

Global Privacy Policy

Superscore App

Introduction

This Privacy Policy ("**Policy**") outlines how we collect, use, and protect your personal data when you use the Superscore App, in compliance with applicable data protection laws and regulations worldwide. These may include, but are not limited to, the European Union's General Data Protection Regulation ("**GDPR**"), Brazil's General Personal Data Protection Law (Law No. 13.709/2018, "**LGPD**"), the United States' California Consumer Privacy Act ("**CCPA**"), Mexican Federal Law on Protection of Personal Data Held by Private Parties ("**FLPPDPP**") and/or other relevant privacy laws in the jurisdictions where we may operate in the future. This Policy ensures adherence to global standards for data privacy while respecting the specific legal requirements of each region and each market. **Superscore** is a mobile App that provides users with access to sports information, live results, and statistics and, in certain circumstances, may redirect users to the **Superbet** platforms for sports betting, promotions, and bonuses (hereinafter "**Superscore**" or the "**App**").

This policy was last updated in December 2024. We reserve the right to change the Policy and recommend that you periodically review its contents.

1. General Information

Sportening B.V. ("**Sportening**"), a company registered in the Netherlands, with address Jacob Van Lennepkade 155 H, 1054ZL Amsterdam and tax number NL 86158937373B01, is the Data controller of your personal data related exclusively to the use of Superscore and processes such data in accordance with the data protection laws of each country where you may access or otherwise use our services.

Superscore operates under a global privacy framework designed to comply with applicable data protection laws and regulations in every region where **Sportening** operates or may operate in the future. As the App controller, Sportening may collaborate with jurisdiction-specific partners, such as platform operators and service providers, to ensure that data processing activities adhere to the local legal requirements and standards, e.g., GDPR, LGPD, CCPA, FLPPDPP, or others. These references are illustrative and should not be construed as an exhaustive list of eventually applicable laws.

Further data processing performed on partner platforms shall be conducted independently under their respective privacy policies. Users may address privacy inquiries to help@sportening.com or shall consult the dedicated privacy notices specific to their jurisdictions for detailed information.

2. What types of personal data do we usually process?

- a) **identification data**, e.g.: name and surname; copy of your ID for managing your complaints.
- b) **login details**: e-mail address, phone number, password, preferred language;
- c) **contact details**: e.g. e-mail address and telephone number;
- d) **user account data**: username; profile picture; language preference; date of birth; notification preferences;
- e) **functional data**: likes, comments, followed channels; uploaded photos and videos; chat history;
- f) **analytical and behavioral data**: interactions with the app; activities such as viewing statistics and clicking on odds;
- g) **technical data**: IP address, geolocation data, device information (operating system, browser).
- h) **user relationship data**, e.g., correspondence (e.g., live chat, e-mail, phone calls); details of inquiries, complaints, or feedback; satisfaction information and other relevant records.

- a) **inferred data:** profiles generated based on interactions, such as sports preferences.

3. Where do we get your data from?

- a) directly from users: we may obtain personal data directly from you when:
- register in Superscore using social accounts (Google, Facebook, Apple ID);
 - fill in contact forms, send requests, or provide feedback;
 - participate in promotions, contests, or other events organized through Superscore;
 - interact with Superscore functionalities such as clicking on displayed odds or using the discussion channels.
- b) other sources:
- **inferred data:** data about users' behavior during use, including interactions with different features; preferences expressed, such as sports channels watched or likes given; clicks on certain features, such as betting odds displayed.
 - **tracking technologies (cookies and other technologies):** in order to understand how users interact with the App, we use cookies and other similar methods through which we receive the following information IP address, geolocation data, data about the device used (operating system, browser). See for specific details the Cookies Policy of the app;
 - **public authorities:** information obtained in the context of investigations, litigation, or pursuant to eventual legal obligations;
 - **representatives:** data provided by persons authorized to represent you in relation to us;
 - **login providers (Google, Facebook, Apple ID):** when users register or login to the App using social credentials, we receive data shared by these platforms:
 - o when signing in through **Google:** we receive your full name, email address and profile picture; the user is informed that Google will share this information when signing in;
 - o when **logging in via Facebook:** we receive full name, e-mail address and profile picture; the user must grant explicit access to share data with Superscore;
 - o **Apple ID authentication:** we receive full name and email address (if the user chooses not to hide it); the user can choose to share or hide certain information before authentication is complete.

Note: Choosing to use social login implies your consent for those platforms to share this information with us.

Data collected from other sources are used to:

- **improving your experience:** personalize your interactions with the App based on your expressed preferences or social profile data.
- **ensuring the App security:** detecting and preventing unauthorized access through authentication and device credentials.
- **behavioral analysis:** optimizing the App functions by analyzing data collected by tracking technologies.

4. What are the purposes and grounds for data processing?

4.1. Conclusion and performance of the agreement with us

In order to provide the services through Superscore, we process your personal data to enable access to the App, personalization of the user account and facilitate access to the 3rd Party platforms (e.g., Superbet), including placing bets, viewing odds and participating in promotions. These activities are essential for the execution of the agreement between the user and the controller of the App.

An integrated aspect of the App is allowing users to access the 3rd Party Platforms as Superbet to place bets, view odds and participate in promotions. This access is completely optional and is achieved by clicking on the odds displayed in the App. In order to facilitate this functionality, certain data collected in Superscore might be shared with these 3rd Parties based on the controller's legitimate

interest to provide an integrated user experience by linking sports information with the sports betting options available on such 3rd Parties platforms.

Disclosure to such 3rd Parties is strictly limited to the data necessary to redirect users and to allow access to such 3rd Parties functionalities. Users are clearly informed about this functionality, and the choice to access such 3rd Parties platform is at their own discretion.

Categories of processed data: authentication data: e-mail address, phone number, password, preferred language; technical data: IP address, device information (operating system, browser), geolocation data; analytical data: clicks on odds, interactions for redirecting to such 3rd Parties platforms.

Legal grounds: the processing of your personal data is based on legal grounds applicable within the relevant jurisdiction. The processing of personal data is necessary for the performance of a contract, enabling account creation, account management, and the provision of the App's functionalities as outlined in the contractual terms and conditions accepted by users. Additionally, disclosing data to partners, such as Superbet or equivalent entities, is justified by legitimate business interests. These interests include providing a complete and integrated user experience by connecting the sports information offered in the App with additional features or services, enhancing services through integration with partner platforms to facilitate user access to additional offers and functionalities, and promoting seamless interaction between the App and partner platforms for the benefit of users. These legal grounds ensure that data processing activities remain lawful and consistent with applicable data protection laws in your jurisdiction.

Consequences for not providing the data: users would not be able to create and manage personal accounts in the app; basic App functionalities such as viewing live scores and personalized notifications would not be available; integration with our Partners would be impossible, which would limit users' access to the optional betting options, bonuses and other promotions offered by us and our Partners.

4.2. Personalize, optimize, and improve user experience in Superscore

Superscore uses the data collected to personalize the user experience by tailoring notifications, the App interface, and the content displayed based on user preferences. The data is also used to optimize the functionality of the app, ensuring a more intuitive and efficient experience and to continuously improve the services offered. Analysis of users' interactions with the App, including technical and authentication data, allows existing functionalities to be adjusted and new features to be created to better meet users' needs.

Categories of processed data: functional data: notification preferences, followed channels, likes, comments, chat history, user-generated content (photos, videos); analytical data: in-App interactions and behaviors (e.g. clicks on different features); technical data: IP address, device information (operating system, browser), geolocation data; authentication data: full name, email address, profile picture (derived through social authentication - Google, Facebook, Apple ID); account data.

Legal grounds: the processing of your personal data is based on legitimate business interests, as permitted under the applicable laws of your jurisdiction. This processing is necessary to personalize notifications and tailor the user experience; optimize the App's functionalities to ensure they are more accessible and efficient; enhance the services provided and improve overall interactions with the App; and create a seamless, relevant, and engaging user experience. These activities are conducted to deliver improved functionality and value to users while aligning with lawful data processing requirements.

Consequences for not providing data: users could not benefit from a personalized experience tailored to their interests; App functionalities could not be optimized to meet users' needs; Superscore could not make effective improvements to the App based on user behavior and feedback generated through interactions.

4.3. Support and user relationship management

Superscore processes users' personal data in order to ensure an optimal relationship with the users, efficiently handling any requests, questions, complaints, or feedback related to the use of the App through the feedback form on the website. We also inform users about relevant changes in relation to

the App functionalities, personalized notifications or other technical and contractual issues. In this context, we manage the data necessary to facilitate the resolution of requests, the improvement of the services offered and compliance with legal obligations.

If users choose to contact us via third-party communication channels (e.g. WhatsApp, Facebook), their personal data may be shared with the controllers of such platforms solely to verify identity and facilitate responses to requests. In the case of recorded phone calls, users may opt out of recorded calls by accessing other communication methods.

Categories of data processed: **identification data:** name, surname; **contact data:** e-mail address, telephone number; **user relationship data:** feedback, questions, complaints, information provided through requests, details of previous interactions, including communication history; **functional and analytical data:** data associated with user interactions with the App, including user behavior, to ensure proper resolution of requests.

Legal grounds: the processing of your personal data is based on several lawful grounds, as applicable under the relevant jurisdiction. Processing related to handling requests associated with the use of the App is necessary for the performance of a contract, forming an integral part of the contractual relationship between users and Superscore. Legitimate interests also serve as a basis for processing, which includes ensuring an effective relationship with users, improving services, properly addressing user requests and complaints to enhance the user experience, and protecting Superscore's rights and interests in legal, administrative, or similar proceedings. Additionally, processing is carried out to comply with legal obligations, which may include adherence to applicable laws, such as consumer protection requirements and relevant record-keeping mandates.

Consequences for failure to provide data: refusal to provide the data required to handle requests may: prevent the request from being properly resolved (e.g. delays or partial resolution); affect the use of certain the App functionalities that depend on the resolution of requests (e.g. personalized notifications).

4.4. Ensuring data security

Superscore attaches great importance to data security and the services offered. We process your personal data to protect user accounts, to prevent misuse or abuse of the App and to detect, investigate and manage any security incidents or fraud attempts. These measures are essential to ensure the integrity of the App, the integrity of the data processed and to protect the rights and interests of our users.

To ensure the functionality and performance of the technical solutions we use, we constantly monitor our systems and implement advanced cyber security measures. This includes the use of encryption technologies, intrusion detection systems and secure authentication procedures.

Categories of data processed: depending on the specific situation, we may process any of the above data. Most commonly, we will process **identification data, authentication data, contact data, account data, and customer relationship data.**

Legal grounds: the processing of personal data for the purpose of ensuring service security is based on legitimate interests and, where applicable, compliance with legal obligations as recognized under the relevant data protection laws in your jurisdiction. Legitimate interests include protecting the integrity and availability of the App, preventing, detecting, and managing fraudulent, unauthorized, or abusive use of our services, and safeguarding users' personal data from unauthorized access, loss, or destruction. It also includes meeting security requirements, such as identifying and preventing incidents, minimizing harm, exercising related rights in cases of unauthorized access to systems or other locations where information is maintained, and maintaining evidence of compliance and effective incident management. Additionally, compliance with legal obligations serves as a basis for processing, such as notifying security incidents, informing affected data subjects, and coordinating with involved vendors when necessary.

Consequences of failure to provide data: failure to provide the necessary data to ensure security may have the following consequences: **compromise of account security:** without the necessary data, we cannot guarantee the protection of your account against unauthorized access or fraudulent activity; **limitation of access to services:** we may need to restrict or suspend access to certain the App functionality to protect the overall security of our systems; **increased risk of security incidents:** lack

of essential information may prevent us from effectively detecting and preventing threats, which may affect both your account and the experience of other users.

As explicitly stated in the Terms of Use of the App, in order to ensure the security of your personal data, it is important that you do not comment or post information in Superscore that contains personal data or information directly related to you.

4.5. Promoting services

We process your personal data in order to provide you with commercial communications, newsletters, alerts, and notifications about the services and functionalities of the Superscore App, as well as about our Partner's offers and promotions. Our communications may include information about: product and service offers; invitations to campaigns, contests and promotions; push notifications and personalized messages about the functionalities of the App.

Communications are done via email, SMS, push notifications, phone calls or on social media platforms where you have an account, depending on the options you select.

Categories of data processed: identification data: first name, last name; **contact data:** email address, phone number; **functional data:** notification preferences, interactions with the app, activities such as comments or likes; **technical data:** device and location information.

Legal grounds: the processing of personal data for specific purposes is based on user consent and legitimate interests, as applicable under relevant data protection laws. User consent provides the legal basis for sending commercial communications through electronic channels, such as email or push notifications. Legitimate interests include informing users about relevant functionalities and improvements to the App, promoting services and features that may be of interest to users—such as upgrades or new functionalities—and maintaining records of consent and marketing preferences to ensure compliance with user choices and applicable regulations.

Rights and options: you can change your preferences regarding marketing communications at any time or unsubscribe completely by using one of the following methods: activating the "Unsubscribe" option in emails you receive; changing your settings in your user account in the app; contacting our team using the contact details available in this policy.

Consequences of refusal: if you do not consent or withdraw your consent: **you will not receive marketing communications;** you will no longer be informed about offers, promotions or new features that may be relevant to you; **limited impact on the use of the app:** withdrawal of consent for marketing does not affect access to the App or basic functionality.

4.6. Personalize communications

For the purpose of providing personalized offers created based on your preferences, we may use the following data: identification data: first name, last name, contact data: phone number and email address, delivery address/billing address, account data, user relationship data, and inferred data. More specifically, we may generate personalized analytics and segmentation according to our marketing needs in order to: improve our services, personalize the communications sent to you and improve the success rate of the marketing campaigns carried out, adapt marketing campaigns, determine the strategy in customer relations in terms of promoting our products and services, and in general to better understand the profile of our customers.

Legal grounds: the processing of your data for this purpose is based on your consent, if you choose to provide it. If you do not wish to receive personalized communications or withdraw your consent for this purpose, the communications sent to you will no longer be as relevant.

4.7. Organizing and participating in promotional campaigns/lotteries

In the context of the campaigns/lotteries organized, the processing of personal data may also be necessary for: (i) formalities for the awarding of prizes claimed, the investigation of fraud, the App of the rules of participation in contests; (ii) the performance of legal obligations such as: payment of relevant taxes and contributions, reporting to the relevant tax authorities and keeping accounting records; publication of the names of winners and prizes awarded in the organized prize contests; operations related to the invoicing of purchased products offered as prizes.

Categories of data processed: identification data, contact data, financial data, customer relationship data and account data for the purpose of organizing various contests and sweepstakes.

Legal grounds: (i) your consent to enter and participate in our sweepstakes/campaigns; (ii) our legitimate interests to ensure the conditions necessary for the conduct and organization of the advertising campaigns/sweepstakes in which you participate, the resolution of any complaints in connection with the organization and conduct of the campaigns and the awarding of prizes, the enforcement of the provisions of the rules of the campaigns, including the investigation of possible violations of their provisions, and the compliance with specific obligations regarding your protection. as a consumer or as a data subject; and (iii) complying with the legal obligations applicable to such promotional campaigns/lotteries.

Depending on the specifics of the advertising campaigns or lotteries organized, you may be invited to provide other personal data, other purposes for the processing of personal data may also be applicable. Details of the conditions for the processing of personal data applicable to each relevant promotional campaign/lottery (including duration of retention, other grounds, recipients, consequences of failure to provide data) will be included in the regulations/terms and conditions of organization and conduct applicable to them.

4.8. Improving our relationship with you and therefore improving our products

For the purpose of performing various analytics, internal reporting on how the App works, and basic profiling against your demographics and consumer preferences, for marketing purposes, mainly to improve the experience offered by Superscore. This analytics data is aggregated data that cannot directly identify you.

Legal grounds: Processing your data for this purpose is based on our legitimate interest in improving your experience and helping us understand your needs and expectations regarding the products and services offered within Superscore. Providing your data for this purpose is voluntary.

4.9. Surveys, market research and other internal analysis

To communicate with you in the process of conducting customer satisfaction surveys for analysis purposes, for quality improvements, for service developments, to measure the success of advertising campaigns or to tailor our services to your requirements.

Categories of data processed: identification data: name, surname, contact data: phone number and e-mail address, city of residence; demographic data: age range, gender; customer value management data: type of products, usefulness, data related to your opinion of our products and your expectations from a provider of such products; your feedback on the campaigns we run, communication with you.

Legal grounds: our legitimate interest to know the opinions and preferences of users regarding our services or other providers, players, teams, and information within Superscore, as well as to optimize our work and identify new opportunities for developing and promoting our services in general; **your consent** expressed in the context of surveys/market research we conduct. Your participation in such surveys or market research is voluntary. Accordingly, it is your choice whether or not to provide us with your data by filling in the participation forms on our website or other similar forms provided in the context of such surveys or studies.

We will ensure that we use personal data only if such use is necessary for the fulfillment of the intended purpose. As a rule, the results of internal analyses and studies are anonymized.

Where we may obtain the above data: in general, we use data that we either: receive from you (directly or through our partners - such as marketing, promotion and market research agencies), or generate or infer from information we hold about you.

What happens if you do not provide us with your data: if you do not wish to participate in our surveys or studies or, where applicable, to provide us with certain information for this purpose, we may not implement or take into account certain of your suggestions or other matters of interest to you. However, your refusal to participate will in no way affect your relationship with us.

Certain surveys may be conducted through the Superscore App /websites. For data processed via cookies and new technologies, please see our Cookies Policy.

4.10. Interaction through platforms and social media

We process your personal data when you interact with the Superscore App or our open pages on social platforms such as Facebook, Instagram, Twitter, or other similar networks. The main purpose of these interactions is to improve the relationship with our users, to respond to their requests and questions, and to promote the functionalities of the Superscore app.

We use these platforms for: **user support and relations:** handling queries or requests received through social networks; **the App promotion:** publishing relevant content about features and promotions; **performance measurement:** analyzing metrics on user interaction with our social pages; **personalization of communication:** creating advertisements tailored to your interests and preferences; **advocacy:** handling situations where our image or interests may be affected.

Categories of data processed: identification data: first name, surname, publicly available data on social platforms; **contact data:** e-mail address, accounts associated with the social media profile; **analytical data:** user interactions and preferences, comments, likes, shares

Legal grounds: in this context, personal data processing is based on (i) legitimate interests and (ii) user consent, as recognized under applicable data protection laws. Legitimate interests include managing interactions with users on social networks, improving services and communications, and protecting our rights and interests in the event of disputes or for incident management purposes. User consent serves as the legal basis for conducting commercial communications on social media platforms.

Consequences of refusal: if you choose not to interact via social networks, this will not affect your use of Superscore, but you will lose access to an additional channel of support and information.

4.11. Defending our rights and interests

We use your data to protect our rights and interests in situations involving: handling complaints, legal requests and disputes; complying with specific legal obligations; maintaining evidence necessary to resolve incidents or complaints.

Processed data: identification data: name, surname; **contact data:** e-mail address, telephone number; **incident-specific data:** any information relevant to the specific case (e.g., complaints, supporting documents) from the above data.

Legal grounds: the processing of personal data is based on (i) legitimate interests and (ii) legal obligations, as required under applicable data protection laws. Legitimate interests include defending against unfounded requests, addressing situations that protect our business interests, complying with data archiving requirements, safeguarding our rights and interests as well as those of others with a legitimate interest, and demonstrating compliance with specific legal standards and requirements. Additionally, processing may be carried out to fulfill legal obligations, such as adherence to requirements imposed by regulatory authorities or courts.

Consequences of refusal: refusing to provide the requested data in the context of defending our rights may affect our ability to resolve your complaint or to protect our interests in the event of a legal dispute.

4.12. Fulfilling our legal obligations

We process your data in order to comply with legal obligations deriving from the applicable legislation, such as keeping records of the justification of any awards and benefits offered, managing reporting to the authorities, and keeping mandatory documentation for archiving purposes.

Categories of data processed: identification data: first name, surname; **contact data:** e-mail address, telephone number; **financial data:** awards and tax details.

Legal grounds: the processing of personal data is based on legal obligations, as required under applicable data protection laws. This includes compliance with tax and accounting legislation, as well as fulfilling requirements imposed by public authorities and courts. These obligations ensure adherence to statutory and regulatory frameworks while maintaining lawful and transparent data processing practices.

Consequences of refusal: if you do not provide the mandatory data, we will not be able to conclude or perform contractual relations with you or to comply with the legal obligations imposed.

4.13. Mergers and Acquisitions

If we are involved in a corporate law transaction (e.g. merger, division or sale of business), we will transmit to or, where appropriate, receive from the entities involved your personal data. We also transfer/receive your personal data for the purpose of integrating databases with the customers of the companies involved in the transaction. For this purpose, we transfer to the transacting companies certain contact data, account data or other data relating to you as a recipient for the purpose of integrating customer databases in the transfer where you are already a customer of the other transacting entity.

Categories of data processed: in the transfer of a planned corporate transaction (e.g. where our group or we buy or sell a business), we may use (transfer to the party involved in the transaction) your personal data to identify and plan the best way to quickly and efficiently realize any commercial opportunities and possible product enhancements in the transfer of that corporate transaction. For example, we may communicate or obtain certain data about you, such as, Contact Data, Account Data (e.g. type of offers/benefits used). As a rule this information will be transmitted/received in pseudonymized or anonymized form.

In all cases, we will disclose or further process (as appropriate) personal data only on the basis of appropriate analysis and risk mitigation measures to ensure that there are no overriding fundamental rights of data subjects that could be affected.

Legal basis: the legitimate interest of us and/or the third-party entity (transaction party) to identify, plan and implement the best way to quickly and efficiently realize any commercial opportunities and database integration where appropriate and possible service enhancements, or where applicable your consent.

5. To whom do we disclose your personal data?

To ensure the functioning of the App and to provide the services described, as well as to fulfill legal obligations, your personal data may be disclosed to the following categories of recipients:

- a) **Public and regulatory authorities:** tax authorities, courts of law, other relevant public institutions where we are required to do so by law or in connection with an official investigation or complaint; and supervisory authorities where it is necessary to respond to legal requests.
- b) **IT and technical service providers:** partners that provide support for IT infrastructure, such as maintaining servers, hosting data in data centers and troubleshooting technical incidents.
- c) **Marketing and advertising service providers:** agencies that manage promotional campaigns, including sending newsletters, push notifications or commercial messages, as well as optimizing our online presence.
- d) **Providers of surveys or market research/user surveys** - to conduct surveys or market research, customer satisfaction surveys or to obtain feedback from our users about our products and services.
- e) **Our electronic communication service providers** - chat platforms, customer interaction the App s, e-mail or automated message platforms;
- f) **Social Media platforms and other third parties whose cookies/other technologies** are placed in the App (see our Cookie Policy for details)
- g) **Security and fraud prevention providers:** entities involved in detecting, preventing, and reporting security incidents or misuse of the App .
- h) **Providers of legal, accounting and financial advisory services;**
- i) **Joint Controllers:** we share data for integrating the App functionalities that allow access to our partner's platforms, including redirecting users to the platform for betting purposes, viewing odds, and using available promotions.
- j) With other Superbet Group companies for internal collaboration, administrative matters, and daily operations in accordance with this Privacy Notice.
- k) With the entities whose rights need to be defended/ natural persons having a legitimate justified interest, including the joint controllers.

- l) With entities involved in corporate reorganizations/mergers/acquisitions in compliance with data processing rules, principles and guidelines.

6. Where do we store your personal data?

Your personal data will be stored and processed by us and our service providers in the following territories: Brazil, the European Economic Area, the United Kingdom and the USA.

Each of our service providers that process and store your personal data is required to protect and secure it in accordance with applicable industry standards, regardless of whether their jurisdiction imposes less stringent obligations to protect personal data.

Where the data recipients are located in third countries for which the European Commission has not issued an adequacy decision, we will enter into agreements with each recipient containing standard contractual clauses approved by the European Commission or other supervisory authority (if necessary). This ensures an adequate level of protection of personal data. We exercise due diligence through due diligence processes to ensure that such data transfers do not pose risks. A copy of the standard contractual clauses used by us can be found at: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj.

7. How do we secure personal data?

The associated operators have put in place all necessary technical and organizational measures, including physical, electronic and procedural safeguards, to protect the confidentiality and security of the personal data you provide to us. These measures are designed to protect personal data against unauthorized access, destruction, loss, alteration, disclosure or misuse. Our security measures are designed to maintain an appropriate level of data confidentiality, integrity and availability. Information transmitted and received through the website and the App is encrypted using Secure Socket Layer (SSL) technology. We have a 24/7 network traffic monitoring system to detect signs of attacks or breaches.

Despite the security measures mentioned above, we want you to be aware that the Internet and IT services are not perfectly secure environments and that there is always the possibility that your personal data may be subject to unauthorized actions by third parties. Although we take appropriate steps and use security measures to protect your personal data, no method of transmission or storage is completely secure.

8. Data storage period

Your data will be processed for a limited period, determined by various criteria in accordance with the applicable laws and regulations of each jurisdiction globally. These criteria include compliance with statutory provisions that mandate the retention of certain types of data for specified periods, such as tax records, contractual obligations, or other regulatory requirements. Data may also be retained as necessary to demonstrate compliance with applicable laws, regulations, or standards. Specific rules related to secure archiving and storage for historical, legal, or business purposes may further influence retention periods. The duration of processing will also depend on the purposes for which the data was originally collected, ensuring that it is only retained for as long as necessary to achieve those purposes, after which it will be securely deleted or anonymized. Additionally, the needs or requests of data subjects, including their rights to access, rectify, or erase their data, may impact processing timeframes, as will justify requests from third parties, such as contractual partners or other stakeholders, provided they align with legal and ethical standards. Data may also be retained to address lawful orders, investigations, or inquiries from public authorities or regulatory bodies, as well as to adhere to recognized industry practices for data retention and disposal. General or specialized timeframes established under applicable laws, regulations, or contractual obligations will also serve as a guiding factor in determining the retention period.

9. Automated decision-making and profiling

We may perform certain profiling activities to analyze, predict or evaluate aspects of the characteristics of your behavior on our services using specialized software to better understand how you interact with our services, in accordance with our legitimate interests and legal obligations.

The reasons for doing this are:

- improving your interaction with our services;
- protecting against fraud and abuse within the services;
- strengthening our marketing activities.

We want you to understand that we do not make decisions about you solely by using automated means that could have adverse legal or other significant effects on your rights. We ensure that our employees are always involved in such profiling to protect your privacy and rights.

You have the right to object to such profiling in situations where we rely on legitimate interest for processing your personal data.

10. Your rights

You have the following rights regarding the personal data we process. Please note that, apart from the right to object to our use of your information for direct marketing purposes (including profiling for direct marketing), users' rights are not absolute and may be subject to other applicable laws.

- Right to information:** You have the right to obtain information as to the identity of the data controller, the reasons for processing your personal data and other essential information necessary to ensure an adequate and transparent processing of your personal data.
- Right of access:** you have the right to obtain a confirmation from us as to whether or not we are processing your personal data and, if so, access to that data and to information on how the data is processed. You also have the right to obtain a copy of the personal data provided to us and subject to processing (we would like to inform you that for any other copies requested by you, a reasonable fee, based on administrative costs, may be charged).
- Right to rectification:** You have the right to request the correction or removal of inaccurate information about you without undue delay.
- Right to erasure ("Right to be forgotten"):** means that you have the right to request that we erase your personal data, without undue delay, if one of the following grounds applies: they are no longer necessary for the purposes for which they were collected or processed; you withdraw your consent and there is no other legal basis for the processing; you object to the processing and there are no legitimate grounds for overriding; the personal data have been processed unlawfully; the personal data must be erased in order to comply with a legal obligation; the personal data have been collected in connection with the provision of information society services.

In doing so, we will notify each recipient to whom personal data has been disclosed of any deletion of personal data, unless this proves impossible or involves disproportionate effort, and we will inform you of these recipients if you so request.

- Right to processing restriction:** you have the right to request that your personal data be used only for specific purposes in one of the following cases: when you contest the accuracy of the data, for a period of time that allows us to verify the accuracy of the data; the processing is unlawful and you object to the erasure of personal data, requesting restriction instead; where we no longer need the personal data for the purposes of the processing, but you request it from us for the establishment, exercise or defense of a legal claim; where you object to the processing for the period of time during which our legitimate rights are verified to see whether our legitimate rights prevail, in which case we will explain our reasons to you in full.

In doing so, we will notify each recipient to whom personal data has been disclosed of any restriction of processing, unless this proves impossible or involves a disproportionate effort, and we will inform you of these recipients if you so request.

- Right to data portability:** you have the right to ask us to transfer your personal data to you or to another person/entity in a machine-readable format.
- Right to object:** you have the right to object to the processing (including profiling) of your personal data in cases where the basis for processing our data is a task carried out in the public interest or where we have informed you that processing is necessary because of the legitimate

interests of us or a third party. You have the right to object to us using your information for direct marketing and profiling purposes related to direct marketing.

- h) **Rights concerning automated decision-making:** you have the right to ensure that decisions that have legal effects concerning you or significantly affect you are not based solely on automated processing of data unless it is necessary for entering into a contract with you, permitted by law or to which you have consented.
- i) **Right to Opt-Out of Personal Data Sale:** Under certain privacy laws, such as the California Consumer Privacy Act (CCPA), you have the right to direct us not to sell your personal data to third parties. You can exercise this right at any time by submitting a request through the designated method provided in this Policy.

In order to exercise any of the above rights, you can contact us either by e-mail or at customer relations as described on our website and within each dedicated Privacy Notice

Requests are usually dealt with within one calendar month. However, if there is a large volume or particularly complex request, this period may be extended by up to two additional months. We may also refuse to respond to a request in certain circumstances set out in data protection legislation.

You also have the right to lodge a complaint with the Personal Data Protection Authority about the compliance of the processing of personal data

11. Protection of minors

Superscore is intended for individuals over the age of 18. We do not knowingly collect personal data from minors.

By registering for our services and using our products, you confirm that you are of legal age, are fully capable of entering into agreements, and can fully comply with the laws, regulations, rules, and other terms made available to you. You also confirm that you have read and understand this Policy. If we are notified or become aware that a minor has provided us with personal data through any means of communication, we will promptly delete such personal data.

12. How to get in touch with us?

If you have any questions, comments, complaints, or suggestions about this Policy, or concerns regarding the processing of your personal data, please contact us through the dedicated e-mail address- help@sportening.com. We are committed to addressing your inquiries promptly and in compliance with the data protection regulations applicable to your jurisdiction.