

PRIVACY POLICY FOR THE GAZPROM-FOOTBALL.COM WEBSITE

Data protection and data security are a high priority for our company, as we take the protection of your personal data very seriously. Accordingly, we have carried out technical and organisational measures to ensure that the requirements of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act are fulfilled.

Compliance with the data protection requirements relating to the use of our website gazprom-football.com (hereinafter referred to as "Website") is a central concern to us. When you visit and use our website, personal data shall be processed by us as the controller and stored for the duration necessary to fulfil the stated purposes and legal obligations. In the following, we shall inform you concerning the data, the way in which they are processed and the rights you are entitled to.

Personal data (hereinafter also "data" or "information") are pursuant to Article 4 no. 1 of the General Data Protection Regulation (GDPR) all information relating to an identified or identifiable natural person.

1. Name and contact data of the controller and the company data protection officer

This privacy policy applies to the data processing on our website (gazprom-football.com) by the controller

GAZPROM Germania GmbH
Markgrafenstrasse 23
10117 Berlin

Germany

(hereinafter GAZPROM Football)

Telephone +49 (0)30 20195-0
Fax +49 (0)30 20195-313
Email info@gazprom-football.com

You can also send us a message directly via the "[Contact](#)" page.

The data protection officer of GAZPROM Football can be contacted at the address, FAO Data protection officer or at datenschutz@wingas.de or +49 561 99858 7019.

You can contact our data protection officer directly at any time if you have any questions about data protection law or your data protection rights.

2. Processing of personal data and purposes of processinga.

a. When visiting the website

You can visit our website without disclosing information regarding your identity. In the context of any access to our website, however, it is essential that certain personal data are stored on the server of our provider in order to enable the connection to the website. This includes information such as:

- Your client IP address,
- the name and the URL of the file that has been requested,
- the website from which access has been made,
- the name and the description of the internet browser you have used,
- the date and time of each access
- the amount of data transmitted.

The information is stored in a so called log file on the server of our website and is automatically deleted there after 4 weeks.

The IP address is processed for technical and administrative purposes of connection establishment and connection stability in order to ensure the security and functionality of our website and to be able to track any illegal attacks if necessary.

The information shall also be used to evaluate the use of the website, to compile reports on website activity, and to provide other services related to website activity and internet usage for the purpose of market research and needs based website design.

The legal basis for processing the IP address and other information from the log file is Article 6 para.1 S.1 lit. f of the GDPR. Our legitimate interest arises from the security interest mentioned and the need for a trouble free and user friendly provision of our website. From the processing of the IP address and other information in the log file, we can not draw any direct conclusions about your identity.

Only authorised personnel who are responsible for the management of the servers are authorised to access the data. As no personal assignment takes place, the data records for the statistical evaluation are kept in anonymous form by deleting the last digit sequence of the IP address.

Specific personal data, such as email addresses, first name, name, telephone number or address, are requested for separate services and activities. A request for personal data will be applicable especially when you register to access our website, when you request to use a special service and when you take part in a prize competition. This information is collected entirely on a voluntary basis. This information shall also be treated confidentially and shall not be passed on to any third parties.

Online offers provided by our cooperating partners that are integrated into our website and which are referenced as such are excluded from the provisions stipulated in the preceding paragraph. These online offers are governed by separate technical and legal conditions. Please refer to the relevant information provided by our cooperating partners.

On the instructions of competent government authorities, we or our cooperating partners could be obligated in individual cases to hand over personal data if this is required to prevent danger, to provide protection against threats, for public prosecution purposes or for any other reasons regulated by law.

Otherwise, no collection, processing or use of your personal data shall take place, unless the following information indicates otherwise (see, for example, web analysis, remarketing or social networks).

b. Registration of a personal account

Certain functions and offers on our website are only accessible to registered users. The following personal data shall be requested as a result:

- Username and password
- First name and surname
- Postal address,
- Email address,
- Telephone number.

The specification of a telephone number is voluntary. If you do not specify this, you will not incur any disadvantages. However, providing a telephone number makes it easier for us to contact you if you have any questions.

These data is collected to identify you as a user and to give you access to your own user account. The username and a password of your choice are also valid as access data to your user account by means of which you can also log in later. By means of your user account you can use the exclusive functions and offers of the website after successful registration.

We also process your information for the following purposes:

- to know who our contractual partner is,
- for justification, to define content related design, to manage and to amend the contractual relationship with you regarding the use of our website and the services provided therein,
- to verify the data that is provided to ensure that the user is plausible,
- for possibly necessary contact with you for inquiries.

After your registration, you will receive a registration message via email, which you must confirm to verify your email address. This serves as proof that the registration was actually initiated by you.

The processing of the data provided during the registration takes place at your request and is pursuant to Article 6 para. 1 S. 1 lit. b of the GDPR for the aforementioned purposes for the use of exclusive functions and offers and thus for the performance of the contract to which you are party or in order to take steps at your request prior to entering into a contract.

Furthermore, we process your information for the purpose of direct marketing, insofar as this is admissible due to our legitimate interests in an application of our offers pursuant to Article 6 para. 1 S. 1 lit. f of the GDPR or insofar as you expressly consent to use your data for the purpose of sending information pursuant to Article 6 para. 1 S. 1 lit. a of the GDPR. You may withdraw such consent at any time with effect for the future.

The storage of the data shall take place for the duration of the user relationship with you, insofar as you have not agreed to any further use.

c. Competitions

When you participate in one of our competitions on the website, we use your personal details (name, postal address, email address) from a previous registration to ascertain that you have taken

part in the competition, to inform you in the event that you have won and to send you your prize (e.g. tickets) if you should win.

The processing of data in the context of a competition takes place at your request and is pursuant to Article 6 para. 1 S. 1 lit. b of the GDPR for the purposes mentioned above for your participation in and the carrying out of competitions.

In the event that you receive a prize when participating in a competition, we will use your name and address to announce you as the winner of the competition on our corporate communications channels. Currently this concerns the following communication channels:

www.gazprom-football.com,
www.facebook.com/gazpromfootball,
www.twitter.com/gazpromfootball,
www.instagram.com/gazpromfootball.

The processing of data for publication is based on our legitimate interests in accordance with Article 6 para. 1 S. 1 lit. f of the GDPR to use competitions for marketing purposes as well as your corresponding obligation under the conditions of participation (Article 6 para. 1 S.1 lit. b of the GDPR).

The storage of the data shall take place for the duration of the user relationship with you, insofar as you have not agreed to any further use.

We conduct our competitions by means of the services of Lagardère Plus GmbH, Lindleystrasse 12, 60314 Frankfurt a.M, Germany, and Goldene Generation GmbH, Hafenpromenade 1-2, 44263 Dortmund, Germany. The participant data are therefore processed on our behalf by Lagardère Plus GmbH and Goldene Generation GmbH.

Lagardère Plus GmbH and Goldene Generation GmbH use this information for the processing of competitions on our behalf. We have concluded a job processing contract with Lagardère Plus GmbH and Goldene Generation GmbH for this purpose. By means of this contract, Lagardère Plus GmbH and Goldene Generation GmbH assure that they process the data in accordance with the General Data Protection Regulation and ensure the protection of the rights of the data subject.

Lagardère Plus GmbH and Goldene Generation GmbH assure that personal data shall be fully protected against unauthorised access. Lagardère Plus GmbH itself does not use the data of our newsletter recipients to write to them nor does it pass the data on to third parties.

d. Newsletter

Insofar as you have expressly consented pursuant to Article 6 para. 1 S.1 lit. a, we shall use your email address and name to send you our newsletter periodically, which will notify you of available tickets for your favourite club and concerning GAZPROM Football information and offers, and thereby to address you personally.

It is possible to unsubscribe from this newsletter at any time. Please use the relevant unsubscribe link that is found in each newsletter.

If you have unsubscribed, your data shall be deleted immediately from our newsletter mailing list. However, we shall continue to store your information as part of your user account.

We send our newsletter by means of the services of Goldene Generation GmbH, Hafenpromenade 1-2, 44263 Dortmund, Germany. The email addresses and names of our newsletter recipients are therefore processed on our behalf by Goldene Generation GmbH.

Goldene Generation GmbH uses this information to send and evaluate the newsletters on our behalf. We have concluded a job processing contract with Goldene Generation GmbH for this purpose. By means of this contract, Goldene Generation GmbH assure that they process the data in accordance with the General Data Protection Regulation and ensure the protection of the rights of the data subject.

Goldene Generation GmbH assures that personal data are fully protected against unauthorised access. Goldene Generation GmbH itself does not use the data of our newsletter recipients to write to them nor does it pass on the data to third parties.

3. Disclosure of data

Except in the aforementioned cases of processing on behalf of us (newsletter sending and competitions), we shall pass your personal data to third parties only in the following cases:

a. Web hosting

For the provision of this website we use the services of Online Now! GmbH - Agency for digital communication, Kastanienallee 26, 14052 Berlin, Germany (hereinafter: "Online Now!"). Online Now! ensures on our behalf the storage of this website on servers (hosting). For the offer of a website the commissioning of a webhosting service is necessary and takes place according to Article 6 para. 1 S 1 lit. f of the GDPR for the purposes of the legitimate economic interests to make our offer available on this website.

In connection with the hosting, Online Now! processes on our behalf personal data resulting from the following actions of the user:

- When visiting the site in connection with the cookies placed, log files and web analytics services
- When registering as a user

We have concluded a job processing contract for the use of hosting services with Online Now!. By means of this contract, Online Now! assure that they process the data in accordance with the General Data Protection Regulation and ensure the protection of the rights of the data subject.

Further information concerning data protection at Online Now! can be found in their privacy policy www.online-now.de.

b. Other transfer

Otherwise, we shall only pass on your personal data to third parties if:

you have given your express consent pursuant to Article 6 Para. 1 S. 1 lit a of the GDPR. which pursuant to Article 6 para. 1 S. 1 lit. b of the GDPR is required for the performance of a contract with

you, the transfer pursuant to Article 6 para. 1 S. 1 lit. c of the GDPR is necessary for compliance with a legal obligation in the other cases of the following paragraphs, insofar as described there.

The data transferred may only be used by the third party for pre-determined purposes.

A transfer of personal data to a third country (outside the EU) or an international organisation is excluded.

4. Cookies

We use cookies on our website. These are small files which your browser creates automatically and saves on your device (laptop, tablet, smartphone or similar) when you visit our website. Cookies do not damage your device in any way, nor do they contain any viruses, trojans or other damaging software.

Information is stored in the cookie which is associated with the specific device used. However, this does not mean that we receive direct information about your identity.

On the one hand, using cookies means that use of our website will be more pleasant for you. Accordingly, we use “session cookies” to identify that you have already visited individual pages on our website.

In addition, we use temporary cookies to help optimise user friendliness, which are saved on your device for a certain set period. If you visit our website again to make use of our services, the system will automatically recognise that you have already visited us, and which input and settings you activated, so that you do not have to enter these again.

We also use cookies to record the use of our website statistically, and to be able to evaluate this to help optimise our services for you. These cookies allow us to identify that you have already visited us when you visit our website again. These cookies are deleted automatically after a defined period in each case.

The data processed by cookies are for the purposes mentioned for the protection of our legitimate interests in an optimised web offer according to Article 6 para. 1 S. 1 lit. f of the GDPR.

Most browsers accept cookies automatically. However, you can configure your browser so that no cookies are saved on your computer, or that a warning always appears before a new cookie is placed. Full deactivation of cookies, however, can mean that you may not be able to use all the functions of our website.

5. Web analysis

The following tracking tools we use are utilised in accordance with Article 6 para. 1 S. 1 lit. f of the GDPR. By the use of the tracking measures described below, we aim to ensure appropriate design and ongoing optimisation of our website. We also use the tracking measures to record the use of our website statistically, and so that we can evaluate this to help optimise our services for you. These interests are legitimate within the meaning of the directive above.

The respective data processing purposes and data categories as well as objection possibilities can be found in the following description of the services used.

a. AWstats

We use the analysis tool AWstats for the needs oriented design and continuous optimisation of our website. This is a free web analysis software that uses the logfiles (see 2.a) which our servers create based on visits to our website for statistical analysis. No cookies are used for this.

The analyses in question are not integrated with other data sources when AWStats are used. The IP addresses are deleted after the analyses in question have been completed. Unlike other statistical programs, AWStats does not transmit data to a third party server. The program is installed on their own hosting package.

b. eTracker

On our website we use the services of [eTracker GmbH](#) from Hamburg for the analysis of usage data. Cookies are placed that allow a statistical analysis of the use of this website by its visitors and the display of usage related content or advertising. eTracker cookies do not contain any information that makes it possible to identify a user.

The data created by eTracker are processed and stored by eTracker exclusively in Germany on behalf of the provider of this website and are thus subject to the strict German and European data protection laws and standards. In this regard, eTracker was independently audited, certified and awarded the [ePrivacyseal](#).

As the privacy of our visitors is especially important to us, the IP address of eTracker is anonymised as early as possible and log in or device identifiers are converted into a unique key which is not assigned to a person. Any other use, merging with other data or a transfer to third parties is not carried out by eTracker.

You may object to the above mentioned data processing at any time, provided it is person related. Your objection has no adverse consequences for you. In order to object to the collection and storage of your visitor data, you can request an [opt-out cookie from eTracker](#), which will ensure that visitor data from your browser is not collected and stored by eTracker in the future. The opt-out cookie only applies in this browser and is stored on your device. If you delete the cookies in this browser, you have to reset the opt-out cookie. The same applies when using another device.

Further information concerning data protection at eTracker can be found in their [privacy policy](#).

c. Web Fonts

This website uses web fonts provided by the software company Monotype GmbH. For the purposes of the royalty statement and licence management, the frequency of page views is collected by the software company. A tracking URL is generated via the external server of the manufacturer. Please observe the [privacy guidelines](#) of Monotype GmbH their privacy policy. If you would prefer not to use web fonts, you can adjust the appropriate settings in your browser, for example, by disabling the option "Allow pages to choose their own fonts", or similar. Please refer to more detailed information relating to this in the respective help pages of your browser.

6. Conversion Tracking

The following tracking tools are used by us pursuant to Article 6 para. 1 S. 1 lit. f of the GDPR. Conversion tracking services are implemented that we use to measure and analyse the effectiveness of targeted measures on our site and third party platforms. We have a legitimate interest in taking such measures to target our customer communications. In this context, the user behaviour in connection with marketing measures is recorded and tracked without the identity of the user being disclosed.

The respective data processing purposes and data categories as well as objection possibilities can be found in the following description of the services used.

a. Twitter Conversion Tracking

This website uses the online advertising programme Twitter "Conversion Tracking" and the associated pixel tracking technology of the provider [Twitter Inc.](#) This allows us to track your user behaviour when viewing or interacting with ads on Twitter. This gives us a better overview of how successful our campaigns on Twitter are and enables us to optimise them on an ongoing basis.

The tracking pixel is loaded on your device when you respond to any ad we send via Twitter, for example when you click on a link to our page. In this context, a pixel ID is created and stored in a cookie so that we are able to analyse your user behaviour until the tracking pixel expires. The tracking pixel is not for personal identification purposes.

If you do not want us to evaluate your user behaviour in connection with Twitter ads, you can prevent this by a corresponding cookie setting in your browser. As a Twitter user, you also have the ability to personalise how your data is processed by Twitter in your privacy settings.

In connection with the use of Twitter Conversion Tracking, the data collected is also processed on Twitter Inc. servers in the USA. Twitter is certified by the EU-US Privacy Shield data protection agreement and is therefore obligated to comply with EU data protection requirements.

Further information concerning data protection at Twitter can be found in their [Help Center](#).

b. Facebook Pixel

We use Facebook tracking pixels. The social network Facebook is provided by Facebook Inc. or if you are in the EU by [Facebook Ireland Ltd.](#) With the help of Facebook Pixel we can see how you react to our ads on Facebook, for example when you click on a link in the ad that leads to our website. This gives us a better overview of how successful our campaigns on Facebook are and enables us to optimise them on an ongoing basis.

The tracking pixel is loaded on your device when you respond to any ad of ours on Facebook, for example when you click on a link to our page. In this context, a pixel ID is created and stored in a cookie so that we are able to analyse your user behaviour until the tracking pixel expires. The tracking pixel is not for personal identification purposes.

If you do not want us to evaluate your user behaviour in connection with Facebook ads, you can prevent this by a corresponding cookie setting in your browser. As a user of Facebook, you also have the option to opt-out of Facebook Pixel in your Facebook Ads settings after signing up for your account.

In connection with the use of Facebook Conversion Tracking, the data collected is also processed on Facebook Inc. servers in the USA. Facebook is certified by the EU-US Privacy Shield data protection agreement and is therefore obligated to comply with EU data protection requirements.

Further information concerning data protection at Facebook can be found in their [Help Center](#).

7. Targeting

The targeting measures listed below and used by us are based on Article 6 para. 1 S. 1 lit. f of the GDPR. By means of the targeting measures we use, we want to make sure that only your actual or supposed interest oriented advertising is displayed on your devices. These interests are legitimate within the meaning of the directive above.

The respective data processing purposes and data categories can be found in the corresponding targeting tools.

a. Google Double Click

On our website, cookies are used to collect and evaluate information for the optimisation of advertising. We use Google LLC targeting technologies for this purpose. These technologies enable us to target you with individual interest based advertising. The cookies used, for example, provide information about which of our contents you are interested in. On the basis of the information, we can also display offers on the part of third parties that are specifically oriented towards your interests, as they result from your previous user behaviour. The collection and evaluation of your user behaviour is exclusively pseudonymous and does not enable us to identify you. In particular, the information is not merged with personally identifiable information about you.

Google is subject to the EU-US Privacy Shield, which guarantees an appropriate level of privacy.

The cookie shall be automatically deleted after 30 days.

You can also set preferences for displaying interest based advertising through the [Google Ads Settings Manager](#).

For more information and data protection regulations regarding advertising and Google, please refer to the [Google Privacy Policy and Terms of Use](#).

b. Facebook Custom Audiences

In addition, we also use Facebook Website Custom Audiences from [Facebook Ireland Limited](#). This is a marketing service from Facebook. This enables us to display personalised and interest based advertising on Facebook for certain groups of pseudonymised visitors to our website who also use Facebook.

There is a Facebook custom audience pixel integrated into our website. This is a Java Script code by means of which non-personal information about your use of the website are stored These include your IP address, the browser you are using, and the source and destination pages. These data are transmitted to Facebook servers in the United States. Facebook is subject to the EU-US Privacy Shield, which guarantees an appropriate level of privacy.

There is an automatic comparison which determines whether you have saved a Facebook cookie. The Facebook cookie automatically determines whether you belong to the relevant target group for us. If you belong to the target group, we shall display relevant ads on Facebook to you. In this process, you will not be personally identified by us or Facebook.

You may object to the use of the Custom Audiences service on the [Facebook website](#). After logging into your Facebook account, you will be taken to the settings for Facebook ads.

Further information concerning data protection at Facebook can be found in the [privacy policy of Facebook](#).

8. YouTube

Based on the consent pursuant to Article 6 para. 1 S. 1 lit. a of the GDPR, we insert components (Videos) in our platform of the company YouTube, LLC 901 Cherry Ave., 94066 San Bruno, CA, USA (hereinafter: "YouTube"), a company of Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter: "Google").

For this purpose, we use the option "extended data protection mode" provided by YouTube.

If you open a page which features an embedded video, this creates a connection to the YouTube servers and shows the content via information sent to your browser on the internet page.

According to information from YouTube, in the "extended data protection mode", only your data, in particular which of our web pages you have visited and device specific information including the IP address, shall be transmitted to the YouTube server in the USA when you watch the video. By clicking on the video you consent to this transmission.

If you are simultaneously logged into YouTube, this information is assigned to your member account at YouTube. You can prevent this by logging out of your member account before you visit our website.

Google complies with the Privacy Policy of the US Privacy Shield and is registered with the U.S. Department of Commerce US Privacy Shield programme.

For further information about data protection related to YouTube, see the [Google Privacy Policy](#).

9. Recognition of the rights of data subjects

You have the right,

- pursuant to Article 7 para. 3 of the GDPR, to withdraw the consent you have given us at any time. As a consequence of this, we may no longer perform the data processing based on this consent in the future;

- pursuant to Article 15 of the GDPR, to obtain information about your personal data processed by us. In particular, you can request information about the purpose of processing, the category of the personal data, the categories of recipients, to whom your data were or will be disclosed, the planned duration of storing, the existence of a right to correction, erasure, restriction of processing or objection, existence of the right to complain, the origin of your data insofar as they were not

collected by us, as well as the existence of automated decision making including profiling and if required, meaningful information relating to the details of this.

- pursuant to Article 16 of GDPR, to obtain immediate correction of incorrect data or the completion of your personal data which we have stored;

- pursuant to Article 17 of the GDPR, you may obtain the erasure of the personal data we have stored, where processing is not required for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, for the establishment, exercise or defence of legal claims;

- pursuant to Article 18 of the GDPR, to obtain the restriction of processing, where the accuracy of the personal data is contested by you, the processing is unlawful, however you oppose the erasure of the personal data, and we no longer need the data, however you require them for the establishment, exercise or defence of legal claims, or you have objected to the processing pursuant to Article 21 of the GDPR;

- pursuant to Article 20 of the GDPR, to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, or to transmit those data to another controller; pursuant to Article 77 of the GDPR, to lodge a complaint to a supervisory authority. As a rule, you can contact the supervisory authority of your usual place of residence or work or our company headquarters.

10. Information regarding your right to object pursuant to Article 21 of the GDPR

You have the right at any time, on grounds relating to your particular situation, to object and prevent the processing of personal data concerning you pursuant to Article 6 para. 1 lit. e of the GDPR (Data processing in the public interest) and Article 6 para. 1 lit. f of the GDPR (Data processing on the basis of a balance of interest); this also applies to profiling based on the provision of Article 4 para. 4 of the GDPR.

If you file an objection, we shall no longer process your data, unless we are able to provide proof of compelling and legitimate grounds for the processing that outweigh your interests, rights and freedoms, or the processing serves the purpose of exercising, enforcing or defending of legal rights.

Insofar as your objection is directed against the processing of data for direct marketing purposes, we shall stop processing immediately. In this case, the specification of a particular situation is not required. This also applies to profiling insofar as it is associated with such direct advertising.

If you would like to exercise your right to object, just send an email to privacy@gazprom-football.com.

11. Data security

All personal data transmitted by you shall be encrypted using the generally accepted and secure standard TLS (Transport Layer Security). TLS is a safe and proven standard, which is also used in online banking for example. You can detect a secure TLS connection, among other things from the “s”

at the end of the http (i.e. https: // ..) in the address bar of your browser or the padlock icon at the bottom of your browser.

In addition, we use appropriate technical and organisational security measures to protect your data against accidental or deliberate manipulation, partial or complete loss, destruction, or unauthorised access by third parties. Our security measures are continually improved in line with technical developments.

12. Links to other websites

As the provider of our website, we are responsible for collecting, storing and using personal data in connection with the use of our online offer. However, we do not have any influence over whether the website operators that are linked to us comply with the relevant data protection regulations. The respective website operators are responsible for collecting, storing and using personal data on linked websites. Please ensure that you understand how personal data on these linked websites is handled by these service providers.

13. Updating of the privacy policy

This privacy policy is currently valid and is dated May 2018.

You can [download](#), save and print the policy at any time from our website at <https://www.gazprom-football.com/en/datenschutz.htm>.