Privacy Policy

We at MATCHi AB ("we", "our" and "us") care about privacy and want you to feel you are in safe-hands when we process your personal data and we work hard to protect your integrity.

This privacy policy applies to you who use our online competition tool ("Backhandsmash") on our website www.backhandsmash.nu.

Here we explain why we process your personal data, what <u>your rights</u> are, the legal basis on which we handle your data and for how long we store it.

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Who is responsible for processing your personal data?

MATCHi AB (Swedish registration number 556871-6129), is responsible for the processing of your personal data.

Please note that we also process data on behalf of our partners and venues. Should you have any questions regarding this or if you wish to exercise any of your rights under data protection legislation, please contact us via our e-mail address privacy@backhandsmash.nu or write us a traditional letter to our postal address, Gullbergs Strandgata, 411 04 Gothenburg, Sweden.

From where do we collect your personal data?

We collect your personal data directly from you when you register a Backhandsmash account or when you use Backhandsmash, for example when you enter a competition or enter your results or if you choose to up-date or add to your account information. Much information is voluntary to provide.

The partner or venue organising a tournament or similar, which you have entered, might provide us with your information. We process such information on the venues behalf as they have chosen to use Backhandsmash for their tournament and we allow them to enter competition information, including information on participants and to connect with users.

The personal data you need to provide to us

In general, you are not required to provide personal data to us, but certain information needs to be provided in order to use Backhandsmash. In which situations you need to provide personal data to us is described in the below charts where the legal basis is stated as "Performance of a contract" or "Legal obligation". If you do not provide such personal data to us, we will not, for example, be able to make Backhandsmash available for you. Please note that you shall refrain from adding information that you do not wish to become visible to other participants in a competition.

Who can gain access to your personal data and why?

Your personal data is primarily processed by us. Certain information about you will be visible to others. Most information is visible to others entering a competition and may be displayed on screens at a venue or other appropriate places and on our website backhandsmash.nu. You are generally required to use your real name when using Backhandsmash, this is partly because competitions take place in real life and your team members or competitors have a legitimate interest in knowing who they will be meeting. Facilitating contact between players in a competition is an important part of Backhandsmash and this means other players in the same competition as you will be able to see your contact information - such as your email address or phone number. If you do not wish your phone number to be visible to other players you must not enter it into the service and you should only use an e-mail address which you are comfortable with that other players in the same competition can see and might use to contact you outside of Backhandsmash.

Sometimes our partners or venues use Backhandsmash as administrators. They can then process your personal data if you are affiliated with them through signing up for a tournament or similar organised by them. They might also show information about tournaments and individual matches on screens displayed at the venue and such displays can include information entered into Backhandsmash.

In certain cases, we need to share your personal data with our suppliers and partners in order to conduct our business efficiently. We are responsible for any sharing of your personal data to such suppliers, partners or subsidiaries and to make sure your personal data is safe when shared with third parties.

We will *share* your personal data with the following recipients:

- Our IT-suppliers that will process your personal data on our behalf as our processors in
 order for us to have a functioning IT system and conduct our business efficiently. Your
 personal data is only shared to the extent necessary for our suppliers to fulfil their
 obligations in the contract they have with us and according to our instructions. This is
 applicable to all detailed schedules listed below.
- If you receive our newsletters or surveys, we will share your personal data with the company that provides a system for **sending newsletters or conducting surveys**.
- Our **connected partners and venues** to e.g. enable you to enter or register for a competition and/or connect with the organiser of a competition. Your personal data is only shared to the extent necessary for our connected partners and venues to fulfil their obligations in the contract they have with us or directly with you. The venues will process your personal data as controllers because you are also a customer of the venue. In some regards there is an overlap between the information we process and control about you and the information the venue process and control. You will find more information about this here.
- The **analytic services** are mainly provided by Google Ireland Limited. Therefore, Google will process your personal data on behalf of us and according to our instructions as our processor. Thereafter, Google processes your personal data as controller. For more information about Google's processing, read here.

Where is your personal data processed?

We, as well as our processors, process your personal data within the EU/EEA. In some instances, we will transfer your personal data outside of the EU/EEA to our IT-suppliers that process personal data as our data processors and according to our instructions. Such transfer only takes place in accordance with applicable data protection legislation, meaning that we will transfer your personal data outside the EU/EEA when we can ensure an appropriate level of protection of your personal data.

Detailed description of how we process your personal data

The below charts describe in detail why we process your personal data, which categories of personal data we process, our legal basis for the processing and for how long we process your personal data. The legal basis is the basis for our processing of your personal data according to the GDPR.

This is partly such information we have a legal obligation to provide and might feel a bit long and complicated – do not hesitate to contact us if you have any questions regarding our processing of your personal data. Our <u>contact details</u> can be found in the beginning of this privacy policy.

Processing which we are solely responsible for if you use Backhandsmash

To administrate your Backhandsmash account

Purpose with our processing	What personal data we process	Our legal basis for the processing
 Registration of your Backhandsmash account 	NameE-mail address	Performance of a contract

 Enter into an agreement with you regarding your use of Backhandsmash Enable you to log in to your account on our website Send you an e-mail to explain how to change your password if you have requested a new password Communicate with you as necessary to fulfil our contractual obligations, such as to send you 			
updates of Backhandsmash.	with you regarding your use of Backhandsmash Enable you to log in to your account on our website Send you an e-mail to explain how to change your password if you have requested a new password Communicate with you as necessary to fulfil our contractual obligations, such as to send you updates of	• Password	order for us to enter into and fulfil the contract we have with you concerning your use of Backhandsmash. If the data is not provided to us, we will not be able to administrate your

Storage period: We will process your personal data for this purpose until you choose to delete your Backhandsmash account.

To provide you with the features of your Backhandsmash account

Purpose with our processing	What personal data we process	Our legal basis for the processing
 To facilitate the administration and organisation of competitions. Enable you to create a profile and upload profile picture. Show you upcoming and previous matches Produce and show you statistics, for example based on your previous competitions or matches Allow you to accept or activate invites from competition organisers. Send you competition related information Provide you with the means to contact other participants in the same competition as yourself 	 Name E-mail address Competition information and results Social security number Team information Club affiliations We also process information you choose to register, such as: Birthday Gender Phone number Address Profile picture Any information you may choose to add in fields provided 	Performance of a contract The processing is necessary in order for us to fulfil the contract we have with you to provide the features of your account. Legitimate interest The personal data that you choose to register on your profile will be processed based on our legitimate interest to enable e.g. a personalised profile and facilitate interaction at Backhandsmash.

 Allow you to schedule or re-schedule matches To log matches and the interaction with other players. 	o Any communication you enter to other users	
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Storage period: We will process your personal data for this purpose until you choose to unregister/delete your account. You may also choose to remove data by deleting non-obligatory information you have chosen to enter or <u>contact us</u> if you want any help in this matter.

To collect information from our connected partners and venues

Purpose with our processing	What personal data we process	Our legal basis for the processing
 Collect data about you from our connected partners and venues and compile such statistics. 	 Competition information, including results Name 	Legitimate interest The personal data will be processed based on our <u>legitimate interest</u> to compile statistics.

Storage period: We will process your personal data related to statistics until you choose to delete your Backhandsmash account.

To provide customer service and support

Purpose with our processing	What personal data we process	Our legal basis for the processing
 Provide customer service and answer any question you may have in relation to your use of Backhandsmash. Administrate support matters 	 Name Phone number E-mail address Information about the support matter 	Legitimate interest The personal data will be processed based on our legitimate interest to provide customer service. Performance of a contract The processing might also be necessary in order for us to fulfil the contract we have with you concerning your use of Backhandsmash. If the data is not provided to us, we will not be able to help you.

Storage period: We will process your personal data related to customer service and support matters until you choose to unregister/delete your Backhandsmash account.

To analyse how Backhandsmash is used

Purpose with our processing	What personal data we process	Our legal basis for the processing
 Analyse how you use Backhandsmash to improve the website and services. To do this we use the analytic service from Google Analytics. The analytic service means that we place a random ID on your device to distinguish your device from other visitors and to acknowledge patterns in how our website is used. We will however not know who you are The personal data we gather will be used e.g. to optimise functions and to adapt the website to suit our visitors We will gather personal data by using cookies and you can read more about our cookie use 	 An encrypted version of your IP address Information about your device/browser and if you use more than one device (which area in the country you use our website from and which screen resolution you have) Information about your activities on the website, for example what you click on and how many times you have visited the website. Other information Google has about you, e.g. information about from which site you found us. The above is an overview of the most relevant information, but this is very technical and there could be details related to the above which will be processed. 	Legitimate interest The personal data will be processed based on our legitimate interest to provide and improve our customer service. You can prevent Google Analytics from using your personal data by downloading and installing this browser add on. From time to time, different cookies may be used. If these cookies are not essential to the service, we process the data based on your consent, when this is the case you can withdraw your consent at any time.

Storage period: We will store your personal data until you delete your account at the latest, but some data may be deleted earlier. Google will continue to store your personal data for their own purposes and <u>Google</u> will inform you separately about such storing.

To send newsletters, surveys and keep you informed

Purpose with our processing	What personal data we process	Our legal basis for the processing
 Send information about news, marketing, offers and invitations ("newsletters") Send surveys with enquiries related to aspects of our service, the wider market which we cater to or potential future developments. 	 E-mail address Telephone number Information as to whether you wish to receive such communications. The results from surveys are anonymous so we do not process any answers from you as personal data. 	Legitimate interest The personal data will be processed based on our legitimate interest to send marketing, wider information and obtain survey results to improve our service and decision making.

Storage period: We will process your personal data for this purpose as long as you have a Backhandsmash account. You can always choose to unsubscribe or object to receiving newsletters, surveys and marketing at any time. If you object to receiving marketing from us, we keep track of this in our "<u>unsubscribe-list</u>" to avoid sending you any further such material. You can also at any time make an active choice in your account settings letting us know if you wish to receive newsletters and or if you wish to partake in surveys.

If you have any questions or queries

We always strive to keep a good relationship with you and answer all questions you may have. If you have any questions, would want to make a complaint regarding Backhandsmash or if we would have a claim against you as a user, we will process your personal data as described below. We will collect your personal data from you or provide the information ourselves

Note that an ongoing matter may mean that we cannot delete all your personal data after your request.

To handle any cancellations, complaints or claims

Purpose with our processing	What personal data we process	Our legal basis for the processing
 Handle any cancellations, complaints or claims. Initiate possible claims or defend ourselves against a possible complaint or claim. 	 Name. Contact details you have chosen to use, e.g. e-mail address and/or phone number. Information from our communication with you in relation to the claim. 	Legal obligation The processing is necessary to comply with legal obligations to which we are subject, i.e. consumer law. In these cases, you need to provide your personal data to us since we otherwise will not be able to

comply with your consumer rights.

Performance of a contract

The processing might also be necessary in order for us to fulfil the contract we have with you concerning your use of Backhandsmash. If the data is not provided to us, we will not be able to assess and fulfil contractual obligations.

Legitimate interest

We also have a <u>legitimate</u> <u>interest</u> to process your personal data to defend ourselves against a possible complaint or claim.

Storage period: We will store your personal data from the time the complaint or claim was initiated and for the duration of such complaint or claim and if you have a Backhandsmash-account, we store the information for as long as you have an account.

If you object to receiving marketing from us

We will store information about you who have chosen to object to receiving marketing from us – see the below chart for information about this. We have received the personal data from you.

To comply with marketing legislation

Purpose with our processing	What personal data we process	Our legal basis for the processing
• If you have stated that you do not wish to receive marketing from us, we will store such information in an "unsubscribe-list" to make sure we do not send any marketing to you	 E-mail address Telephone number Your objection to receive marketing 	Legal obligation The processing is necessary to comply with legal obligations which we are subject to, i.e. marketing law which require us to not send marketing material to individuals who have objected to receiving such marketing. We cannot make sure you will not receive marketing from us

	without processing your personal data for this purpose and you are therefore required to provide your personal data to us.
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Storage period: You will be listed in our "unsubscribe-list" until further notice.

Processing which we and our partners & venues each have its own responsibility for

For certain processing of your personal data, we act as processor to our partners and venues where they include some of your personal data in Backhandsmash. In many cases, this personal data overlap with the data that we ourselves control and sometimes it might contain more information. This means that if you are a Backhandsmash user and enter an activity or competition, the partner or venue organising the competitions may forward your information to us and they are responsible for how they process your data independently of us.

If you have a request regarding the data we process on behalf of our partners or venues, we will always have to consult the controller before we take any action. If you want information about how the respective venue or partner processes your data, we direct you towards the venue.

The data that may overlap is described in the schedule below listing our purposes and legal basis on which we process it. The below is provided to give an overview of the information involved and is not meant to be exhaustive. Each venue processes information for their own purposes, which might differ from ours and make their own decision on what ground the processing takes place.

To administrate your matches and competitions

Purpose with our processing	What personal data we process	Our legal basis for the processing
 Receive and register your participation in competitions and matches Administrate your competitions and related information such as results etc. 	 Name Contact information Competition information (e.g. where and when you are playing and the result) 	Performance of a contract The processing is necessary in order for us to fulfil the contract we have with you concerning your use of Backhandsmash. If the data is not provided to us, we will not

		be able to administrate the competition and matches.
Share information to and from our connected partners and venues	 Name Contact information Competition information Team information Club affiliation Other information you choose to supply and required by venues, maybe such as age, gender or other. 	Legitimate interest The personal data will be processed based on our legitimate interest to fulfil our contractual obligations in relation to our connected partners and venues and in order for them to perform their obligations in the contract they have with us and in the contract they have with you as we only provide the tool for the organisation and administration of competitions, whereas the partner or venue hosts or are in charge of the competition.

Storage period: We will store your personal data as long as necessary to administrate your competitions and display results. We will process your personal data after this for purposes stated in the charts above, e.g. to administrate your account and provide you with its features etc. In addition to the above, our connected partners and venues are themselves also responsible for your competitions information. They will store your information in accordance with their own privacy rules and to the extent the venue's information is stored by Backhandsmash, we process this personal data on behalf of the venue and in accordance with our data processing agreement with the venue.

Sharing: When you enter a competition organised by a venue, they we will forward your information to us or we will forward your information to them as you are also their customer and they are responsible for how they process your data independently of us.

What are your rights when we process your personal data?

A detailed description.

You have certain rights regarding your personal data and we outline them below.

If you want to know more or if you want to exercise any of your rights, please contact us and we will do our best as we are happy to help. Our <u>contact information</u> can be found at the beginning of this privacy policy.

Right to information and access

You have the right to obtain *confirmation* as to whether we are processing personal data about you or not.

In detail: Information we provide include the following:

- the purpose of the processing;
- categories of processed personal data;
- recipients or categories of recipients to whom personal data can be shared, especially if located in third countries;
- expected retention times for storage or the criteria used to establish such time;
- information about your rights to have personal data corrected, deleted or limit the processing thereof or your right to object to such processing;
- your right to lodge a complaint with a supervisory authority;
- any application of automated decision making, including profiling in accordance with GDPR, articles 22.1 and 22.4; and
- if personal data is transferred to a third country or international organisation, you also have the right to information about what measures, in line with GDPR article 46, have been taken to ensure an appropriate level of data protection.

You also have the right to obtain a copy of the personal data processed by us. Should you request more copies we may choose to charge a reasonable fee to cover administrative costs. If the information is requested via e-mail, you will receive the information in a common electronic format

Right to rectification

You have a right to *correct* any inaccurate personal data concerning you that we may be processing and to ask us to have *incomplete personal data completed*.

In detail: With consideration of the purpose you have a right to complete any non-complete personal data. If possible and within reasonable efforts, we will inform each recipient with whom the personal data has been shared in case of any rectification. If you want more information about such recipients you are welcome to contact us. Our contact information can be found at the beginning of this policy.

Right to erasure ("the right to be forgotten")

Under certain circumstances, you have a right to request that we delete your personal data. In addition to our own processing of personal data, we also process data on behalf of venues as data processors. If you request that we delete your personal data, we will handle your request as related to our own processing but should you also want a venue to stop processing your personal data, you must contact the venue directly.

In detail: You have the right and we have the obligation to delete your personal data without undue delay if any of the following applies:

- personal data are no longer necessary for purposes which they were collected or processed,
- you object to the processing pursuant to Article 21.1 of the GDPR and there are no legitimate reasons for the processing outweighing your reasons, or you object to the processing in accordance with Article 21.2 of the GDPR,
- personal data has been non lawfully processed, or
- personal data must be deleted in order to fulfil a legal obligation under EU law or any applicable national law to which we are subject.

In the event that we have made public the personal data and are required to delete it as above, we will, taking into account available technology and the cost of implementation, take reasonable steps including technical measures, to notify the controllers of your request and that you wish they delete any links to, or copies or reproductions of specific personal data.

Please note that our obligation to delete and notify does not apply to the extent processing is necessary for the following reasons:

- to exercise the right to freedom of expression and information,
- to fulfill legal obligations under EU law or applicable national law to which we are subject, or
- to be able to establish, assert or defend legal claims.

We delete your personal data at your request, provided that we do not have an obligation to save the personal data in accordance with applicable laws and regulations.

We will notify each recipient to whom the personal data has been shared of any deletion that has taken place as described above, unless this proves to be impossible or entails a disproportionate effort. If you want information about these recipients, you are welcome to contact us. You will find our <u>contact information</u> at the beginning of this privacy policy.

Right to restrict processing

Under certain circumstances, you also have a right to request that we restrict our processing of your personal data.

In detail: The right applies if:

- you dispute the accuracy of the information (but only for such time that allows us to verify),
- the processing is illegal and you oppose the deletion of personal data and instead request a restriction on the use of the data.
- you need the personal data to assert or defend legal claims even though we no longer need the data for our purposes, or
- you have objected to the processing in accordance with Article 21.1 of the GDPR and we have not done an assessment of whether our legitimate interest in the processing outweighs your legitimate reason for restricting the processing of your personal data.

If the processing referred to above is restricted, such personal data (with the exception of storage) may only be processed with your consent or to establish, assert or defend legal claims or to protect the rights of any other persons or for reasons of public interest. Furthermore, we will notify you before ceasing to restrict any processing.

We will notify each recipient to whom the personal data has been disclosed of any restriction on processing taken place as described above, unless impossible or if it entails a disproportionate effort. If you want information about these recipients, you are welcome to contact us. You will find our contact information at the beginning of this privacy policy.

Right to data portability

Under certain circumstances, you have a right to *receive your personal data from us in a structured, commonly used and machine-readable format* and, where technically feasible, have your personal data *transferred to another company* ("data portability").

In detail: The right to data portability applies to personal data that you have provided to us in a structured, widely used and machine-readable format, if the processing is based on the legal basis of performance of contract (GDPR, Article 6.1 b) and the processing is automated.

The exercise of the right to data portability does not affect the application of Article 17 of the GDPR, which shall not apply to processing that is necessary for the performance of a task of general interest or that is part of the exercise of authority performed by us.

Your right to data portability must not adversely affect the rights and freedoms of others.

Right to withdraw your consent and object to processing

You have a right to object to our processing of your personal data when the processing is based on the legal basis "legitimate interest" and we will always consider your objection. You always have a right to withdraw any consent you have given us, partly or completely. For example you can always withdraw consent to use your data for marketing and profiling purposes, such as sending newsletters, surveys or giving you customised suggestions. You can read more about this in the charts above.

In detail: If you object, we may no longer process your personal data as long as we can not demonstrate compelling legitimate reasons for the processing that outweigh your interests, rights, and freedoms or whether it is for the determination, exercise, or defence of legal claims.

Right to lodge a complaint with a supervisory authority

You always have the right to *lodge a complaint* with a supervisory authority. You may do this in the EU/EEA member state where you live, work or where an infringement of applicable data protection laws is alleged to have occurred. The supervisory authority in Sweden is the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten).

Balancing of interests assessments when processing personal data based on the legal basis "legitimate interests"

As we state above, for some purposes, we process your personal data based on our "legitimate interest". By carrying out a balancing of interests assessment concerning our processing of your personal data, we have concluded that our legitimate interest for the processing outweighs other concerns. This assessment is done with caution and we strive to strike a fair balance.

If you want more information about any aspect of how we process your data or if you want to exercise any of your rights, you are very welcome to contact us. Our <u>contact information</u> can be found in the beginning of this privacy policy.

This Privacy Policy was adopted by MATCHi AB on the 1 of January 2024.