

# RSLTS - PRIVACY POLICY

Effective Date: [25.04.2025]

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## || Introduction

This privacy policy (the “Policy”), which may be updated periodically, outlines how PHYGITAL INTERNATIONAL DMCC, a company registered in accordance with the Company Regulations 2020 of the Dubai Multi Commodities Centre Authority having DMCC Entity Number DMCC194758 (“PI”) processes personal data (the “Personal Data”) in the context of its digital activities within the RSLTS (*means our applications for Devices, including any services and content accessible through the Apps, as well as upgrades, modifications, subsequent versions, updates, and error corrections*). Additionally, this Policy covers engagement and information services managed by us either independently or in collaboration with WORLD PHYGITAL COMMUNITY LIMITED (“WPC”), a company registered in accordance with Chapter 622 of the Laws of Hong Kong having Registration Number 3311309. Collectively, we refer to these activities as the “Services” in this Policy.

This Policy also details how we process the Personal Data that it receives from other organizations, as well as data collected through cookies and similar technologies integrated into third-party digital properties for our benefit.

We are committed to protecting your privacy and ensuring that your personal information is handled responsibly. This Policy explains what types of Personal Data we collect, how we use it, and the rights you have regarding your information when using our Apps.

## || Who are we?

When we refer to “**we**”, “**our**” or “**us**” in this Policy, we mean PI.

PI is a leading voice in the Phygital Sports world, focused on innovating and redefining the future of sports. As the custodian and rights holder of the Games of the Future, we oversee the bidding process for each host city. In addition to the Games of the Future, PI operates the New Sports LAB, a specialized research and development program dedicated to creating new sporting disciplines and event formats.

WPC is a non-governmental and non-profit multi-member organization that provides a general direction and oversight for the introduction and popularization of Phygital Sports at the international level.

Established in August 2023, WPC was created in response to the need for a global governing body to promote, develop, and enhance interest, understanding, awareness, and the image of Phygital Sports both internationally and domestically.

Phygital Sports is defined as a comprehensive competitive activity that integrates functional and digital components implemented either in stages or simultaneously during the competitive process as part of a single competitive action with a combined result or score.

When we refer to “**you**” or “**your**” we mean individuals whose data we collect through our Services or whose data we receive from other organizations with whom we collaborate.

## **|| Applicability and Acceptance of Policy**

This Policy defines “Personal Data” and explains how Personal Data is collected, used, processed, and disclosed.

This Policy becomes effective when you first access and register on the RSLTS. By accessing, browsing, or using the RSLTS you irrevocably and unconditionally accept and agree to adhere to the provisions of this Policy without any exemptions, limitations, and/or exclusions.

If you disagree with any provision of this Policy or do not wish to consent to the processing of your Personal Data, you must cease using the RSLTS.

## **|| Legal Grounds for Personal Data Processing**

We process your Personal Data based on the following legal grounds:

- **Contractual Necessity:** When we have a contract with you, we will process your Personal Data to fulfill that contract, particularly to provide access to the RSLTS under our Terms of Use;
- **Consent:** Your consent, as provided in this Policy;
- **Legal Obligations:** When we are required to comply with legal obligations, such as responding to court orders or regulatory requests;
- **Legitimate Interests:** When processing, is necessary for our legitimate interests, provided that such interests do not override your fundamental rights and freedoms;
- **Compliance with Applicable Legislation:** As permitted by relevant laws.

## **|| Consent to Personal Data Processing**

### *EU Persons’ Consent to Personal Data Processing*

- If you are an EU resident, we will process your Personal Data based on your consent as required by the General Data Protection Regulation (GDPR). We will only proceed if we have received from you a freely given, specific, informed, and unambiguous indication of your wishes, indicating your agreement for us to process your Personal Data (“**Consent**”).
- You can provide your Consent by ticking a box when visiting the RSLTS or by submitting your Personal Data through designated forms. By ticking the box, you irrevocably and unconditionally consent to our processing of your Personal Data as specified in your Consent.
- Your Consent encompasses all processing activities related to the same purpose(s). If there are multiple purposes for processing, your Consent is considered granted for all of them. You have the right to withdraw your Consent at any time by emailing us at [legal@phygitalinternational.com](mailto:legal@phygitalinternational.com). Withdrawal of Consent does not affect the lawfulness of any processing based on Consent prior to its withdrawal.
- Except as required or enabled by law, we will not use or disclose your Personal Data for any purpose for which you have refused Consent or later withdrawn your Consent. If you withdraw Consent, you agree that we may continue to use your previously provided

Personal Data to the extent necessary to fulfill contractual obligations or as permitted by law.

### Non-EU Persons' Consent to Personal Data Processing

If you are not an EU resident, by providing us with your Personal Data via the RSLTS or otherwise, you irrevocably and unconditionally consent and agree to our processing of your Personal Data in accordance with this Policy. This includes:

- Collecting, storing, using, disclosing, sharing, and transferring (including cross-border) your Personal Data provided to us, as well as any Personal Data collected from your use of the RSLTS (e.g., data collected automatically and/or from other sources); and/or
- Use cookies and web beacons (including pixel tags) to collect your Personal Data and associate it with your computer and web browser.

## **|| Collection of Personal Data**

### General Provisions

The type of Personal Data we collect depends on your interaction with us. While you can often choose whether to provide your Personal Data, opting out may limit your access to the full functionality of the RSLTS. When using the RSLTS, you may provide us with the following types of Personal Data:

- 1) **Voluntarily Disclosed Personal Data:** Information you provide on an individual basis;
- 2) **Automatically Collected Personal Data:** Information collected automatically during your use of the RSLTS;
- 3) **Third-Party Collected Personal Data:** Information we gather from other sources other than the RSLTS.

Please note that the RSLTS may contain links to other third-party applications that may also collect Personal Data about you through cookies or other technologies. This Policy does not apply to your interactions with those third-party applications. We recommend reviewing their privacy policies, as we have no control over their data practices.

### Personal Data You Provide to Us

To fulfill our obligations under the Terms of Use, we may ask you to provide certain Personal Data, including but not limited to:

- your name;
- any other information requested during registration or while using the RSLTS.

This data is collected only when voluntarily provided and solely for the purposes clearly identified on the RSLTS or in this Policy.

We may collect your Personal Data in various ways, including but not limited to:

- subscribing to a newsletter;
- filling out forms;
- providing feedback.

We reserve the right to combine Personal Data collected from different sections of the RSLTS with any other relevant information.

### Personal Data We Collect Automatically

When you access and interact with the RSLTS, we may automatically collect certain types of Personal Data, including but not limited to:

- **Device Information:** Details about the computer or mobile device you use to access the RSLTS, such as hardware model, operating system and version, web browser type, and other device identifiers;
- **Server Log Information:** This includes, but is not limited to, your login details, date and time of visits, pages viewed, button clicks, input form changes (excluding entered values), errors encountered, IP address, time spent on the RSLTS, and the previous and next RSLTS visit;
- **Tracking Technologies:** We and our service providers use various technologies, including cookies and web beacons, to collect information during your interactions with RSLTS. “Cookies” are small data files stored on your device that help us gather information about device identifiers, IP addresses, web browsers used, pages viewed, time spent on pages, and links clicked. “Web beacons” are graphic images placed on a webpage or in an email that monitor user behavior. They often work in conjunction with cookies. For more details on our cookie policy, please refer to our Cookies Notice.

### **|| Collection of Data through Third Parties**

We may authorize third parties to run and manage services promoting the Phygital Movement, represented by WPC members. These third parties may share information they collect about you, such as your first and last name or unique identifier, your email address, with us. They are required to obtain proper consent from their users before transferring any Personal Data to us. The information exchanged will be specified in accordance with the privacy and cookie policies of those third parties and this Policy.

WPC Members share their users’ Personal Data with us. Such transfers will adhere to the privacy and cookie policies of each relevant WPC member.

### **|| Use of Personal Data**

We use your Personal Data for the following purposes:

- to facilitate your use of our Services;
- to manage your user account and your authentication;
- to promote Phygital Sports internationally and encourage participation in related events;
- to manage competitions and fan engagement opportunities through our Services or our partner organizations (e.g., WPC);
- to provide goods, Services, information, or content you have requested;
- to transfer your data to selected third-party service providers;
- to prepare and organize final events and tournaments;
- to generate reports and informational materials on the competition results;
- to inform participants about results and news.

## **|| Disclosure of Personal Data**

### General Provisions

We treat Personal Data as confidential and will not disclose or use it without valid legal grounds. We may disclose your Personal Data in the following circumstances:

- with your Consent or at your instruction;
- with companies under common control or ownership with us or our offices internationally;
- for everyday business purposes, such as processing transactions, maintaining accounts, responding to court orders and legal investigations;
- in connection with a merger or sale of our company assets, or if we do a financing or are involved in an acquisition or any other situation where Personal Data may be treated as a business asset;
- if we believe your actions violate our Terms of Use or applicable legislation, or to protect the rights, property, and safety of any of our assets or third parties.

We may without limitations share aggregated or de-identified information that cannot reasonably identify you.

### Information That is Made Publicly Available

Certain Personal Data may be made publicly available via our Services or third-party sites including:

- information necessary for competitions or contests, such as gameplay data in standings or winner announcements; and
- news and editorial content about athletes, coaches, or individuals relevant to our mission.

## **|| Transmission of Personal Data**

The transmission of Personal Data over the Internet or other publicly accessible networks is not completely secure. We are not liable for the security of any Personal Data transmitted online or through third-party content.

Your information may be transferred to and processed in countries outside your residence. We have implemented appropriate safeguards to ensure your information remains protected in accordance with this Policy. Generally, Personal Data is processed in Hong Kong.

We may transfer your Personal Data to third parties for the purposes and legal bases for processing outlined in this Policy. Some of these third parties may be located in countries such as the UAE, that do not offer a level of privacy protection equivalent to that provided under the laws of Hong Kong or the European Union.

To ensure your data is adequately protected, we implement measures required by applicable law. Before transferring Personal Data from the UAE to other countries, we utilize recognized safeguard mechanisms, including standard contractual clauses approved by UAE regulators.

We are committed to maintaining the security and confidentiality of your Personal Data throughout any transfer process. If you have any questions about our data transfer practices or the safeguards we employ, please feel free to contact us.

## **|| Protection of Personal Data: Security Measures**

We implement appropriate security, administrative, and technical measures to protect any Personal Data you provide. These measures safeguard your Personal Data against unauthorized access and unlawful processing or disclosure, as well as accidental loss, modification, or destruction, through state-of-the-art technical and organizational measures.

Personal Data is protected through advanced and organizational measures, which are continuously updated in response to technological advancements and organizational changes. Regular audits and controls are conducted to ensure compliance. However, no computer security system is entirely foolproof, and the Internet is not a secure method for transmitting information. Therefore, we do not assume responsibility for Personal Data submitted or received via the Internet, nor for any unauthorized access or use of that information. You agree not to hold us liable for any loss or damage resulting from the misappropriation, interception, modification, deletion, destruction, or use of information provided through RSLTS.

## **|| Retention of Information**

We may retain your Personal Data in accordance with applicable laws and as necessary to fulfill our obligations. This retention is based on the need to comply with legal requirements and resolve potential disputes.

We may retain your Personal Data until you withdraw your Consent or the Terms of Use are terminated. We aim not to store your Personal Data longer than necessary to provide access to the RSLTS or respond to inquiries.

Where Personal Data is collected through the RSLTS, we may continue processing this data to promote the Phygital movement and maintain user engagement, even after the relevant tournament operator (e.g., WPC) has ceased its own data processing. Such processing will be in accordance with this Policy.

## **|| Rights**

Under applicable data protection laws, you have the following rights:

- the right to be informed about the collection and use of your Personal Data;
- the right to access and receive a copy of the Personal Data held by us;
- the right to rectify any incomplete Personal Data;
- the right to request deletion of your Personal Data (the “right to be forgotten”);
- the right to restrict (i.e. prevent) the processing of your Personal Data;
- the right to data portability (to obtain a copy of your Personal Data to re-use);
- the right to object to specific uses of your Personal Data;
- rights concerning automated decision-making and profiling;
- the right to revoke the Consent for future processing of your Personal Data; and
- the right to complain to the relevant data protection authority.

## **|| Alterations to the Policy**

We reserve the right to update this Policy at our discretion. We recommend checking this Policy frequently to stay informed about changes and how we protect Personal Data.

By using the RSLTS, you acknowledge and agree that it is your responsibility to periodically review this Policy and be aware of the changes. Your continued use of the RSLTS following any modifications to this Policy will be deemed as your acceptance of those changes.

The Policy may occasionally be translated into other languages. In the event of any discrepancies between the English version of this Policy and its translations, the English version shall prevail.

## **|| Data Protection Officer**

We appointed a Data Protection Officer (DPO) who is an expert in data privacy and operates independently to ensure compliance with the GDPR. The DPO's responsibilities include:

- monitoring internal compliance with data protection policies and procedures;
- informing and advising us on data protection obligations;
- providing guidance on Data Protection Impact Assessments (DPIAs);
- acting as a point of contact for data subjects and supervisory authorities.

## **|| Children's Privacy**

The minimum age to use RSLTS is 18 years. We do not knowingly collect Personal Data from individuals under this age. In jurisdictions where a higher age of consent applies, we will require parental consent before collecting any Personal Data associated with a child. We strongly encourage parents to educate their children about online safety, including not sharing personal information without parental guidance.

## **|| Complaint and Contact**

If you have any concerns or complaints regarding the use of your Personal Data, or if you have questions related to this Policy, please contact us at:

- Address: Platinum Tower, Plot No: JLT-PH1-12, Jumeirah Lake Towers, Dubai;
- Email: [legal@phygitalinternational.com](mailto:legal@phygitalinternational.com).

We are committed to addressing your concerns and will make reasonable efforts to resolve any issues. If we are unable to assist you satisfactorily, you have the right to lodge a complaint with the relevant data protection supervisory authority.