

GDPR COMPLIANCE

Fanplayr (the "*Company*") declares its compliance with the GDPR, General Data Protection Regulation.

Fanplayr in order to apply the GDPR requirements has been adopting technical and organizational measures aimed at the security of Fanplayr Personal Data and security of Personal Data processed on behalf of the Customer.

The measures are listed here below:

1. Compliance with the law

The *Company* undertakes to comply with the GDPR and any future changes of the applicable law.

2. Safeguarding

The *Company* has appropriate measures to protect Personal Data, including appropriate technical and organizational measures to ensure protection from any unauthorized or illegal processing or accidental damage to Personal Data.

3. Fair processing

The *Company* considers the Customer Personal Data as confidential, processes Personal Data in line with the law and processes the data only to provide the agreed services. The *Company* will correct Customer Data for any errors or inaccuracies as a result of Customer communication.

4. Personnel Personal Data handling

Fanplayr has reasonable security measures, including restrictions on access and processing of data only to authorized personnel. The staff is selected for reliability, legally bound by confidentiality and secrecy. Employees are authorized to process only the data necessary for their functions and only on the client/projects assigned to each of them.

If necessary, the *Company* appoints a data protection officer in cooperation with the Customer's data processing manager.

5. Transfers

Fanplayr does not transfer Customers Personal Data outside the country in which they



are located, except for the Member States of the European Economic Area ("EEA"), or on written instructions from the Customer and in accordance with the relevant EU model clauses.

6. Consent

The *Company* does not directly collect consent for the processing of Personal Data, however it has inserted mechanisms to allow respect for the rights of Data Subjects.

7. Information

The *Company* does not directly inform Customers' users. The processing of data on behalf of the Customer will be legal and legitimate and only to provide services to the Customer.

8. Privacy Policy and disclosure

The *Company* has adopted a Privacy Policy whose text can be find on the *Company* website www.fanplayr.com. The *Company* has already adopted an internal policy for the safe processing of data. Data processed by Fanplayr on behalf of Customer are not disclosed.

9. Personal Data Breach

In the event of a Personal Data Breach which involves Customer Personal Data, The *Company* will: (i) promptly take all necessary and appropriate corrective action to remedy the underlying causes of the Personal Data Breach and make reasonable commercial efforts to ensure that such Personal Data Breach will not recur; (ii) notify Customer without delay, and in any event within twenty-four (24) hours, providing reasonable detail of the Personal Data Breach and likely impact on Data Subjects; and (iii) take any action required by Applicable Law and/or at the reasonable request of Customer.

Customer shall make the final decision on notifying (including the contents of such notice) Customer's users, employees, service providers, Data Subjects and/or the general public of such Personal Data Breach, and the implementation of the remediation plan, to the extent Customer Personal Data is concerned.

10. Retention

Any Customer Personal Data is returned to the Customer or destroyed, following Customer request, when it is no longer required for the performance of the Services agreed, or within a reasonable time based on the type of Personal Data.

11. Rights of Data Subjects

The *Company* has the means and will take reasonable actions to allow compliance with



reasonable requests from Data Subjects (in relation to their rights under Article 12-22 of GDPR) in the event that the Customer has shared their Personal Data with the *Company*.

12. Sensitive/ Special Personal Data

The *Company* does not share any sensitive/special categories of Personal Data, as defined in Article 9 and 10 of GDPR, unless expressly agreed in writing with the Customer.

13. Security Measures

The *Company* has placed appropriate technical and applicative security measures to avoid the risk of loss, damage, unauthorized access, even accidental, aimed at ensuring the availability, integrity and confidentiality of the Customer Personal Data.