

ESL Ticketing

Welcome to our privacy policy. We take the concerns of privacy very seriously and want to make sure that your privacy is protected whenever you use our service. Below we inform you about the nature, scope and purpose of the processing of personal data within our online offering and the related websites, features and content, as well as external online presence, such as web sites. our Social Media Profile (collectively referred to as "Online Offering").

Together with our Terms and Conditions and our Cookie Policy, this Privacy Policy constitutes the content of our agreement with you.

1.1. Who collects personal data

Turtle Entertainment GmbH, represented by the Managing Directors Ralf Reichert and Dr. Andreas Walker, Schanzenstraße 23, 51063 Cologne, Germany
Register Court: District Court Cologne, HRB 36678
E-Mail: info@turtle-entertainment.com

1.2. Types of processed data:

- Inventory data (e.g. name, address).
- Contact data (e.g. e.mail, telephone number).
- Content data (e.g. text inputs, photographs, videos).
- Usage data (e.g. visited websites, interest in content, access times).
- Meta / data communication (e.g. device-information, ip-addresses).

1.3. Categories of affected persons

Visitors and users of the online offer (in the following the affected persons are referred to collectively as "users"). Attendees of events.

1.4. Purpose of the process

- Provision of the online offer, its functions and contents.
- Answering contact requests and communicating with users.
- security measures.
- audience measurement / marketing

2.1. Used terms

For the purposes of this Privacy Policy, "personal data" means any information relating to an identified or identifiable natural person (hereinafter the "data subject"). These include in particular your name, your email address [and possibly your address and your telephone number]. Personal information also includes information about your use of our website. In this context, we collect personal information from you as follows: information about your visits to our website, such as the extent of the data transfer, the location from which you retrieve the data from our website, as well as other connection data and sources that you retrieve. This usually happens through the use of log files and cookies. Further information on log files and cookies can be found below and in our cookie policy.

"Processing" means any process performed with or without the aid of automated procedures or any such process associated with personal data. The term goes far and includes virtually every handling of data.

"Responsible person" means the natural or legal person or public authority or institution that decides, alone or in concert with others, on the purposes and means of processing personal data.

2.2. Relevant legal bases

According to Art. 13 DSGVO we inform you about the legal basis of our data processing. If this is not mentioned, the following applies: The legal basis for obtaining consent is Art. 6 para. 1 lit. a and Art. 7 GDPR, for the processing for the fulfillment of our services and the performance of contractual measures as well as the answering of inquiries, this results from Art. 6 para. 1 lit. b DSGVO, for processing in order to fulfill our legal obligations Art. 6 para. 1 lit. c DSGVO, and for processing in order to safeguard our legitimate interests, Art. 6 (1) lit. f DSGVO. In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d DSGVO as legal basis.

3.1. Collaboration with processors and third parties

If, in the course of our processing, we disclose data to other persons and companies (contract processors or third parties), transmit them or otherwise grant access to the data, this is done exclusively on the basis of a legal permission (eg if a transmission of the data to third parties pursuant to Art. 6 para. 1 lit. b DSGVO is required to fulfill the contract), you have consented to the transmission, a legal obligation to do so or based on our legitimate interests (eg the use of agents, web hosters, etc.).

Insofar as we commission third parties to process data on the basis of a so-called "contract processing contract", this is done in accordance with Art. 28 GDPR.

3.2. Transfer to third countries

If we process data in a third country (outside the European Union (EU) or the European Economic Area (EEA)) or if this is done in the context of the use of third party services or disclosure or transmission of data to third parties, this is done only if there is fulfillment of our contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or have the data processed in a third country only in the presence of the special conditions of Art. 44 et seq. DSGVO. That the processing is e.g. on the basis of specific guarantees, such as the officially recognized level of data protection (eg for the US through the Privacy Shield) or compliance with officially recognized special contractual obligations (so-called "standard contractual clauses").

4. Your rights

You have the right to request a confirmation as to whether data concerning you are being processed and for information about this data as well as for further information and a copy of the data in accordance with Art. 15 GDPR.

In accordance with Art. 16 GDPR you have the right to demand the completion of the data concerning you or the correction of the incorrect data concerning you.

In accordance with Art. 17 GDPR, you have the right to demand that the relevant data be deleted immediately or, alternatively, to require a restriction on the processing of your data in accordance with Art. 18 GDPR.

You have the right to demand that the data relating to you that you provide us in accordance with Art. 20 GDPR be obtained and request their transmission to other responsible persons.

You also have according to Art. 77 GDPR the right to file a complaint with the competent supervisory authority.

You have the right to withdraw a granted consent according to Art. 7 para. 3 GDPR with effect for the future. For this purpose it is sufficient to send an email to the following address:

privacy@eslgaming.com

You can object to the future processing of your data in accordance with Art. 21 GDPR at any time. The objection may in particular be made against processing for direct marketing purposes. You should address your withdrawal to us as follows:

via e-mail to:

privacy+withdrawal@eslgaming.com

After you have revoked your consent, we will use your information solely to provide you with information about our service and we will refrain from submitting any further advertising to you.

5. Cookies

"Cookies" are small files that are stored on users' computers. Different information can be stored within the cookies. A cookie is primarily used to store the information about a user (or the device on which the cookie is stored) during or after his visit to an online offer. Temporary cookies, or "session cookies" or "transient cookies", are cookies that are deleted after a user leaves an online service and closes his browser. In such a cookie, e.g. the contents of a shopping cart are stored in an online store or a login jam. The term "permanent" or "persistent" refers to cookies that remain stored even after the browser

has been closed. Thus, e.g. the login status will be saved if users visit it after several days. Likewise, in such a cookie the interests of the users can be stored, which are used for range measurement or marketing purposes. As a "third-party cookie", cookies will be offered by providers other than the person responsible for the online offer (otherwise, if only the cookies are called "first-party cookies").

We can use temporary and permanent cookies and clarify this separately as part of our cookie policy.

If you do not want cookies to be stored on your computer, you can disable the corresponding option in the system settings of your browser. Saved cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional restrictions of this online offer.

A general objection to the use of cookies used for online marketing purposes can be found in a variety of services, especially in the case of tracking, via the US website <http://www.aboutads.info/choices> or the EU page <http://www.youronlinechoices.com/> be explained. Furthermore, the storage of cookies can be achieved by switching them off in the settings of the browser. Please note that you may not be able to use all features of this online offer.

You can find more information in our cookie policy.

6. Deletion of data

The data processed by us are deleted or limited in their processing in accordance with Articles 17 and 18 GDPR. Unless explicitly stated in this privacy policy, the data stored by us are deleted as soon as they are no longer required for their purpose and the deletion does not conflict with any statutory storage requirements. Unless the data is deleted because it is required for other and legitimate purposes, its processing will be restricted. That The data is blocked and not processed for other purposes. This applies, for example for data that must be kept for commercial or tax reasons.

According to legal requirements in Germany the storage takes place especially for 6 years according to § 257 Abs. 1 Nr. 2-3, Abs. 4 HGB (trading books, inventories, opening balance sheets, annual accounts, trade letters, accounting documents, etc.) and for 10 years according to § 147 para. 1 AO, §§ 257 para. 1 no. 4, para. 4, 238 HGB (books, records, management reports, accounting documents, commercial and business letters, documents relevant for taxation, etc.).

7. Business-related processing

In addition we process

- contractual data (eg., Subject of contract, duration, customer category).
- payment data (eg., Bank details, payment history)

from our customers, prospects and business partners for the purpose of providing contractual services, service and customer care, marketing, advertising and market research.

8. Hosting

The hosting services we use are for the purpose of providing the following services: infrastructure and platform services, computing capacity, storage and database services, security and technical maintenance services we use to operate this online service. Here we, or our hosting provider, process inventory data, contact data, content data, contract data, usage data, meta and communication data of customers, interested parties and visitors to this online offer on the basis of our legitimate interests in an efficient and secure provision of this online offer acc. Art.6 para. 1 lit. f GDPR i.V.m. Art. 28 GDPR (conclusion of contract processing contract).

9. Collection of access data and log files

We, or our hosting provider, collect on the basis of our legitimate interests within the meaning of Art. 6 para. 1 lit. f. GDPR Data on every access to the server on which this service is located (so-called server log files). The access data includes name of the retrieved web page, file, date and time of retrieval, amount of data transferred, message about successful retrieval, browser type and version, the user's operating system, referrer URL (the previously visited page), IP address and the requesting provider.

Logfile information is stored for security purposes (for example, to investigate abusive or fraudulent activities) for a maximum of 100 days and then deleted. Data whose further retention is required for evidential purposes shall be exempted from the cancellation until final clarification of the incident.

10. Provision of contractual services

We process inventory data (e.g., names and addresses as well as contact information of users), contract data (e.g., services used, names of contacts, payment information) for the purpose of fulfilling our contractual obligations and services in accordance with Art. Article 6 (1) (b) GDPR. The entries marked as obligatory in online forms are required for the conclusion of the contract.

The deletion of the data takes place after expiration of legal warranty and comparable obligations, the necessity of the storage of the data is checked every three years; in the case of legal archiving obligations, the deletion takes place after its expiration. Information in the customer's account remains until it is deleted.

11. Contact

When contacting us (for example, by contact form, email or via social media) your details for processing the contact request and their processing acc. Art. 6 para. 1 lit. b) GDPR processed. The information can be stored in a Customer Relationship Management System ("CRM System") or comparable request organization. We delete the requests, if they are no longer required. We check the necessity every three years; Furthermore, the legal archiving obligations apply.

12. Comments and posts

If you leave comments or other contributions, your IP address will be changed based on our legitimate interests within the meaning of Art. 6 para. 1 lit. f. DSGVO stored for 100 days. This is for our own safety, if someone leaves illegal content in comments and contributions (insults, prohibited political propaganda, etc.). In this case, we ourselves can be prosecuted for the comment or post and are therefore interested in the identity of the author.

13.1. Newsletter

Below we would like to inform you about the content of our newsletter as well as the registration, shipping and statistical evaluation procedures as well as your right of objection. By subscribing to our newsletters, you agree to its receipt and the procedure described below.

Consent to receive the newsletter: We only send newsletters with the consent of the recipient or a legal permission. Insofar as the contents of a newsletter are concretely described, this is decisive for your consent. Incidentally, our newsletter contains information about our services and us.

Double opt-in and logging: Registration for our newsletter is done in a so-called double-opt-in procedure. After registration, you will receive an email asking you to confirm your registration. This is necessary so that nobody can log in with external email addresses. Registration for the newsletter will be logged in order to prove the registration process according to the legal requirements. This includes the storage of your registration and confirmation time, as well as your IP address. Likewise, a change of your stored data is logged.

Credentials: To sign up for the newsletter, you must enter your e-mail address. Optionally, we kindly ask you to provide your first name as well as surname for personal address in the newsletter.

The dispatch of the newsletter and the associated performance measurement is based on your consent in accordance with. Art. 6 para. 1 lit. a, Art. 7 GDPR in connection with § 7 Abs. 2 Nr. 3 UWG or on the basis of the legal permission according to Art. § 7 Abs. 3 UWG.

The logging of your registration is based on our legitimate interests in accordance with. Art. 6 para. 1 lit. f GDPR . Our interest includes the use of a user-friendly and secure newsletter system that serves our business interests as well as meeting the expectations of users and allows us to provide evidence of consent.

You can terminate the receipt of our newsletter at any time, ie. Revoke your consent for the future. A link to cancel the newsletter can be found at the end of each newsletter. We may save the submitted email addresses for up to three years based on our legitimate interests before we delete them for the purposes of newsletter distribution, to provide proof of formerly granted consent. The processing of this

data is limited to the purpose of a possible defense against claims. In the event that you desire a premature cancellation, you must confirm to us the former existence of a consent.

13.2. Newsletter – Shipping Service

The newsletters will be sent by MailChimp, a mail-order service provider of Rocket Science Group, LLC, 675 Ponce De Leon Ave # 5000, Atlanta, GA 30308, USA. You can view the privacy policy of the shipping service provider here: <https://mailchimp.com/legal/privacy/>. The Rocket Science Group LLC is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European data protection standards (<https://www.privacyshield.gov/participant?id=a2zt00000000TO6hAAG&status=Active>). The shipping service provider is based on our legitimate interests acc. Art. 6 para. 1 lit. f GDPR and a contract processing agreement acc. Art. 28 (3) sentence 1 GDPR .

The shipping service provider may use the data of the recipients in pseudonymous form, i. without assignment to a user, to optimize or improve their own services, e.g. for the technical optimization of shipping and the presentation of newsletters or for statistical purposes. However, the shipping service provider does not use the data of our newsletter recipients to address them themselves or to pass the data on to third parties.

13.3. Newsletter – measuring success

Included in the newsletter is a so-called "web-beacon", i. a pixel-sized file which is retrieved from our server when the newsletter is opened or from its server in the case of the use of a mailing service provider. As part of this call, technical information, such as information about the browser and your system, as well as your IP address and time of the call will be collected.

This information is intended to improve the technical performance of the service based on the technical data or the target groups and your reading behavior based on their call locations (which can be determined with the help of the IP address) or the access times. Likewise, it is determined if and when the newsletters are opened and which links are clicked. For technical reasons, this information can be assigned to the individual newsletter recipients. This is based on recognizing the reading habits of our users and adapting our content to them or sending different content according to the interests of our users.

14. Payment transactions

For a contract, in which you have to pay a fee, provided that the purchase was made via the website, we need your credit card information (credit card number, country, holder of the credit card) in accordance with Art. 6 (1) (a) and (f) GDPR credit card, credit card verification code (CVV code) and expiration date of your credit card), your name, bank account number and bank code if you choose the direct debit or if you choose another payment method or if you choose SEPA direct debit Your IBAN (international bank account number) and your BIC (International bank code of the institution of the debtor) and your home address. Please note that your credit card details or PayPal payments are collected and processed by your payment processor in relation to your payments for the service.

15. Social Media

We maintain online presence within social networks and platforms in order to communicate with customers and users active there and to inform them about our services. When calling the respective networks and platforms, the terms and conditions and the data processing guidelines apply to their respective operators.

Unless otherwise stated in our Privacy Policy, users' data will be processed as long as they communicate with us within social networks and platforms, e.g. Write posts on our online presence or send us messages.

16. Photography, Video, Interviews at events

By entering the venue you consent to your photo and video being taken, stored and displayed privately or publicly for editorial and commercial use by ESL and its partners.

17. Integration of services and contents of third parties

Based on our legitimate interests (ie interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 (1) lit. GDPR), we make use of content or services offered by third-party providers in order to provide their content and services Services, such as Include videos (hereinafter collectively referred to as "Content").

This always presupposes that the third-party providers of this content perceive the IP address of the users, since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of this content. We endeavor to use only content whose respective providers use the IP address solely for the delivery of the content. Third parties may also use so-called pixel tags (invisible graphics, also referred to as "web beacons") for statistical or marketing purposes. The "pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may include, but is not limited to, technical information about the browser and operating system, referring web sites, visit time, and other information regarding the use of our online offer.

17.1. Eventim

We use Eventim as a ticketing platform. It is used for purchasing, paying, access management to the venue and marketing future events by ESL and the Eventim portfolio.

17.2. Tixr.com

We use Tixr.com as a ticketing platform. It is used for purchasing, paying, access management to the venue and marketing future events by ESL and the platforms portfolio.

17.3. Eventbrite

We use Eventbrite.com as a ticketing platform. It is used for purchasing, paying, access management to the venue and marketing future events by ESL and the platforms portfolio.

17.4. Ticket Factory

We use theticketfactory.com as a ticketing platform. It is used for purchasing, paying, access management to the venue and marketing future events by ESL and the platforms portfolio.

17.5. INTI

We use theticketfactory.com as a ticketing platform. It is used for purchasing, paying, access management to the venue and marketing future events by ESL and the Evenplatformstim portfolio.

17.6. AXS.com

We use AXS.com as a ticketing platform. It is used for purchasing, paying, access management to the venue and marketing future events by ESL and the Evenplatformstim portfolio.

17.7. Ticketmaster.com

We use AXS.com as a ticketing platform. It is used for purchasing, paying, access management to the venue and marketing future events by ESL and the Evenplatformstim portfolio.

17.8. Hosting of Photos and Videos

We use cloud storage to upload and manage our photo, video and content libraries. This content of the events that you attended, which might display you as part of the crowd, are stored, edited, managed in those systems.

18. Raffle

We will collect, process and use personal data as an organizer of sweepstakes, as far as this is necessary to justify the legal relationship with you as a participant and for the subsequent implementation and processing. For the handling of the raffle and the dispatch of the prizes we use a service provider Crowd9 PTY LTD. Its privacy policy can be found at <https://gleam.io/privacy>.

To participate in the competition, we require the following personal data: Your name and your e-mail address. In the event that you win, we will also need your address.

In the event that the delivery of the prize is handled by third parties (cooperation partner of Turtle), we will forward to the required extent the contact details of the winner to the respective cooperation partner, so that he can get in touch with the winner.

19. Information about your rights

You can always ask for free which personal data we have stored about you. If your data is incorrect, we look forward to correcting it. Please inform us if your data has changed.

Information requests, complaints or suggestions concerning our data protection please send to the following address:

Turtle Entertainment GmbH
Schanzenstraße 23
51063 Köln