

# Privacy Policy

Effective as of March 23, 2026.

Please click [here](#) to view the previous version of our Privacy Policy.

**[California Notice at Collection/State Law Privacy Rights](#)**: See the State law privacy rights section below for important information about your rights under applicable state privacy laws.

PFFA Acquisition, LLC and our affiliates ("PFF," "we", "us" or "our") provides an online platform delivering detailed and timely sports data and information to users. This Privacy Policy describes how PFF processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, mobile application, and social media pages) as well as our marketing activities and other activities described in this Privacy Policy (collectively, the "Service"). PFF may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

PFF also provides a data and analytics platform (the PFF IQ Platform) to teams, agencies, media and other businesses. This Privacy Policy does not apply to information that we process on behalf of our business customers while providing our platform to them. Our use of information that we process on behalf of our business customers may be governed by our agreements with such customers. If you have concerns regarding your personal information that we process on behalf of a business customer, please direct your concerns to that customer.

***NOTICE TO EUROPEAN USERS**: Please see the [Notice to European Users](#) section for additional information for individuals located in the European Economic Area or United Kingdom (which we refer to as "Europe", and "European" should be understood accordingly) below.*

You can download a printable copy of this Privacy Policy [here](#).

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## Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, email address, billing and mailing addresses, and

phone number.

- **Demographic data**, such as your city, state, country of residence, postal code, and age.
- **Profile data**, such as the username and password that you may set to establish an online account on the Service, date of birth, redemption code, biographical details, social media login credentials, interests, preferences, information about your participation in our contests, promotions, or surveys, and any other information that you add to your account profile.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, communicate with us via chat and/or AI features, social media, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Sports engagement data**, such as your participation, preferences and choices in our fantasy, draft, or sports analysis tools, including our NFL draft boards, player or team selections, predictions and related activity you generate through the Service.
- **User-generated content data**, such as photos, images, comments, questions, messages, works of authorship, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- **Transactional data**, such as information relating to or needed to complete your orders on or through the Service, including order numbers and transaction history.
- **Payment data** needed to complete transactions, including payment card information or bank account number.
- **Promotion data**, including information you share when you enter a competition, promotion or complete a survey. Please note that if you participate in a sweepstakes, contest or giveaway through the Service, we may ask you for your Contact Data to notify you if you win or not, to verify your identity, determine your eligibility, or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules and other relevant information for each sweepstakes and contest that you enter.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third-party sources.** We may combine personal information we receive from you with personal information falling within one of the categories identified above that we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services and data licensors.
- **Customers**, such as users who provide us with contact data of their friends and contacts to invite them to use the Service.
- **Service providers** that provide services on our behalf or help us operate the Service or our

business.

- **Business transaction partners.** We may receive personal information in connection with an actual or prospective business transaction. For example, we may receive your personal information from an entity we acquire or are acquired by, a successor, or assignee or any party involved in a business transaction such as a merger, acquisition, sale of assets, or similar transaction, or in the context of an insolvency, bankruptcy, or receivership.
- **Third-party services,** such as social media services, that you use to log into, or otherwise link to, your Service account. This data may include your username, profile picture and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data,** such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data,** such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **General Location data** based on IP address.
- **Communication interaction data** such as your interactions with our email, text or other communications (e.g., whether you open or forward emails). We may do this through the use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

For more information concerning our automatic collection of data, please see the [Tracking technologies](#) section below.

## Tracking & Other Technologies

**Cookies and similar technologies.** Some of the automatic collection described above is facilitated by cookies and similar technologies – for example, we may store a record of your preferences in respect of the use of these technologies in connection with the Service. For more information, see our Cookie Policy.

**Chat and other artificial intelligence (“AI”) technologies,** such as those provided by OpenAI that employ cookies and software code to operate the chat or user input/prompt features that you can use to communicate with us or input your prompts and other data through the Service. OpenAI and other third parties may access and use information about webpages visited on our website, your IP address, your general geographic information (e.g., city, state), and other personal information you share through online chats or within inputs to facilitate the provision of the Service.

For information concerning your choices with respect to the use of tracking technologies, see the [Your](#)

[choices](#) section, below.

## How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery and operations.** We may use your personal information to:

- provide the Service and operate our business;
- enable security features of the Service;
- establish and maintain your user profile on the Service;
- facilitate your invitations to friends who you want to invite to join the Service;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- communicate with you about events or contests in which you participate; and
- provide support for the Service, and respond to your requests, questions and feedback.

**Service personalization,** which may include using your personal information to:

- understand your needs and interests;
- personalize your experience with the Service and our Service-related communications; and
- remember your selections and preferences as you navigate webpages.

**Service improvement and analytics.** We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

**Marketing and advertising.** We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
- **Interest-based advertising.** We, our service providers, and third-party advertising partners may use cookies and other technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that we or they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Your choices](#) section of our Cookie Notice.

**Events, promotions and contests.** We may use your personal information to:

- administer promotions and contests;

- communicate with you about promotions or contests in which you participate; and
- contact or market to you after collecting your personal information at an event.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**To create aggregated, de-identified or anonymized data.** We may create aggregated, de-identified or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified or anonymized data by removing information that makes the data identifiable to you and we will not attempt to reidentify any such data. We may use this aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business

**Further uses,** in some cases, we may use your personal information for further uses, in which case we will ask for your consent to use your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

## Retention

We generally retain personal information for as long as reasonably necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, for fraud prevention purposes, or otherwise for the 'Compliance and protection' purposes outlined above.

To determine the appropriate retention period for personal information, we consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we will either delete it, anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

## How we share your personal information

We may share your personal information with the following parties (or as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection).

**Affiliates.** Our corporate parent, subsidiaries, and affiliates.

**Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, AI providers, such as online chat functionality providers and other providers of generative AI technologies, email delivery, marketing, consumer research and website analytics).

**Payment processors.** Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Paypal. Paypal may use your payment data in accordance with its [privacy policy](#). Apple may use your payment data in accordance with its [privacy policy for Apple Pay](#). Google may use your payment data in accordance with its [privacy policy for Google Pay](#).

**Advertising partners.** Third-party advertising companies for the [interest-based advertising purposes](#) described above.

**Third parties designated by you.** We may share your personal information with third parties where you have instructed us or provided your consent to do so.

**Business and marketing partners.** Third parties with whom we partner, including parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

**Linked third-party services.** If you log into the Service with, or otherwise link your Service account to, a social media or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the [Compliance and protection purposes](#) described above.

**Business transferees.** We may disclose personal information in the context of actual or prospective business transactions (*e.g.*, investments in us, financing of us, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of us as part of any merger, acquisition, sale of assets, or similar transaction, or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

We make commercially reasonable efforts to verify that the parties with whom our mobile application shares personal information provide a level of protection of personal information consistent with the practices described in this Privacy Policy, except that all such parties described above other than service providers and affiliates may, to the extent permitted by law, use personal information as described in their own privacy policies.

## Your choices

In this section, we describe the rights and choices available to all users. Users who are located in states

with consumer privacy laws that apply to us and in Europe can find additional information about their rights below.

**Access or update your information.** If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account. You may review, correct and/or update certain elements of your personal data by adjusting your preferences in the “Profile” section of our site, but note that we may retain certain information as required by law or for legitimate business purposes.

**Opt-out of communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

**Cookies and other technologies.** For more information about cookies and similar technologies employed by the Service and how to manage your preferences, see our Cookie Policy.

**Blocking images/clear gifs.** Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

**Advertising choices.** In addition to the choices described in our Cookie Policy, you may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- **Browser settings.** Changing your internet web browser settings to block third-party cookies.
- **Privacy browsers/plugin-ins.** Using privacy browsers or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Certain platforms offer opt-out features that let you opt-out of use of your information for interest-based advertising. For example, you may be able to exercise that option for Google and Facebook, respectively, at the following websites:
  - Google: <https://adssettings.google.com/>
  - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
  - Network Advertising Initiative: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)
  - Digital Advertising Alliance: [optout.aboutads.info](http://optout.aboutads.info).
  - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

**Do Not Track.** Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

**Linked third-party platforms.** If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

**Delete your content or close your account.** You can choose to delete certain content through your account or to delete your account. If you wish to request to close your account, please [contact us](#).

## Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

## Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

*Users in Europe should also read the information provided about transfers of personal information to recipients outside Europe contained in the 'Notice to European Users' below.*

## Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

## Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service

after the effective date of any modified Privacy Policy indicates your acknowledgmentacknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

## How to contact us

- [Contact Support](#)
- **Email:** consumer-feedback@pff.com
- **Mail:** 1216 Central Pkwy, Cincinnati, OH 45202

## State privacy rights notice

Except as otherwise provided, this section applies to residents of California and other U.S. states to the extent they have privacy laws applicable to us that grant their residents the rights described below (collectively the “**State Privacy Laws**”).

This section describes how we collect, use, and share for the purposes of targeted advertising Personal Information of residents of these states and the rights these users may have with respect to their Personal Information. Please note that not all rights listed below may be afforded to all users and that if your state does not afford you these rights, you may not be able to exercise these rights. In addition, we may not be able to process your access, correction or deletion request if you do not provide us with sufficient detail to allow us to confirm your identity and understand and respond to your request.

For purposes of this section, the term “**Personal Information**” means information that relates to an identified or identifiable natural person, or that is reasonably capable of being used to identify, contact, or precisely locate a natural person, household, or a particular computing system or device. In some cases, we may provide a different privacy notice to certain categories of residents of certain states, such as job applicants, in which case that notice will apply instead of this section.

We do not re-identify personal information that is de-identified.

**Your privacy rights.** You may request to exercise the rights listed below. We will respond to your request in accordance with applicable law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - The categories of Personal Information that we have collected.
  - The categories of sources from which we collected Personal Information.
  - The business or commercial purpose for collecting, selling, and/or sharing Personal Information for targeted advertising purposes.
  - The categories of personal information that we sold or shared for targeted advertising purposes, and the categories of third parties to whom this information was sold or shared, categorized by the type of personal information for each type of third party.
  - The categories of personal information that we disclosed for business purposes and the types of entities to whom this information was disclosed.
  - The specific third parties to which we have disclosed personal information.
- **Access.** You can request a copy or representative summary of the Personal Information that we have collected about you.
- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from or about you.
- **Opt-out of certain processing** You can opt out of the sharing of your Personal Information for targeted advertising purposes and any other processing deemed a sale under applicable law.
- **Opt-out of profiling/automated decision making.** We do not use your Personal Information to engage in automated processing or profiling Personal Information to evaluate, analyze, or predict

personal aspects related to your economic situation, health, personal preferences, interests, reliability, behavior, location, or movements to make a decision that produces legal or similarly significant effects.

- **Consumers under 16.** We do not have actual knowledge that we collect, sell or share the personal information of consumers under 16 years of age. If you are under the age of 18, please do not attempt to register for the Service or provide personal information through the Service. If we learn that we have collected personal information from a child under the age to consent to data sharing, we will delete that information. If you believe that a child under the age to consent to data sharing may have provided us personal information, please contact us.
- **Limit processing of Sensitive Personal Information.** We may collect certain categories of Sensitive Personal Information as described in this Privacy Policy. You can ask us to limit the processing of any Sensitive Personal Information we collect except for (1) information we collect or process without the purpose of inferring characteristics about you, and (2) as necessary for certain business purposes, including:
  - Certain auditing purposes, such as counting ad impressions or auditing compliance with legal requirements.
  - Ensuring the security and integrity of personal information.
  - Debugging purposes.
  - Short-term, transient use, including non-personalized advertising limited to the experience within our Services.
  - Performing services on behalf of the business, such as providing customer service or storage.
  - Providing advertising and marketing services, excluding cross-context behavioral advertising.
  - Internal research and development.
  - Verifying or maintaining the quality or safety of the service.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by applicable law.
- **Appeal.** You can appeal our denial of any request validly submitted.

**Exercising your right to information/know, access, correction, deletion, and appeal [and limit processing of Sensitive Personal Information].** You may submit requests at [Contact Support](#) or via email to [consumer-feedback@pff.com](mailto:consumer-feedback@pff.com).

**Exercising your right to opt-out of the “sale” or “sharing” of your Personal Information.** While we do not sell personal information for money, like many companies, we use services that help deliver personalized content to you as described above. The State Privacy Laws may classify our use of some of these services as “selling” or “sharing” your Personal Information with the advertising partners that provide the services. You can submit requests to opt-out of tracking for targeted advertising purposes or other sales of Personal Information here: [Contact Support](#) or via email to [consumer-feedback@pff.com](mailto:consumer-feedback@pff.com), or by broadcasting the global privacy control signal.

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

**Verification of Identity; Authorized agents.** We may need to verify your identity to process your information/know, access, correction, deletion, or appeal requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury or other specific information that we think only you would have, where permitted by law.

Under some State Privacy Laws, you may enable an authorized agent to make a request on your behalf. However, we may need to verify your authorized agent’s identity and authority to act on your behalf. Depending on the kind of request you have made, we may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your State Privacy Law rights on your behalf, the information we request to verify your identity, or confirmation that you have given the authorized agent permission to submit the request.

**Personal information that we collect, use and disclose.** We have summarized the Personal Information we collect and may disclose to third parties by reference below to both the categories of Personal Information defined in the “Personal Information we collect” section of this Policy above and the categories of Personal Information specified in state law. This table describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

Personal Information (“PI”) we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” or “share” PI
Contact data	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>Commercial information</i></li> <li>● <i>California customer records (as defined by Cal. Civ. Code § 1798.140)</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated,</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners</i></li> <li>● <i>Business &amp; marketing partners</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<p><i>de-identified or anonymized data</i></p> <ul style="list-style-type: none"> <li>• <i>With your consent</i></li> </ul>		
Demographic data	<ul style="list-style-type: none"> <li>• <i>Identifiers (online)</i></li> <li>• <i>Identifiers (other)</i></li> <li>• <i>California customer records</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Service delivery &amp; operations</i></li> <li>• <i>Service personalization</i></li> <li>• <i>Service improvement &amp; analytics</i></li> <li>• <i>Marketing &amp; advertising</i></li> <li>• <i>Events, promotions &amp; contests</i></li> <li>• <i>Data sharing in the context of corporate events</i></li> <li>• <i>To create aggregated, de-identified or anonymized data</i></li> <li>• <i>With your consent</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Affiliates</i></li> <li>• <i>Service providers</i></li> <li>• <i>Payment processors</i></li> <li>• <i>Advertising partners</i></li> <li>• <i>Third parties designated by you</i></li> <li>• <i>Business &amp; marketing partners</i></li> <li>• <i>Professional advisors</i></li> <li>• <i>Authorities and others</i></li> <li>• <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Advertising partners</i></li> <li>• <i>Business &amp; marketing partners</i></li> </ul>
Profile data	<ul style="list-style-type: none"> <li>• <i>Identifiers (online)</i></li> <li>• <i>Identifiers (other)</i></li> <li>• <i>Commercial information</i></li> <li>• <i>California customer records</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Service delivery &amp; operations</i></li> <li>• <i>Service personalization</i></li> <li>• <i>Service improvement &amp; analytics</i></li> <li>• <i>Marketing &amp;</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Affiliates</i></li> <li>• <i>Service providers</i></li> <li>• <i>Payment processors</i></li> <li>• <i>Advertising partners</i></li> <li>• <i>Third parties designated by</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Advertising partners</i></li> <li>• <i>Business &amp; marketing partners</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<p><i>advertising</i></p> <ul style="list-style-type: none"> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<p><i>you</i></p> <ul style="list-style-type: none"> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> <li>● <i>Other users &amp; the public</i></li> </ul>	
<p>Communications data</p>	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>Commercial information</i></li> <li>● <i>California consumer records</i></li> <li>● <i>Internet or Network Information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners</i></li> <li>● <i>Business &amp; marketing partners</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
Transactional data	<ul style="list-style-type: none"> <li>● <i>Commercial information</i></li> <li>● <i>California consumer records</i></li> <li>● <i>Financial information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners</i></li> <li>● <i>Business &amp; marketing partners</i></li> </ul>
Marketing data	<ul style="list-style-type: none"> <li>● <i>Identifiers</i></li> <li>● <i>Commercial information</i></li> <li>● <i>California customer records</i></li> <li>● <i>Internet or Network Information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners</i></li> <li>● <i>Business &amp; marketing partners</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<ul style="list-style-type: none"> <li><i>events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<ul style="list-style-type: none"> <li><i>others</i></li> <li>● <i>Business transferees</i></li> </ul>	
User-generated content data	<ul style="list-style-type: none"> <li>● <i>Sensory Information</i></li> <li>● <i>California consumer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> <li>● <i>Other users &amp; the public</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>None</i></li> </ul>
Government-issued identification data	<ul style="list-style-type: none"> <li>● <i>Identifiers (online)</i></li> <li>● <i>California customer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>None</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<p><i>improvement &amp; analytics</i></p> <ul style="list-style-type: none"> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<p><i>partners</i></p> <ul style="list-style-type: none"> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	
<p>Payment data</p>	<ul style="list-style-type: none"> <li>● <i>Commercial information</i></li> <li>● <i>Financial information</i></li> <li>● <i>California consumer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>None</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<ul style="list-style-type: none"> <li>● <i>With your consent</i></li> </ul>		
Promotion data	<ul style="list-style-type: none"> <li>● <i>Identifiers (online)</i></li> <li>● <i>Identifiers (other)</i></li> <li>● <i>Commercial information</i></li> <li>● <i>California customer records</i></li> <li>● <i>Internet or Network Information</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners</i></li> <li>● <i>Business &amp; marketing partners</i></li> </ul>
Data about others	<ul style="list-style-type: none"> <li>● <i>Identifiers (online)</i></li> <li>● <i>Identifiers (other)</i></li> <li>● <i>California consumer records</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp;</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Advertising partners</i></li> <li>● <i>Business &amp; marketing partners</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<ul style="list-style-type: none"> <li>contests</li> <li>• Data sharing in the context of corporate events</li> <li>• To create aggregated, de-identified or anonymized data</li> <li>• With your consent</li> </ul>	<ul style="list-style-type: none"> <li>partners</li> <li>• Professional advisors</li> <li>• Authorities and others</li> <li>• Business transferees</li> </ul>	
Device data	<ul style="list-style-type: none"> <li>• Identifiers (other)</li> <li>• Internet or Network Information</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery &amp; operations</li> <li>• Service personalization</li> <li>• Service improvement &amp; analytics</li> <li>• Marketing &amp; advertising</li> <li>• Events, promotions &amp; contests</li> <li>• Data sharing in the context of corporate events</li> <li>• To create aggregated, de-identified or anonymized data</li> <li>• With your consent</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service providers</li> <li>• Payment processors</li> <li>• Advertising partners</li> <li>• Third parties designated by you</li> <li>• Business &amp; marketing partners</li> <li>• Professional advisors</li> <li>• Authorities and others</li> <li>• Business transferees</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners</li> <li>• Business &amp; marketing partners</li> </ul>
Online activity data	<ul style="list-style-type: none"> <li>• Identifiers (other)</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery &amp;</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Service</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners</li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
	<ul style="list-style-type: none"> <li>● <i>Commercial information</i></li> <li>● <i>Internet or Network Information</i></li> </ul>	<p><i>operations</i></p> <ul style="list-style-type: none"> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<p><i>providers</i></p> <ul style="list-style-type: none"> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Business &amp; marketing partners</i></li> </ul>
Precise geolocation data	<ul style="list-style-type: none"> <li>● <i>Geolocation data</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Service delivery &amp; operations</i></li> <li>● <i>Service personalization</i></li> <li>● <i>Service improvement &amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Affiliates</i></li> <li>● <i>Service providers</i></li> <li>● <i>Payment processors</i></li> <li>● <i>Advertising partners</i></li> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>None</i></li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<ul style="list-style-type: none"> <li>● To create aggregated, de-identified or anonymized data</li> <li>● With your consent</li> </ul>	<p><i>transferees</i></p>	
Communication interaction data	<ul style="list-style-type: none"> <li>● Identifiers (other)</li> <li>● Internet or Network Information</li> </ul>	<ul style="list-style-type: none"> <li>● Service delivery &amp; operations</li> <li>● Service personalization</li> <li>● Service improvement &amp; analytics</li> <li>● Marketing &amp; advertising</li> <li>● Events, promotions &amp; contests</li> <li>● Data sharing in the context of corporate events</li> <li>● To create aggregated, de-identified or anonymized data</li> <li>● With your consent</li> </ul>	<ul style="list-style-type: none"> <li>● Affiliates</li> <li>● Service providers</li> <li>● Payment processors</li> <li>● Advertising partners</li> <li>● Third parties designated by you</li> <li>● Business &amp; marketing partners</li> <li>● Professional advisors</li> <li>● Authorities and others</li> <li>● Business transferees</li> </ul>	<ul style="list-style-type: none"> <li>● Advertising partners</li> <li>● Business &amp; marketing partners</li> </ul>
Data derived from the above	<ul style="list-style-type: none"> <li>● Inferences</li> </ul>	<ul style="list-style-type: none"> <li>● Service delivery &amp; operations</li> <li>● Service personalization</li> <li>● Service improvement</li> </ul>	<ul style="list-style-type: none"> <li>● Affiliates</li> <li>● Service providers</li> <li>● Payment processors</li> <li>● Advertising partners</li> </ul>	<ul style="list-style-type: none"> <li>● Advertising partners</li> <li>● Business &amp; marketing partners</li> </ul>

Personal Information ("PI") we collect	CCPA statutory category	Business/commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
		<ul style="list-style-type: none"> <li><i>&amp; analytics</i></li> <li>● <i>Marketing &amp; advertising</i></li> <li>● <i>Events, promotions &amp; contests</i></li> <li>● <i>Data sharing in the context of corporate events</i></li> <li>● <i>To create aggregated, de-identified or anonymized data</i></li> <li>● <i>With your consent</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>Third parties designated by you</i></li> <li>● <i>Business &amp; marketing partners</i></li> <li>● <i>Professional advisors</i></li> <li>● <i>Authorities and others</i></li> <li>● <i>Business transferees</i></li> </ul>	
<p>Other Sensitive Personal Information</p> <p><i>Aside from precise geolocation data, payment data, and government-issued identification data referenced above, we do not intentionally collect this information, but it may be revealed in identity data or other information we collect</i></p>	<ul style="list-style-type: none"> <li>● <i>Protected Classification Characteristics</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>N/A</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>N/A</i></li> </ul>	<ul style="list-style-type: none"> <li>● <i>None</i></li> </ul>

**Additional information for California residents.**

- **Shine the light law.** Under California’s Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to

which the company has disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for the third party's own direct marketing purposes, and the categories of personal information disclosed. Alternatively, you have the right to opt out of our disclosure of your personal information to third parties for their direct marketing purposes. You may send us requests under this law to [consumer-feedback@pff.com](mailto:consumer-feedback@pff.com). In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

**Additional information for Texas residents.** NOTICE: We may sell your sensitive personal data, as defined by the Texas Data Privacy and Security Act, by using services that help deliver interest-based ads to you as described above.

**Additional information for Nevada residents.** Nevada residents have the right to opt-out of the sale, as defined, of certain personal information for monetary consideration. While we do not currently engage in such sales, if you are a Nevada resident and would like to make a request to opt out of any potential future sales, please email [consumer-feedback@pff.com](mailto:consumer-feedback@pff.com).

**Contact Us.** If you have questions or concerns about our privacy policies or information practices, please contact us using the contact details set forth in the [How to contact us](#) section, above.

## Notice to European users

### General

**Where this Notice to European users applies.** The information provided in this ‘Notice to European users’ section applies only to individuals located in the European Economic Area (EEA) or United Kingdom (UK) (i.e., “**Europe**” as defined at the top of this Privacy Policy).

**Personal information.** References to “personal information” in this Privacy Policy should be understood to include a reference to “personal data” as defined in the “**GDPR**” (i.e., the General Data Protection Regulation 2016/679 (“**EU GDPR**”)) and the EU GDPR as it forms part of the laws of the United Kingdom (“**UK GDPR**”). Under the GDPR, “personal data” means information about individuals from which they are either directly identified or can be identified. The personal information that we collect from and about you is described in greater detail in the section “Personal information we collect” that is set out above.

**Controller.** PFF is the “controller” in respect of the processing of your personal information covered by this Privacy Policy for purposes of the GDPR. See the ‘How to contact us’ section above for our contact details.

### Our legal bases for processing

In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to process your personal information in order to deliver the Service to you, or where you have asked us to take specific action which requires us to process your personal information (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant purposes for which we use your personal information – for more information on these Purposes and the data types involved, see the ‘How we use your personal information’ section above and the description of associated data sharing relevant to such purposes set out in the ‘How we share your personal information’ section also above.

Purpose	Categories of personal information involved	Legal basis
<b>Service delivery and operations</b>	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Demographic data</li> <li>● Profile data</li> <li>● Communications data</li> <li>● Sports engagement data</li> <li>● Transactional data</li> <li>● Payment data</li> <li>● Promotion data</li> <li>● Data from Third-Party Sources.</li> <li>● Device data</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Contractual Necessity.</b></li> <li>● <b>Legitimate Interests.</b> We have a legitimate interest in ensuring the ongoing security and proper operation of our Service (including, where relevant, responding to any contact via any “contact us” feature or similar), our business and associated IT services, systems and networks.</li> </ul>
<b>Service personalization</b>	<ul style="list-style-type: none"> <li>● Demographic data</li> <li>● Profile data</li> <li>● Sports engagement data</li> <li>● Data from Third-Party Sources.</li> <li>● Device data</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Legitimate Interests.</b> We have a legitimate interest in providing you with a good service via the Service, which is personalized to you and that remembers your selections and preferences.</li> <li>● <b>Consent,</b> in respect of any optional processing relevant to personalization (including processing directly associated with any optional cookies used for this purpose).</li> </ul>
<b>Service improvement and analytics</b>	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Demographic data</li> <li>● Profile data</li> <li>● Communications data</li> <li>● Data from Third Party Sources</li> <li>● Device data</li> <li>● Online activity data</li> <li>● Communication interaction data</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Legitimate Interests.</b> We have a legitimate interest in providing you with a good service and analysing how you use it so that we can improve it over time, as well as developing and growing our business.</li> <li>● <b>Consent,</b> in respect of any optional cookies used for this purpose.</li> </ul>
<b>Direct marketing</b>	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Demographic data</li> <li>● Profile data</li> <li>● Marketing data</li> <li>● Data from Third Party Sources</li> <li>● Communication interaction data</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Legitimate Interests.</b> We have a legitimate interest in promoting our operations and goals as an organization and sending marketing communications for that purpose.</li> <li>● <b>Consent,</b> in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.</li> </ul>

Purpose	Categories of personal information involved	Legal basis
<b>Interest-based advertising</b>	<ul style="list-style-type: none"> <li>● Data from Third-Party Sources</li> <li>● Device data</li> <li>● Online activity data</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Consent</b></li> </ul>
<b>Events, promotions and contests</b>	<ul style="list-style-type: none"> <li>● Contact data</li> <li>● Demographic data</li> <li>● Marketing data</li> <li>● Promotion data</li> <li>● Communication interaction data</li> </ul>	<ul style="list-style-type: none"> <li>● <b><u>Contractual Necessity</u></b>, to administer events in accordance with the terms or rules thereof (including communicating with you as and where necessary).</li> <li>● In respect of promoting these events: <ul style="list-style-type: none"> <li>○ <b><u>Legitimate Interests</u></b> – we have a legitimate interest in promoting these events, including the associated publicising of our business and operations.</li> <li>○ <b><u>Consent</u></b> – in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given promotional communications.</li> </ul> </li> </ul>
<b>Compliance and protection</b>	<ul style="list-style-type: none"> <li>● Any and all data types relevant in the circumstances</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Compliance with Law.</b></li> <li>● <b>Legitimate Interests.</b> Where Compliance with Law is not applicable, we have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We may also have a legitimate interest in ensuring the protection, maintenance, and enforcement of our rights, property, and/or safety.</li> </ul>
<b>Data sharing in the context of corporate events</b>	<ul style="list-style-type: none"> <li>● Any and all data types relevant in the circumstances</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Legitimate Interests.</b> We have a legitimate interest in providing information to ‘Business transferees’ and parties who are involved in an actual or prospective corporate event (including to enable them to investigate – and, where relevant, to continue to operate – all or relevant part(s) of our operations).</li> </ul>

Purpose	Categories of personal information involved	Legal basis
<b>To create aggregated, de-identified or anonymized data</b>	<ul style="list-style-type: none"> <li>Any and all data types relevant in the circumstances</li> </ul>	<ul style="list-style-type: none"> <li><b>Legitimate Interests.</b> We have a legitimate interest in taking steps to preserve the privacy of our users, and in creating aggregated, de-identified or anonymized data to train our AI models.</li> </ul>
<b>Further uses</b>	<ul style="list-style-type: none"> <li>Any and all data types relevant in the circumstances</li> </ul>	<ul style="list-style-type: none"> <li>The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the personal information was collected.</li> <li><b>Consent</b>, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.</li> </ul>

Other information

**No obligation to provide personal information.** You do not have to provide personal information to us. However, where we need to process your personal information either to comply with applicable law or to deliver our Service to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Service to you. We will notify you if this is the case at the time.

**No sensitive information.** We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership, or biometric or genetics characteristic other than as requested by us as part of the Service) on or through the Service, or otherwise to us. If you provide us with any such sensitive personal information when you use the Service, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Service.

**No automated decision-making and profiling.** As part of the Service, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects.

Your additional rights

**General.** European data protection laws may give you certain rights regarding your personal information in certain circumstances. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Transfer.** Transfer to you or a third party of your choice a machine-readable copy of your personal information which you have provided to us.
- **Restrict.** Restrict the processing of your personal information, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal information where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time.

**Exercising These Rights.** You may submit these requests by contacting us. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions. Typically, you will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within a month of receipt. It may take us longer than a month if your request is particularly complex or if you have made a number of requests; in this case, we will notify you and keep you updated.

**Your Right to Lodge a Complaint with your Supervisory Authority.** Although we urge you to contact us first to find a solution for any concern you may have, in addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- *For users in the European Economic Area* – the contact information for the data protection regulator in your place of residence can be found here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)
- *For users in the UK* – the contact information for the UK data protection regulator can be found here: <https://ico.org.uk/make-a-complaint/>

#### Data Processing outside Europe

PFF is a U.S.-based company – many of our service providers, advisers, partners or other recipients of data are also based in the U.S. This means that, if you use the Service, your personal information will necessarily be accessed and processed in the U.S. It may also be provided to recipients in other countries outside Europe.

Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to it by making sure one of the following mechanisms is implemented:

- **Transfers to territories with an adequacy decision.** We may transfer your personal information to countries or territories whose laws have been deemed to provide an adequate level of protection for personal information by the European Commission or UK Government (as and where applicable) (from time to time) or under specific adequacy frameworks approved by the European Commission or UK Government (as and where applicable) (from time to time), such as the EU-U.S. Data Privacy Framework or the UK Extension thereto.
- **Transfers to territories without an adequacy decision.**

- We may transfer your personal information to countries or territories whose laws have **not** been deemed to provide such an adequate level of protection (e.g., the U.S.).
- However, in these cases:
  - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in Europe – for example, standard-form contracts approved by relevant authorities for this purpose; or
  - in limited circumstances, we may rely on an exception, or ‘derogation’, which permits us to transfer your personal information to such country despite the absence of an ‘adequacy decision’ or ‘appropriate safeguards’ – for example, reliance on your explicit consent to that transfer.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.