



Independent
Electronic Sports

Privacy Notice

This is the privacy notice of Independent Electronic Sports Sàrl.

Last update March 25th, 2022 (ver. 1.1)

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1. Privacy Notice of Independent Electronic Sports Sàrl

1.1. This is the privacy notice ("Notice") of Independent Electronic Sports Sàrl, c/o Roux & Associés SA, Espace des Remparts 10, CH-1950 Sion, ("Independent Electronic Sports", "we", "us", "our"). Independent Electronic Sports is the data controller for the purpose of this Notice.

1.2. This Privacy Notice is not necessarily a comprehensive description of all our data processing therefore other Privacy Notices or similar documents may apply to specific circumstances. The data protection regulations form an integral part of our Terms and Conditions.

1.3 By accessing and/or using our Services, you as a Customer or potential Customer agree to the terms outlined in this Privacy Notice. The term "Personal Data" in this Privacy Notice shall mean any information that identifies or could reasonably be used to identify any person. If you provide us with the personal data of other persons, please make sure the respective persons are aware of this Privacy Notice and only provide us with their data if you are allowed to do so and such personal data is Privacy Notice correct. This is in line especially with the EU General Data Protection Regulation (GDPR).

2. Controller

2.1. The "controller" of data processing as described in this Privacy Notice (i.e. the responsible person) is Independent Electronic Sports Sàrl, c/o Roux & Associés SA, Espace des Remparts 10, CH-1950 Sion (Switzerland), as far as the operation of the website and the services provided by Independent Electronic Sports are concerned.

2.2. As far as our courses are provided by Independent Electronic Sports, the latter is required for the data processing in this context.

2.3. You can notify us of any data protection-related concerns using the following contact details: Independent Electronic Sports Sàrl, c/o Roux & Associés SA, Espace des Remparts 10, CH-1950 Sion (Switzerland), and by email to privacy@independent-esports.com.

3. Collection and Processing of Personal Data

3.1. Among the types of Personal Data that this Website collects, by itself or through third parties, there are:

- Cookies;
- Usage Data;
- email address;
- phone number;
- first name;
- last name;
- street;
- city;
- country;
- company name.

3.2 We use this information to manage customer accounts and provide Services. In addition, you provide personal data in the content you upload to the Service which we use to provide our Service.

3.3 We also collect information automatically through your use of the Service like information regarding your clicks and views.

3.4 To access or use our Platform and Services you must be at least 16 Years old. Consequently, we do not knowingly collect Personal Information about minors.

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3.5 Apart from data you provided to us directly, the types of data we receive about you from third parties include, but are not limited to, your address and any interests and other socio-demographic data (for marketing purposes) data in connection with your use of our websites (e.g., IP address, MAC address of your smartphone or computers, information regarding your device and settings, cookies, date and time of your visit, sites and content retrieved, applications used, referring website, localization data, the contents of your interaction with our customer support or sales departments, which may include text/video/audio recording and transcripts), and information that is provided to us by job candidates, when they apply for work with us.

3.6 Any use of Cookies – or other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document, if available.

3.7 Users are responsible for any third-party Personal Data obtained, published, or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

3.8 Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

4. Third-Party Links

4.1 This Website may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please

check these policies before you submit any personal data to these websites.

5. Purpose of Data Processing and Legal Grounds

5.1. We primarily use collected data to provide required services to our Customers but also and not limited to send newsletters and other communications with promotion content unless we receive an opt-out notification from you, for billing, account management, and other administrative matters, to prevent and solve security issues and abuse.

5.2. We may also process personal data if required by law or any other regulation. In addition, in line with applicable law and where appropriate, we may process your personal data and personal data of third parties for the following purposes, which are in our legitimate interest, such as:

- providing and developing our products, Platform and Services, and other platforms, on which we are active;
- communication with third parties and processing of their requests (e.g., media inquiries);
- review and optimization of procedures regarding needs assessment for the purpose of direct customer approach;
- advertisement and marketing (including organizing events), provided that you have not objected to the use of your data for this purpose (if you are part of our Customer base and you receive our advertisement, you may object at any time and we will place you on an opt-out against further advertising mailings);
- market and opinion research, media surveillance;

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- asserting legal claims and defense in legal disputes and official proceedings;

ensuring our operation, including our IT, our websites, and other appliances;

5.3. If you have given us your consent to process your personal data for certain purposes, we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we require one.

5.4. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

6. Cookies / Tracking and Other Techniques Regarding the Use of our Website

6.1. A "cookie" is a small piece of data sent from a website and stored on the user's computer or mobile device by the user's web browser while the user is browsing. Cookies were designed to be a reliable mechanism for websites to remember stateful information (such as items added in the shopping cart) or to record the user's browsing activity (including clicking particular buttons, logging in, or recording which pages were visited in the past). They can also be used to remember arbitrary pieces of information that the user previously entered into form fields such as names, addresses, passwords, and credit card numbers.

6.2. Like many other websites, we also use cookies on ours. Different cookies have different purposes but also different lifespans. The lifespan of a cookie determines how long a cookie will remain on your computer before it deletes itself.

6.3. We typically use cookies and similar techniques on our websites and apps, which allow for the identification of your browser or device. Besides cookies that are only used during a session and deleted after you visited the website ("session cookies"), we may use cookies to save user configurations and other information for a certain time (e.g., six months) ("permanent cookies").

6.4. Notwithstanding the foregoing, you may configure your browser settings in a way that it rejects cookies, only saves them for one session, or deletes them prematurely. Most browsers are pre-set to accept cookies.

6.5. We use permanently to understand how you use our services and content and to enable to show you customized offers and advertisement. If you block cookies, it is possible that certain functions are no longer available to you.

6.6. In accordance with applicable law, we may include visible and invisible image files in our newsletters and other marketing emails. If such image files are retrieved from our servers, we can determine whether and when you have opened the email, so that we can measure and better understand how you use our offers and customize them. You may disable this in your email program, which will usually be a default setting.

6.7. By using our websites and consenting to the receipt of newsletters and other marketing emails you agree to our use of such techniques. We use Google Analytics and similar services (for example Facebook, Twitter, LinkedIn) on our website. These are services provided by third parties, which may be located in any country worldwide and which allow us to measure and evaluate the use of our website (on an anonymized basis). For this purpose, permanent cookies are used, which are set by the service provider. The service provider does not receive (and does not retain) any personal data from us, but the service provider may track your use

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of the website, combine this information with data from other websites you have visited and which are also tracked by the respective service provider and may use this information for its own purposes (e.g. to controlling of advertisements).

6.8. If you have registered with the service provider, the service provider will also know your identity. In this case, the processing of your personal data by the service provider will be conducted in accordance with its data protection regulations. The service provider only provides us with data on the use of the respective website (but not any Personal Information of you). If you agreed to Google Analytics or other similar providers to receive personalized commercial offers, you may be served with ads based on your visits to our Services.

7. Facebook pixels

7.1. We use the "Facebook Pixel" of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook") on our website. With its help, we can keep track of what users do after they see or click on a Facebook advertisement. This enables us to monitor the effectiveness of Facebook ads for purposes of statistics and market research. Data collected in this way is anonymous to us, which means we cannot see the personal data of individual users. However, this data is saved and processed by Facebook. Facebook can connect this data with your Facebook account and use it for its own advertising purposes, in accordance with Facebook's Data Policy which can be found at <https://www.facebook.com/about/privacy/>. You can allow Facebook and its partners to place ads on and outside of Facebook. A cookie can also be saved on your device for these purposes. Please click here if you would like to withdraw your consent.

8. Site Kit by Google (Google Analytics and Google Tag Manager)

8.1. Our website uses Site Kit by Google, a web analysis service of Google, Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, www.google.com ("Google Analytics", "Google Tag Manager" or "Google").

8.2. Google Analytics employs cookies that are stored on your computer to facilitate an analysis of your use of the site. The information generated by these cookies, such as the time, place, and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there. In using Google Analytics our website employs the extension "anonymizelp". In doing so, Google abbreviates and thereby anonymizes your IP address before transferring it from EU/EEA member states. Google uses this information to analyse your use of our site, to compile reports for us on internet activity, and to provide other services relating to our website.

8.3. Google may also transfer this information to third parties where required to do so by law or where such third parties process this data on Google's behalf. Google states that it will never associate your IP address with other data held by Google.

8.4. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly as noted elsewhere in this Privacy Notice. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our website.

8.5. Google Analytics also offers a deactivation add-on for most current browsers that provides you with more control over what data Google can collect on websites you access. The add-on tells the JavaScript

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(ga.js) used by Google Analytics not to transmit any information about website visits to Google Analytics. However, the browser deactivation add-on offered by Google Analytics does not prevent information from being transmitted to us or to other web analysis services we may engage.

8.6. Google Analytics also uses electronic images known as web beacons (sometimes called single-pixel gifs) and are used along with cookies to compile aggregated statistics to analyse how our site is used. You can find additional information on how to install the browser add-on referenced above at the following [link](#). For the cases in which personal data is transferred to the US, this is based on the standard contractual clauses of the European Commission. You can opt-out of Google's use of cookies by visiting the [Ads Preferences Manager](#), or through the Network Advertising Initiative [opt-out](#) page.

8.7. Google Tag Manager ("GTM") is a tag management system to manage JavaScript and HTML tags used for tracking and analytics on websites. Tags are small code elements that, among other things, are used to measure traffic and visitor behaviour: to understand the effect of online advertising and social channels; to set up remarketing and orientation towards target groups; and to test and optimize websites. GTM makes it easier for us to integrate and manage our tags. We use GTM on our website to include the following tracking tools (as described in detail this Section 11):

- Google Analytics
- Google AdWords
- Facebook Conversion Pixels
- Hotjar

If you have performed deactivation, GTM takes this deactivation into account. More information about GTM's privacy practices can be found [here](#) and terms of use [here](#).

9. Remarketing

9.1. We use AdWords and Remarketing Lists features of Google Analytics for Display Advertisers to remarket to individuals who visit our program pages. Third-party vendors, such as Google, show our ads on sites across the internet, and in some cases, use cookies to serve ads based on someone's past visits to our website. You can opt-out of Google's use of cookies by visiting Google's Ads Settings. You can also opt-out of all third-party vendor's use of cookies by visiting the [Network Advertising](#) Initiative opt-out page.

10. Contact form

10.1. By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, or any other kind of request as indicated in the form. Personal Data processed:

- email address;
- first name;
- last name;
- company;
- street;
- postal code;
- city,

country.

11. Mailing list or newsletter

11.1. By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email

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messages containing information of commercial or promotional nature concerning this Website.

11.2. Personal Data processed:

- email address;
- first name;
- last name.

11.3. You may cancel your subscription to our newsletters at any time and object to the further processing of your data. At the end of each newsletter, there is an option to remove your name from the mailing list Hubspot.

11.4. Hubspot is a marketing and sales automation platform, including CRM, that helps us to connect and engage with our customers. Hubspot's platform enables us to create optimized customer experiences by automating processes and communicating with our customers across channels with personalized, intelligence-driven messages. Hubspot collects cookies to see which features are most popular, counting visitors to a page, improving their services, keeping their services secure, and providing a better user experience. Hubspot logs information about the type of browser you use, access times, pages viewed, IP address, your general location, and the page you visited before navigating to our website. Also, they collect information about the device you use to visit our website, including the hardware model, operating system and version, unique device identifiers, and mobile network information. Cookies, web beacons, and electronic images are used to count visits and understand usage and campaign effectiveness.

11.5. You can find Hubspot's Privacy Policy [here](#). Hubspot Conversations lets us connect your chat and email information to the contact record you have in Hubspot. That keeps all the sales and support data we need in one place—and helps us to give you a better experience. We collect your name, email address, and other contact information

through Hubspot Conversations. The information you provide to us through chat or email may contain other personal data.

12. Third-Party Payment Processors

12.1. We use third-party payment processors to process payments made to us. In connection with the processing of such payments, we do not retain any personally identifiable financial information such as credit card numbers. Rather, all such information is provided directly to our third-party processor, Stripe (the "Payment Processors").

12.2 The Payment Processor's use of your personal data is governed by their privacy policy, which may be viewed at the following web address: Stripe: [Privacy Policy](#). Stripe may install cookies on your device, as stated in their [cookie policy](#). Twint: [Privacy Policy](#).

13. Data transfer and Transfer of Data Abroad

13.1. In the context of our business activities and in line with the purposes of the data processing set out in Section 2, we may transfer data to third parties, insofar as such a transfer is permitted and we deem it appropriate, for them to process data for us. In some cases, we use external service providers to process data on our behalf.

13.2. These service providers have been carefully selected by us, commissioned in writing, and are bound by our instructions. They are regularly monitored by us. The service providers will not pass this data on to third parties but will delete it once the contract has been fulfilled and the statutory storage periods have been completed unless

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consent has been given to store it beyond this. You can read more about how Google uses your Personal Information [here](#). You can also opt out of Google Analytics [here](#).

13.3. Certain Recipients may be within Switzerland, but they may be located in any country worldwide. If we transfer data to a country without adequate legal data protection, we ensure an appropriate level of protection as legally required by way of using appropriate contracts (in particular based on the standard contract clauses of the European Commission) or binding corporate rules or we rely on the statutory exceptions of consent, the performance of contracts, the establishment, exercise or enforcement of legal claims, overriding public interests, published personal data or because it is necessary to protect the integrity of the persons concerned. You can obtain a copy of the mentioned contractual guarantees at any time from the contact person named under Section 1 above insofar they are not available under the mentioned link. However, we reserve the right to redact copies for data protection reasons or reasons of secrecy or to produce excerpts only.

14. Retention Periods for your Personal Data

14.1. We process and retain your personal data as long as required for the performance of our contractual obligation and compliance with legal obligations or other purposes pursued with the processing, i.e. for the duration of the entire business relationship as well as beyond this duration in accordance with legal retention and documentation obligations. personal data may be retained for the period during which claims can be asserted against our company or insofar as we are otherwise legally obliged to do so or if legitimate business interests require further retention (e.g., for evidence and documentation purposes).

14.2. As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible. In general, shorter retention periods of no more than twelve months apply for operational data (e.g., system logs).

15. Data Security

15.1. We have taken appropriate technical and organizational security measures to protect your personal data from unauthorized access and misuse. However, we cannot and do not guarantee the absolute protection and security of any Personal Information.

16. Obligation to Provide Personal Data to Us

16.1. In the context of our business relationship, you must provide us with any personal data that is necessary for the conclusion and performance of a business relationship and the performance of our contractual obligations (see above Section 2).

16.2. Without this information, we will usually not be able to enter into or carry out a contract with you in addition, the website cannot be used unless certain information is disclosed to enable data traffic (e.g. IP address).

17. Profiling

17.1. We may partially process your personal data automatically to evaluate certain personal aspects (profiling). In particular, profiling allows us to inform and advise you about products possibly relevant to

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you more accurately. For this purpose, we may use evaluation tools that enable us to communicate with you and advertise you as required, including market and opinion research.

18. Your Rights

18.1. In accordance with and as far as provided by applicable law (as is the case where the GDPR is applicable), under the respective legal conditions, you have the right to:

- to request from us access to and rectification or deletion of your personal data;
- to request us to restrict the processing of your personal data, in particular to object to the processing of your personal data for direct marketing purposes;
- to request from us to provide you or any person or entity you appointed with a digital file of your personal data (data portability).

Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example, if we are obliged to retain or process certain data, have an overriding interest (insofar as we may invoke such interests), or need the data for asserting claims.

18.2. You may withdraw your consent that allows us to process your personal data for the indicated purposes at any time. If exercising certain rights will incur costs on you, we will notify you thereof in advance. Consent can be withdrawn at any time by contacting us via email.

18.3. In general, exercising these rights requires that you can prove your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way). To assert these rights, please contact us at the addresses provided in Section 1 above. In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority.

18.4. You also have the right to lodge a complaint with the competent authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch>).

19. Amendments

19.1. We may amend this Privacy Notice at any time without prior notice. The current version published on our website shall apply. If the Privacy Notice is part of an agreement with you, we will notify you by e-mail to the e-mail address that you provided during registration or other appropriate means in case of substantial changes.