

# EveryPlay.live – PRIVACY POLICY

## 1 Welcome

This Privacy Policy describes how Infront Sports & Media AG (“**Infront**”) collects and uses your personal information when you access, visit or otherwise make use of the EveryPlay.live streaming platform (the “**Platform**”). It is important you read this Privacy Policy alongside our Terms and Conditions of Use and our Cookies Policy.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will always strive to uphold all applicable data protection laws when providing you with the Platform, including the General Data Protection Regulation (GDPR), the Swiss Federal Data Protection Act and country-specific data protection regulations applicable to the Platform.

## 2 Who are we?

The legal entity responsible for this Privacy Policy is:

Infront Sports & Media AG  
Headquarters  
Group Legal Department  
Grafenauweg 2  
6302 Zug  
Switzerland

Tel. +41-41-723 15 15

Email: [data-protection@infrontsports.com](mailto:data-protection@infrontsports.com)

Web: [www.infront.sport](http://www.infront.sport)

## 3 What information do we collect about you?

We strive to collect only the personal information that we need. We’ve summarised below the categories of information that we receive and store about you.

### Contact and account information

Information required to create and manage your user account, which includes your name, email address, username or similar identifier, password and account preferences.

### Technical information

Information about your device or browser used to access the Platform, which includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Platform and our website.

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## **Analytics information**

Information about your use of the Platform, including how you use our services (for example, the time spent watching content and how you navigate the service).

## **Marketing and communications information**

Information you provide to us about your preferences in receiving marketing from us and our third parties and your communication preferences.

## **Other information you give us**

Information that you voluntarily provide to us, including the team you support, your survey responses; participation in contests or promotions; email or chat correspondence with us, suggestions for improvements; referrals; or any other actions you perform on the Platform.

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any payment or financial information from you, as we use a third-party payment provider Stripe to process your payments to us – for more information on Stripe, please see the section *Who and why do we share your information?* below.

## **If you fail to provide the personal information**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **4 How do we collect your information?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your contact and account information by subscribing to the Platform and managing your account.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect technical information about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. Please see our [Cookies Policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal information about you from various third parties and public sources as set out below.

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Technical information, including from the following parties:

- analytics providers (for example, those providing location data to customise the Platform and content available to you);
- Platform advertisers (for example, those providing interest-based and online advertising related information to customise advertising to you); and
- the Platform's payment provider(s).

## 5 For what purposes do we collect and use your information?

We will only use your personal information when the law allows us to. Our lawful basis for collecting and using the personal information described in this Privacy Policy depends on the personal information we collect and the specific context in which we collect the information. Most commonly, we will use your personal information in the following circumstances:

- Where we need to **perform the contract** we are about to enter into or have entered into with you.
- Where it is necessary for **our legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a **legal obligation**.
- Where you have given us **consent** for us to process your personal information for one or more specified purposes.

The purposes for which we may process your personal information and our corresponding lawful bases for doing so are listed below.

- To register your profile and give you access to the Platform.
  - To provide our services to you, including but not limited to creating and managing profiles providing and enhancing features, and ensuring the functionality of the Platform and our website.
  - To manage our relationship with you including enabling us to enforce our Terms and Conditions of Use for the Platform and notifying you about changes to our Terms and Conditions of Use or this Privacy Policy.
  - To provide you with location-based services (e.g. to enforce territorial restrictions of content available based on your location).
  - To fix problems with your account for the Platform, resolving of disputes, providing other services within the scope of customer service.
  - To determine your geographic location.

Our lawful basis for the activities above is that the processing is necessary for the performance of our contract with you, or in order to take steps at your request prior to entering into a contract.

- To administer and protect our business, our website and the Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To detect abuse of our services.
- To diagnose and fix problems and develop and test new content, products, services and features.

Our lawful basis for the activities above is the pursuit of our legitimate interests of operating and expanding our business activities lawfully or running our business, provision of administration and IT services, network security, to prevent fraud.

- To provide you with personalised advertising and marketing communications where you have requested information from us or subscribed to the Platform and have not opted out of receiving that marketing. You are free to opt-out of direct marketing communications at any time, as specified in the section *What about personalisation and marketing?* below.
- To use data analytics to improve our website, the Platform, products/services, marketing, customer relationships and experiences.

Our lawful basis for the activities above is the pursuit of our legitimate interests of developing the Platform, growing and developing our business, to inform our marketing strategy and to keep our website updated.

- Occasionally we may rely on consent to send you specific direct marketing communications. Where consent is relied upon you will have actively agreed to the processing and have been presented with specific information about the activity, and you may withdraw your consent at any time by contacting us.
- We will also collect your consent where legally required, for example for the use of cookies or other mobile identifiers, or where we need to store information on your device.

## 6 Who do we share your information with and why?

We may share your personal information and other information as set out below. Where we disclose your personal information with other organisations, we require them to respect the security of your personal information, to treat it in accordance with applicable law, and to use it only for specified and authorised purposes.

### Group entities

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Within the Infront Group, every entity that requires your data to fulfil our contractual and legal obligations will have access to it. For example, we share your personal information to other Infront entities as required for the purposes of IT and system administration and other purposes set out in the *What purposes do we collect and use your information for?* section above.

### **Service providers**

We disclose your information to third party service providers authorised by us and acting on our behalf to operate functions of our services. We have agreements in place with these third-party service providers to ensure that they keep your information secure and process the data in accordance with applicable data protection laws. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collection, advice and consulting, and sales and marketing. For example, we engage service providers to process credit card transactions or other payment methods, to provide customer service, to analyse and enhance information (including information about users' interactions with our service), and to process and administer customer surveys. The payment processor we use for this Platform is Stripe. You can see more information on how Stripe handles your personal information here: [Stripe Privacy Policy](#).

### **Professional advisers**

We may need to share your personal information to our professional advisers and the professional advisers of other entities of the Infront Group including lawyers, bankers, auditors, insurers and accountants.

### **The Federation, clubs and sponsors**

Where legally permitted, we may share your personal information with Platform rightsholder/ federation/ league partners and their participating clubs and sponsors so they can have some insight on the league's and club's fans, including for example their viewing habits.

### **Business transfers and transactions**

In the event of any reorganisation, restructuring, merger or sale, or other transfer of assets, we will transfer information, including your personal information, provided that the receiving party agrees to treat your personal information in a manner that is consistent with this Privacy Policy.

### **Other lawful reasons**

We may share your personal information and other information with third parties where we are under a duty to, or reasonably believe we need to, disclose or share your personal information in order to:

- comply with any applicable law, regulation, legal obligation or regulatory/law enforcement authority request;
- detect, investigate and prevent fraud, money laundering and other harmful or unlawful activities;
- enforce or apply our Terms and Conditions of Use; and

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- protect against harm to the rights of the Infront Group, its rights holders and/or its users (including related to piracy or the threat of piracy), as permitted by applicable law.

## **7 Do we share your information internationally?**

Infront Group operates internationally and many service providers also process data outside of Switzerland and the European Economic Area (EEA). Therefore, your personal information may be transferred to countries outside Switzerland or the EEA. Personal information is transferred outside the EEA only where the recipient country has been deemed by the European Commission to ensure an adequate level of protection for personal information or where we have put in place other appropriate safeguards, in particular standard data protection clauses adopted by the European Commission.

Your personal information collected in connection with the Platform and under this Privacy Policy will be stored on servers within the United States of America.

Please contact us if you would like to request to see a copy of the specific safeguards applied to the export of your information.

## **8 How long do we keep your information?**

Personal information is only kept for as long as necessary to achieve the purpose for which it was collected, after which it is deleted or anonymised. We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

For the majority of information we hold, we will only hold personal information for as long as the relevant individual is a subscriber to the Platform. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

## **9 What are your rights?**

Under certain circumstances, you are able to exercise rights in respect of your personal information we process. Some of these rights are not automatic and may depend on applicable data protection laws.

- The right to access, update or to delete the information we have on you.
- The right of rectification – this enables you to have any incomplete or inaccurate data we hold about you corrected.
- The right to object – this enables you to object to processing if you feel it impacts on your fundamental rights and freedoms and we are relying on a legitimate interest.
- The right of restriction – this enables you to ask us to suspend the processing of your personal information, for example if you want us to establish the data's accuracy.

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- The right to data portability – a right to require us to provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format.
  - The right to withdraw consent, where we are relying on consent to process your personal information without affecting the lawfulness of any processing carried out before you withdraw your consent.

If you wish to be informed what personal information we hold about you and if you want to exercise any of the rights listed above, please contact us. Please note that there are legal qualifications to some of the rights and they may not always apply under applicable data protection laws. Should this be the case, we would inform you of this when you contact us.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10 How do we protect the information?**

Any personal information collected by us is stored on secure servers, and we use thorough procedures to protect against loss, misuse, unauthorised access, alteration, disclosure or destruction of personal information. In the event of a physical or technical incident, we maintain strict security and incident response plans to handle such incidents in a timely manner and to limit their negative effects.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **11 What about personalisation and marketing?**

Subject to your preferences (including consent, where required), we collect and use your personal information to send you direct marketing communications about our services via email, push notification, protected identifier matching, and text message. You are free to opt-out of direct marketing communications at any time by logging into the Platform and checking or unchecking relevant boxes to adjust your marketing preferences, or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## **12 Are children allowed to use the Platform?**

It is a priority of ours to protect children while using the internet, and Infront does not knowingly collect data relating to children.

You must be 18 years old or older to subscribe to our services. If you think that your child has provided of personal information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

### **13 How we use cookies?**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookies Policy](#).

### **14 When do we change this policy?**

We keep this Privacy Policy under regular review to ensure it reflects how we process your personal information, including changes to our processing purposes, your rights in respect of your personal information, and substantive or material changes to how we process personal information. We will take proactive measures to notify you of any such changes via an appropriate means to ensure you remain informed, such as emails, and website pop ups.

### **15 Complaints**

If you believe that we have not complied with any of our obligations under data protection laws, please let us know. You also have the right to lodge a complaint with a supervisory authority. You can contact the supervisory authority of your usual place of residence, your place of work or the registered office of Infront.

### **16 How to contact us?**

If you have any questions in respect of this Privacy Policy, about the collection and processing of your personal information, or to exercise your rights, please contact [data-protection@infrontsports.com](mailto:data-protection@infrontsports.com).