

## Privacy Policy for the KingFootball app and website

We at KINGFOOTBALL value and comprehend that privacy is a paramount. Therefore we ensure that all personal information is handled according to data protection and privacy laws.

We are presenting to you our Privacy Policy (“Policy”) to enable you to comprehend what data we gather from clients of the KINGFOOTBALL App and the KINGFOOTBALL site (KingFootball.com) and how we use this data. This Policy is a piece of and subject to our Terms of Use for the KINGFOOTBALL Services. We kindly advise you to review it in details. If you have downloaded or subscribed, or use any of KingFootball services you are consenting to be bound by this Policy in regard of the data gathered about you by means of the KINGFOOTBALL Services and you agree to any use that data as portrayed in the Policy.

### Policy Coverage

The general coverage of our Policy applies between KINGFOOTBALL and any person who uses the KingFootball app or the KingFootball website. It treats the use of information that we collect while you are using the KINGFOOTBALL app and the KINGFOOTBALL website.

If you happen to download any of our apps or use our scope of services, please be aware that for some of them, we might define additional terms, which might be unique to that App / Service. In this case the terms of use shall be accessible via the App itself, or defined additionally on our website, but in all cases they shall comply with this Privacy Policy.

### Not covered by this Policy

Any services and third party websites that may be accessed through our services through links or other means shall not be covered by our Policy, as they represent third party instances.

### Terms used

<b>“Content”</b>	is all the content, which is made available via the KINGFOOTBALL Services. This may include, but is not limited to animation, documents, images, links, sound files, videos, text, etc.
<b>“Information”</b>	is any information that you or your device send, submit or transmit to KINGFOOTBALL via the KINGFOOTBALL Services, including information automatically collected by us.
<b>“Personal Data”</b>	is any data which could be used to identify who you are, e.g name, phone number, and email address.
<b>“Third Party Content”</b>	is the content which is published on our platform by Business users of our service.
<b>“you”, “your”</b>	defines any person visiting the KINGFOOTBALL Website, using the KINGFOOTBALL App or Services.

<b>“KINGFOOTBALL”, “we”, “our”, “us”</b>	is the KINGFOOTBALL.BG Limited Company with registered address in Sofia, Bulgaria
<b>“KINGFOOTBALL App”</b>	is our app that provides interactive content, which is published on behalf of businesses that can be accessed by you, and may include interactive entertainment such as augmented or mixed reality which shall be accessible on the App Store or Google Play Store.
<b>“KINGFOOTBALL Services”</b>	cover all services we provide via the KingFootball App, KingFootball website or other services delivered by our platform. All databases, features, software and web pages related to KINGFOOTBALL functionality, provided and defined by the company.
<b>“KINGFOOTBALL Website”</b>	means the official KINGFOOTBALL website available at <a href="http://www.KingFootball.com">www.KingFootball.com</a> .

A “person” might be any individual, company, corporation, legal entities or any other natural person or legal entity.

The term “include” shall mean that it may “include without limitation”.

## **DATA CONTROLLER**

The data controller is KingFootball.BG, a limited company, incorporated and registered in Bulgaria (company number 205062164). You may contact us through the means displayed in that document. Any third party publishing a product or other digital material in our service, are the controllers with regard to the processing of your Personal Data in connection with your use of Third Party Content and, and therefore the third parties are solely accountable for compliance with any applicable legislation with regards to such processing.

## **CONDITIONS AND RIGHTS OF USE**

Under the EU data protection legislation (and with regards to the General Data Protection Regulation - GDPR), our Policy has been solely designed to support all needed compliance and therefore you:

- have the right to access the Personal Data we hold about you;
- are duly informed about how we collect and use your Personal Data;
- have the right for changes in that Personal Data, if any of it is not complete or accurate
- have the right to be forgotten, including requesting us to delete any Personal Data we store about you;
- have the right to limit the processing of any of your Personal Data;
- have the right to receive a copy of your Personal Data in a portable format , which shall allow you to use it on another device or service;
- have the right to deny us to use your Personal Data for particular purpose which may or may not include profiling and automation within the scope of our Service;
- have the right to be excluded by any notification lists, which you are subscribed to automatically when you are using our Service;

Whenever you exercise your rights, please be aware that that we may be unable to delete information that is archived, and if you request removal of your data or deletion of your account we may no longer provide with some or all of our KingFootball services.

For all request regarding your Personal Data, please contact us by the means described in that document. If we fail to proceed with your request you may have the right to complain to relevant authorities.

### **How we may collect personal information**

Whenever you use the KINGFOOTBALL services we may collect some information from you. Some of this information may be Personal Data, other may be Unidentified information, i.e. the Unidentified information may be usage statistics of all users in general for certain service. Whenever we use your information we shall do so by complying to the present Privacy Policy.

### **Registration and Collection of Data**

In the scope of KINGFOOTBALL services we may request you to register or confirm part of your personal data before you can access those features (i.e. newsletter, “scanning feature”, etc.). In some cases you may be asked to provide personal information about yourself, such as:

- Your name
- Your phone number
- Your email
- Your gender
- Your birthdate
- Country
- Other, specified in the registration field of a KingFootball service.

In different cases of the use of KINGFOOTBALL services we might collect:

- emails sent to KINGFOOTBALL and messages submitted via the KINGFOOTBALL app and Website.
- Feedback
- Content generated by user
- Information given to us by third parties
- Information about device
- Information in regard to statistics of usage when using KINGFOOTBALL app

## **Contacting KINGFOOTBALL via email or other means**

If you have decided to contact us in regards to KINGFOOTBALL services, email/write us or fill in the contact form on the KINGFOOTBALL website, or similar, we may store information about you from the content of your message, such as name, email and the message itself.

## **Content Generated by Users**

In some KINGFOOTBALL services you may be allowed to create content via the KINGFOOTBALL website or app, which can be further shared, scanned, displayed, linked to third party websites and may or may not include photos, videos, animations, or messages. That all is defined by us as “Content Generated by Users”. That may be any attached information to an NFC tag, QR Code, Unique Code or Brand, that is scanned by our APP and that may have attached information to it. Some of these codes may be in digital form, some may be printed and set on any material using KINGFOOTBALL service, and may be accessed through our KINGFOOTBALL apps.

Whenever you use KINGFOOTBALL app and service to generate content you upload, and we do not store any camera data during any play of content of our app. If you chose to share any experience with “Content Generated by Users” you must keep in mind that some of it may or may not contain personal details about you or third parties, i.e. media that features you or someone you know personally. We strongly advise any user that generates content to be aware that any personal information you decide to upload when using our services you must be careful not to disclose personal data of third parties without their consent, which may or may not include: phone numbers, addresses, names, or any other data covered by Personal Data protection laws. Therefore we advice to receive consent first prior to uploading any of that data online.

You must know that even if removed from you, copies of this data may remain in archive of KINGFOOTBALL services or on a user’s device.

We would like to emphasise that only you, and not KingFootball, is responsible to control any content you have generated as an user of KINGFOOTBALL services. If any content you generate contains any personal information of third parties you may have the duty as a Data Controller under related protection law you must comply with

## **Information that is collected by any Third Parties**

Sometimes we may engage the services of other companies that are related to providing specific features or processes in KINGFOOTBALL services. That may include search engine capabilities, storage and delivering of content, analytics, marketing, advertising, media editing, payment services. These third party providers may send us Personal Data that is related to you. Also we may collect and store information from publicly available resources on the internet, including third party websites and social media, which might be through public or licensed APIs. In any such case we shall always use that information in compliance to this Policy. If any of the third party service providers collect directly data from you it shall be them and not KINGFOOTBALL the Data Controller related to any information you may decide to provide them. We strongly suggest you to review the policy of any third party provider to whom you disclose your personal information directly.

## Usage of KINGFOOTBALL APP and device information related to it

Whenever a user is using KINGFOOTBALL app our servers will automatically collect information from your mobile device, as described below:

- ID of the installation;
- The time ;
- The type of device you are using (including version of OS);
- What KINGFOOTBALL app version you are using;
- How do you use your KINGFOOTBALL app – (e.g. analytics how many unique codes you scan);
- The IP address that is linked to your device to assure special location information we might provide for you, and that IP shall not be stored by us;

That anonymous data may be used by us to optimize your user experience and access to KINGFOOTBALL services, to let you access new functionalities or to extend the present services we offer to you and others users of the KINGFOOTBALL app.

### **KINGFOOTBALL APP installation ID**

When you deploy the KINGFOOTBALL app for the first time we generate unique Installation ID. That number is random and includes date and time of installation, but can not be used to identify you personally. With that anonymous ID we are able to track information without compromising your privacy in the following way:

- whenever you scan a code, NFC or an image that is related to KINGFOOTBALL service;
- Whenever you perform certain actions – e.g. “tapping on the screen”
- When you open the KINGFOOTBALL app;
- Confirmation that you are allowed to use an age-restricted feature in the KINGFOOTBALL App.

Besides the usage of the KINGFOOTBALL app the ID is not being used to track you in any way. That ID is stored and not shared with any third parties.

### **Log Data – KINGFOOTBALL websites**

Our systems will automatically record and store information created by your access to and use of our websites, including specific actions performed by you within these KINGFOOTBALL Services (collectively, “**Log Data**”). This may include information about your device, your IP Address, browser type,

the pages that you visit, time spent on pages and other statistics. We use this information to better tailor the KINGFOOTBALL Services to our users' needs and to provide you with targeted communications that you are happy to receive from us. We may also link this automatically collected information to Personal Data. We may also add Log Data to our customer relationship management system.

We do not use any Log Data to track you outside of the KINGFOOTBALL Services

## **GPS Location Data**

KINGFOOTBALL does not receive or process GPS location data at any point – neither by you or from other location service providers.

## **How We May Use Personal Information**

To the extent permitted by applicable law, we may use Personal Information:

- to conform to the agreements in our contract and to respond to your requests, such as to respond to your questions or to send you notifications.
- to send administrative information regarding changes and updates in our terms, conditions, and policies.
- to provide updates and information about the products, services and promotions of KF and
- to send you advertising and promotional material or special offers from KF and our partners. All marketing and promotional information shall be sent to you only in respect to your prior consent. You will have the option to opt out at any point in time. However, please have in mind that you may not opt out of communication that is related to the the security of the KingFootball services.
- to allow us to offer the full spectrum of the KINGFOOTBALL Services and to enable you to use the available Content;
- to enable you to create and share Content generated by you;
- to personalize your experience by presenting specialized content and promotional communication that would be in your scope of interest.
- to provide customer support services, such as service updates, responding to support requests;
- to allow you to participate in social sharing, including live social media feeds.
- for KF's general administration and business purposes, such as supporting, analyzing, improving and developing KF services, including updating the KINGFOOTBALL App on your phone and addressing security or technical issues;

## **USER PROFILES**

User profiles are created only for people who register and create a profile in the KF app. No profiles are created for users who only visit the website or downloaded the app. We collect only a minimum amount of Personal Data.

## **How and where Personal Information May Be Stored and Processed Disclosed**

We use our own servers to store and process data in connection with the KINGFOOTBALL Services. These servers are physically located in Luxemburg and France. Most data processing services are performed inhouse, but it is possible that we work with third party service providers to perform specific data processing activities on our behalf. If so, KF will be the data controller and shall remain responsible for any processing performed by third parties.

If any Personal Data is transferred outside of the European Economic Area (EEA) we shall ensure by all means that your Personal Data is protected by using parties that comply with the EU data protection laws

## **USERS LOCATED IN THE EUROPEAN UNION**

If you use the KINGFOOTBALL Services while you are outside the EEA, your Personal Data may be transferred to countries outside the EEA (including the United States) to enable us to provide you with those services. As the KingFootball App is available for use internationally it is possible that any Personal Data contained in your User Generated Content that you publish on our platform may be automatically transferred by our servers to a device, server or other computer equipment being used in a country outside the EEA where different data protection rules may apply.

If you **the KINGFOOTBALL Services this means that you** agree with **international transfers described in this section.**

## **How Personal Information May Be Disclosed**

Your Personal Information will not be shared, sold or transferred without your consent. To the extent permitted by applicable law, your Personal Information may be disclosed:

- to other users after you have agreed that Information you share is to be made public.
- to business, brand, and promotion partners and affiliates of KingFootball who may provide promotion and advertising services within the KINGFOOTBALL app. They will get to see information about your device and your use of the KingFootball App. This shall be done in non-personal and aggregated form;
- to our affiliates for purposes described in this Privacy Policy.

- to social media if you participate in social sharing, to your connections related to with your social media account, to other users of the KINGFOOTBALL Services and to your social media account provider, in connection with your social sharing activity.
- to third parties to whom the KINGFOOTBALL Services should be provided;
- to other companies, which provide services on our behalf e.g. providers of analytics services and customer relationship management tools;
- to other third parties which require disclosure to protect the rights, property or safety of the KINGFOOTBALL Services;
- to business partners of KINGFOOTBALL who will receive aggregated statistics about the development of our services and products. This shall be done in a way that does not identify you personally;
- to public authorities to comply with the law and legal obligations.

## **CONTROLLING THE USE OF YOUR INFORMATION**

By agreeing with these Polucy you consent that we use your Personal information as described in it. You may withdraw your consent for KINGFOOTBALL to process your Personal Data at any point by notifying us in writing us an e-mail or sending us a message through the KF website.

### **THIRD PARTY SITES and services**

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site to which these Sites contain a link, as the KINGFOOTBALL Services may contain links to websites and on-line services that are operated by third parties. KINGFOOTBALL does not control these Third Party Services and is in no way responsible for their content, or information collection practices. This Policy does not apply to your use of any Third Party Services.

### **Security**

As data security is vital for KINGFOOTBALL and our users, we have taken reasonable organizational, commercial, technical and administrative measures to protect any Personal Information what we have access to. We use by SSL/TLS end-to-end encryption when transmitted from your servers to our servers and information stored on our servers is protected by encryption, key authentication and by firewalls

However, you should have in mind that no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with KF is no longer secure, please immediately notify us of the problem by contacting us.

### **RETENTION PERIOD**



We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Policy, and for a reasonable period thereafter for backup, archival and/or audit purposes, unless a longer retention period is required or permitted by law.

### **How you can access or change your Personal Information**

To review, correct, update, delete or otherwise limit our use of your Personal Information that has been previously provided to us, please email, call or write to us and describe your request. You also have the right to ask for a copy of any of your Personal Data held by us at any given moment. You will have to prove your identity before any information is disclosed to you. Also, please, note that there may be residual information that may remain in our databases and other records, which will not be removed or changed and that we may need to retain certain information for recordkeeping purposes.

### **USE OF SITES BY MINORS**

The KF Services are directed to individuals who are permitted to share their Personal Information without parental consent and we request that other individuals (including individuals under the age of 13) not provide Personal Information through the Sites.

If a parent or legal guardian becomes aware that their child under the age of 13 has provided us with personal information without their parental consent, please inform us and we will delete all related information.

Parents and guardians should be aware that there may be content in the KINGFOOTBALL Services that is targeted at a general audience and that may be used by minors. Please, have in mind that KINGFOOTBALL has no control over the content generated by its users. If you have any concerns, we recommend that you monitor your child's use of the KingFootball App.

### **COOKIES AND ANALYTICS**

Please see our separate page on cookies for information on how KINGFOOTBALL uses cookies, analytics and similar technologies in connection with the KINGFOOTBALL website: <https://www.KingFootball.com/cookie-policy>.

### **UPDATES AND CHANGES TO THIS PRIVACY POLICY**

We may change this Privacy Policy over time and we reserve the right to make changes to this Policy. If we do so, all changes shall be posted on our website and you will be able to see in this page when this Privacy Policy was last updated. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on the site. Your use of the site following these changes means that you accept the revised Privacy Policy.

## CONTACTING US

If you have any questions about the KINGFOOTBALL Services or this Privacy Policy, please contact us by email or by post using the details below. Please ensure that your query is clear, particularly if it is a request for information about the Personal Data we hold about you.

1. You may email us at: **info@kingfootball.com**
2. You may send mail to the following postal mail address:

KINGFOOTBALL LIMITED

Office 1,

66-68 Burel Str,

1408 Sofia, Bulgaria

## APPLICABLE LAW

Irrespective of which country you live in or submit Information from the law which applies to this Policy shall be the law of England and Wales.

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