

# BEELUP | PRIVACY POLICIES

Effective July 22nd., 2022

## 1. INTRODUCTION

Dreams Factory Group, LLC, (hereinafter “BEELUP”), provider of the service “BEELUP - REVIVÍ TU PARTIDO” respects the privacy of the users (hereinafter “User” or “You”) of the website <https://beelup.com> (hereinafter “site”) and of the people whose image is depicted in the video recordings (hereinafter “User”), for which reason does hereby compromises to protect their personal data (hereinafter “Personal Data”). These privacy policies (hereinafter “Privacy Policies”) are applicable to any user personal details provided to or collected by us.

We will process the personal data of citizens or residents of the European Union only in accordance with the present Privacy Policies and the applicable regulations to which we are subject, especially the General Data Protection Regulation 2016/679 (EU) (“GDPR”). In the case that the User discloses third parties’ personal data to BEELUP, such User will be responsible to get approval from the interested parties and for the accuracy of the information provided.

Data controller: The Users will at any time be able to review, correct or delete their Personal Data, in accordance with the GDPR and applicable legislation. Likewise, the User may at any time contact our Data Protection Officer about such actions at [privacidad@beelup.com](mailto:privacidad@beelup.com) or via certified letter to:

Data Protection Officer - Dreams Factory Group, LLC  
16192 Coastal Highway Lewes, Delaware 19958, United States

Processing of the Personal Data is carried out by the Controller for the correct functioning of the Site, as well as the pursuit of a legitimate interest, which constitutes the legal basis for the Personal Data processing as stated in article 6, par, 1 GDPR.

## 2. DATA COLLECTED BY US

In using our website we may collect, use, store and transfer different types of personal data, which we have grouped as follows:

- Identity data: name, surname, user name or similar, ID number, personal image (photograph or video).
- Contact information: invoicing address, e-mail address and phone numbers.
- Transaction information: payment details and products and services information.
- Technical data: Internet Protocol (IP) address, login information, browser type and version, configuration and time zone location, types and versions of the browser adds-on, operating system and platform and other devices technology used to access our website.
- Profile information: user name and password, purchases made or orders placed,

interests, preferences, comments and surveys answers.

- Usage data: information on how You use our website, products and services.
- Marketing and communications information: marketing preferences received from us or from our third parties and communication preferences.
- Additional data that may be provided by the User.

We do not collect any special or sensitive type of personal data (including information about race or ethnic origin, religious or philosophical beliefs, sex life, sexual orientation, political opinions, union affiliation, health, genetic or biometric information) or information about convictions or criminal offenses.

The Users need to take into account that in case BEELUP needs to collect Personal Data as requested by law or under the terms of a contract, and such data is not provided upon request, BEELUP might be forced to cancel the service, which situation will be duly notified as the case may be.

### **3. AUTOMATICALLY COLLECTED DATA**

When interacting with the BEELUP Site, we may automatically collect technical and usage data about your device, actions and navigation patterns. This is done through the use of cookies, server logs and similar technologies. We may also collect technical data in case you visit other websites that use our cookies.

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your Personal Data if permitted by law and in order to better use our Services under the following circumstances:

- That you expressly authorized to
- When we need to fulfill the contract we are about to enter into or have already entered into with the User.
- In case it is necessary to enforce our legitimate interests (or the interests of a third party) and your interests and fundamental interests and rights do not prevail over such interests.
- When we need to fulfill a legal or regulatory obligation.

### **5. DISCLOSURE OF PERSONAL DATA**

5.1 We work with third parties service providers in order to develop websites and applications, hosting, maintenance, backup copies, storage, virtual infrastructure, payment processing, analysis and other services that may require access or use of your information. In case a service provider needs to access your personal data in order to render services on our behalf, such provider will do so only under upon our written instructions, including compliance with the policies and procedures designed to protect your information.

5.2 When permitted or required by law, your Personal Data may also be disclosed to authorities, insurance companies, pension institutions, occupational health institutions and similar authorities.

## **6. INTERNATIONAL TRANSFER OF YOUR PERSONAL DATA**

BEELUP operates globally. This means that personal data may be transferred, stored (for example in a data center) and processed out of the country or region where it was initially collected. Consequently, when providing your personal data you acknowledge that such information may be transferred to or stored in the United States of America or other countries outside the EEA, Switzerland and the United Kingdom. Such countries may have different data protection regulations and less protective than those in your country.

We protect your personal data by virtue of these Privacy Policies independently from the place where such information is to be processed and we take the appropriate contractual measures or any other kind of measure in order to protect You in accordance with the relevant legislation. When personal data from users from EEA, Switzerland or the United Kingdom are transferred to a recipient located in a country outside the EEA, Switzerland or the United Kingdom that has not been recognized as having an appropriate level of data protection, we ensure that the transfer is governed by the European Commission's standard contractual clauses.

## **7. COOKIES**

This website uses cookies. Cookies are small text files that the corresponding web server sends to the user's browser when first visiting the website and which are stored on the user's computer or in the browser's cache memory. Once the same device enters the web page, the browser checks whether the corresponding cookie is already available. The browser sends the data stored in the cookie back to the web server. This way the web server can detect whether the browser has already visited the same website.

The data collected with the help of the cookies are used by BEELUP just to improve the service and to anonymously analyze the usage of the website. No further use of the data is made, nor is the data used to identify the user of the website.

You may configure your browser not to store cookies from this website on your hard disk, or make your browser delete the cookies already stored on your device, respectively. However, you must take into account that upon doing so, you may possibly not be able to use all functionalities of the website. The procedure to change the configuration may vary according to the browser, the information related to adaptations and the steps to change the configuration of your browser can be found in the "Help" menu of each browser.

## **8. OUR SECURITY**

We have set security measures according to the principles of legality, correctness and transparency in order to prevent your Personal Data from being accidentally lost, used or accessed without permission, or altered or disclosed. Additionally, we limit access to your Personal Data to those employees, agents, contractors and other third parties that have a need to access. Such parties will only process your personal data under our instructions and subject to the duty of confidentiality.

We have designed procedures to treat any possible breach, and You as well as any applicable regulatory body will be notified of a breach when we are legally required to do so.

## **9. DATA STORAGE PERIOD**

We will only store your personal data for the period necessary to fulfill the objectives for which we have collected them, including compliance with legal, accounting or reporting requirements.

Account information: As a basic rule we keep your account information until you decide to delete it. If you have not been active for a period of 6 (six) months we will remind you to use your account and consequently it will be deleted if it remains inactive for an 18 (eighteen) month period.

The information related to your purchase of our Services will be -as a basic rule- deleted after 3 (three) years from the end of the calendar year in which the purchase was made. However, we can keep your data for a more extended period in case we have a legitimate purpose to do so, for example, if necessary to initiate, enforce or defend legal claims or if necessary to comply with a legal requirement.

We also keep some of your data if necessary to back up the commercial operations and to continue developing and improving our Services. In the cases in which we keep the information to improve and develop our Services, we take steps to delete the information that identifies you directly and we only use it to disclose collective perceptions about the use of our Services, and not to specifically analyze your personal features.

Marketing information: If you have chosen to receive our marketing e-mails, we retain information about your marketing preferences unless you specifically request us to delete such data.

## **10. YOUR RIGHTS**

To create transparency in the processing of your Personal Data you will find below information about your rights. You are entitled to:

- Request access to your Personal Data. You will receive a copy of the personal data that we have about you and check that we are using such information according to law. Our services enable you to access and update some information. For example, you can access and update your personal data on your account configuration menu and update your name, sex and birth date. Likewise, you can update your profile photo and the main e-mail address.
- You can request correction of the personal data that we keep about you. This allows you to have any incomplete or inaccurate information that we may have, corrected. ● Request deletion of your Personal Data. This allows you to request deletion or elimination of personal data if there is no reason for us to continue processing it. You are also entitled to request deletion or elimination of your personal data if you objected to the processing thereof, if we might have illegally processed your information or in the case we are requested to delete your personal data to comply with local laws and regulations.
- Object to the processing of your personal data when we act upon a legitimate interest (or the interest of a third party) and for some reason you wish to object to it since you

consider such action affects your fundamental rights and freedoms. You are also entitled to object when we are treating your personal data for direct marketing purposes.

- Request restriction in the treatment of your personal data. This allows you to request the interruption of your personal data processing in the following cases: (a) If you wish that we detail the accuracy of the information; (b) If you need that we keep the information even if we no longer need it, since you need it to establish, bring or defend a legal claim; or (c) In the case you objected to the use of your data but we need to verify if we have compelling legal reasons to use them.
- File a claim. You are also entitled to file a complaint with the local data protection authority if you believe or suspect that we are illegally processing your data.

## **11. IMAGE**

BEELUP broadcasts and plays audiovisual images of games played in our clients' sporting facilities, who expressly notified the existence of cameras and of the recordings, to which purpose the Users give their express consent for the recording, playing and use of their image in compliance with these Privacy Policies and current legislation.

If you have played a game and wish to remove a video recording depicting your image on our platform please send your request to [bajas@beelup.com](mailto:bajas@beelup.com) containing the video code and a copy of your ID as well.

## **12. CONTACT INFORMATION**

BEELUP is the controller and responsible for the Personal Data provided by the User or collected about them at the time our Website is visited.

If you have any questions or concerns about the way in which your Personal Data is used, including requests, objections to or right of portability to enforce your legal rights in accordance with the restrictions and specific provisions of the PDGR, please write to [privacidad@beelup.com](mailto:privacidad@beelup.com).