

## LALIGA SCORE WORDS PRIVACY POLICY

The Game is the product of a business partnership between EPIC PANDA GAMES S.L (hereinafter, “**EPIC PANDA**”) and LaLiga Group International, S.L. (hereinafter “**LaLiga**”). Hence, under the terms and conditions defined below, we inform you that the personal data you provide to register and access the Game will be processed by LaLiga and EPIC PANDA, respectively, each as data controllers for the processing thereof. As joint controllers of the processing, EPIC PANDA and LaLiga have signed an agreement establishing their obligations regarding the processing of the data. The content of the agreement is available to users upon request.

### **Who is the data controller?**

On the one hand, your personal data will be processed by LaLiga, with Spanish Tax Code: B05421805 and registered address at 60 Calle Torrelaguna, 28043 Madrid.

Contact with the Data Protection Officer: [dpo@laliga.es](mailto:dpo@laliga.es)

On the other hand, your personal data will also be processed by EPIC PANDA GAMES S.L., with Tax Code B40657058 and registered address at Carrer de la Creu Roja 1, B6 PB PT10 – 46014, a spanish mercantile company.

You can contact the Data Protection Delegate of EPIC PANDA by emailing [info@epicpandagames.com](mailto:info@epicpandagames.com) if you have any questions regarding the content of this privacy policy.

Users of the Game may contact the delegate of data protection of LaLiga and EPIC PANDA to know the essential content of the agreement between both parties in relation to the Game.

### **Where do we get your personal data from?**

LaLiga and EPIC PANDA will process the data that you have provided us directly in the onboarding of the game (Language), other data inferred as a result of the use and activity in the Game (user ID, device ID, operating system, device model, version of the Game and telemetry, for example, clicking on a certain content or the time you stay in the game) and the country data, which you can optionally provide through Google (Google Services) or Apple (Game Center).

### **Why do we process your personal data?**

LaLiga and EPIC PANDA undertake to process your personal data according to the provisions of applicable legislation and, in particular, to process any personal data of the User to which it may have access as a result of the latter’s use of the Game in a confidential manner. To that end, LaLiga and EPIC PANDA have implemented suitable technical and organisational measures to guarantee the security of your personal data and avoid the destruction, loss, unlawful access or unlawful alteration thereof. When deciding upon these measures, such criteria as the following were taken into consideration: (i) the scope; (ii) the context and purpose for processing the personal data; and (iii) the technical state of the art and existing risks.



Main purposes:

- EPIC PANDA and LaLiga:

- / **Access to the Game:** We inform you that the personal data that you provide in the onboarding of the Game (language) and the data inferred as a result of the use and activity in the game (user ID and device ID) will be processed by LaLiga and EPICA PADA for the purposes of facilitating, managing, maintaining and controlling your access and activity within the Score Words game.

In this regard, LaLiga uses Microsoft's cloud services (Azure) for managing and hosting your personal data. Your personal data will be transferred outside the European Economic Area, specifically to the United States, because of this service. This is a country in which an equivalent level of protection to that of the European Economic Area is not guaranteed. Consequently, LaLiga has signed standard contractual terms adopted by the European Commission with said service providers pursuant to the provisions of Art. 46.2 c) of the General Data Protection Regulation, including additional guarantees and obligations addressed to these providers for as much security and transparency as possible. The content of the standard contractual terms is available on request through [lopd@laliga.es](mailto:lopd@laliga.es).

- / **Payments in the Game:** In the event that you access the mobile application and make payments within the Game, we inform you that your personal data will be processed by Google or Apple, through their payment gateways, in order to manage the payment of payments. In this sense, we invite you to read the privacy policies of Google or Apple to find out about the treatment of your data.

The legal basis for the aforementioned purposes is that the processing is necessary for the execution of a contract in which the interested party is a party by virtue of the provisions of art. 6.1 b) of the General Data Protection Regulation.

- LaLiga:

- / **Internal reports:** Likewise, LaLiga will process in aggregated form the personal data on the use of the Platform (user ID, device ID (IDFA or, where relevant, IDFV), device model, operating system and telemetry, for example, clicking on particular content or how long you stay on the asset) and lastly, and the country that you provide optionally through Google (Google Services) or Apple (Game Center) for the preparation of relevant metrics and statistics that let LaLiga analyse how the Game is used by the different user segments that are generated and the impact of its campaigns, evaluating the interest that they have generated among said segments based on the data analysed. In particular, LaLiga will carry out aggregated segmentation based on the aforementioned data, which includes:

- Segmentation according to operative system and the country. (e.g., 20 android devices have installed the Game in Spain).



## Use of the identifier for advertisers (“IDFA”) on iOS (Apple) devices

Use of the IDFA for the “**Internal reports**” purpose requires the user tracking permission within Apple’s iOS operating system. In the event that the user has not given their permission for the use of the IDFA, LaLiga will not be able to carry out this purpose using the IDFA of the device.

The user may accept or reject the tracking permission at any time in the iOS settings of the user’s Apple device.

The legal basis for the aforementioned purpose is that the processing is necessary to satisfy the legitimate interest of LaLiga by virtue of the provisions of art. 6.1 f) of the General Data Protection Regulation, consisting in extracting lessons learned from the information provided and obtained from users that let it improve the Game and optimise the campaigns run based on the interest they generate among the different user groups. Before that, we would like to inform you that LaLiga has analysed the proportionality between its legitimate interest and its users’ rights and freedoms. You can request the conclusions of this analysis through [lopd@laliga.es](mailto:lopd@laliga.es).

You have the right to object to the aforementioned purpose at any time in accordance with the procedure described in the section “**What are your rights when you provide us your personal data?**”

### Additional Purposes

Should you provide your consent and be more than 14 years old, the additional purposes for which LaLiga and EPIC PANDA will process your personal data can be found below:

- LaLiga:

- / **Preparation of exhaustive profiles:** LaLiga will make an exhaustive profile of you in order to show you banners with personalised advertising on websites, in applications or on social media about LaLiga’s product and services (for example, if we identify that you are a supporter of specific club, we will offer you personalised incentives, such as a shirt of your favourite team).

Likewise, the aforementioned information will be targeted to the segments (user groups that are made according to the information obtained from them or how you use the Game) that we can create based on the following data sources:

- The information that you provided when you access to the Game (in this case, country and favourite sport - if football is chosen, also the favourite team);
- Data inferred as a result of the use and activity on the Platform (device ID, registered user ID, device model, operating system and telemetry, for example, clicking on particular content or how long you stay on the asset).

LaLiga will also generate said segments by taking into account the following



profiling techniques:

- Campaign optimisation: we will exclude you from advertising campaigns on draws in which you have participated, on apps you have downloaded or registered on, on products or services you have already purchased (for example, we will avoid offering you a LaLiga app if we know that you have already downloaded it)
- Users with similar interests and preferences: thanks to the profile that LaLiga creates about you, we can send you personalised content that takes into account other profiles similar to yours (for example, if we identify that other users similar to you like eSports, we will show you advertising related to eSports).
- User ratings: LaLiga will obtain an unknown variable from known variables provided by you or inferred of you in order to carry out an analysis of its users with the aim of identifying those with the greatest propensity for using or contracting LaLiga products, and, if applicable, offering them products and services.

The legal basis for processing your data for the aforementioned purposes **is the consent you have granted** for processing your data for the selected purposes under the provisions of art. 6.1 a) of the General Data Protection Regulation. Your personal data will be held for these purposes until you revoke the consent granted.

You have the right to withdraw your consent at any time following the procedure described in the section ***“What are your rights when you provide us your personal data?”***, this does not affect the legality of the processing based on consent prior to its withdrawal.

- EPIC PANDA:

/ **EPIC PANDA’s Advertisement policy:** So that EPIC PANDA can show you personalised recommendations and advertisement about activities, products, or services.

The legal basis for processing your data for the aforementioned purpose is the consent that you provided for the processing of your data for the selected purpose. Your personal data will be retained for this purpose until you withdraw your consent.

You have the right to withdraw your consent at any time in line with the procedure set out in the section ***“What are the user’s rights when we are provided with your personal data?”***, without affecting the legality of consent-based processing prior to its withdrawal.

#### **How long do we store your personal data?**

- LaLiga:

The personal data which we process will be stored for such time that the purposes which motivated their collection persist and/or you do not revoke the consent which you have given, or you do not exercise your rights of erasure, objection or restriction of processing.



Likewise, LaLiga will keep your personal data, duly blocked, for the following period of time for the sole purpose of addressing any kinds of responsibilities that could arise:

- / **Access to the Game:** The data provided for access to the Game will be kept as long as you do not request the deletion of your data, this purpose persists and, once it has ended, during the limitation period of legal actions that may arise from it.
- / **Payments in the Game:** The data provided for payments in the Game will be kept as long as you do not request the deletion of your data, this purpose persists and, once it has ended, during the limitation period of legal actions that may arise from it.
- / **Internal reports:** The data provided for internal reports will be kept as long as you do not request the deletion of your data, this purpose persists, you do not object their processing and, once this purpose it has ended, during the limitation period of the legal actions provisions that may arise from it.
- / **Preparation of exhaustive profiles:** The data provided for preparation of exhaustive profiles will be kept as long as you do not request the deletion of your data, this purpose persists, you do not object to the given consent and, once this purpose it has ended, during the limitation period of the legal actions provisions that may arise from it.

Said personal data will be deleted when such period of time expires.

- EPIC PANDA:

EPIC PANDA will keep your Personal Data while you keep your account as a user of the Game, do not revoke your consent, and / or do not exercise your right to suppress, oppose or limit the processing. We keep your Personal Data for as long as we need it for the purposes indicated in this privacy policy, to meet your needs, to provide you with content related to the Game and to comply with our legal obligations.

Once your relationship with EPIC PANDA, is finalized, we may retain some of your Personal Data as long as it is necessary to comply with our legal obligations, as well as to meet any responsibility arising from your treatment.

**Who will we send your personal data to?**

- LaLiga:

Your personal data will not be sent to third parties. However, LaLiga may communicate your personal data and any other user information when required to the public authorities in the performance of the duties legally attributed to them and pursuant to the applicable provisions.

Similarly, some entities subcontracted by LaLiga could access the personal data and information as data processors or sub-processors in order to provide LaLiga with a required service, as stated in the different purposes in the section ***“Why do we process your personal data?”*** These service providers sign a contract that requires them to use your personal information solely for the provision of the services communicated in this policy.



- EPIC PANDA:

In some cases, we need to communicate your Personal Data to companies that provide us with services related to information technologies or marketing agencies, with whom we outsource certain services related to the data processing we perform. In these cases, we make sure that said third parties comply with the regulations on protection of personal data.

Your Personal Data will not be communicated to other third parties, except legal obligation. No transfers of Personal Data to third countries or international organizations are foreseen.

**What are your rights when we are provided with your personal data?**

We inform you that you can exercise your rights to access, rectification, objection, erasure, portability, right to not be subject to an automated decision and limitation on processing with LaLiga or EPIC PANDA at any time:

What are your rights as a user?

- / Right to access: you have the right to obtain confirmation about whether LaLiga or EPIC PANDA process your personal data and access these data.
- / Right to rectification: you can ask for inaccurate personal data to be amended or rectified.
- / Right to erasure: you can ask for your personal data to be deleted.
- / Right to limitation on processing: In certain circumstances, you may ask for the processing of your data to be limited. In this case, they may only be kept for the purpose of defence against lawsuits.
- / Right to object: you may object the processing of your data for the purpose you specify. LaLiga or EPIC PANDA will refrain from processing your data, unless justified on compelling legitimate grounds or for defence against possible lawsuits.
- / Right not to be subject to a decision based solely on automated processing, including profiling, which may cause you legal effects or similarly significantly affects you.
- / Right to portability: if the Game so permits, you may exercise the right to portability of your data, in a structured, commonly used and machine-readable format to another data controller.

How can I exercise my rights?

- (i) LaLiga:

By sending an email to: [lopd@laliga.es](mailto:lopd@laliga.es). The exercise of your rights is completely free of charge.

When accessing and, as applicable, registering on the application, you provided your consent for the purposes for which your data was requested. You may withdraw this consent at any



time, via the Consents Centre on the app menu or by sending an email to: [lopd@laliga.es](mailto:lopd@laliga.es)

The withdrawal of your consent will not affect your ability to use the app nor the legality of processing based on this consent prior to its withdrawal.

Furthermore, if you believe that you have been unable to exercise your rights satisfactorily, you may contact the Data Protection Officer of LaLiga by writing an email to [dpo@laliga.es](mailto:dpo@laliga.es) or lodging a complaint with the Spanish Data Protection Agency via its website at [www.agpd.es](http://www.agpd.es)

(ii) EPICPANDA:

Through written communication addressed to Adolfo Soler to the mail address [info@epicpandagames.com](mailto:info@epicpandagames.com) or to the postal address Carrer de la Creu Roja 1 B6 PB PT10 – 45014.

If by registering in the Game you have given your consent for the purposes for which you have been requested, you may revoke it, at any time, via the section called “Advertisement Policy” on the app menu or by sending an email to the address: [info@epicpandagames.com](mailto:info@epicpandagames.com) or at the postal address indicated in the previous paragraph.

The withdrawal of your consent will not affect your ability to use the app nor the legality of processing based on this consent prior to its withdrawal.

Furthermore, if you believe that you have been unable to exercise your rights satisfactorily, you may contact the Data Protection Officer of EPIC PANDA by writing an email to [info@epicpandagames.com](mailto:info@epicpandagames.com) or lodging a complaint with the Spanish Data Protection Agency via its website at [www.agpd.es](http://www.agpd.es)