

## PRIVACY POLICY

Forza Insider AB, a company organized under the laws of Sweden with company registration number 559069-8873 and registered address Box 2166, 403 13 Gothenburg (below referred to as “**Forza Insider**”) processes personal data in accordance with law, including the General Data Protection Regulation and Personal Data Protection Act 2012 (PDPA).

### 1. THE TYPE OF DATA THAT FORZA INSIDER PROCESSES

Forza Insider will process both non-personal data, i.e. information that cannot be attributed to a person, and personal data, i.e. information regarding an identifiable person.

#### 1.1. Non-personal data

*Non-personal data that Forza Insider will collect from you*

When you use our services, i.e. download and use our app Forza Insider (“**Services**”), we use tools or third party analytical software to automatically collect non-personal data about you and your use of our Services, including your comments and posts in forums. Such non-personal data is information that is aggregated and depersonalized and which cannot be used to identify you. We collect this information by using advertiser ID, which is a technology that differentiates smartphones and other devices from each other through a unique number. By tracking the number, advertiser ID makes it possible for us to collect information about your use of our Services. The types of non-personal data that Forza Insider collects can, for example, consist of advertiser ID, information about your use of the Services, such as what teams and players you are interested in and your prediction in a specific game, your hardware, device software platform and firmware, software installation properties, including, but not limited to unique installation identifier and software version, your country specific settings and other non-personal data as reasonably required by Forza Insider to enhance the Services.

#### 1.2. Personal data

Forza Insider will process both personal data submitted by you to Forza Insider as well as personal data that Forza Insider will collect from you.

*Personal data submitted by you to Forza Insider*

When you download the application and register for an account to use the Services, or when you contact Forza Insider by requesting technical support, by requesting Forza Insider to save your app settings (if you use an Android device) or by signing up for any of the services that we or our partners provide in the app, such as competitions displayed in the app and other promotional activities, you will provide your personal data, such as name, e-mail address, phone number, address, personal identification number, birth date and/or sex. The personal data may be processed by both Forza Insider and Forza Insider’s partners, including the partner who provides the service and the club you signed up as a fan for when registering an account to use the Service, except for personal identification number which will not be processed by Forza Insider. Apart from these

situations, Forza Insider will not require you to provide any personal data in order for you to use the Services and therefore not process any other personal data.

#### *Personal data that Forza Insider will collect from you*

As described above, see section 1.1, Forza Insider will collect and process data about you when you use our Services. When you request technical support, request us to save your app settings or sign up for any of the services provided by us or any of our partners in the apps, and provide us with your personal data mentioned above, we will be able to link your personal data to your advertiser ID. This means that all data (described above as non-personal data) that we have collected about you before this time through your advertiser ID, becomes identifiable information about you. Therefore, all data mentioned in section 1.1 will also be regarded by Forza Insider as personal data after this point. For this reason, the information below also addresses such information. When referring to “personal data” below, non-personal data that has become personal data is included.

## **2. WHAT ARE THE PURPOSES OF THE PROCESSING OF PERSONAL DATA AND WHAT IS THE LEGAL BASIS FOR THE PROCESSING?**

It is important that you understand the purpose of Forza Insider’ processing of your personal data and the legal basis for processing your data.

#### *Providing of the Services*

In order to make it possible for you to use our Services properly and for us to provide you with technical support and an opportunity for you to sign up for our services in the app or to save your app settings (if you use an Android device and request that your app settings are being saved), Forza Insider will process your personal data. The legal basis for Forza Insider’ processing of your personal data is that the processing is necessary for the performance of our contract with you or to take steps to enter that contract.

In order to make it possible for you to sign up for any of the services provided by our partners in the app, such as competitions and events displayed in the app, Forza Insider will process your personal data. The services are organized by our partners and Forza Insider only displays and provides the possibility for you to sign up for it. It is the specific partner company that is responsible for the processing of your personal data and that is the controller of the personal data provided by you, and Forza Insider processes your personal data as a processor. The legal basis for Forza Insider’s processing of your personal data is that the processing is necessary for the performance of your contract with the partner company or to take steps to enter such a contract.

#### *Marketing*

As a user of Forza Insider’s Services, you will be provided information about our Services and our partners’ services, products and/or events that we or our partners believe you will find interesting and relevant due to your user behavior, for example by displaying ads, sending you marketing e-mails and other marketing from us and our partners in the Services and in social media. Forza Insider and Forza Insider’s partners will independently process your relevant personal data for such

marketing purposes and will independently be responsible for the processing of your personal data. The advertising tracking technologies that are used in order to enable us and our partners to provide you with customized marketing information are integrated into the Services. If you do not wish to be subject to this technology you can turn off the advertisement tracking technologies in the settings of the device that you are using. If you turn the advertisement tracking technologies off it will not limit the function of the Services and affect your user experience. The legal basis for Forza Insider's and our partners' processing of your personal data for marketing purposes is your consent which you give by accepting this privacy policy or which may be given when signing up for a specific competition or event in the app.

If you withdraw your consent you may not be able to use the Services.

### **3. FOR HOW LONG WILL FORZA INSIDER PROCESS THE PERSONAL DATA?**

Forza Insider will store your personal data for as long as is needed for the processing related to the purposes and legal grounds described above. Your personal data may be stored in different locations in our systems and for different purposes. In light of this, personal data which has been deleted from one system because it is no longer needed there, may still exist in another system for a different purpose.

Personal data that Forza Insider processes in order to provide the Services, including technical support, will be stored for three years after your request for support. The reason for this is to make it easier for you to get assistance from Forza Insider. It is often the same technical problem that users experience. Therefore Forza Insider needs to see the history of technical problems that have arisen when you have used the apps. Personal data that Forza Insider processes in order to provide you with the opportunity to save your app settings (when using an Android device), will be stored for as long as you request the app settings to be saved.

Personal data that Forza Insider processes in order to make it possible for you to sign up for any of the services provided by us or our partners in the app, will be stored by Forza Insider for no longer than one year after the service has been provided or for as long as is requested by the partner company.

Personal data that Forza Insider processes for marketing purposes will be stored no longer than two years after either your last contact with Forza Insider or your last active use of the Services. It is not possible for Forza Insider to see if you remove the app from your device or if you stop using the app. This is since some users use the Services only to receive the app's push notifications (a use of the apps which we are not able to track), while some users browse and use the apps very actively (which enables for us to track the use). Therefore, Forza Insider will regard you as a customer and user of the Services for two years from your last contact with Forza Insider or your last active use of the Services and may use your personal data for marketing purposes during this time.

Your personal data may be processed for a longer period than stated above if necessary, to comply with legal requirements or authority decisions.

#### **4. TO WHOM DOES FORZA INSIDER TRANSFER YOUR PERSONAL DATA AND WHERE IS YOUR PERSONAL DATA PROCESSED GEOGRAPHICALLY?**

In addition to the processing performed by Forza Insider, your personal data will also be processed by others. Your personal data will be disclosed to and processed by Forza Insider's parent company Forza Insider Holding AB and its affiliates, and Forza Insider's partners, such as gambling companies that you have signed up for in the app.

Your personal data will also be disclosed to companies who process personal data on Forza Insider's behalf, so-called processors. Forza Insider has contracts in place that ensure that the processors process your personal data in accordance with this privacy policy and Forza Insider's instructions.

Forza Insider may also disclose your personal data in order to permit a merger, an acquisition or a sale of all or parts of Forza Insider's assets.

Forza Insider may also disclose your personal data to authorities that require that Forza Insider disclose such personal data.

It is also important that you understand that you consent to Forza Insider disclosing some or all of your non-personal data as well as personal data collected by Forza Insider to the club for which you signed up as a fan for when registering an account to be able to use the Services. Forza Insider and the club will be independent controllers in relation to your personal data.

Your personal data will be disclosed to entities both within and outside of the EU and EEA.

#### **5. YOUR LEGAL RIGHTS**

You have the right to free of charge, upon written request to the e-mail address listed below, receive information about what personal data Forza Insider stores about you and how that personal data is used and processed. In the event that your personal data is inaccurate or wrong, you have the right to request that Forza Insider corrects or removes the personal data.

If your request is unfounded or your request is excessive, e.g. should you frequently and within short intervals ask to receive information about what personal data Forza Insider stores about you or that Forza Insider shall provide a copy of or remove the personal data in question, Forza Insider have the right to refuse to act on your request, or to charge a reasonable fee which covers the administrative costs of the action requested by you.

##### *Your right to object*

You may object to your personal data being processed for direct marketing purposes at any time. If you do not want your data to be used for direct marketing, you can notify Forza Insider by sending an e-mail to Forza Insider at [support@forzafc.football](mailto:support@forzafc.football). We will then, as far as possible, stop processing and delete the personal data. However, we cannot delete the personal data if we need to continue processing it for any of the other purposes mentioned above.

You may also contact Forza Insider if you are unhappy with the way Forza Insider is processing your personal data. You have the right to file a complaint with the supervisory authority regarding Forza Insider's processing of your personal data or handling of any inquires related to it.

Forza Insider may change this privacy policy. Forza Insider will inform you in the app or by other notification of the revised privacy policy and the date on when the revised privacy policy will enter into force.

For personal data for which Forza Insider's partner is an independent controller such partner is responsible for the processing of your personal data. Please note that such partner's privacy policy may vary from the terms in this privacy policy and that such partner may keep your personal data for a longer or shorter period of time than what is stated in this privacy policy. You may still receive marketing from such partner even if you have informed Forza Insider that you no longer wish to receive direct marketing from Forza Insider.