

# Privacy Policy

Proyoli Gaming Ltd. (the “Company” or “Proyoli”)

Privacy Policy

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## Introduction

Proyoli Gaming Ltd. (the “Company” or “We ” or “Our”) appreciates and respects your privacy and has undertaken the relevant steps to meet the recent changes in privacy regimes including the provisions of the European General Data Privacy Regulation (the “GDPR”).

We have designed our privacy practices and processed with a view to complying with the GDPR and to keep us on the path of ongoing GDPR compliance.

This Privacy Policy explains what information is collected by us when you enter and use our [Site](#), and/or play the ‘Real Manager’ game, including any localized version under sub-domains of our Site (collectively the “Services” or the “Games”) and how and why we collect the information we do. It also explains how we may use this data, and what rights you have in relation to such data. We take every reasonable step to ensure that your rights under the GDPR are met – for more information on your rights you can go to your right section below.

In general, we only collect personal information directly from you or via your social media provider if you subscribe through a social media provider, such as Facebook or using your Google Account. We only request personal information that is necessary and relevant so that we provide you with the Services. Furthermore, we only use your personal information for the specific purpose for which you provided it to us, and we process it in a lawful and transparent manner.

If you are aged 16 or under (a minor), or you are reading this on behalf of a minor for whom you have parental responsibility, please refer to the Section on [Minors and Privacy](#).

Any capitalized terms not defined herein shall be as set forth in the [Terms of Use, terms](#).

PLEASE READ THIS PRIVACY POLICY CAREFULLY. IF YOU DO NOT WISH FOR YOUR INFORMATION TO BE USED AS SET FORTH HEREIN, PLEASE DO NOT ACCESS THE SITE OR USE THE SERVICE.

## Controller

Under the GDPR, we are classified as a Controller of the personal data you provide us with, and in accordance with the GDPR we will make efforts to ensure that all the personal data we hold about you is, at all times meets the following (the “GDPR standard”):

1. used fairly, lawfully, and transparently;
2. collected for specific, explicit and legitimate purposes;
3. adequate, relevant to and limited;
4. accurate and can be kept up-to-date;
5. not kept in a form which permits your identification for longer than is necessary; and
6. held securely.

As a controller, we are required to demonstrate compliance with the foregoing standard, and this Privacy Policy is one of the ways in which we meet our accountability requirements under the GDPR.

## What personal information do we collect?

We collect the following types of personal data about you:

- When registering, for identification, authentication and localization of your account, we collect the following information which is mandatory:
- First Name and Last Name: this can be your real name or an alias.
- Date of Birth: this is so we can verify you are above 16 and also so that we may give you presents. In-game purchases are subject to parental supervision if you are a minor. You must provide us with the information for parental control across the application. This can only be deleted when deleting the account.
- E-mail: this is used for authentication and can be amended if required by you on the “**My Account**” section of your user interface.
- Favorite Team: we need this in order to provide you with content related to your favorite team. This is an essential component of the Game and can only be deleted when deleting the account. This information can be seen by other fans of the same team and might be passed to the team itself.
- Location: we need this in order to localize the application language and our offerings such as competitions and in-game purchases. You do not have to provide us with this information, but if you don't, we will not be able to provide you with localized language and offerings. You always need to choose a location, but this can be amended on the “My Account” section of your user interface.

#### **If you register using your Facebook or Google account ,**

If you register using your Facebook or Google account, we use your Facebook or Google ID for authentication purposes, and you consent to us receiving your e-mail, name, date of birth and location. You will also need to choose a favorite team. We also receive information from Facebook regarding your gender, and the IDs of your Facebook friends from Facebook. This is used to suggest in-game friends if they are also registered.

In addition, your Facebook profile picture might appear in social features, e.g.: when you post a message on our wall, your picture will appear if your account is linked to Facebook.

When you use the contact form in order to correspond with us, we collect your name and e-mail address, and any other information we might need in order to conduct the dialogue with you. [Note for the Company – such option for user's request should be implemented within the platform itself and not only via the Real Manager Facebook Page.]

#### **Playing the Game**

If you make in-Game purchases using PayPal, we keep your PayPal account ID and details regarding your purchases for our internal records.

In addition, when you play the Game, we automatically collect and store information about your interaction in server logs that we maintain in order to enable you to analyze your performance over several seasons. This may include details of how you are using our Services; Internet protocol address; device event information such as crashes, system activity, hardware settings, browser type, standard HTTP request headers, including but not limited to user agent, referral URL, language preference, date and time, and cookies that may uniquely identify your browser or your user account. Personal information and passwords are not stored in the logs.

We and our partners use various technologies to collect and store information when you visit the website, and this may include sending one or more cookies or randomly generated identifiers to your device. For more information on how we use cookies please see our [Cookies Policy](#)

#### **What do we do with this information?**

Your e-mail or any other identifier (such as Facebook or Google ID) is used first and foremost for authentication purposes. We use your personal data in order to recognize you and create a unique identifier and unique user experience for you.

If you wish to participate in our competitions, then your first and last name (or alias) will be made public in the Game and may also be published on social media. Your first and last name can be an alias (unless you have registered using Facebook or Google This information may also be passed to our sponsors.

We ask for your specific consent to participate in our competitions and you can opt out of this at any time on the “**My Account**” page. If we do not receive your consent, you will not be able to participate in our competitions. If you opt-out from participating in the competitions on My Account page, then you will no longer be able to participate in our competitions, but the information with regard to competitions you have already participated in (and your rank) will remain **unless you request to delete your user entirely**, in which case all information regarding your activity on the Site will be deleted within one month.

We will also keep a record of your communication with us in order to help us resolve issues and to safeguard you and the Site against fraud and abuse.

The information we collect also helps in understanding and improving how you use the Site including carrying out analytics; in protecting and securing the Site; forwarding payments for processing; complying with applicable laws and regulations; and other business-related purposes, managing records, and conducting legal, regulatory and internal investigations.

We may correspond with you using your e-mail and occasionally send you a newsletter. You may opt-out of this at any time using the link provided within each email or on the My Account page.

In the event of a merger, acquisition or asset sale we may disclose your personal information to the prospective seller or buyer.

When paying, we use PayPal payment processing and iCredit. You are subject to PayPal and/or iCredit’s own privacy policy. We suggest you review carefully before using their services.

#### **The legal basis we rely on to process personal information**

Pursuant to the GDPR, processing of personal information is only lawful, if and to the extent that we have a lawful basis for such processing. Under the GDPR there are six lawful bases, as follows:

1. Consent
2. Necessary for the performance of a contract
3. Necessary for compliance with a legal obligation
4. Necessary to protect your vital interests
5. Necessary for a task performed in the public interest; and
6. Necessary for our legitimate interests, except where such interests are overridden by your fundamental rights and freedoms

The legal bases we have for processing of your personal information are, as applicable: (i) with your consent, (ii) in order to perform a contract, and (iii) legitimate interests.

#### **Consent**

When you register with us you may consent that we use your information for participating in competitions and that it can be passed to our sponsors and social media. You may also provide us with specific consent, on occasion to share information with sports administrations and your favorite team.

From time to time we may ask you to participate in certain surveys. If you consent to participate in a survey the information you provide will be used in order to improve our game and to further personalize your experience and as set forth elsewhere in this document. .

#### **Contract**

Your personal data is used amongst others to authenticate you and in order to enable certain features such as localization and optimization; in addition, we use your personal information in order to administer contests, competitions, prize draws and other promotions, including selecting the winners and publishing the results. Therefore, we are using your data on the basis that it is necessary for us to be able to perform our contract with you.

## **Legitimate Interest**

Based on our legitimate interests. We determined our legitimate interest by considering the following:

*The purpose* - your personal information is processed in the framework of the Services to the extent necessary to provide you with the Game experience in an effective, efficient and enjoyable way. We also need your information in order to prevent abuse of our Services.

*The necessity* - the processing we do of your personal information is necessary in order to carry out our commercial and business objectives. It would be too risky to run the Game without identifying you and having some basic information with regard to you. We need certain additional information about you in order to adapt and improve the Game so that you will enjoy it more. Our business model is based amongst others on sponsorship and promotions of third parties. In order to recruit sponsors and advertisers that pay to be associated with our Services, we are required to disclose certain personal information to them, in particular if you participate in competitions sponsored by them.

*Balancing test* – we believe that we are using your personal information in a responsible way and are not overriding your fundamental rights and freedoms.

Therefore, our use of your data, amongst others such as localization and favorite team is necessary for our legitimate interests in protecting and providing the Services in this way.

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 if possible, request your consent and if not will notify you and we will explain the legal basis which allows us to do so.

## **Information Made Public, Passed to Our Sponsors and or Sport Administrations**

If you wish to participate in our competitions than you have agreed that we may publish your contact information with your performance in the Game on our site and social media. In addition, you agree that we may pass your contact information to our sponsors. You may also provide us with specific consent, on occasion to share certain information with applicable sports administration.

## **Data Transfers**

We may process, transfer and/or store your personal information on a server located outside the country where you live. As required by the GDPR we keep records of our processing activities, including with regard transfers of your personal data to third countries. We only transfer your personal data to company's that meet the conditions set forth in the GDPR and/or subject to your consent, as follows:

Our cloud is hosted by Amazon and processed using Atlas, in Frankfurt, as applicable. All of the aforementioned attest to their worldwide compliance with the GDPR.

We may keep certain information in Israel – on the basis of the adequacy decision. The European Commission resolved that the level of protection of personal data in Israel is adequate.

## **Surveys**

If you provide your opt-in consent we will use basic Identity and Contact Data to send you links to research surveys to gather opinion from football fans on a range of issues that affect the Game, and the information submitted by you will be used to assist us with shaping the future of the Game. These surveys may ask you to submit additional personal data (including age and gender).

## **How long we keep information about you?**

We retain your personal information and your activity logs until you request that it be deleted, in order to enable you to review your performance over various seasons. However, after you have not accessed the site for 24 months, we will delete your data, as set forth in our Retention Policy.

If you will reach such season Game performance that will qualify to our 'All Time' high scores tables published and updated by us from time to time, we will ask for your consent to keep your data for more than two years and publish it so that other users could see how successful you were and try to break your scores.

### **Minors**

It is important to us that children can enjoy our Services in a responsible manner.

We are committed to safeguarding children's personal data collected online, and to helping parents and guardians and their children learn how to exercise control over personal data while exploring the Internet.

We do not knowingly collect personal information from children. Children under the age of 13 are not permitted to create, access, or use our Site or play our Games. If you discover that notwithstanding the foregoing your child has been playing our Game, please contact support to request to review or remove and upon our reasonable verification, we will delete the applicable information.

### **Information security & retention**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. The support team or anyone representing the product, will never ask for your password.

### **Third Party Services**

We engage third party businesses to provide services to us or to you on our behalf, such as support for the internal operations of our Services (and related services), customer support, communications, data storage and delivering communications (including calendar notifications). In providing their services, they may access, receive, maintain or otherwise use personal data on our behalf. Our service providers only use your personal data in accordance with the relevant services and are not permitted to use your personal data for their own purposes. Where this is not the case you will be notified by us.

We also use third party tools to help us manage and analyze our social media presence, and report on comments, mentions and other content that is posted about us on social media sites and other public channels and forums. These third parties' activities, and their information collection and sharing practices, are subject to the terms of the relevant social media site, channel or forum. We will use this information in accordance with this Privacy Policy.

We use a third party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to analyze and maximize the experience our users have in each part of the Services. This information is only used by us in a way which does not identify you.

### **Clubs and Sports Administrations.**

Where you allow us to, we will share your personal data with your favorite club to help your club interact with its fans. This Privacy Policy applies to our use of your personal data only, and you should refer to the relevant privacy policy of the relevant Club to understand how they use your personal data and should contact them directly if you no longer wish to receive their communications. In addition, on occasion your personal data might be shared with an applicable sports administration, if possible, we will always request your consent in advance.

### **Legally Required.**

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-organization of the legal or ownership structure of Proyoli Gaming Ltd.

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.

### **Links to Other Sites**

The Services may contain links to other websites, applications and environments that are not owned or controlled by us (the “**Other Sites**”). The owners and operators of those Other Sites are responsible for their collection or use of your personal data and you should check their respective privacy policies. Unless specifically referred to otherwise, this Privacy Policy applies to the Services only and not the Other Sites.

### **What Are Your Rights?**

You may have certain rights in respect of your personal information, including the right to access, correct, restrict the processing of and object to processing of your personal information. You may also have a right to portability of your information, and to have your information erased.

We are committed to respecting your rights. You may action your rights on the My Account page or by contacting support.

You may request to peruse the information collected about you on the My Account page and we will send you a link to this information as soon as technically possible.

Should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted using you My Account page.

You may close your account at any time, on the My Account page.

If you still feel that your personal data has not been handled appropriately according to the law, and you are in the EU you can contact your data protection authority and file a complaint with them.

### **Security**

Your personal data is processed on our Cloud, which is hosted by Amazon and processed using Atlas. All of the aforementioned attest to their worldwide compliance with the GDPR.

Except for Proyoli's employees and service providers, who are under an explicit obligation to maintain confidentiality, we may share your information with any competent law enforcement authority, if required to do by a judicial order or any other legal directive.

We may use professional security services in order to safeguard the collected information. Such services may include periodical checks and backups. Nevertheless, we are not responsible for any security faults that may be caused and are beyond our control.

We are putting in to place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized 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 are putting into 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.

Where we have given you or you have chosen a password which enables you to access certain Services, you are responsible for using reasonable care in keeping this password confidential.

### **Changes**

Any changes we may make to our Privacy Policy in the future will be posted on our web site. If we make substantial changes to this

Privacy Policy, we will inform you by an email or by placing a notification window on our website

### **Contact Us**

If you have any questions, or need further information about our privacy practices, please get in touch using [email](#) or [Support](#) page. Using this page allows us to respond to your query as quickly and efficiently as possible.

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