

GDPR COMPLIANCE

Fanplayr Inc. (hereafter "*The Company*" or "*Fanplayr*") declares its compliance with the European GDPR, General Data Protection Regulation.

The Company, in order to apply the GDPR requirements, has adopted technical and organizational measures aimed at the security of Fanplayr's Personal Data and security of Personal Data processed on behalf of its Customers.

The measures are listed as follows:

1. Compliance with the law

The Company undertakes to comply with the GDPR and any future changes of applicable law.

2. Safeguarding

The Company has appropriate measures to protect Personal Data, including appropriate technical and organizational measures to ensure protection from any unauthorized or illegal processing or accidental damage to Personal Data.

3. Fair processing

The Company considers the Customer Personal Data as confidential and processes Personal Data in line with the law and only to provide the agreed services. *The Company* will correct Customer Data for any errors or inaccuracies as a result of Customer communication.

4. Personnel handling Personal Data

The Company has reasonable security measures, including restrictions on access and processing of data only to authorized personnel. The staff is selected for reliability, legally bound by confidentiality and secrecy. Employees are authorized to process only the data necessary for their functions and only for the clients/projects assigned to each of them.

If necessary, *The Company* will appoint a data protection officer in cooperation with the Customer's data processing manager.

5. Transfers

The Company does not transfer Customers Personal Data outside the country in which they are located, except for the Member States of the European Economic Area ("EEA") and the U.S. (where the server are phisycally located), or on written instructions from the Customer and in accordance with the relevant EU model clauses.

6. Consent

The Company does not directly collect consent for the processing of Personal Data, however it has inserted mechanisms to allow respect for the rights of Data Subjects.

7. Information

The Company does not directly inform Customers' users. The processing of data on behalf of the Customer will be legal and legitimate and only to provide services to the Customer.

8. Privacy Policy and Disclosure

The Company has adopted a Privacy Policy whose text can be find on the Company website www.fanplayr.com. *The Company* has already adopted an internal policy for the safe data processing. Data processed by *Fanplayr* on behalf of Customers are not disclosed.

9. Personal Data Breach

In the event of a Personal Data Breach which involves Customers Personal Data, The Company will: (i) promptly take all the necessary and appropriate corrective actions to remedy the underlying causes of the Personal Data Breach and make reasonable commercial efforts to ensure that such Personal Data Breach will not recur; (ii) notify Customers without delay, and in any event within twenty-four (24) hours, providing reasonable detail of the Personal Data Breach and likely impact on Data Subjects; and (iii) take any action required by Applicable Law and/or at the reasonable request of Customers.

Customers shall make the final decision on notifying (including the contents of such notice) customers' users, employees, service providers, Data Subjects and/or the general public of such Personal Data Breach, and the implementation of the remediation plan, to the extent Customer Personal Data is concerned.

10.Retention

Any Customer Personal Data is returned to Customer or destroyed, following Customer request, when it is no longer required for the performance of the Services agreed, or within a reasonable time based on the type of Personal Data.

11. Rights of Data Subjects

The Company has the means and places reasonable actions to allow to comply with reasonable requests from Data Subjects (in relation their rights under Article 12-22 of GDPR) in the event that the Customer has shared their Personal Data with the Company.

12. Sensitive/ Special Personal Data

The Company does not share any sensitive/special categories of Personal Data, as defined in Article 9 and 10 of the GDPR, unless expressly agreed in writing with the Customer

13. Security Measures

The Company has placed appropriate technical and applicative security measures to avoid the risk of loss, damage, unauthorized access, even accidental, aimed at ensuring the availability, integrity and confidentiality of the Customer Personal Data

Dated this 16th day of June 2020

A handwritten signature in black ink, appearing to read "Simon Yencken".

Simon Yencken
CEO
Fanplayr Inc