# **LADbible Group Privacy Notice**

# Last updated 11 June, 2025

This privacy notice explains how the LBG Media group of companies, including LADbible Group Limited and our affiliated companies LBG Media plc, LADbible Ireland Limited and Betches Media, LLC, T/as LADbible, SPORTbible, GAMINGbible, UNILAD, Tyla, Betches and other brands (collectively, the "Group", "we", "us", "our") process your personal data ("you", "your") when you use our website, content or other services.

**Accessibility:** If you are having any trouble accessing this privacy notice or our services, please contact us at +1 516-273-8270. Our hours of operations are between 10 AM and 5 PM EST, Monday to Friday (excluding public holidays).

You can exercise certain rights regarding your personal data as described in the **Your Data Privacy Rights** section below. Users in certain jurisdictions, such as residents of a U.S. state with a comprehensive consumer privacy law, the European Union and the United Kingdom, have specific rights which are set forth below.

The Group is the controller of your personal data.

1. Purpose of this privacy notice

This privacy notice aims to give you information on how the Group collects, uses, discloses, transfers, stores and processes your personal data when you use our services.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing information about you so that you are fully aware of how and why we are using your personal data. This privacy notice supplements the other notices and is not intended to override them.

If you have any questions about this privacy notice, please contact us using the details set out at the end of this notice.

- 2. Who does this privacy notice apply to?
  - **2.1** This notice applies to any service where a link to this notice appears, as well as:
  - our **service users** who access our services such as our website or content anywhere on the web, such as, users who watch our content, submit content to us, participate in our surveys and focus group and other users; and
  - **other persons** who interact with us, when you call us or email us. However, job applicants should read our recruitment privacy notices, available at <a href="https://jobs.ladbiblegroup.com/privacy-policy">https://jobs.ladbiblegroup.com/privacy-policy</a> (LADbible Group) and <a href="https://careers.betches.com/privacy-policy">https://careers.betches.com/privacy-policy</a> (Betches).
  - 2.2 This notice applies to you whether you act in your personal capacity or as employee or agent of an organisation.
- 3. What types of information do we collect?
- 3.1 Generally, "personal data" (also called "personal information" or "personally identifiable information" under some laws) refers to any information that identifies you or relates to you or is otherwise defined as personal data by applicable law. However, the exact meaning of personal data may be determined by the law of your place of residence.

3.2 We will generally use your personal data to (i) provide and enable you to use our website, content and other services, (ii) respond to your queries, (iii) develop and promote our organisation and services; (iv) ensure the security and technical availability of our services; and (v) comply with the law or legal process. The chart below provides more details:

Categories of personal data	Examples	Business Purposes for Collecting and Disclosing Personal Data	Legal ground for processing (for individuals in the EEA, Switzerland and UK only)
Personal identifiers.	A real name, postal address, online identifier, internet protocol (IP) address, email address, account name.	Contact you regarding our services.  Target advertising and content to you.  Analyze and manage our services.	Necessary for our legitimate interest in the proper administration of our business, dispute resolution, ensuring technical operation of our services and debt collection and necessary for compliance with a legal obligation to which we are subject.
			We may rely on <b>soft opt-in</b> to send marketing to our existing clients or will obtain your <b>consent</b> as required by law, for example, if you sign up for our newsletter.
			We will obtain your <b>consent</b> where required by law. For example, your consent will be required to place <b>cookies or similar technologies</b> on your device or to read information on your device.
Sensitive personal data / special categories of personal data.	Race, ethnicity	For purposes of job applications and employment.	Necessary for the performance of our contract with you.  We will obtain your consent where
			required by law.
Device information	Your browser, mobile device ID, IP address, cookie ID and other information about the device you use to access our website,	Contact you regarding our services.  Target advertising and content to you.  Analyze and manage our services.	Necessary for our legitimate interest in the proper administration of our business, dispute resolution, ensuring technical operation of our services and debt collection and necessary for compliance with a legal obligation to which we are subject.

	content and other services.		We will obtain your <b>consent</b> where required by law.
Commercial information.	Records of your purchases, subscriptions and other transactions with our services.	Process your requests.  Analyze and manage our services.	Necessary for the performance of our contract with you.
Internet or other similar network activity.	Browsing history, search history, open rates, click, rates, active time spent, site navigation, and other information on your interaction with our services.	Target advertising and content to you.  Analyze and manage our services.	Necessary for our legitimate interest in the proper administration of our business, dispute resolution, ensuring technical operation of our services and debt collection and necessary for compliance with a legal obligation to which we are subject.  We will obtain your consent where required by law.
Non-precise-locatio n data.	Physical location.	Target advertising and content to you.  Analyze and manage our services.	Necessary for our legitimate interest in the proper administration of our business, dispute resolution, ensuring technical operation of our services and debt collection and necessary for compliance with a legal obligation to which we are subject.  We will obtain your consent where
Professional or employment-relate d information.	Employer, employment history, resumes and CVs, background checks, and other employment-rela ted information.	Contact you regarding engagement with us.	required by law.  Necessary for the performance of our contract with you.
		Analyze and manage our services.	We will obtain your <b>consent</b> where required by law.
Inferences drawn from other personal	Used to create a profile reflecting a person's	Contact you regarding our services.	Necessary for our <b>legitimate interest</b> in the proper administration of our business,

data for profiling purposes.	preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Target advertising and content to you.  Analyze and manage our services.	dispute resolution, ensuring technical operation of our services and debt collection and necessary for compliance with a legal obligation to which we are subject.  We will obtain your consent where required by law.
Payment information	Payment information will be processed by Shopify, and fulfilled via our logistics partner. The Group does not have access to your payment information. For more information, please refer to Shopify's privacy policy at: https://www.sho pify.com/legal/pr ivacy	To facilitate purchases on our stores.	Necessary for the performance of our contract with you

# **3.3** In addition:

- If you engage with our focus groups or surveys, or if you participate in our community such as <u>LADnation</u>, we will collect your input and other **participation information**. We will usually aggregate this data so that it does not directly or indirectly reveal your identity or any special category data.
- If you participate in our **competitions**, we collect your contact details such as your name and email address. This data is only used for the purposes of the relevant competition and will be subject to those competition terms and conditions, which will be notified to you at the time. If we share your data with third party partners, such as a company that has sponsored the competition, we will tell you this when you enter the competition.
- We may collect data through our partners including LiveRamp, Chartbeat and Google subject to your cookie consent settings.
- **3.4** Much of the personal data we process is voluntarily provided to us by you or is automatically by us from your device. You can adjust your device privacy settings to limit disclosure of your personal data. We would ask that you only provide the necessary personal data to us.

- 3.5 Some of the information will be necessary to assist you, to provide our services or to pursue our legitimate interests in data processing. In certain limited cases, some personal data may be mandatory for our compliance with the law.
- 3.6 We may "enrich" the data that we hold about our users for data-led targeted advertising for our clients. Data enrichment works by sharing your pseudonymised personal data with a trusted third-party platform so that they can enrich this data with personal data that has been obtained via various sources including data that is publicly available and data shared with them by other companies. This type of sharing enables advertisers to target specific audiences within our users that fall into defined segments or categories. Advertisers will have no access to any of our users' data as part of this process. We vet data providers to ensure they comply with all their data protection obligations including explaining what they do with your data, keeping it secure and protecting it appropriately. We have a written agreement in place with all data providers we work with and we monitor their activities to ensure they are complying with our contractual requirements. You can opt out of data enrichment or your data being used for targeted advertising through data enrichment at any time by changing your preferences in the cookie settings. If you opt out of data pairing, this means that your personal data held by us will no longer be combined with data held by data pairing providers.
- **3.7** We use Google Analytics on this service. For information about Google Analytics please see "How Google uses information from sites or apps that use our services", (located at <a href="www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>. To opt out of Google Analytics, please copy and paste "tools.google.com/dlpage/gaoptout" into your browser and download the Google Analytics opt-out browser add-on.
- **3.8** We use Chartbeat for analytics on this service. To opt-out of Chartbeat analytics, please go to: <a href="https://static.chartbeat.com/opt-out.html">https://static.chartbeat.com/opt-out.html</a> into your browser.

#### 4. Data accuracy

We will rely on the information provided by you as accurate, complete and up to date, so please keep us informed of any changes. For example, if you change your email address, please let us know so that we can continue sending you our newsletters and other useful updates.

## 5. Sharing your information

We will share your information where it is lawful, necessary and proportionate to do so with (i) our **third party service providers** who may process personal data on our behalf, (ii) our **marketing** and **analytics** partners deploying cookies and similar technologies in our services and **other partners**, as explained above, (iii) our **affiliated companies** for the purposes set out above, (iv) persons or authorities where we are **compelled by law** or responsible practices, (v) to the relevant entity in case of a **merger**, **acquisition** or **collaboration**, and (vi) other third parties where you have provided your **consent**.

#### 6. Sources of data

We obtain personal data (i) when you voluntarily provide it to us, (ii) when we collect it automatically from your device (such as via tracking cookies), (iii) from third parties who may sell or license personal data to us and (iv) from publicly available sources.

#### 7. Targeted Advertising

We believe that advertising is more effective and relevant when it is targeted to your interests and behaviors. Therefore, we may work with third parties who collect information on our service through the use of cookies and similar methods in order to serve you with relevant advertisements on other services or to determine that you have seen our advertisements on other services. You do have the ability to control certain advertising practices.

You may opt-out of being tracked online by certain companies who are listed at the Digital Advertising Alliance (DAA) at the <u>DAA's consumer choice page http://www.aboutads.info/choices/</u> and may also learn more about online behavioral advertising at this website.

The opt-out process through the DAA relies upon the placement of an opt-out cookie on your device, and you must repeat this process on each device or if your cookies are purged from your device. Cookie-based opt-outs are not effective on certain mobile services. Users may opt out of certain advertisements on mobile applications or reset advertising identifiers via their device settings. If you opt-out, you will still receive advertisements, but they will not be delivered to you by such companies from whom you have opted-out based upon your behavioral data possessed by the companies from whom you have opted-out.

To learn how to limit ad tracking or to reset the advertising identifier on your iOS and Android device, click on the following links:

iOS - <a href="https://support.apple.com/en-us/HT202074">https://support.apple.com/en-us/HT202074</a> Android - <a href="https://support.google.com/ads/answer/2662922?hl=en">https://support.google.com/ads/answer/2662922?hl=en</a>

You may also download and set your preferences on the <u>DAA's App Choices</u> mobile application(s) available in Google Play or the Apple App stores. More information about opting out on mobile devices is available here - <a href="https://www.networkadvertising.org/mobile-choice/">https://www.networkadvertising.org/mobile-choice/</a>

Except as required by applicable law, we do not respond to or honor "do not track" (a/k/a DNT) signals or similar mechanisms automatically transmitted by web browsers for which we are cannot evaluate your choice

### 8. Third party services

- **8.1** Our services may contain links to other websites, third party services, such as Twitter and Instagram and plugins. You should check the privacy statements of these third party providers before you use them as we are not responsible for how they may process your personal data.
- **8.2** We may access your social media profile details including your social media username, name, profile photo and any other information you choose to make available to us when you connect with or contact us through your social media account or access our content via your social media account.
- **8.3** Third parties may collect data about you such as information about your interaction with our posts and content and 'likes' on social media platforms, such as Facebook, X, Snap, TikTok, or LinkedIn, profile information, preferences and interests received from our advertising and analytics partners and other third parties.

## **8.4** LADnation – sharing your personal data with STRAT7 Researchbods

Where you participate in the LADnation community, we will share your personal data with STRAT7 Researchbods who have helped us create our LADnation community. We do this so that STRAT7 Researchbods can provide services to us, such as creating research activities for or assisting us if there are any technical issues with the LADnation community. By agreeing to

participate in the LADnation community, you consent to us sharing your personal data with STRAT7 Researchbods, and this is the legal basis on which we rely in processing your data. We ensure that your personal data is shared with STRAT7 Researchbods in accordance with applicable data protection laws and we have a contract with STRAT7 Researchbods which requires us and them to observe your data protection rights.

# 9. How long is your information kept?

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including without limitation for the purposes of satisfying any legal, accounting or reporting requirements.

The length of time we retain your personal data will depend on what it is being used for, generally, we will keep your personal information for 6 years from collection. However, in practice the retention period will likely be shorter if the information is no longer needed or longer if required for lawful purposes.

Where it is no longer necessary to process your personal data, we will delete it or anonymise it by removing all details that may identify you, in accordance with applicable data protection legislation. For example, if you withdraw your consent to process your personal data, we will delete it unless it is required to be retained under applicable laws. You must back up your data if you wish to keep it for longer.

# 10. How do we secure your information?

We maintain appropriate organisational and technological safeguards to help protect against unauthorised use, access to or accidental loss, alteration or destruction of the personal data we hold. We also seek to ensure our third-party service providers do the same.

We will endeavour to use the least amount of personal data as is required for each purpose. We will employ pseudonymisation and anonymisation techniques, where appropriate.

Our staff will access your personal data on a "need to know" basis.

We have in place processes to deal with any suspected data breach and will notify you and any regulator of a breach where we are required to do so under applicable laws.

# 11. Where is your information processed?

Generally, your information is held in the United States, United Kingdom and the EEA. We may transfer your personal data to our affiliated companies, suppliers and other third parties in countries different to your country of residence, which may be outside such locations. Information stored in the United States and elsewhere may be subject to lawful requests by the courts or law enforcement authorities in certain countries. We will comply with applicable rules about international transfer of personal data.

### 12. Children

Our services are not intended for children under 18 years of age. We do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child without verification of parental consent as required by applicable law, we will delete that information. If you believe we might have any personal information from or about a child, please contact us at <a href="mailto:dataprotection@ladbiblegroup.com">dataprotection@ladbiblegroup.com</a>.

# 13. Opt-out

If you would like us to stop sending you marketing communications or to stop processing your personal data for direct or targeted marketing purposes, please contact us at <a href="mailto:dataprotection@ladbiblegroup.com">dataprotection@ladbiblegroup.com</a>

Alternatively, you can request to stop receiving our marketing communications at any time by clicking on the unsubscribe link at the bottom of each marketing message.

# 14. Updates

If we make any changes to this notice you will be able to see them on this page. You should regularly check for updates, as indicated by the "Last updated" date at the top.

If you do not agree with the changes, please do not continue to use our website or services. Of course, if any such changes significantly affect you, we will ask for your prior consent where we are required to do so by law.

# 15. Your data privacy rights

This section provides further disclosures and describes the rights in relation to your personal data that you may have under certain laws in the United States and in the UK/EEA under the General Data Protection Regulation ("GDPR") or other relevant laws.

#### United States

If you are a resident of California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, Montana, Delaware, Iowa, Nebraska, New Hampshire, New Jersey or another state with a similar comprehensive consumer privacy law (collectively, "Covered States"), you may have specific rights regarding your personal data under applicable laws in such Covered States (collectively, "State Privacy Laws"). This section describes the rights that consumers of Covered States have and explains how to exercise those rights. To be clear, these rights are granted only to the extent that you are considered a consumer of a Covered State and we are acting as a "controller" or "business" (as applicable) under State Privacy Laws with respect to your personal data.

The categories of personal data we process, our purposes for processing your personal data, the categories of personal data that we share with third parties, and the categories of third parties with whom we share it are set forth in the terms of the privacy notice above.

In addition to the rights set forth in our privacy notice, State Privacy Laws may, depending on your state of residence, provide you with the following rights:

- **Right to know.** You may have the right to know whether we process your personal data and to access such personal data. You may also have the right to request that we disclose certain information to you about our collection, use, or disclosure of your personal data.
- **Right to data portability.** You may have the right to obtain a copy of your personal data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another business without hindrance, where the processing is carried out by automated means.
- Right to delete. You may have the right to delete personal data that you have provided by or that we have obtained about you. Please note that we may deny such request if the requested deletion falls under an exception as set forth in the State Privacy Laws. We may also keep a record of your request.
- **Right to correct.** You may have the right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes for which we process it.
- **Right to opt out.** We may (i) use your personal data for purposes of: targeted advertising and (ii) "sell" or "share" (as defined under State Privacy Laws) your personal data. We do not

- engage in profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **Right to nondiscrimination.** You have the right not to receive discriminatory treatment by us for the exercise of your privacy rights. Unless permitted by the State Privacy Laws, we will not:
  - o Deny you goods or services;
  - o Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
  - o Provide you a different level or quality of goods or services; or
  - o Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## EXERCISING YOUR U.S. STATE PRIVACY RIGHTS.

To opt-out of sale/share (as defined by California law) or targeted advertising, please change your cookie preferences <u>here</u>.

To exercise any of the other rights described above, you may email us at <a href="mailto:dataprotection@ladbiblegroup.com">dataprotection@ladbiblegroup.com</a>

Only you, or a person or business entity that you authorize to act on your behalf (an "authorized agent"), may make the requests set forth above. You may also make a request on behalf of your minor child. If you are an authorized agent or an adult acting on behalf of your minor child, please reach out by emailing to <a href="mailto:dataprotection@ladbiblegroup.com">dataprotection@ladbiblegroup.com</a> so we could verify your authority. In order to protect the security of your personal data, we will not honor a request if we cannot verify your identity or authority to make the request and confirm the personal data relates to you. The method used to verify your identity will vary depending on the nature of the request. Generally speaking, verification will be performed by confirming that you are the owner of the email address to which the request relates. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We will make every effort to respond to your request within 45 days from when you contacted us. If you have a complex request, the State Privacy Laws allow us up to 90 days to respond. We will still contact you within 45 days from when you contacted us to let you know we need more time to respond.

If we decline to take action on a request that you have submitted, we will inform you of our reasons for doing so, and provide instructions for how to appeal the decision. Depending on your state of residence you may have the right to appeal within a reasonable period of time after you have received our decision. If you have this appeal right, within 60 days (45 days for residents of Colorado) of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If we deny your appeal, we will provide you with a method for contacting your state attorney general's office to submit a complaint.

United Kingdom / European Economic Area

If you are a resident of the UK or EEA, the following terms apply to you:

## Data subject rights

Subject to certain exemptions, limitations and appropriate proof of identity, as a data subject, you will generally have numerous rights in relation to your personal data that you may exercise with the controller, including the following:

- **Right to information** about matters set out in this notice. You may also contact us for further details about our retention policy and international data transfers using the contact details at the end of this notice
- Right to make an access request to receive copies of personal data.
- Right to rectification of any inaccurate or incomplete personal data.
- Right to withdraw consent previously provided.
- **Right to object to** our processing of personal data based on our legitimate interests, and any automated processing and profiling.
- **Right to erasure** of personal data, within limited circumstances.
- **Restriction** on the processing of personal data.
- Right to data portability from one service provider to another, where applicable.
- **Right to lodge a complaint** with your country's supervisory authority, such as the Information Commissioner's Office in the UK.

If you wish to exercise your data privacy rights, please email dataprotection@ladbiblegroup.com

All requests will be processed in a timely manner, generally within one month. If we cannot process your request within this period, we shall explain why and process it as soon as possible thereafter.

#### 16. Contact us

If you have any queries or concerns about how we use your personal data, contact us at <a href="mailto:dataprotection@ladbiblegroup.com">dataprotection@ladbiblegroup.com</a> or by post, marked for the attention of the Data Protection Office, to:

If you are based in Canada or the USA:

Betches Media, LLC 43 W. 24<sup>th</sup> St. New York, NY 10010

If you are based in the UK, Europe or the rest of the world other than Canada or the USA:

LADbible Group Limited 20 Dale Street Manchester M1 1EZ UK

We will try to resolve your query without undue delay.