

## **ePremier League 2018 - 2019 - Privacy Policy**

*Updated 08 January 2019*

In this Privacy Policy, terms such as "we", "us", "our" or similar expressions shall mean the Football Association Premier League Limited.

We take your privacy very seriously and are committed to protecting your personal data (meaning any information about you from which you can be identified). This Privacy Policy explains what personal data we collect when you:

- access and interact with the website e.premierleague.com (including its subdomains) (**Website**);
- enter and participate in the ePremier League 2018-2019 (**Tournament**); and/or
- otherwise interact or communicate with us in relation to the Tournament.

It also explains how we will use this data, and what rights you have in relation to such data.

We keep our privacy practices under review and may change this Privacy Policy from time to time by notifying them to you.

Please read this Privacy Policy carefully together with any additional privacy notices/ information we may provide to you during your participation in the Tournament.

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### **1. Background**

We are a "controller" under the EU General Data Protection Regulation (the GDPR) and UK Data Protection Act 2018 (**Data Protection Law**). This means we are responsible for deciding how we use the personal data that we collect about you and, in accordance with the Data Protection Law, we will ensure that the personal data we hold about you is, at all times:

1. used fairly, lawfully, and transparently;
2. collected for limited, specific purposes only;

3. adequate, relevant to and limited to what is necessary for those purposes;
4. kept accurate and up-to-date;
5. not kept for longer than is necessary; and
6. held securely.

We shall be accountable for and able to demonstrate our compliance with our obligations under the Data Protection Law, and this Privacy Policy is one of the ways in which we do that.

## 2. What Personal Data Do We Collect and How

The table below sets out what personal data we may collect about you and how we collect it.

Type of personal data	How we collect it
<b>Identity Data</b> (first name, last name, username, address, gender, date of birth)	Provided by you when you register for the Tournament or to receive information about the Tournament, or otherwise through a direct interaction with us (e.g. by email). Information which is mandatory will be marked with an asterisk (*). The provision of other Identity Data is optional.
<b>Contact Data</b> (email address, mobile number, social media handles, and location (country/ place of residence))	Provided by you when you register for the Tournament or to receive information about the Tournament, or otherwise through a direct interaction with us (e.g. by email or telephone).
<b>Player Data</b> (profile picture, social network account details, player identification details (EA account ID, Gamertag and/or PSN ID), account preferences, selected Premier League Club, match results, rankings, key performance indicators, game-play statistics, a log of disputes and/or disciplinary actions, and any personal information sent through the Direct Competitor Chat feature)	Either provided by you when you register for the Tournament or collected by us during your participation in the Tournament. We will not collect all of this data from each player - the types of Player Data we collect from you will depend on how far you progress in the Tournament.
<b>Communications Data</b> (preferences in receiving messages from us and/ or our Clubs and/ or our commercial partners)	Provided by you when you register for the Tournament or to receive information about the Tournament, or otherwise through a direct interaction with us.
<b>Media Data</b> (images from photographs and video footage)	We will capture gameplay, images of players competing and of crowds, players and fans at the Live Finals and other Tournament events.
<b>Usage Data</b> (visits to and use of the	This is collected by Gfinity (see 4. Who

Website, activity history, engagement data including "clicks and opens")	<i>We Share Your Personal Data With)</i> when you visit and interact with the Website and may be processed on our behalf or provided to us.
<b>Technical Data</b> (IP address, browser type, hardware type, network and software identifiers, system configuration information, location data, device information)	This is collected by Gfinity (see <i>4. Who We Share Your Personal Data With)</i> when you visit and interact with the Website and compete in the Tournament and may be processed on our behalf or provided to us.

### 3. How and Why We Use Your Personal Data

We will only use your personal data where Data Protection Law allows us to. Data Protection Law says we can collect and use personal data on the following bases:

1. it is necessary for us to be able to **perform an agreement** with you.
2. it is necessary for our **legitimate interests** (and your interests and fundamental rights do not override those interests);
3. if we have your **consent** (which you can withdraw at any time); or
4. to comply with a **legal obligation** (i.e. rules laid down by courts, statute or regulation).

Accordingly, we lawfully use your personal data in the following ways:

#### (a) Delivering the Tournament

<b>Purpose</b>	<b>Type of Data</b>
To register you for the Tournament	Identity Data Contact Data Player Data
To operate the Tournament and allow you to participate in it	Identity Data Contact Data Player Data
Provide you with information about the Tournament and respond to your queries about the Tournament	Identity Data Contact Data Player Data Communications Data
To administer and deliver any prizes	Identity Data

	Contact Data
	Player Data
	Communications Data

We use this data in this way in order to deliver the Tournament and related services to you in an effective, efficient and accurate way, and in accordance the Tournament Terms and Conditions <https://e.premierleague.com/terms-and-conditions>. Therefore, we use this data on the basis that it is necessary for us to be able to perform our agreement with you and for our legitimate interests of delivering the Tournament in this way.

### (b) Administering the Tournament

Purpose	Type of Data
To verify your identity and to monitor and analyse the use of your player account to detect and prevent fraudulent activity, security incidents and criminal activities.	Identity Data Contact Data Player Data Technical Data Usage Data
To detect and prevent cheating in the Tournament, and otherwise ensure that all players comply with the Tournament rules, policies and expected standards of behaviour	Identity Data Contact Data Player Data Technical Data Usage Data
To detect and prevent illicit or illegal gambling activities	Identity Data Player Data

We use this data in this way on the basis that it is necessary for our legitimate interests of ensuring the proper operation and governance of the Tournament, and possibly in order to comply with a legal obligation in response to a legal process.

**(c) Marketing:** We may use Identity Data, Contact Data and Communications Data to inform you of news, offers, events, competitions and promotions by specified media which may be of interest to you and/ or we provide such data to our Clubs and/ or our official commercial partners (e.g. Gfinity) so that they can do this. We give you the option of providing opt-in consent to receive different kinds of direct marketing communications from us or these third parties or deciding not to do so.

**OPT-ING OUT:** You can withdraw your consent and opt-out of marketing communications from us at any time by following the instructions provided to you in the relevant communication (for example, the 'unsubscribe' link in an email). Alternatively, you may contact us at [info@premierleague.com](mailto:info@premierleague.com). We may still need to send service emails to you from time to time.

If you have chosen to receive communications directly from a particular Club or another third party, you will be consenting to us passing the data to them to use in accordance with their privacy policy, so you should contact them directly if you no longer wish to receive their communications. Each of the Club's privacy policies are available here. Gfinity's privacy policy is available here:

<https://www.gfinity.net/support/legals/category/3>.

**(d) Media coverage:** We may use the Media Data together with Identity Data, Player Data and Contact Data for Tournament and Premier League-related publishing and media coverage and live broadcasting. We will provide you further information about our promotional and media activities where it is relevant and appropriate to do so; depending on how far you progress and the extent of your involvement. We use this data on the basis of our legitimate interests in promoting and publicising the Tournament. If you have any concerns or objections about the use of your personal data in this way you may contact us at [dataprotection@premierleague.com](mailto:dataprotection@premierleague.com) or by using the other details provided below.

**(e) Other purposes:** We could have to use your personal data which we hold to protect your or someone else's vital interests for example to make contact in rare emergency situations. We could also have to use your personal data in connection with legal and regulatory matters such as our maintenance of business records, compliance with external reporting requirements and internal policies and procedures and responses to requests by government, law enforcement, regulators, courts, rights holders or other third parties including in respect of the use or misuse of intellectual property, such as our brand or media rights, or those of our licensees/commercial partners or their parties. Therefore we use this data on the basis that it is necessary both for our legitimate interests in protecting, defending and enforcing rights and interests in this way and also so that we can comply with legal obligations.

We will only use your personal data for the purposes for which we collected it as described above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **What if you do not want to share your personal data?**

Please note that if you decline to provide certain mandatory personal data, you may not be able to participate in the Tournament and/ or we may be unable to fully respond to any inquiries you make.

## **4. Who We Share Your Personal Data With**

In delivering and administering the Tournament we may share your personal data with third parties in the following circumstances:

**(a) EA:** We may share the following information with EA (<https://www.ea.com/en-gb>) your name, email address, EA Account ID, Gamertag and/or PSN ID, and information about your performance in the Tournament. EA require this data in order to:

(i) check a player's eligibility to the EA Sports FIFA 19 Global Series and contacting such player to award them Pro Points, based on their ranking in the Tournament; and

(ii) arrange for a player's registration in subsequent EA Sports FIFA 19 Global Series.

EA will use all such data in accordance with its Privacy Policy (<http://tos.ea.com/legalapp/WEBPRIVACY/GB/en/PC/>)

**(b) Gfinity (and other third party service providers):** We have engaged Gfinity (<https://www.gfinityesports.com>) to help with the operation and administration of the Tournament and Gfinity will process personal data on our behalf in the performance of its services. This includes collecting and storing personal data collected through the Website (which it hosts and operates) and sending certain communications about the Tournament on our behalf.

- **Website:** Please note that in operating the Website Gfinity may collect certain Technical and Usage Data for its own business purposes, as set out in Gfinity's Privacy Policy (<https://www.gfinity.net/support/legals/category/3>) and Cookies Policy (<https://www.gfinity.net/support/legals/category/8>).
- **Chat Service:** In order to help us answer any queries you may have about the Tournament, Gfinity also uses an online and mobile chat service on the Website via a third party app. The chat service is not owned or operated by us and the provider of the app (Discord) is responsible for the collection and use of personal data which is obtained via the chat service. You should refer to Discord's privacy policy to understand how your personal data will be handled: <https://discordapp.com/privacy>. If you do not want to use the chat service you can contact us/ Gfinity at [support@gfinity.net](mailto:support@gfinity.net).
- **Marketing:** In addition, where you have consented or requested that we do so, we will permit Gfinity to use certain personal data to send you Gfinity-related marketing communications (see *3. How and Why We Use Your Personal Data*).
- **Offline Support:** In order to facilitate offline support for questions you may have about the Tournament, Gfinity uses a customer support service via a third party app which can be accessed through the Website. The customer support service is not owned by us and the provider of the app (Freshdesk) is

responsible for the collection and use of personal data which is obtained via the support service. You should refer to Freshdesk's privacy policy to understand how your personal data will be handled:

<https://www.freshworks.com/privacy/>. If you do not want to use the customer support service you can contact us / Gfinity at [support@gfinity.net](mailto:support@gfinity.net)

In order to operate the Tournament we may also engage other third party businesses to provide services to us or to you on our behalf (for example, data storage, systems support, delivery of communications, and event, venue management), which may require them access, receive, maintain or otherwise use personal data on our behalf.

All of our service providers only use your personal data in accordance with our strict instructions to provide the relevant services and are not permitted to use your personal data for their own purposes, unless we permit them to do so.

**(c) Clubs:** If you progress through the online qualification stage, we will pass certain Identity and Contact Data to the Club you have selected to represent so they can contact you with further information and instructions in relation to your participation in the next stages of the Tournament. In addition, where you have consented or requested that we do so, we will provide your personal data to selected Clubs for marketing purposes (see *3. How and Why We Use Your Personal Data*).

**(d) Gambling operators:** We may share your name and certain Player Data with gambling operators to assist our efforts to detect and prevent illicit or illegal gambling activities.

**(e) Other:** We may also disclose your personal data if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes or in the event of a re-organisation of the legal or ownership structure of the Premier League (or the Tournament).

Notwithstanding anything else in this Privacy Policy, we may share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual and the individual cannot be re-identified.

## 5. Transferring Your Personal Data Outside the EU

We do not expect to transfer your personal data outside of the EU, however, in the event that we need to we will ensure that your personal data is protected to a similar degree, in accordance with Data Protection Law. We do this by ensuring one of the specific safeguards approved by the European Commission is in place. You can find further information about these safeguards at [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en).

## 6. Security of Your Personal Data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed (a **Data Security Breach**). In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to know. They will only use your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Data Security Breach and will notify you and any applicable regulator where we are legally required to do so.

## 7. Managing Your Account and Personal Information

If you access your player account and go to Edit Profile (accessed via the drop down menu next to player username) >> Account Settings, you can access and download certain personal information.

Account Settings will also enable you to review, correct, update or change your personal information at any time.

In order to delete their account, players should go to Contact Support, and raise a support ticket asking for their account to be removed. It is recommended that the subject line of this request be "Delete Account".

You can request a transcript of any conversations you have via the Direct Competitor Chat feature by emailing [support@gfinity.net](mailto:support@gfinity.net). A copy of the transcript will be sent to the email address you have provided within 48 hours. Please note that once the Tournament has finished we will delete all transcripts unless we have a good and lawful reason not to.

## 8. Data Retention

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for (see 3. *How and Why We Use Your Personal Data*), including for the purposes of satisfying any accounting, reporting or other legal requirements, in accordance with our Data Retention Policy.

If you send a request to delete your account, then this will be done as soon as reasonably possible. We will only retain copies of your personal data where we have a lawful reason to do so.

## 9. Your Rights

Under Data Protection Law, you have certain rights (depending on the circumstances) in connection with your personal data, which include:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are using it lawfully, provided always that this does not adversely affect the rights and freedoms of other people;

- **Request correction** of the personal data that we hold about you. Where any of the information we hold about you is incorrect or incomplete we will act promptly to rectify this, including where you have requested us to do so;

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to our use (see below);

- **Object to use** of your personal data where we are relying on our legitimate interests (see above) and there is something about your particular situation which makes you want to object to our use on this ground;

- **Withdraw your consent** to our use of your personal data where we do so in reliance on your consent. Once we have received notification that you have withdrawn your consent, we will no longer use your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law;

- **Request the restriction** of use of your personal data. This enables you to ask us to suspend the use of personal data about you, for example if you want us to establish its accuracy or the reason for using it; and

- **Request the transfer** of the personal data you have provided, on the basis of consent or for a contract with us, to you or a third party where technically feasible.

We are committed to respecting your rights. If the **Account Settings** tool referred to above (see 7. *Access to Your Personal Data*) does not meet your requirements, you may action your rights (as may be applicable) by contacting us using the details provided below and we will comply with your requests within a reasonable period unless we have a lawful reason not to do so.

Requests should be made in writing and to ensure that personal data is dealt with carefully and confidentially we will require the requestor to provide verification of their identity and all applications must be accompanied by copies of at least two official documents, which show your name, date of birth and current address (for example, driving licence, birth/ adoption certificate, passport, recent utility bill).

In responding to such requests, we will explain the impact of any objections, restrictions or deletions requested.

We will not charge you a fee to exercise your rights unless your request is clearly unfounded or excessive, in which case we may charge you a reasonable fee. Alternatively, we may refuse to comply with the request in such circumstances.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK data protection authority. The ICO's contact details as are follows: Information Commissioner's Office, Wycliffe House, Water

Lane, Wilmslow, Cheshire, SK9 5AF; Tel: 0303 123 1113 (local rate) or 01625 545 745; <https://ico.org.uk/global/contact-us/>

## **10. Children and Privacy**

Children under the age of 16 are not permitted to enter the Tournament and therefore we do not intend or expect to collect personal data about children. However, if you have parental responsibility for a child that has in any event registered for the Tournament by providing false information, and would like to review any personal data that we may have collected about that child, have this information deleted, and/or request that there be no further collection or use of your child's personal data, or if you have any questions about our Privacy Policy or practices, you may contact us at [dataprotection@premierleague.com](mailto:dataprotection@premierleague.com).

## **11. Contact Us**

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us using the following contact details:

Premier League Data Protection Lead  
The Football Association Premier League Limited  
30 Gloucester Place,  
London, W1U 8PL

*[dataprotection@premierleague.com](mailto:dataprotection@premierleague.com)*

(0)207 864 9000