

## PLAYER DATA: PRIVACY NOTICE

### INTRODUCTION

This privacy notice provides information on how Genius Sports Limited and the companies in its corporate group (“**Genius Sports**”, “**we**”, “**our**” or “**us**”) collect, process and share personal data relating to players in sporting events (including esports) and other “**connected persons**” associated with those events, in particular referees/judges, club owners, managers, directors or any other relevant participant or person involved within a given sport (references to “**you**” and “**your**” in this policy are to players and connected persons). It also explains your rights as a data subject and how those rights may be exercised.

We keep our privacy practices under review and may amend this policy from time to time. This version is dated August 2021.

### ABOUT US

Genius Sports provides data, technology and media services for the sports, betting and entertainment industries. We are proud to be partnered with over 500 of the world’s biggest and best sporting organisations for the collection of official live sports data. This data is adapted and supplied by us to various third parties including sportsbooks, sports organisations and media companies, which rely on that data for the provision of their services.

In providing our services, we process certain personal data about sports players and connected persons as a “**controller**” of that information under applicable data protection law, including in particular the UK Data Protection Act 2018 and the EU General Data Protection Regulation. This means that we are responsible for deciding how we use the personal data.

### PERSONAL DATA WE COLLECT

Broadly speaking, personal data is data about a living individual that directly or indirectly identifies the individual.

Genius Sports collects personal data relating to players and connected persons for the following sports: 3 x 3 basketball, American football, Australian football, badminton, baseball, basketball, beach volleyball, boxing, cricket, darts, esports, football, futsal, handball, ice hockey, martial arts, motor sport, rugby league, rugby union, snooker, squash, table tennis, tennis, volleyball and water polo.

The personal data that Genius Sports processes about players and connected persons is generally publicly available information. We may collect this data from cameras livestreaming the sports event (whether operated by us or a third party), from statisticians manually recording the data live at the sports venue (either directly engaged by us or engaged by the rightsholder of the data, such as the relevant federation or league) or from live feed analysts located in our Bulgarian and Colombian offices who record data following analysis of a low latency stream of the event.

The type of personal data collected varies from sport to sport. In relation to players, it may include personal information, such as photograph, forename, surname, nickname, gender, date of birth, email address, home address, place of birth, nationality, player position, team affiliation history, player match history, player/shirt number and player social media. It may also include information relating to individual performance and/or behaviour during the sporting event. For example, we might process data on the number of goals or touchdowns scored by a player in a game or season, or details of any bookings received or substitutions made.

In relation to connected persons, the personal data may include forename and surname. For referees/judges, the data may additionally include match history and individual performance and/or behaviour during the sporting event. For a club owner, chairman, director or manager of a team or sporting organisation (or equivalent role), the data may additionally include information on the individual’s career history. In addition, we may process personal data in video footage of players or connected persons taking part in streamed sporting events, specifically their image and any associated audio data.

Finally, there are certain types of personal data (referred to as “**special category data**”) that are afforded a higher level of protection under applicable data protection law because they are more sensitive. Special category data include personal data relating to a person’s racial or ethnic origin, religious or philosophical beliefs, trade union membership, genetics, biometrics, health, sex life or sexual orientation.

We may incidentally capture special category data consisting of data relating to a player’s injuries (health data) where we obtain live streams of sporting events. When processing this personal data, we rely on the condition under applicable data protection law that the data has been manifestly made public by the data subject.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data for the purpose for which we collected it, as set out below.

Purpose	Personal data used	Lawful basis for processing
To maintain integrity and prevent crime and corruption within the relevant sport.	<p><b>For players and connected persons:</b> forename, surname, audio and visual personal data in live or historic video streams of sporting events.</p> <p><b>Additionally for players:</b> photograph, player position, player match history, player behaviour/performance during the match, and relevant social media and open source information.</p> <p><b>Additionally for connected persons:</b> career history, behaviour/performance</p>	We collect and use your personal data because it is necessary for our (or other’s) legitimate interests to record sports matches in order to develop and offer sports integrity monitoring products and/or services.

	<p>during the match, match history and relevant social media and open source information.</p> <p>The above data will be analysed with reference to betting activity to identify any suspicious betting patterns or connections to suspicious persons.</p>	
<p>To provide sportsbook services and related betting services; we provide data directly to betting operators (or indirectly via turnkey sports betting solutions) who use the data we provide for the creation, pricing, trading and risk management of betting markets.</p>	<p><b>For players and connected persons:</b></p> <p>Audio and visual data in live video streams of sporting events</p> <p><b>Additionally for players:</b></p> <p>Forename, surname, shirt/player number and individual performance data.</p>	<p>We collect and use your personal data because it is necessary for our (or other's) legitimate interests to offer betting and related services.</p>
<p>To provide sports data services; we provide sports data to third parties including sports organisations, media companies and broadcasters for the purposes of sports news services and fan engagement.</p>	<p><b>For players and connected persons:</b></p> <p>Audio and visual data in live video streams of sporting events</p> <p><b>Additionally for players:</b></p> <p>Forename, surname, shirt/player number and individual performance data</p>	<p>We collect and use your personal data because it is necessary for our (or other's) legitimate interests to offer sport data services for sports news and fan engagement.</p>
<p>To provide competition management services to sporting bodies</p>	<p><b>For players:</b></p> <p>Forename, surname, nickname, photograph, contact details (such as phone number and home and email addresses), gender, date of birth, place of birth, nationality, player position, team affiliation history and player/shirt number.</p>	<p>We collect and use your personal data because it is necessary for our (or other's) legitimate interests to provide services to enable sports organisations to manage club, team and member data and publish information to their websites.</p>

	<p><b>For connected persons:</b></p> <p>Forename, surname, photograph, contact details (such as phone number, email address and home address), gender, date of birth, place of birth, nationality.</p>	
--	--	--

Where we say that it is in our legitimate interests to use your personal data in the ways described above, our “legitimate interests” (or another’s legitimate interests) means the interest of our business (or another’s) to conduct itself so as to provide the best services and products. Before using your personal data for our or another party’s legitimate interests, we make sure that we take into account any potential impact that such use may have on you and your rights. We do not use your personal data for activities where our (or another’s) interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to do so by law).

You may obtain further information about how we assess our legitimate interests against any potential impact on you by contacting us using the details in the “Contact and DPO” section below.

## WITH WHOM MIGHT WE SHARE YOUR PERSONAL DATA?

We may share your personal data with the following third parties:

- **Companies within the Genius Sports group of companies.**
- **Organisations to whom we provide services:** such as betting operators, sports organisations, media companies, broadcasters, website providers and product developers.
- **Organisations that provide services to us:** such as IT service providers (like our cloud storage services, our content delivery network or our website app developers).
- **Our professional advisers:** where the personal data is required in order for them to provide their advice.
- **Potential buyers:** to any potential buyer of any part of our business, provided that we inform the buyer that your personal data may only be used for the purposes outlined in this privacy notice.
- **Governments or our regulators:** where the law tells us to do so.
- **Police, law enforcement and security services:** to help them with any investigation, prevention of crime or matter of national security.

In each case, we will only share your personal data where it is necessary to do so.

## TRANSFERRING YOUR DATA CROSS-BORDER

We are a global business and therefore it may be necessary to transfer your personal data outside of the country in which it was collected, including to companies within our corporate group, service providers

and commercial partners based in other locations. We have offices in Australia, Lithuania, the United States, Bulgaria, Colombia, Estonia and Italy where personal data is routinely processed.

Where a transfer is made to a country outside of the UK or European Economic Area (EEA), the standard of protection for personal data may be lower than it is in the UK or EEA.

Whenever we transfer your personal data outside of the UK or EEA, we take steps to ensure that it is afforded a similar level of protection as within the UK or EEA, by making use of one of the specific safeguards approved by the UK Information Commissioner or European Commission, as appropriate, including the use of standard contractual data protection clauses. You may obtain more details of the protection given to your information when it is transferred cross-border by contacting us using the details in the “Contact and DPO” section below.

## HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We generally keep personal data for as long as required to fulfil the purposes for which it was collected. However, in some circumstances we may retain personal data for longer periods of time if necessary to comply with legal, tax or accounting requirements, or if we are required to do so by a court, regulator or other applicable legal or governmental body with authority to make the request. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax and other requirements.

## YOUR RIGHTS TO YOUR PERSONAL DATA

Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the rights to:

- request access to your personal data;
- request rectification of any mistakes in your personal data;
- request erasure of your personal data;
- request restriction of processing of your personal data;
- object to our processing of your personal data;
- withdraw your consent to our use of your personal data (only where we rely on consent as the lawful basis for processing).

If you wish to exercise any of these rights, then please contact us using the details in the “Contact and DPO” section below. Please note that there may be legal or regulatory reasons why the above rights cannot be exercised; if this is the case, we’ll tell you why.

## COMPLAINTS

If you have a complaint about the handling of your personal information, please contact us using the details in the “Contact and DPO” section below. We’ll investigate your complaint and notify you in writing of the outcome as soon as possible and in any event within 30 days of receiving the complaint.

If you’re not happy with the response to your complaint, you can refer your complaint to the relevant supervisory authority in your country. In the United Kingdom, we are regulated by the Information Commissioner’s Office (“**ICO**”). You may make a complaint to the ICO by calling their helpline on 0303 123 1113 (local rate), by starting a live chat at <https://ico.org.uk/make-a-complaint/> or by writing to them at: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## CONTACT AND DPO

Genius Sports Limited is the controller of your personal data.

The company registration details are as follows:

**Genius Sports Limited** (company no: 10197219, ICO registration no: ZA198905)

**Address:**

9<sup>th</sup> Floor  
10 Bloomsbury Way  
Holborn  
London  
England  
WC1A 2SL

Our Data Protection Officer is Maria Hernandes. You may contact Maria and our privacy team by email to: [privacy@geniussports.com](mailto:privacy@geniussports.com)