplinary officials appointed under the Global Rules, witnesses (fact and expert) and secretariats as necessary. We will also publish certain information (including photographs and footage) and may share it with the media, on disciplinary complaints and findings, and on results and records of the game, whether as statistics, press releases or promotional content.

You can also choose to share information about a matter, complaint or investigation with other third parties, such your team, a lawyer or relative.

### **What rights do I have?**

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**, and to ask us to **share (port) this data to another controller**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the **right to complain** to a competent authority. This may be a data protection authority where you live, work or where you believe a breach may have occurred. We will always inform you where information you provide is mandatory. Information that is provided in order to comply with our Global Rules is mandatory. Failure to provide this information could result in a misconduct complaint under the Global Rules.

### **How do I get in touch with you?**

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch at [support@iggalaxy.com](mailto:support@iggalaxy.com) or by writing to Data Protection, Intergalactic Gaming Ltd, Work.Life CORE, Brown Street, Manchester, M2 1DH.

### **How long will you retain my data?**

Where we process registration data, we do this for as long as you are an active user of the Platform and for six years after this.

Where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data for site security purposes, we retain it for 6 months.

Where we process personal data in connection with performing a contract or for a fan sweepstake or fan competition, we keep the data for six years from your last interaction with us.

If you are a Participant:

- intelligence or evidence gathered about integrity or disciplinary matters;

- IG's internal and published records of decisions and the written reasons for decisions taken in respect of disciplinary matters; and
- IG's internal and published records of decisions and the written reasons for decisions taken to prevent participation on integrity grounds,

will be reviewed every three years. If IG considers that ongoing retention is justified, it will continue to retain relevant information until at least its next review. We will also review the information we hold about you at the end of any investigation or case to ensure this remains relevant. For particularly serious cases, and where you may have an ongoing role in esports, we may inevitably hold information indefinitely, but this will remain subject to review.

Information about Competition results, such as who has scored points and when, will be retained indefinitely to keep a record of the Competition. This is also the case for gameplay footage and images captured during Competitions which may also be used for promotional purposes.