

PRIVACY POLICY

This Privacy Policy governs the processing and protection of data relating to users of the website located at: www.gamingchampions.gg (the “**Site**”). Users may enter the “Gaming Champions” action through the Site (“**Action**”) by submitting the completed form. The organiser of the Action is G2A.COM Limited with its registered office at 31/F, Tower Two, Times Square, 1 Matheson Street, Causeway Bay, Hongkong, registration number 63264201 (“**G2A.COM**”).

This Privacy Policy contains provisions regarding the personal data of users of the Site and the personal data of persons who have made an entry in the Action, as well as the data of persons making complaints about the Site’s operation and persons using the contact box.

The information contained on the Site is checked for accuracy. The Administrator reserves the right to make changes to the content of the Site and this Privacy Policy.

G2A.COM is a service provider who provides users with an electronic service consisting of making available the content of the Website and enabling the use of its functionalities.

INFORMATION ON PERSONAL DATA PROCESSING

IDENTITY OF THE PERSONAL DATA CONTROLLER

The administrator of personal data of persons entering the Action, persons selected in the Action as winners, as well as users of the Site, including cookies collected via the Site and persons using the contact form functionality (“**Users**”) is G2A.COM Limited with its registered office at 31/F, Tower Two, Times Square, 1 Matheson Street, Causeway Bay, Hongkong, registration number 63264201.

REPRESENTATIVE IN EUROPEAN UNION

The Representative of the Administrator in the European Union is G2A PL sp. z o.o. with the head office in Warsaw (00-113), Emili Plater 53 Street, entered into entrepreneur register under the number of KRS No: 0000677012. Any questions relating to personal data processing in European Union should be direct to the above address of head office or dpo@g2a.com.

COLLECTION OF PERSONAL DATA THROUGH THE SITE

Personal data of Site Users is collected and processed depending on the way the User uses the Website. The User’s personal data may be collected and processed in connection with the provision of services offered by the Site, the operation of the Site, or the use of the contact form available on the Site.

PURPOSES FOR WHICH PERSONAL DATA IS PROCESSED

The Site Users’ data is processed in order to ensure the proper functioning of the Site, i.e. to display the Site content, to maintain the session on this Site, to ensure safety, as well as for analytical and statistical purposes, and in the event of your consent for advertising purposes.

The data of the Site Users, as well as of the persons who are entered in the Action, collected as part of the application form and the contact form available on the Site, are processed for the purpose of

making an entry in the Action by the User, responding to the submitted enquiry and for other purposes related to implementing the Action.

THE LEGAL BASIS FOR PROCESSING PERSONAL DATA

The basis for the processing of the data of Users who use the Site functionalities is the need for the performance of an agreement (on the provision of services by electronic means) to which the data subject is a party or to take action at the request of the data subject, before entering into such an agreement (legal basis: Article 6(1)(b) of the GDPR). The aforementioned services (provided as part of an agreement on the provision of services by electronic means) are free of charge, their provision begins at the moment the Users visits the Site and, depending on which functionalities of the Site they use, they include: browsing the content available on the Site (including all its subsites), submitting an application for the Action using the application form, sending a question through the contact box available on the Site. The aforementioned services are provided within the scope limited by the duration of the Action specified on the Site.

The basis for processing the data of persons using the application form made available as part of the Site is the consent of the participant (legal basis: Article 6(1)(a) of the GDPR), received for the purpose of organising and carrying out the Action, including: selecting from among the persons submitted by the participants of the Action the winner who has served the most in terms of achievements using video games. The processing of personal data of persons who are entered in the Action takes place on the basis of the Administrator's legitimate interest, which is the awarding of distinctions in the Action (Article 6(1)(f) of the GDPR). The processing of data provided in the contact form available on the Website processed in order to respond to inquiries made via the contact form takes place on the basis of the controller's legitimate interest (Article 6(1)(f) of the GDPR), which consists in enabling the response to a submitted inquiry and not leaving inquiries unanswered. Processing for the purpose of possible establishment, investigation or defence against claims, being the implementation of the legitimate interest of the administrator and the consideration of complaints, takes place on the basis of the legitimate interest of the administrator (Article 6(1)(f) of the GDPR).

The basis of data processing for analytical and statistical purposes, collected with the use of tools offered by **Google Marketing Platform**, is the legitimate interest pursued by the controller, consisting of analysing traffic and behaviour of Website users and, on this basis, creating statistical studies to optimise Website usability (pursuant to Article 6(1)(f) of the GDPR).

The basis of data processing for advertising purposes collected using tools available through the Google Marketing Platform (and services such as: Google Analytics, Google Search Ads 360, Google Tag Manager, Double Click, Global Site Tag), as well as Facebook Pixel, are processed on the basis of the user's voluntary consent (Article 6(1)(a) of the GDPR). In the case of giving the consent referred to above, the processing consists in automated profiling of the User's data by recording the history of browsing the website, and thus monitoring the User's interests and location using cookies.

INFORMATION ABOUT RECIPIENTS OF PERSONAL DATA AND TRANSFERS OF DATA TO THIRD COUNTRIES

Personal data of Site Users may be disclosed to other entities solely for purposes related to provision of Site content and functionality, including authorities authorized by law.

Data recipients (by which we understand entities to which data may be disclosed) may be entities of the following categories: entities and bodies to which personal data are made available under generally applicable laws, employees or associates of G2A.COM or employees or associates from the other companies of G2A capital group ((i) Global R&D sp. z o.o. with its registered office in Warsaw, address: Emilii Plater 53 Street, 00-113 Warsaw, Poland registration number 0000692862, (ii) G2A PL

sp. z o.o. with the head office in Warsaw (00-113), Emili Plater 53 Street, entered into entrepreneur register under the number of KRS No: 0000677012, (iii) G2A Limited Liability Company with its registered office 8275 South Eastern Avenue 200, 89123 Las Vegas, Nevada USA, entity number: E0627762014-7) and entities providing services for G2A.COM including IT (hosting), courier, postal, accounting or legal services only to the extent necessary in connection with the conduct of the Action.

The data of Users who have not objected to the processing of data for analytical and statistical purposes and those who have consented to the processing of data for advertising purposes collected using the tools offered by the Google Marketing Platform when entering the Website will be entrusted to companies in the Google group (Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043 USA). Please refer to the following document for details of its personal data processing policy in relation to these functionalities: https://support.google.com/displayvideo/answer/7621162?hl=pl&ref_topic=3528231.

Data of Users who have agreed to the processing of data for advertising purposes, collected using the tools offered by Facebook, will be entrusted or disclosed to Facebook Ireland Limited, 4 Grand Canal Square, Dublin, Ireland when accessing the Site. If the Users agree, information about their activities on the Site, including information about their device, the Site they visit, and their use of the Site's services, will be transmitted to the aforementioned entity regardless of whether they have a Facebook account and are logged into Facebook. For more information on how Facebook uses cookies in conjunction with Facebook business tools, see the [Facebook Cookie Policy](#).

In the above cases, personal data may be transferred to third countries (recipients in third countries). It appears from the information received from the entities mentioned above that data may be transferred to third countries for which an adequate level of protection has not been recognised by the Commission, but in such cases, appropriate safeguards are in place based on standard contractual clauses in accordance with Commission Decision 2010/87/EU of 5 February 2010 on standard contractual clauses for the transfer of personal data to processors established in third countries under Directive 95/46/EC of the European Parliament and of the Council; in such cases, copies of the safeguards mentioned above may be obtained on request from the entity to which the data is transferred.

PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

User data collected in connection with browsing the Website by the User are processed in accordance with the table of cookies use (available below), however not longer than until the User clears the content of cookies in the browser the User uses. User data is collected and analysed with the use of cookies, including tools made available through Google Marketing Platform, as well as Facebook, and is processed until the Users change their settings to opt out of data collection using cookies.

In terms of the Action, the length of time for which personal data will be stored depends on the purpose for which it is processed:

1. in the case of consent for the processing of personal data given by the participant in the Action – until the time of fulfilling the purpose of the consent, understood as selecting the winner from among the persons entered by the participants in the Action or its revocation, whichever is the earlier.
2. in the scope of determining and asserting own claims or defending against the claims made – until the potential claims expire,
3. in terms of fulfilling the legal obligations incumbent on G2A.COM – for the period in which the law requires keeping records and fulfilling obligations resulting from them with regard to the donee winner.

After the expiry of the aforementioned periods, the personal data provided by the participant of the Action or the donee winner shall be deleted or made anonymous.

Additionally, the data of Users who make contact using the contact box on the Site will be processed for a period of one month from the date of sending the last message, in order to maintain the continuity of correspondence.

RIGHTS OF THE DATA SUBJECTS

Please be informed that each data subject has the right to access their personal data and to request their correction, rectification, erasure, restriction of their processing, as well as the right to object to the data processing (when the processing is based on a legitimate interest of the controller pursuant to Article 6(1)(f) of the GDPR), the right to data portability, where the processing is based on a contract pursuant to Article 6(1)(b) of the GDPR or consent pursuant to Article 6(1)(a) of the GDPR. In addition, where the personal data processing is based on consent, pursuant to Article 6(1)(a) of the GDPR, the User has the right to withdraw consent to the processing of personal data, with the proviso that the withdrawal of consent shall not affect the lawfulness of processing, which took place on the basis of consent before its withdrawal.

In connection with the personal data processing, the persons whose data are processed may lodge a complaint with the supervisory authority (President of the Office for Personal Data Protection).

INFORMATION WHETHER THE DATA PROVISION IS A LEGAL/CONTRACTUAL REQUIREMENT AND THE CONSEQUENCES OF FAILING TO PROVIDE THE DATA

Providing personal data is voluntary (it is not a statutory or contractual requirement or a condition for entering into a contract), but it is necessary in order to use the Site, enter the Action and possibly receive a gift by the winner, lodge complaints or queries. Wherever the controller asks for consent to process personal data, failure to provide such consent will result in the controller not collecting such data.

BROWSING THE SITE AND SUBSITES

When Users browse the Site, they are required to disclose to us their IP address and personal information collected through cookies and other technologies placed by the Site on the device they are using. On their basis it is possible, among other things, to determine the country and telecommunications operator through which a given User connects to the Site. Data collected automatically by the Site includes: the User's IP address, information about the computer and connection, browser type and version, browser plug-in types and versions, the operating system.

In addition, but only if browser settings are not changed, the Site collects additional data about the pages the Users visit, such as the number of visits, country, browser, time of visit, etc., which are analysed using the tools provided by the Google Marketing Platform that help us understand how users use the Site. This information will only be used for aggregate, anonymous statistical compilation to help us improve the products and customer service of this Site.

If the Users agree, we also use the data we collect for marketing and advertising purposes through the Facebook Pixel tool to target them with advertisements through Facebook, as well as through tools offered by the Google Marketing Platform in the use of remarketing tools. Data processed for marketing and advertising purposes will be used to analyse how the Users use the Website and to control advertising activities.

SECURITY OF THE DATA COLLECTED

Personal data and other data of a non-personal nature collected through the Website are stored on a secure server and may only be accessed by authorised personnel who are trained in the protection of personal data and information system security, as well as being obliged to maintain strict confidentiality. Personal data shall be processed with technical and organisational measures which ensure the protection of the processed data in accordance with the requirements specified in the provisions on the personal data protection. The data security measures are adapted to the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing the Directive 95/46/EC (General Data Protection Regulation, "GDPR").

INFORMATION ON AUTOMATED DECISION MAKING

Where you have given your consent and have not subsequently opted out, we may also collect information about what is watched to create a profile of your interests on the basis of content that we think was interesting for you as well as content that other users similar to you have found engaging. By using this profile of your interests we can adapt our marketing materials by replacing the default content with content more relevant to your interests.

COMPLAINTS, QUESTIONS AND TECHNICAL SUPPORT

In order to obtain information regarding the services or technical support provided to Users, the User may send an inquiry directly to the support staff by completing the form provided on the Site. User inquiries, including complaints about the operation of the Website, will be dealt with on an ongoing basis by dpo@g2a.com. The answer to the inquiry (complaint) will be sent via e-mail to the address provided in the inquiry (complaint).

COOKIES

Some of the elements on the Website may use cookies. These are small files stored in the User's browser. They make it possible to store additional data related to the User only. Such files allow us to identify the User, allow us to customise a website for a User, and speed up certain operations. Cookies can only be stored for the duration of a visit to a site (session) or for a specific, predetermined period of time.

At any time the Users may restrict the Administrator's access to cookies. For this purpose, the Users should modify the settings of their Internet browser. Changing your settings may result in the Site not functioning properly on the device you are using at the time, and in extreme cases, may even prevent you from using the Site altogether.

The user may, by changing the settings of the browser, disable cookies. Most often, the appropriate option can be found in the privacy or settings tab of a given programme. Below you will find information on how you can change your cookie settings in the most popular web browsers:

1. for Mozilla Firefox at:

<https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox>

2. for Internet Explorer at:

<https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ede5947fc64d>,

3. for the Microsoft Edge browser at:

<https://support.microsoft.com/en-us/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd>

4. for the Google Chrome browser at:

<https://support.google.com/chrome/answer/95647?hl=en>,

5. for the Opera browser at the address:

<https://help.opera.com/en/latest/security-and-privacy/>,

6. for the Safari browser at:

<https://support.apple.com/en-gb/guide/safari/sfri11471/mac>

Changing your settings to opt out of allowing data collection using Google Marketing Platform tools or Facebook should not limit your use of the Site in any way.