

PRIVACY POLICY

LALIGA Clash is a product that is offered by LALIGA Group International S.L. (hereinafter, “LALIGA”). Therefore, the personal data that you provide to access and, where relevant, sign up to LALIGA Clash (hereinafter, “Game”) will be processed by LALIGA as the data controller.

To use the Game (mobile app, web and smart TV) you must register with the LALIGA Ecosystem, through which you access an environment created by LALIGA, composed of several applications and websites, belonging to both LALIGA and the affiliated football clubs with which LALIGA has collaboration agreements, where, by means of a common registration implemented by LALIGA for said assets (LALIGA Single Sign-On), each user receives a unique identifier such that any selection or modification of preferences or request for erasure made on one of the applications or websites which form part of the ecosystem will affect the rest of the LALIGA Ecosystem environment and the entities which it comprises. Access to the [link](#) to learn more about LALIGA Ecosystems and the entities which it comprises.

Who is the data controller for your personal data?

Your personal data will be processed by LALIGA, with CIF (tax identification no.) B05421805 and address at Calle Torrelaguna 60, 28043, Madrid.

LALIGA’s Data Protection Officer contact: dpo@LALIGA.es

Where do we get your personal data from?

LALIGA will process the data which you provide via the registration form (alias or nickname, email, favourite team, region and country, all of which are requested as required data, and the telephone number requested as optional data), as well as other data inferred as a result of your use of and activity within the Game (registered user ID; device ID; advertising ID or Mobile Advertising ID – MAID; identifier for the provider of the service provided through the Game, LALIGA – IDFV – which permits the identification of your device in order to track your activity in LALIGA Ecosystem applications; identifier for advertisers – IDFA – which permits the identification of your device in order to track your activity in LALIGA Ecosystem applications and third-party applications; operating system; device model and telemetry, for example, when you click on certain content or the time you remain active will also be recorded) or your interactions with communications which we may send you via push, in-app or email notifications, as applicable (for example, clicking on the content of a communication).

Likewise, in the event that you are the user of another asset for which LALIGA is the controller or in which LALIGA acts as joint controller of the data and which forms part of the LALIGA Ecosystem, in the Game LALIGA may process the aforementioned personal data, whether declared or inferred in said assets.

Finally, we inform you that in the iOS version of the Game, Apple will ask your permission for the use of the advertising identifier of your device (“IDFA”) by LALIGA for any of the purposes which may require it, in accordance with the section ***Why do we process your personal data?*** of this privacy policy.

Importing data from social media

We would like to inform you that you will be able to use the social media profiles you have to sign up to or access the LALIGA Ecosystem, as well as to share with LALIGA additional information on your social media profiles.

Data shared through Facebook:

- Name and profile photo (required to sign up. However, we hereby inform you that LALIGA does not process your profile photo)
- Email address (optional)
- Birthday (optional)
- Bio posts (optional. Your public and private bio posts, including photos and videos, information on the places tagged in them and the kinds of reactions they got).
- Gender (optional)
- Page likes (optional)
- Current city (optional)
- Interest categories:
 - *Food,*
 - *Animals and Pets,*
 - *Art and Culture,*
 - *Banking, Finance and Economy,*
 - *Alcoholic Beverages,*
 - *Beauty,*
 - *Film, Theatre and Musicals,*
 - *Sports,*
 - *Electronics and Computing,*
 - *Energy, Science and Industry,*
 - *Social Groups,*
 - *House and Home,*
 - *Children's,*
 - *Media,*
 - *Fashion,*
 - *Motoring,*
 - *Women,*
 - *Music,*
 - *Leisure and Entertainment,*
 - *NGOs and Good Causes,*
 - *Health, Hygiene and Wellbeing,*
 - *Insurance,*
 - *Professional Services,*
 - *Shopping,*
 - *Technology and Internet,*
 - *Telecommunications,*
 - *TV and Radio,*
 - *Travel,*
 - *Videogames,*
 - *Viral Media.*

Thanks to your page likes and bio posts, LALIGA will obtain the following inferred data:

- “Engagement” score: this value measures the volume of interactions by the user with the Facebook wall of the official LALIGA page.
- “Social” score: this value measures the influence of the user on social media.
- “Promotion” score: users’ walls are analysed looking for references to prize draws, promotions and participations in prize draws, and a score is assigned which measures the promotional ratio of the user’s wall. Whether the user follows Facebook pages devoted to publishing promotions, raffles and prize draws is also verified.
- “Fan Value” score: This score is a combination of the three previous ones which classifies users by the score obtained (a user with a higher score is considered a more valuable user).

Data shared through Google:

- First name and surname(s) (required to sign up)
- Email address (required to sign up)

Data shared via Apple:

- Apple ID or email address (Required to register)
- Name (Required to register)

In regards to Facebook, Google or Apple registration, we inform you that LALIGA is not responsible for the legal adequacy of the social network you use for the aforementioned purposes. For this reason, we recommend that you review the conditions of use and privacy policy of the social networks that you are going to use for these purposes so that you can verify that the processing carried out with your personal data is in accordance with your expectations of privacy and the data protection regulations that may be applicable in each case.

Once the data has been imported and incorporated into your registered user account, your data will be included in the LALIGA Ecosystem and processed by LALIGA for the purposes described in this Privacy Policy.

Why do we process your personal data?

Main purposes:

- / **Registering, accessing and participating in the Game:** We inform you that the personal data you provide when registering will be processed by LALIGA for the purposes of facilitating your registration and access to the Game, as well as to manage your participation in it. Likewise, LALIGA will use it to grant you access to the other LALIGA Ecosystem assets. In particular, LALIGA will use the following data to fulfil this purpose:
 - Email address: required for registration and to access the Game.
 - Alias or nickname: used to identify the user within the Game.
 - Favourite team: used to designate your team within the Game.

- **Region:** used to show the sponsors of the Game corresponding to the selected region (the sponsors of the game in America are different to those in Europe).

Likewise, in order to verify the validity of the email address provided to LALIGA to register for the game, LALIGA uses the services of a third-party provider (RP Solutions Inc.) which also involves international transfer to the United States, in this case of the email address supplied. This country does not guarantee an equivalent level of protection to the European Economic Area. For this reason, LALIGA has signed standard contractual clauses adopted by the European Commission with that service provider by virtue of the provisions of Art. 46.2 c) of the General Data Protection Regulation, including additional guarantees and obligations addressed to these providers to ensure the greatest possible security and transparency. The content of the standard contractual clauses is available on request from 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, via their payment gateways, for the purpose of managing the payments. In this regard, we invite you to review the privacy policies of Google or Apple to obtain information on the processing of your data. The information relating to any payments you may make will not be processed by LALIGA.
- / **Attending to queries:** we hereby inform you that LALIGA may process your personal data concerning your email, telephone number (mobile and landline) and other data that you provide in order to manage any requests you make to us over the chat on the Game about its operation, answer questions, receive suggestions and/or resolve incidents in order to respond to you.
- / **In-app notifications related to the Game:** If you access the Game's mobile app, you will be able to receive in-app notifications relating to the Game (for example, about changes to the privacy policy, legal notice or terms and conditions of use of the Game, ads about new features etc.). These notifications are displayed only when you are inside the mobile app; LALIGA will use your user ID to send you the notification.

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. The necessary and essential data for the provision of these services within the Game are your username, email address, country and user identifiers. If you do not provide said data, you will not be able to access the Game to register and enjoy the services.

- / **Internal reports:** Furthermore, LALIGA will process in aggregate form the personal data which you supplied during registration (in this case, region, country and favourite team) or social login (if applicable, birthday, sex, page likes and current city), usage data of the Game and

of the other LALIGA Ecosystem assets which you use (user ID, device ID (IDFA or if applicable, IDFV), device model, operating system and telemetry, for example, clicking on certain content or the time you remain active) and finally, interactions with communications of any type which you may receive (for example, clicking on the content of a communication) or in communication with Game support, for the preparation of relevant metrics and statistics which allow LALIGA to analyse the use made of the Game by different user segments which are generated and the impact of its campaigns, evaluating the interest which they have generated among the aforementioned segments based on the data analysed. In particular, LALIGA will carry out aggregated segmentations based on the aforementioned data, which include:

- Segmentations based on favourite team and country. (e.g. 20 users from Spain have selected X team as their favourite team).

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 lopdp@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?*”

- / **Assets’ security and quality control:** LALIGA will process the usage data of the Game (User ID, Device ID, device model, operating system and telemetry, for example the user actions performed within the Game), for the purpose of detection of errors, and technical problems, as well as the optimization of the services provided by the Game.

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 offering a Game with the maximum quality and user experience. 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.

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:

The additional purposes for which LALIGA may process your personal data are set out below:

- / **Push notifications on the Game's content:** If you access the Game's mobile app, you will be able to receive push notifications concerning the Game's content through your smartphone or tablet's regular notification system. You can stop such communications being sent at any time through the Game's 'notifications centre' or through the settings on your smartphone or tablet. These notifications may be displayed on your device whether you are inside the mobile app or not; LALIGA will use your user ID to send you the notification.

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 achieving higher levels of consumption of audiovisual content through notifications on sporting events that can be broadcast on the Game. 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.

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?"*

How long will we keep your personal data for?

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:

- / **Registering, accessing and participating in the Game:** The data provided for registration, access and participation 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.

- / **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.
- / **Attending to enquiries:** The data provided for attending to enquiries 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.
- / **In-app notifications related to the Game:** The data provided for in-app notifications related 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.
- / **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.
- / **Assets' security and quality control:** The data provided for assets' security and quality control 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.
- / **Push notifications on the Game's content:** The data provided for push notifications on the Game's content 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.

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

To which recipients will your personal data be communicated?

Your personal data may be communicated to other people or companies to be used for their own purposes provided that you give us your consent by checking the box provided or for the service you request. In this regard, we hereby inform you that your personal data will be communicated to third parties as explained in the section "*Why do we process your personal data?*"

- / LALIGA will communicate the personal data, whether declared or inferred in the Game, (identified in the section *Where do we get your personal data from?*) to the affiliated football clubs which form part of the LALIGA Ecosystem with the purpose of allowing you the access to their assets and have the same fan profile in the whole ecosystem. All of this will be possible provided that you are a registered user of any of the assets for which said clubs are responsible for, in accordance with the privacy policies of the assets of each club and based on the consent which you have granted them. The legal basis which legitimises this

communication of personal data 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, in particular, the performance of the services offered to users in the LALIGA ecosystem through LALIGA's Single Sign-On, which are regulated in the terms of use of the Game, and in the terms of the other assets which form part of said ecosystem. To learn more about LALIGA Ecosystem and which clubs form part of it, you may access the following [link](#).

Likewise, LALIGA may provide personal data and any other user information when required to do so by public authorities exercising responsibilities that have been lawfully granted to them and in accordance with applicable regulations.

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.

What do your rights as a user consist of?

We inform you that, at any time, you can exercise your rights of access, rectification, objection, erasure, portability, not being subject to automated decisions and limitation of the processing before LALIGA.

- / Right of access: you have the right to obtain confirmation as to whether LALIGA is processing your personal data, as well as to access such data.
- / Right of rectification: you can request LALIGA to modify or rectify personal data that is inaccurate.
- / Right of erasure: you can request LALIGA to delete your personal data.
- / Right of limitation to processing: In certain circumstances, you can request the processing of your data to be limited, in which case, it will only be kept for the exercise or defence of claims.
- / Right of objection: you can object to the processing of your data for the purpose you specify. LALIGA will cease to process the data, except for compelling legitimate grounds, or for the exercise or defence of possible claims.
- / 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 of portability: if the Game allows for it, you can exercise the right of portability of your data, in a structured, commonly used and machine-readable manner, and to transfer the data to another data controller.

How do I exercise my rights?

By sending an email to: lopdp@LALIGA.es. Exercising your rights is completely free of charge.

Likewise, you can revoke the consent given or object to the data processing based on legitimate interest at any time by following the procedure set out in the different communications you receive from LALIGA, through the Subscription Centre found on the Game's menu, or by sending an email to: lopd@LALIGA.es.

The objection to a particular purpose or the revocation of consent given will not affect your use of the app or the legality of the processing prior to the objection or revocation of consent.

On the other hand, if you have signed up for the Game through social media or a similar service, you can exercise your right to erase your data by deactivating the “LALIGA Ecosystem” service in the services connected to your social media profile. Please see the conditions for each service for more information:

- Google: <https://myaccount.google.com/permissions>
- Facebook: <https://facebook.com/help/218345114850283>
- Apple: <https://support.apple.com/en-gb/HT210426>

Finally, if you believe that you have failed to obtain satisfaction in the exercise of your rights, you are not happy with how your personal data has been processed or if you want to access the essential aspects of the joint responsibility agreement signed between the parties, please don't hesitate to contact LALIGA's data protection officer at dpo@LALIGA.es or, where relevant, file a complaint with the Spanish Data Protection Agency (AEPD) through its website www.aepd.es.

Are there any kinds of restrictions?

LALIGA hereby inform you that you need to be at least 14 years old to use and, where appropriate, sign up to the Game.