



Feenix Group: GDPR Statement and Safeguarding Policies 2024

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FEENIX GROUP PRIVACY POLICY

This is the GDPR Policy of Feenix Group which includes Feenix Talent, Feenix Esports Feenix Agency and Feenix Marketing. This privacy policy will explain how our organisation uses the personal data we collect from you when you use our website.

Topics:

- What data do we collect?
- How do we collect your data?
- How will we use your data?
- How do we store your data?
- Marketing.
- What are your data protection rights?
- What are cookies?
- How do we use cookies?
- What types of cookies do we use?
- How to manage your cookies
- Privacy policies of other websites
- Changes to our privacy policy
- How to contact us
- How to contact the appropriate authorities

Feenix Group collects the following data:

- Personal identification information (name, email address, phone number, etc.)
- Message (if you leave a message alongside your information in our contact form)

How do we collect your data?

You directly provide Feenix Group with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- Use or view our website via your browser's cookies.

Feenix Group may also receive your data indirectly from the following sources:

- Research studies we reference which you may have taken part in.

How will we use your data?

Feenix Group collects your data so that we can:

- Process your order, manage your account.
- Email you with special offers on other products and services we think you might like

If you agree, Feenix Group will share your data with our partner companies so that they may offer you their products and services.

- When Feenix Group processes your order, it may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

How do we store your data?

Feenix Group securely stores your data online with limited access to personal data to only those employees who require it for their job roles. We only collect and store the minimum amount of personal data necessary for the intended purpose and we regularly review and delete unnecessary data.

Feenix Group will keep your personal data for the minimum required period. Once this time period has expired, we will delete your data, online and any physical documents.

Marketing

Feenix Group would like to send you information about products and services of ours that we think you might like, as well as those of our partner companies.

- Feenix Talent
- Feenix Studio
- Feenix Esports
- Feenix Marketing

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Feenix Group from contacting you for marketing purposes or giving your data to other members of the Feenix Group.

If you no longer wish to be contacted for marketing purposes, please contact us or click unsubscribe at the end of the email you receive.

What are your data protection rights?

Feenix Group would like to make sure you are fully aware of all of your data protection rights.

Every user is entitled to the following:

- **Right to access:** You have the right to request Feenix Group for copies of your personal data. We may charge you a small fee for this service.
- **The right to rectification:** You have the right to request that Feenix Group correct any information that you believe is inaccurate. You also have the right to request Feenix Group to complete information you believe is incomplete.
- **The right to erasure:** You have the right to request that Feenix Group erase your personal data, under certain conditions.

- **The right to restrict processing:** You have the right to request that Feenix Group restrict the processing of your personal data, under certain conditions.
- **The right to object to processing:** You have the right to object to Feenix Group's processing of your personal data, under certain conditions.
- **The right to data portability:** You have the right to request that Feenix Group transfer the data that we have collected to another organisation, or directly to you, under certain conditions.
- If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.
- At our email: hello@feenixgroup.com
- Call us at: +353 851060772

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit allaboutcookies.org.

How do we use cookies?

Feenix Group uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- Making recommendations based on your previous actions

What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** - Feenix Group uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** - Feenix Group uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Feenix Group sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

How to manage cookies

- You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

Privacy policies of other websites

- The Feenix Group website may contain links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Changes to our privacy policy

- Feenix Group keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 19th April 2024.

How to contact us

- If you have any questions about Feenix Group's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.
- Email us at: hello@feenixgroup.com
- Call us: +353 851060772

How to contact the appropriate authority

- Should you wish to report a complaint or if you feel that Feenix Group has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.
- Email: info@oic.ie
- Address: 6 Earlsfort Terrace, Dublin 2, D02 W773.
- Phone number: +353-1-639 5689
- The Office of the Information Commissioner is open between 9.15 a.m. and 5.00p.m. Monday to Friday.

FEENIX GROUP SAFEGUARDING POLICY FOR UNDER 18'S, AT RISK ADULTS & PARENTS/GUARDIANS 2024

APPENDIX 1: UNDER 18'S AND AT RISK ADULTS

This document is for professional gamers, content creators, or anyone working in collaboration with Feenix Group who are:

- Under the age of 18 or
- Adults classified as being 'at risk'

It explains what safeguarding is, what to look out for, and who to tell about any potential safeguarding incidents that may arise.

WHAT IS SAFEGUARDING?

Feenix Group has a responsibility to promote and protect your rights and well-being. This responsibility extends to tournaments, gaming events, content creation days, bootcamps, and any other activity taking place.

This responsibility is also known as 'safeguarding', which is a general term that covers:

- Preventing harm to your health and development
- Encouraging you to respect yourself and others, and think about your mental and physical health and wellbeing
- Making sure you have a safe environment so that you can do the best you can do
- Encouraging you to tell us if something is wrong

OUR PLEDGE

Here at Feenix Group, we take safeguarding seriously and as such we promise to do 5 things:

1. RIGHTS

We act with due consideration towards the rights of children and adults at risk who interact with us (including their parents and guardians).

2. RESPONSIBILITY

We accept our responsibility to safeguard children and adults at risk who interact with us. We will promote and protect their rights and well being.

3. RESPECT

We create an atmosphere of respect for self and others. This includes supporting those under our care to be mindful of their physical and mental health.

4. REPORTING

We encourage reporting of safeguarding concerns and will take all reports seriously. We will respond sensitively and proactively to all reports we receive.

5. RISKS

We will understand and address risks presented in both digital and physical environments which we control.

WHAT TO LOOK OUT FOR

There's no "one size fits all" definition of a safeguarding incident. Examples of safeguarding incidents include:

- Neglect (e.g. not being provided with facilities to wash or eat)
- Physical abuse (e.g. being hit)
- Emotional abuse (e.g. being bullied or being ignored)
- Sexual abuse (e.g. being looked at or touched in a sexual way)

It's really important to note that you don't have to have been abused to have had your rights violated. Anything that makes you feel unsafe or uncomfortable also falls under 'safeguarding'. This could be:

- Being regularly separated off from a group activity by the same person
- Being touched when there is no good reason for physical contact (or being asked to touch someone else), even if the touching is not sexual
- Being sent messages about your personal life that aren't about your role at Feenix Group
- Being asked to send pictures or videos of yourself, even if not in a sexual way
- Being singled out and told to keep secrets from other people

A safeguarding incident can happen online or in person. Our policies cover both.

TELLING SOMEONE

Any abuse or safeguarding issue that you may experience is never your fault. It is ok and important to tell someone when you feel comfortable doing so and when it is safe for you to do so. This could be your parent or guardian, a friend, or someone at Feenix Group

There is a specific Safeguarding Team at Feenix Group responsible for safeguarding. There are a few ways to get in touch with the Safeguarding Team:

Safeguarding Team UK:

Email: jake@feenixgroup.com

Mobile: +44 7554 119290

Safeguarding Team IE:

Email: ellen@feenixgroup.com

Mobile: +353 851060772

If you don't know any of the Safeguarding Team or don't feel comfortable telling them, you can tell anyone else at Feenix Group or someone who is not at Feenix Group who can pass the message to the Safeguarding Team.

Whatever you report to our Safeguarding Team, you can rest assured that:

- We will listen to you
- We will support you
- We will do everything possible to help you
- We will not blame or judge you
- We will keep your information private, unless we need to tell someone to keep you safe
- You will have done the right thing

MORE INFORMATION

You can find more information regarding Safeguarding at Feenix Group on our website.

APPENDIX 2: FOR PARENTS/GUARDIANS

OUR PLEDGE

This document provides guidance for parents, carers or guardians of professional gamers or creators or anyone else working with Feenix Group who are:

- Under the age of 18 or
- Adults classified as being 'at risk'

WHAT IS SAFEGUARDING?

Feenix Group has a responsibility to promote the welfare of all children, young people, and adults at risk that we engage with and care for. We must keep them safe and operate in a way that protects them. We are responsible for, and are committing to, safeguarding at any time and any place.

Safeguarding is an umbrella term which refers to the process of ensuring the health and wellbeing of children, young people and adults at risk. This includes:

This responsibility is also known as 'safeguarding', which is a general term that covers:

- Encouraging them to be mindful about health and wellbeing
- Preventing harm to their health and development
- Taking action to create a safe environment so that they can have the best outcomes such we promise to do 5 things:

1. RIGHTS

We act with due consideration towards the rights of children and adults at risk who interact with us (including their parents and guardians).

2. RESPONSIBILITY

We accept our responsibility to safeguard children and adults at risk who interact with us. We will promote and protect their rights and well being.

3. RESPECT

We create an atmosphere of respect for self and others. This includes supporting those under our care to be mindful of their physical and mental health.

4. REPORTING

We encourage reporting of safeguarding concerns and will take all reports seriously. We will respond sensitively and proactively to all reports we receive.

5. RISKS

We will understand and address risks presented in both digital and physical environments which we control.

IDENTIFYING HARM

We seek to work with parents, guardians, and carers to help achieve our safeguarding pledge. In considering safeguarding risks, we look for the four main types of abuse from which a child or young person may suffer: neglect, physical abuse, emotional abuse and sexual abuse

Behaviours and situations that may be indicative of grooming. Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit, and abuse them.

Examples of behaviours we look to spot (and encourage those we work with to report) include a child or adult at risk being:

- Regularly separated off from a group activity by the same person
- Touched when there is no good reason for physical contact (or being asked to touch someone else), even if the touching is not sexual
- Sent messages about their personal lives that aren't about their role at Feenix Group
- Asked to send pictures or videos of themselves, even if not in a sexual way, singled out and told to keep secrets from other people

If you're worried about a child under your care and want to talk to them, we recommend the NSPCC's advice regarding how to tackle difficult conversations around subjects like abuse and bullying. The Feenix Group Safeguarding team (see below) can also help.

REPORTING AN INCIDENT

Feenix Group's Safeguarding Team is responsible for the management of safeguarding at Feenix Group and all other associated companies, day-to-day.

DISCLOSURES BY YOU

If you need to make a disclosure on behalf of a child, young person, or adult at risk, contact the Safeguarding Team. This includes making disclosures about a member of Feenix Group staff.

Any disclosures to the Safeguarding Team are confidential and information is shared on a need to know basis only.

DISCLOSURES BY A CHILD, YOUNG PERSON OR AN ADULT AT RISK

We strongly encourage children, young people, and adults at risk to report a safeguarding incident to our Safeguarding Team (or anyone else) when they feel comfortable doing so and when it is safe for them to do so.

Please refer to Appendix 1 | For Under 18's and Adults at Risk (above), which distils the information in the Safeguarding Policies and provides practical advice for disclosing.

Disclosures by others about a child, young person, or adult at risk for whom you are legally responsible

We will tell you about a disclosure that we have received concerning a child, young person, or adult at risk for whom you are legally responsible, where we have permission to do so and if appropriate. This communication will be via the Head of Safeguarding at Feenix Group.

ONLINE COMMUNICATION WITH CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK

Part of safeguarding is ensuring appropriate and responsible communication with children, young people and adults at risk as Feenix Group often engages with them online, through social media and community platforms.

We are committed to involving a child, young person, or adult at risk's parent or guardian as early in our conversation as possible to ensure that the child, young person, or adult at risk's best interests are protected.

Feenix Group has implemented internal processes to ensure responsible communication between children, young people, and adults at risk, and members of our team (those at Feenix Group who are most likely to communicate with these individuals online).

DECISION MAKING

Any contract that Feenix Group signs with a person aged under 18 must also be signed by that child's parent or guardian. This is non-negotiable. We also strongly recommend that all professionals we engage seek independent legal, financial or tax advice before signing a contract with us.

Professional gaming is a performance business. Inevitably there will be situations in a young person's career where decisions we make on the basis of performance may significantly impact the young person's emotional state – for example, 'benching' a player, applying contractual penalties or extending or terminating a contract.

Wherever possible, we will inform and/or involve a parent, guardian, or carer before we make any decisions that will affect their child's career. It is important to note that a decision based on performance which impacts a player's wellbeing is not, of itself, a safeguarding issue.

TRAVEL

We will request written consent from you, as a parent or guardian, for any activities, events or significant travel arrangements concerning a child, young person or adult at risk, e.g. overnight stays, and while on trips.

We will only permit children, young people, and adults at risk to travel to a Feenix Group event by themselves, unsupervised, if we have received prior written consent from their parent or guardian.

During overnight stays, we ensure that adults (Feenix Group staff or otherwise) do not enter a child, young person, or adult at risk's room unless there is a safety concern, in which case two adults will enter and will not invite children, young people, or adults at risk into their rooms.

MORE INFORMATION

You can find more information regarding Safeguarding at Feenix Group on our website.

We encourage you to email hello@feenixgroup.com if you require any further information about our approach or if you have any concerns.