



GUILD ESPORTS PLC - PRIVACY POLICY

1. Introduction

1.1. We are Guild Esports PLC (referred to as Guild, we, us and our in this Privacy Policy), a company incorporated in England with company registration number 12187837 and whose registered office address is Room 4, 1st Floor 50 Jermyn Street, London, SW1Y 6LX.

1.2. The information set out in this Privacy Policy is provided to individuals whose personal data we process (you or your) as data controller, in compliance with our obligations under Articles 13 and 14 of the General Data Protection

Regulation 2016/679 (GDPR).

2. Data controller details

2.1. We are the data controller in relation to the processing of the personal information that you provide to us. Our contact details are as follows:

2.1.1. Address: Room 4, 1st Floor 50 Jermyn Street, London, SW1Y 6LX.

2.1.2. Email address: privacy@guildesports.com (please include "Personal Data Request" in your subject heading to ensure it receives the correct attention).

3. How we collect your information

3.1. Generally, the information we hold about you comes from the way you engage with us, for example by doing any of the following:

3.1.1. through engaging with us via our website;

3.1.2. providing us with information in the course of registering with us;

3.1.3. contacting us offline, for example by telephone, SMS, email or by post; and

3.1.4. interacting with us using social media.

4. What we collect

4.1. The types of personal data that we may collect, use, store and transfer about you are as follows:

4.1.1. Contact data such as your name and email address;

4.1.2. Technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website;

4.1.3. Usage data including information about how you use our website; and

4.1.4. Marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences.

4.2. 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.

5. Purpose/Legal grounds

What do we use your information for?	Type of data	Lawful basis for processing including basis of legitimate interest
To register you with us	Contact data	Necessary for our legitimate interests (to keep our records updated)
Sending marketing communications to you	<ul style="list-style-type: none"> - Contact data - Marketing and communications data 	We will obtain your consent prior to sending any marketing communications to you (see further information below regarding how you can opt-out).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> - Contact data - Technical data 	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> - Technical data - Usage data 	Necessary 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 manage our relationship with you including informing you about changes to our terms or privacy policy	Contact data	<ul style="list-style-type: none"> - Performance of a contract with you - Necessary to comply with a legal obligation - Necessary for our legitimate interests (to keep our records updated)

6. Sharing your information
- 6.1. Please note that personal information we are holding about you may be shared with and processed by:
- 6.1.1. regulators or other third parties for the purposes of monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
 - 6.1.2. credit reference and fraud prevention agencies;
 - 6.1.3. any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
 - 6.1.4. other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services;
 - 6.1.5. our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
 - 6.1.6. our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, our bank, payment processing providers and those organisations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested; and
 - 6.1.7. another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguards are in place).
- 6.2. Please note that we include links within our website to third party social media providers such as Facebook and Twitter, but we will not share your information with such providers without your consent.

7. International transfers
- We will not transfer personal data relating to you to a country which is outside the European Economic Area (EEA) unless:
- 7.1. the country or recipient is covered by an adequacy decision of the Commission under GDPR Article 45;
 - 7.2. 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
 - 7.3. one of the derogations for specific situations under GDPR Article 49 is applicable to the transfer. These include (in summary):
 - 7.3.1. the transfer is necessary to perform, or to form, a contract to which we are a party:
 - 7.3.1.1. with you; or
 - 7.3.1.2. with a third party where the contract is in your interests;
 - 7.3.2. the transfer is necessary for the establishment, exercise or defence of legal claims;
 - 7.3.3. you have provided your explicit consent to the transfer; or
 - 7.3.4. the transfer is of a limited nature, and is necessary for the purpose of our compelling legitimate interests.

8. Retention of personal data
- 8.1. 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 will only hold your personal information on our systems for as long as you have elected to receive communications from us.
 - 8.2. Where we no longer need your personal information, we will dispose of it in a secure manner.
 - 8.3. In some circumstances you can ask us to delete your data: see your legal

rights at paragraph 9 below for further information.

8.4. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your rights in respect of your personal data

9.1. You have certain rights under existing data protection laws, including the right to (upon written request) access a copy of your personal data that we are processing. In accordance with the GDPR:

9.1.1. you will have the following rights:

9.1.1.1. right to access: the right to request certain information about, access to and copies of the personal information about you that we are holding (please note that you are entitled to request one copy of the personal information that we hold about you at no cost, but for any further copies, we reserve the right to charge a reasonable fee based on administration costs); and

9.1.1.2. right to rectification: the right to have your personal information rectified if it is inaccurate or incomplete; and

9.1.2. in certain circumstances, you will also have the following rights:

9.1.2.1. right to erasure/“right to be forgotten”: the right to withdraw your consent to our processing of the data (if the legal basis for processing is based on your consent) and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we are required to hold on to the information for compliance with any legal obligation or if we require the information to establish or defend any legal claim);

9.1.2.2. right to restriction of use of your information: the right to stop us from using your personal information or limit the way in which we can use it;

9.1.2.3. right to data portability: the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible; and

9.1.2.4. right to object: the right to object to our use of your personal information including where we use it for our legitimate interests or for marketing purposes.

9.2. You have the right to unsubscribe from our marketing communications at any time by following the link in the footer of the last email you received from one of our brands (“Unsubscribe”) or by sending your request with detailed instructions to us (see contact details above in the “Data Controller details” section.

9.3. Please note that, if you withdraw your consent to the use of your personal information for purposes set out in our Privacy Policy, we may not be able to carry out our contractual obligations to you or provide you with access to all or certain parts of our services.

9.4. If you consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office. Please see further information on their website: www.ico.org.uk.

10. Automatic decision making

We do not make decisions based solely on automated data processing, including profiling.

11. Security

11.1. We keep your information protected by taking appropriate technical and organisational measures to guard against unauthorised or unlawful processing, accidental loss, destruction or damage. For example:

11.1.1. where appropriate, data is encrypted when transiting on our system or stored on our databases;

11.1.2. we have implemented safeguards in relation to access and confidentiality in order to protect the information held within our systems; and

11.1.3. we frequently carry out risk assessments and audits to monitor and review threats and vulnerabilities to our systems to prevent fraud.

2.2. However, while we will do our best to protect your personal information, we cannot guarantee the security of your information which is transmitted via an internet or similar connection. It is important that all details of any username, password and/or other identification information created to access our servers are kept confidential by you and should not be disclosed to or shared with anyone.

12. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time, for example to keep it up to date, to implement minor technical adjustments and improvements or to comply with legal requirements. We will always update this Privacy Policy on our website, so please try to read it when you visit the website (the "last updated" reference tells you when we last updated our Privacy Policy).

Last updated 23 June 2020