



# Privacy Policy

## SBET PRIVACY POLICY

Last updated: Sep 22, 2021

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of the SBET LTD. (“SBET”, “controller”, “we”, “us”, “our”). The use of <https://sbettoken.org> (“Internet pages of SBET”, “website”) is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject. SBET’s main mission is to prevent losing of different things or help to find them.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the laws of Switzerland (primarily) – “applicable law” – including the General Data Protection Regulation (“GDPR”), and in accordance with the country-specific data protection regulations applicable to SBET.

NOTWITHSTANDING TO ANYTHING AFOREMENTIONED OR SPECIFIED HEREINBELOW THE GDPR WILL APPLY ONLY IN THOSE CASES WHEN YOU ARE A CITIZEN OR RESIDENT OF ONE OF THE MEMBER STATES OF THE EUROPEAN UNION, THE APPLICABLE LAW AND/OR THE COUNTRYSPECIFIC DATA PROTECTION REGULATIONS SHALL APPLY IN ALL OTHER INSTANCES.

By means of this data protection declaration, our enterprise would like to inform the public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, SBET has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g., by telephone.

### 1. Definitions

The data protection declaration of SBET is based on the terms used by the European legislator for the adoption of the GDPR. Our data protection declaration should be legible and understandable for the public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

#### a) Personal Data

Personal data means any information relating to an identified or identifiable natural person (“data subject”, “user”, “you”, “your”, “yours”). An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person such as your education, work experience, skills, photo, city or area and endorsements.



**b) Data Subject**

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

**c) Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

**d) Restriction of Processing**

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

**e) Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

**f) Pseudonymization**

Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**g) Controller or controller responsible for the processing**

Controller or controller responsible for the processing is the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**h) Processor**

Processor is a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

**i) Recipient**

Recipient is a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third-party or not.

**j) Third-party**

Third-party is a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

**k) Consent**

Consent of the data subject is any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which you, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.



## **2. Name and Address of the Controller**

The controller for the purposes of the GDPR, the applicable law and other applicable data protection laws and other provisions related to data protection is:

SBET  
Zurich

Email: [info@sbettoken.org](mailto:info@sbettoken.org)  
Website: <https://sbttoken.org>

## **3. Name and Address of the Data Protection Officer**

The Data Protection Officer of the controller is:

SBET  
Zurich

Email: [info@sbettoken.org](mailto:info@sbettoken.org)  
Website: <https://sbttoken.org>

Any data subject may, at any time, contact our Data Protection Officer directly with all questions and suggestions concerning data protection.

## **4. Cookies**

The Internet pages of SBET uses cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Using cookies, SBET can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software



programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

## **5. Collection of General Data and Information and Its Use by SBET**

The website of SBET collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected information may include (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, SBET does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, SBET analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

You and other users may post various content that includes information about data subjects on our website (for example, as part of blog posts, feed updates and comments, videos).

We may collect additional information about data subjects when they send, receive, or engage with messages in connection with Internet pages of SBET. For example, if you receive SBET connection request, we may track whether you have acted on it and will send you reminders. We also use automatic scanning technology on messages.

Services provided by SBET may be changed from time to time as they are dynamic and we often

introduce new services, options, and features, which may require new information to be collected. If we collect materially different personal data (types of data) or materially change how we use your data (purpose of processing), we will notify all data subjects and may also modify this Privacy Policy, if necessary, upon our own discretion with or without previous notice. How we are going to use your data mostly depends on what services you use via our Internet pages, and we also use your data to authenticate you and authorize access to our website.

The controller may collect, process, and use data about you (such as SBET profiles you have viewed, or data provided through address book uploads or partner integrations) to suggest connections for you and other users of SBET website and enable you to invite others to become a participant and connect with you on our website. You can also opt to allow us to use your precise location or proximity to others to suggest other nearby SBET's users for you to connect with. It is your choice whether to invite someone to our website, send a connection request, or allow another participant to become your connection. When you invite someone to connect with you, your invitation may include your name, photo, network, and contact information. We will send invitation reminders to the person you invited. You can choose whether to share your own list of connections with your connections.

We use the information about you to recommend relevant content across our website. SBET may use your content, activity, and other data, including your name and picture, to provide notices to your SBET network and others. For example, subject to your settings, we may notify others that you have updated your profile,



posted a blog, took a social action, made new connections, or are mentioned in the news or to add 'progression trees' into your account which will be used by us to suggest improvements, or personalize content for users.

Our website services allow you to communicate with other SBET's users and schedule and prepare meetings with them as well as complete tasks. Depending on your account settings, we scan messages to provide 'bots' or similar tools that facilitate tasks such as scheduling meetings, draft responses, summarize messages or recommend next steps. You can collaborate on tasks with other as defined by our website. Users can also get new tasks as they progress through their progression tree. You can communicate with others and schedule meetups for the tasks.

We may use data, such as public feedback, to conduct research and for the further development of our website to provide you and other users with a better, more intuitive, and personalized experience, drive membership growth and engagement on Internet pages of SBET, and make our services better in general.

We also dedicate Internet pages of SBET for your personal development and would like to create economic opportunity for SBET's users and to help them be more productive and successful. We use the data available to us to research social, economic, and other trends and policies that help bridge the gap in various geographic areas. In some cases, we may work with trusted third parties to perform this research, under controls that are designed to protect your privacy. We may publish or may allow others to publish economic insights, presented as aggregated data rather than personal data.

We may use polls and surveys that are conducted by us and others through our website. You are not obligated to respond to polls or surveys, and you have discretion as to the information you provide. You may also opt out of survey invitations.

## **6. Registration on Our Website**

The data subject can register on the website of the controller with the indication of personal data. The types of personal data transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for its own purposes. The controller may request transfer of such personal data to one or more processors (e.g., a parcel service) that also uses such personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address – assigned by the Internet service provider (ISP) and used by the data subject – date, and time of the registration are also stored. The storage of these data is required to prevent any misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to protect the rights and legitimate interests of the controller. This data is not passed on to third parties, unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

Registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered users are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

## **7. Additional Provisions on Use of Personal Data and Website Functional**



The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the written request or indication of the data subject, insofar as there are no statutory storage obligations. The Data Protection Officer particularly designated in this data protection declaration, as well as the entirety of the controller's employees are available to the data subject in this respect as contact persons.

We may contact you by any electronic means such as email, notices posted on our websites or apps, messages to your SBET inbox, and other ways through Internet pages of SBET, including text messages and push notifications. We may send you messages about the availability of Internet pages of SBET, security, or other service-related issues as well as changes of this Privacy Policy. We may also send messages about how to use the Internet pages of SBET, network updates, reminders, and promotional messages from us and our partners. You may change your communication preferences at any time. Please be aware that you cannot opt out of receiving service messages from us, including security and legal notices.

We may use user's personal data (which can include your communications) needed to investigate, respond to and resolve complaints and issues with our services provided via Internet pages of SBET (e.g., bugs, failures etc.) We may also use your personal information to generate statistics about our users, their profession or industry, the number of ads impressions served or clicked on, or the demographic distribution of visitors to our website. We use your data (which may include your communications) if we think it is necessary for security purposes or to investigate possible fraud or other violations of other legal documents published on Internet pages of SBET.

Our website may allow viewing and sharing information, including through posts, follows, likes, and comments. When you share a post (e.g., an update, video, or blog), the default (which you can change) is to share it publicly.

When you opt to link your account with other services, personal data will become available to their providers. The sharing and use of that personal data will be described in, or linked to, a consent screen when you opt to link the accounts. For example, you may link your Twitter or Facebook account to share content from our website into these other services, or your email provider may give you the option to upload your SBET contacts into its own service. You may revoke the link with such accounts.

In accordance with your account settings, excerpts from your profile will appear on the services of others (e.g., search engine results, mail and calendar applications that show a user a brief SBET profile of the person they are meeting or messaging, social media aggregators, talent, and lead managers etc.).

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our website (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of data controller, SBET's users, personnel, or others. We attempt to notify SBET's users about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us, or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy.



## **8. Security of Personal Data**

SBET does implement security safeguards designed to protect your personal data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. Although, we cannot warrant the security of any information that you provide us. There is no guarantee that such data will not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

We currently do not share personal data with third parties for their direct marketing purposes without your permission. Learn more about this and about our response to “do not track” signals. If you have questions or complaints regarding this Privacy Policy, please first contact SBET.

## **9. Subscription to Our Newsletters**

On the website of SBET, users may have the opportunity to subscribe to our enterprise’s newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

SBET informs its customers and business partners regularly by means of a newsletter about enterprise offers. The enterprise’s newsletter may only be received by the data subject if (1) the data subject has a valid email address and (2) the data subject registers for the receipt of newsletter. A confirmation email will be sent to the e-mail address registered by a data subject for the first time for the receipt of newsletter, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorized to receive the newsletter.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary to understand the (possible) misuse of the e-mail address of a data subject later, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by email, if this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties. The subscription to our newsletter may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for receipt of the newsletter, may be revoked at any time. For revocation of consent, a corresponding link is found in each newsletter. It is also possible to unsubscribe from the newsletter at any time directly on the website of the controller, or to communicate this to the controller in written.

## **10. Newsletter-Tracking**

The newsletter of SBET may contain so-called tracking pixels. A tracking pixel is a miniature graphic embedded in such emails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, SBET may see when an email was opened by a data subject, and which links in the email were called up by data subjects.

Such personal data collected in the tracking pixels contained in the newsletters are stored and analyzed by the controller to optimize the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. These personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by



means of the double-opt-in procedure. After a revocation, these personal data will be deleted by the controller. SBET automatically regards a withdrawal from the receipt of the newsletter as a revocation.

## **11. Contact Possibility via the Website**

The website of SBET may contain information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (email address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

## **12. Comments Function in the Blog on the Website**

SBET offers users the possibility to leave individual comments on individual blog contributions on a blog, which is on the website of the controller. A blog is a web-based, publicly accessible portal, through which one or more people called bloggers or web-bloggers may post articles or write down thoughts in so-called blog posts. Blog Posts may usually be commented by third parties.

If a data subject leaves a comment on the blog published on this website, the comments made by the data subject are also stored and published, as well as information on the date of the commentary and on the username chosen by the data subject. In addition, the IP address assigned by the Internet service provider (ISP) to the data subject is also logged. This storage of the IP address takes place for security reasons, and in case the data subject violates the rights of third parties or posts illegal content through a given comment. The storage of these personal data is, therefore, in the own interest of the data controller, so that it can exculpate itself in the event of an infringement. This collected personal data will not be passed to third parties, unless such a transfer is required by law or serves the aim of the defense of the data controller.

## **13. Subscription to Comments in the Blog on the Website**

The comments made in the blog of SBET may be subscribed to by third parties. There is the possibility that a commenter subscribes to the comments following his comments on a particular blog post.

If a data subject decides to subscribe to this option, the controller will send an automatic confirmation email to check the double opt-in procedure as to whether the owner of the specified e-mail address decided in favor of this option. The option to subscribe to comments may be terminated at any time by the data subject.

## **14. Routine Erasure and Blocking of Personal Data**

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the applicable laws or regulations to which the controller is subject.

If the storage purpose is not applicable, or if a storage period prescribed by the applicable laws expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## **15. Rights of the Data Subject**

### **a) Right to confirmation**

Each data subject shall have the right to obtain confirmation from the controller as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself or herself of this right of confirmation, the data subject may, at any time, contact our Data Protection Officer.





#### **b) Right to access**

Each data subject shall have the right to obtain from the controller free information about their personal data stored at any time and a copy of this information. Furthermore, the data subject will have access to the following information:

- the purposes of the processing.
- the categories of personal data concerned.
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, recipients in third countries or international organizations.
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing.
- the existence of the right to lodge a complaint with a supervisory authority.
- where the personal data are not collected from the data subject, any available information as to their source; and
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have the right to obtain information as to whether personal data are transnationally transferred or to an international organization. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer. If a data subject wishes to avail himself of this right of access, you may at any time contact our Data Protection Officer or another employee of the controller.

#### **c) Right to rectification**

Each data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Considering the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, you may, at any time, contact our Data Protection Officer.

#### **d) Right to erasure (right to be forgotten)**

Each data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her as soon as possible, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.



- The personal data must be erased for compliance with a legal obligation in accordance with the applicable law to which the controller is subject; and/or
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If any one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by SBET, the data subject may at any time contact our Data Protection Officer. The Data Protection Officer of SBET shall promptly ensure that the erasure request is compiled as soon as possible.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. The Data Protection Officer of SBET will arrange the necessary measures in individual cases.

#### **e) Right to restriction of processing**

Each data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful, and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims; and/or
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If any one of the conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by SBET, you may at any time contact our Data Protection Officer. The Data Protection Officer will arrange the restriction of the processing.

#### **f) Right to data portability**

Each data subject shall have the right to receive the personal data concerning him or her, which was provided to a controller in a structured, commonly used, and machine-readable format. The data subject shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising the user's right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

To assert the right to data portability, the data subject may at any time contact the Data Protection Officer.



#### **g) Right to object**

Each data subject shall have the right to object, on grounds relating to their situation, at any time, to the processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

SBET shall no longer process the personal data in the event of the objection, unless SBET can demonstrate reasonable grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defense of legal claims.

If SBET processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to SBET processing such personal data for direct marketing purposes, SBET will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to their situation, to object to processing of personal data concerning him or her by SBET for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To exercise the right to object, the data subject may directly contact the Data Protection Officer. In addition, the data subject is free in the context of the use of information society services to use their right to object by automated means using technical specifications.

#### **h) Automated individual decision-making, including profiling**

Each data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorized by the applicable law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, SBET shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express their point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, the data subject may at any time directly contact our Data Protection Officer.

#### **i) Right to withdraw data protection consent**

Each data subject shall have the right to withdraw their consent to processing of their personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, the data subject may at any time directly contact our Data Protection Officer.

### **16. Data Protection for Applications and the Application Procedures**

The data controller shall collect and process the personal data of applicants for the purpose of the processing the application procedure. The processing may also be carried out electronically. This is the case if an



applicant submits corresponding application documents by e-mail or by completing a web form on the website to the controller. If the data controller concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by the controller, the application documents shall be automatically erased two months after notification of the refusal decision, provided that no other legitimate interests of the controller are opposed to the erasure.

## **17. Data Protection Provisions About the Application and Use of Facebook**

On this website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include, among other, the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland AG., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The operating subsidiary may be different depending on the location of data subject.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During this technical procedure, Facebook is made aware of what specific subsite of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject – and for the entire duration of their stay on our Internet site – which specific subsite of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g., the “Like” button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then the data subject may prevent this by logging off from their Facebook account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook, e.g., the Facebook blocker of the provider Webgraph, which may be obtained under <http://webgraph.com/resources/facebookblocker/>. These applications may be used by the data subject to eliminate a data transmission to Facebook.



## **18. Data Protection Provisions About the Application and Use of Google AdSense**

On this website, the controller has integrated Google AdSense. Google AdSense is an online service which allows the placement of advertising on third-party sites. Google AdSense is based on an algorithm that selects advertisements displayed on third-party sites to match with the content of the respective third-party site. Google AdSense allows an interest-based targeting of the Internet user, which is implemented by means of generating individual user profiles.

The operating company of Google's AdSense component is Alphabet Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States. The operating subsidiary may be different depends on your location.

The purpose of Google's AdSense component is the integration of advertisements on our website. Google AdSense places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Alphabet Inc. is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google AdSense component is integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google AdSense component for the purpose of online advertising and the settlement of commissions to Alphabet Inc. During this technical procedure, the enterprise Alphabet Inc. gains knowledge of personal data, such as the IP address of the data subject, which serves Alphabet Inc., inter alia, to understand the origin of visitors and clicks and subsequently create commission settlements.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Alphabet Inc. from setting a cookie on the information technology system of the data subject. Additionally, cookies already in use by Alphabet Inc. may be deleted at any time via a web browser or other software programs.