

## PRIVACY POLICY

Welcome to **Exsportia**, an online platform for recreational sports events (the “**Service**”). The Service is owned and operated by **Exsportia Ltd.** (“**Exsportia**”, “**we**”, “**us**” and “**our**”). The Service is available through our website application and through our designated mobile applications (the “**App**”).

We at Exsportia respect your privacy. This Privacy Policy (“**Policy**”) explains the privacy practices for our Service and App. It also describes the rights and options available to you with respect to your information.

Exsportia is the data controller for the purposes of the personal data we process via the App. Our registered address is at 8 Biluya Street, Tel Aviv, Israel. You may contact us about privacy or data protection matters by email at [support@exsportia.com](mailto:support@exsportia.com).

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under Regulation (EU) 2016/679 (General Data Protection Regulation) (“**GDPR**”) which applies across the European Union (including in the United Kingdom).

### ABOUT US

Exsportia is an online platform for recreational sports events such as tournaments, leagues, sports games, training groups and sports classes (each, an “**Event**”). The Service enables users (“**Players**”) to discover and register to various Events, join amateur leagues, invite and being invited to Events and book venues offered through the App.

online platform for users looking to participate in recreational sports events, where they can discover, book and join events at venues.

Those who own a venue suitable for hosting Events, such as basketball or tennis court or space which may be used by Yoga and Pilates groups, etc. (each, a “**Venue**”), or those who wish to offer one of more Events, may sign up to the Service and offer Users your Venue or Event for booking through the App. Each of these will be referred to as a “**Host**”. The platform also enables Hosts to manage their overall bookings made on or off the App.

Players and Hosts will all be referred together as “**Users**”.

### **PERSONAL DATA WE COLLECT**

**We collect information you provide us voluntarily and knowingly throughout the course of your use of the App. You are not legally required to provide us with your information.**

**Enquiry Information.** You can submit an enquiry through our designated page on the App. You will be asked to provide information such as your name, email address, phone number, the topic of your enquiry and the text of your message. The mandatory fields for completion will be marked. We refer to this data as “**Enquiry Information**”.

**Preferences, Rankings and Feedback.** When you book Venues through the App, participate in Events or invite Users to do so, we will collect the information regarding the type of sport you booked or participated in, whether other Players participated with you and if so – who, and the score or result of the game. We also collect and process feedback that any Player can provide about another Player that he or she played with. We refer to this data as “**Preferences, Rankings and Feedback Information**”.

**Booking Information.** When you book Venues through the App, we will

collect the information you provide during the booking process, including your credit card information to pay the fees required by the Host for the booking of his or her venue. We refer to this data as “**Booking Information**”.

**Registration Information.** When a Host creates a Host account through the App the Host will be required to provide us with the following details: first and last name, date of birth, email address, home address, country and phone number. We refer to this data as “**Registration Information**”.

**Venue Information.** When Hosts post a Venue on the App, the Host will be required to provide us information regarding the Venue or Event they wish to offer to Players, such as: type of Venue or Event, name of Venue or Event, a description of the Venue or Event including the types of equipment and facilities offered at the Venue or Event, Venue’s or Event’s address, photos or videos of the Venue or Event, the currency used in the place where the Venue or Event is located, the limit age of the users for whom the Venue or Event is intended, for what types of sports the Venue is suitable, the fee charged for booking, the cancellation policy and more. We refer to this data as “**Venue and Event Information**”.

Neither Players nor Hosts have a legal duty to provide any of the above information, however, they will not be able to submit an enquiry, book a Venue, receive invites to Events, register as a Host or offer Venues through the App, without providing the required information.

**We also collect analytics information about your use of the App.**

When you use the App, we will collect and process certain information in relation to your visit and use of the App including: IP address, time and date of access, type of browser used, language use, links clicked and the web pages accessed. We refer to this data as “**Analytics Information**”.

## **HOW WE USE PERSONAL DATA**

**To respond to your enquiry**

We will use your enquiry information to contact you about your enquiry and handle your enquiry.

**To allow you, a Player, to book an Event or Venue**

We use your Booking Information in order to process the booking and charge you the fees associated with the booking. We also use it for accounting and record-keeping purposes, to adapt the App and its content to Users' preferences, to better understand the market demand in which Exsportia operates in and for managerial reporting and business planning.

**To offer Events and Venues that are more suitable to your preferences and abilities**

We will process the Preferences, Rankings and Feedback Information to assess your ranking in relation to other Players. On that basis we will offer you and other Players Events and Venues that are more likely to be suitable to you and them considering your sport preferences, peer-feedback and assessed ranking.

**To enable you, a Host, to offer Venues and Events through the App.**

We will process your Registration Information and Venue and Event Information to enable you to create a Host account on the App, and offer Venues and Events through to other users of the App. We will also process this information for accounting and record-keeping purposes, to adapt the App and its content to Users' preferences, to better understand the market demand in which Exsportia operates in and for managerial reporting and business planning.

**To provide Players with promotional and marketing content from Venues.**

We and the Venue will process Player's Booking Information to send the Player occasional promotional and marketing messages regarding Events and special deals that the Venue offers.

**We use Analytics Information to improve and enhance the App. We also use it for business administration purposes.**

We use Analytics Information to improve the App and enrich the content on the App. We also use the Analytical Information to adapt the App, its content, to Users' preferences. Finally, we will use the Analytics Information to understand the market in which Exsportia operates in and for managerial reporting and business planning.

## **WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS**

*We will not share your information with third-parties, except in the events listed below or when you provide us your explicit and informed consent*

**We share your information, including credit card information, with our service providers helping us to operate our business and the App. We also share your Booking Information with the Hosts you booked with.**

We will share your information with our service providers, who assist us with the internal operations of the App. These service providers are authorized to use your personal information only as necessary to provide these services to us and not for their own promotional purposes. Among others, we share your credit card information with our payment processing provider Total Processing Limited.

We also share Booking Information with the Hosts that a Player had booked an Event with, for them to manage, administer and bookkeep your bookings.

We do not sell your personal information to third parties.

**We share a Player's basic information with other Players he booked an Event with and with potential Players that we believe he can be suitable for an Event with.**

If you are a Player and have booked an Event with other Players, we will share your basic information with those other Players. We will also share your information with other Players that may be suitable for an Event with you considering your own and their Preferences, Rankings and Feedback Information.

**We will share your information with competent authorities or other parties, if you violated the law or abused your rights to use the App.**

If you have violated this policy or any other agreement you have with Exsportia, abused your rights to use the App, or violated any applicable law. Your information will be shared with competent authorities and with third parties (such as legal counsel and advisors), for the purpose of handling of the violation or breach.

**We will share your**

If we are required to disclose your information by a judicial, governmental

information if we are legally required.

or regulatory authority.

We will share your information with third-party in any event of change in Exsportia's structure.

If the operation of Exsportia or the App is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition) we will share your information to enable the structural change.

## COOKIES AND OTHER TRACKERS

What are cookies?

Cookies are text files, comprised of small amount of data, that are saved on your computer or other device (e.g. smartphone, tablet, etc.) when you use internet and visit various websites.

The information that the cookies maintain is read by the App you visit, during the session of your visit to the App and when you return to visit it again.

We use cookies necessary to operate the App, for app statistics, for marketing purposes and to remember your app preferences.

We use cookies for a number of purposes, as briefly explained below.

**Necessary.** Cookies that are strictly necessary for the functioning of the App. The App cannot operate properly without these cookies. You can set your browser to block or alert you about these cookies, but some parts of the App may not function properly.

**Preferences.** Cookies that remember your choices when you use the App and allow the App to react by reflecting your preferences.

**Statistics.** Cookies that help us understand how you and other users interact with our App by collecting data that does not directly identify you.

## SECURITY AND DATA RETENTION

We will retain your personal information for as long as we need it to operate the App and interact with users and customers, and thereafter as needed for record-keeping matters.

We retain personal data for the duration needed to support our ordinary business activities operating the App and interacting with Users.

Thereafter, we will still retain your personal information as necessary to comply with our legal obligations, bookkeeping requirements, resolve disputes, establish and defend legal claims and enforce our agreements.

We implement measures to secure your information

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, it is not guaranteed, and you cannot expect that the App will be immune from information security risks.

## LEGAL BASIS AND DATA SUBJECT RIGHTS

Legal bases for processing your information

The legal basis for collecting and processing your Enquiry Information is our legitimate business interest in responding to your enquiry and

developing our User base.

The legal basis for collecting and processing Preferences, Rankings and Feedback Information is our legitimate business interest in offering products and Events that are more likely to be suitable to you and your peer Players' preferences and abilities.

The legal basis for collecting and processing your Booking Information to send you our occasional promotional and marketing messages regarding Events and special deals that Venues offers is the Host's legitimate interest in promoting its business of Events.

The legal basis for processing your Booking Information for booking Events, and for sharing Booking Information with the Host that you – the Player – booked an Event with, is the performance of the contract between you and the Host for the Event.

The legal basis for processing Registration Information and Venue and Event Information to enable you to create a Host account on the App, and offer Venues and Events through to other users of the App is the performance of the contract between us and you, the Host, for the provision of the Service.

The legal basis for processing Registration Information and Venue and Event Information for our record-keeping, App adaptations, and for managerial reporting and business planning, is our legitimate interest in managing the App and in business development and planning.

The legal basis for collecting and processing Analytics Information is our legitimate interest in managing the App and, business development and planning.

The legal basis for sharing your basic information with other Players you booked an Event with is the is the performance of the contract between you and the Host for the Event.

The legal basis for sharing your information with other Players that may be suitable for an Event with you is our legitimate business interest in offering Events that are more likely to be suitable to you and your peer Players' preferences and abilities.

The legal basis for sharing your information with competent authorities, or other third parties, if you violated the law or abused your rights to use the App, or breached the contract with us, is our legitimate interest in protecting our business from abuses and violation of law.

The legal basis for required disclosures of your information to a judicial, governmental or regulatory authority is our legitimate interest in protecting our business from abuses and violation of law, our compliance with legal obligations.

The legal basis for sharing your information to enable the structural

change at Exsportia is our legitimate business interest in our business continuity.

**We will transfer your information internationally in manners consistent with applicable data protection laws.**

Information we collect from you will be processed within and outside Europe.

Because we transfer your information from within Europe to other jurisdictions outside Europe, we will endeavor to do so using adequate safeguards consistent with those determined by the EU Commission. For example, we transfer your personal data to Israel for processing. Israel is recognized by the European Commission as having adequate protection for personal data.

**You have certain rights to access, update or delete your information, obtain a copy of your information, withdraw your consent and object or restrict certain data processing activities**

If you are in the EU, you have the following rights under the GDPR:

**Right to Access** your personal data that we process and receive a copy of it.

**Right to Rectify** inaccurate personal data we have concerning you and to have incomplete personal data completed.

**Right to Data Portability**, that is, to receive the personal data that you provided to us, in a structured, commonly used and machine-readable format. You have the right to transmit this data to another service provider. Where technically feasible, you have the right that your personal data be transmitted directly from us to the service provider you designate.

**Right to Object**, based on your particular situation, to using your personal data on the basis of our legitimate interests. However, we may override the objection if we demonstrate compelling legitimate grounds, or for the establishment, exercise of defense of legal claims. You may also object at any time to the use of your personal data for promotional and marketing content from Venues, by simply opting out of it through the App's preferences.

**Right to Restrict** processing your personal data (except for storing it) if you contest the accuracy of your personal data, for a period enabling us to verify its accuracy; if you believe that the processing is unlawful and you opposes the erasure of the personal data and requests instead to restrict its use; if we no longer need the personal data for the purposes outlined in this policy, but you require them to establish, exercise or defense relating to legal claims, or if you object to processing, pending the verification whether our legitimate grounds for processing override yours.

**Right to be Forgotten.** Under certain circumstances, such as when you withdraw your consent to our newsletters, you have the right to ask us to erase your personal data relating to that processing. However, we may still process your personal data if it is necessary to comply with a legal obligation, we are subject to under laws in EU Member States or for the establishment, exercise or defense of legal claims.

If you wish to exercise any of these rights, contact us at [support@exsportia.com](mailto:support@exsportia.com).

We reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you with information that you have asked for, we will explain the reason for this.

**You have a right to submit a complaint to the relevant supervisory data protection authority.**

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in particular in the Member State of your residence, place of work or of an alleged infringement of the GDPR.

In the United Kingdom, this is The Information Commissioner's Office (ICO)

Water Lane, Wycliffe House, Wilmslow - Cheshire SK9 5AF

Tel. +44 1625 545 745

e-mail: [international.team@ico.org.uk](mailto:international.team@ico.org.uk)

Website: <https://ico.org.uk/>

## **CHANGES TO THIS PRIVACY POLICY**

**If we change this Policy, we will post the updated policy on the App.**

From time to time, we may change this Policy, in which case we post the updated Policy on the App. The latest version of the Policy will always be accessible through the App.

Last Update: February 17th 2020