

Your privacy is important to us, and we are committed to protecting it. This Privacy Policy outlines how 532 Design Limited (**we** or **us**) collects, uses, and safeguards your personal information when you use our mobile app and related services (collectively, the **Services**).

We collect various types of information to enhance your experience and ensure the smooth operation of our Services. This includes data you provide directly, such as when you create an account, and information collected automatically, like usage data and device information.

By using our Services, you acknowledge that you have read and understood this Privacy Policy,

We may update this Privacy Policy periodically to reflect changes in our practices or legal requirements. We encourage you to review it regularly to stay informed about how we protect your privacy.

Our Services may contain links to third-party websites or features. Please note that we do not control these third parties and are not responsible for their privacy practices. We recommend reviewing their privacy policies before providing any personal information.

If you have any questions or concerns about our Privacy Policy or how we handle your personal data, please contact us at contact@532design.com.

Introduction

Last modified 30 October 2025.

This privacy notice describes how we will collect, use, share and otherwise process your personal data in connection with your use of:

- 532design.com;
- Crowdlegends.com; and,
- Crowd Legends: Football mobile application software available on the Apple App Store and Google Play Store platforms. (**App**).

This App is not intended for those under 13 and we do not knowingly collect data relating to children.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

You can download a copy of the full notice [here](#).

Important information and who we are

532 Design Limited is the controller and is responsible for your personal data (**COMPANY, we, us** or **our** in this notice).

We have appointed a data privacy manager. If you have any questions about this privacy notice, please contact them using the details set out below.

Contact details

Our full details are:

- Full name of legal entity: 532 Design Limited (SC734411), a company incorporated in Scotland having its registered office at 10 Euclid Crescent, Dundee, DD1 1AG

United Kingdom

- Name or title of data privacy manager: Simon Fraser, Chief Operating Officer
- Email address: simon@532design.com
- Postal address: 10 Euclid Crescent, Dundee, DD1 1AG

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK regulator or your local Data Protection Authority (DPA) at any time for data protection issues.

Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review.

This version was last updated on 18th April. It may change and, if it does, those changes will be posted on this page and notified to you when you next start the App or log onto your account. You may be required to read and acknowledge the changes to continue your use of the App or the Services.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you. Please email contact@532design.com to update your details.

The data we collect about you

We collect, use, store and transfer different kinds of personal data about you. To make it easier for you to use this privacy notice, we group these into the following categories. Each of these categories is described in more detail in the description of categories of personal data.

- Identity Data.
- Contact Data.
- Profile Data.
- Device Data.
- Content Data.
- Usage Data.
- Security Data.
- Cookies Data.
- Direct Marketing Data.
- Location Data.

- Personalisation Data.

We do not intentionally collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

How is your personal data collected?

We collect your personal data in the following way:

- **Registration.** We collect your Identity Data and Contact Data when you register your account with us.
- **Communications.** When you communicate with us via email or one of our online forms we collect your Contact Data. If the communication relates to an error or problem you are having with the App or one of our Services, we may collect Usage Data for diagnosis and improvement.
- **Information you generate when using our App and Services.** Each time you access and use our App and Services we collect Content, Device, Cookies, Personalisation and Usage Data. We collect Content Data where you upload it to the App or interact with the content available on the App. We collect Device, Cookies, Personalisation and Usage Data by using cookies and other similar technologies. Please see our cookie notice for further details.
- **Information we collect through monitoring the use of our App, Sites and Services.** Each time you access and use our App and Services we collect information about that access and use, being Device, Content, Cookies, and Usage Data.
- **Additional information we otherwise collect through our App, Sites and Services where we have your consent to do so.** Where you provide your consent, we collect your Location Data on an ongoing basis while you have the App installed on your device.
- **Direct Marketing.** We collect and record Direct Marketing Data when we add you to our marketing database, you request to change your direct marketing preferences, or you interact with our direct marketing communications.
- **Information we receive from third parties and publicly available sources.** We will receive personal data about you from the third parties set out below:
 - Device and Cookies Data from the following parties:
analytics providers being Playfab, Google Analytics and Go Daddy; and,
advertising networks being AdMob.
 - Player Data from IMAGO, FifPro and reputable online public sources.

Cookies

We use cookies (small files placed on your device) and other tracking technologies on the App to improve your experience and our development of the App and our Services. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie notice. We use a cookie banner that allows users to

provide granular consent for non-essential cookies before they are set. Users can withdraw or modify their consent at any time.

How we use your personal data

We will only use your personal data when we have a lawful basis to do so. Our lawful basis for each purpose for which we use your personal data is specified below. Most commonly we will use your personal data in the following circumstances:

- **Consent.** Where you have freely consented before the processing in a specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by using the unsubscribe button at the bottom of marketing emails using our cookie banner or contacting us (see Your legal rights below).
- **Performance of a contract.** Where we need to process your personal data to perform a contract with you or where you ask us to take steps before we enter into a contract with you. Where we rely on performance of a contract and you do not provide the necessary information, we will be unable to perform your contract.
- **Legitimate interests.** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Legal obligation.** Where we need to use your personal data to comply with a legal or regulatory obligation. Where we rely on legal obligation and you do not provide the necessary information, we may be unable to fulfil a right you have or comply with our obligations to you, or we may need to take additional steps, such as informing law enforcement or a public authority or applying for a court order.

1.1 Delivery and improvement of our App and purchases

Purpose or activity	Type of personal data	Lawful basis for processing
To permit you to install the App and register you as a new App user	Device Connected Usage	Performance of a contract
To take steps towards providing you with services at your request and sending you service communications. Some Identity data such as your first name and nationality may be visible to other users on the App during gameplay.	Identity Contact Connected Device Usage	Performance of a contract Legitimate interests

Enforce our terms and conditions	Identity	Legitimate interests
To personalise your time zone for game play deadlines	Location Connected	Legitimate interests (to deliver our App and to secure our services)

1.2 Account management and profiling

Purpose or activity	Type of personal data	Lawful basis for processing
Combining the information we collect about you into a single customer account profile.	Contact Direct marketing Personalisation	Legitimate Interests (to publicise and grow our business)

1.3 Direct marketing

Purpose or activity	Type of personal data	Lawful basis for processing
To send you direct marketing communications via push notification	Contact Device Direct Marketing	Consent Unless we can rely on the soft opt-in and you have not opted out, in which case we rely on Legitimate Interest (to publicise and grow our business). For users located in the EU, we will only send direct marketing communications where we have obtained explicit consent.
To send you direct marketing communications by telephone or post	Contact Device Direct Marketing	Legitimate interests (to publicise and grow our business) Unless you have opted out, in which case we rely on Consent

1.4 Troubleshooting, improvement and security

Purpose or activity	Type of personal data	Lawful basis for processing
To administer, monitor and improve our business, Services and this App including troubleshooting, data analysis and system testing	Identity Contact Device Player Data Connected	Legitimate interests (for running our business, provision of administration and IT services, network security, maintaining the security of our App and Services, providing a secure service to users and preventing fraudulent and other misuse of our App)
Applying security measures to our processing of your personal data,	All personal data under this privacy notice	Legal obligation (applying appropriate technical and organisational measures under

including processing in connection with the App		Article 32 of the UK GDPR and the EU GDPR)
Otherwise monitoring use of the App and deploying appropriate security measures	Contact Security Transaction	Legitimate interests (running our business, provision of administration and IT services, network security, maintaining the security of our App and services, providing a secure service to users and preventing fraudulent and other misuse of our App)

1.5 Rights and obligations

Purpose or activity	Type of personal data	Lawful basis for processing
To comply with our other legal obligations, including compliance with tax legislation, judicial, law enforcement and government authorities' requests	All personal data under this privacy notice	Legal obligation

1.6 Cookies and personalisation

Purpose or activity	Type of personal data	Lawful basis for processing
To deploy and process personal data collected via Cookies that are strictly necessary, as set out in the cookies note	Cookies	Legitimate interests (delivering and securing the App and our Services)
To deploy and process personal data collected via Cookies that are not strictly necessary, as set out in the cookies note	Cookies	Consent
To deliver (personalised) advertisements to you	Personalisation	Consent

1.7 Other communications

Purpose or activity	Type of personal data	Lawful basis for processing
To notify you of changes to the App, Services and our terms and conditions for ongoing contracts	Contact	For ongoing or prospective contracts, Performance of a contract Otherwise, Legitimate interests (in servicing our users and prospective users)
To notify you of updates to this privacy notice	Contact	Legal obligation (to inform you of our processing under Articles 13

	Transaction	and 14 of the UK GDPR and the EU GDPR)
To respond to your requests to exercise your rights under this notice	As relevant to your request	Legal obligation (complying with data subject requests under Chapter 3 of the UK GDPR and the EU GDPR)
To ask you to complete a survey and process your response	Contact	Legitimate interests (to analyse how users use our products or Services and to develop them and grow our business) Unless you have previously opted out, where we will rely on Consent
To otherwise respond to your enquiries, fulfil your requests and to contact you where necessary.	As relevant to your enquiry or request	Legitimate interests (service our users and prospective users)

1.8 Business contacts

Purpose or activity	Type of personal data	Lawful basis for processing
Process personal data relating to staff members of our business contacts, including suppliers, customers and prospects	Contact Identity	Legitimate interests (servicing and receiving products or services, to or from our business contacts and carry out our B2B business)

Automated decision making and profiling

We make the following decisions based solely on automated processing or profiling that produce legal effects concerning you (or that may have similarly significant effects):

Age Verification: We use automated systems to verify the age of users based on the information provided during registration. If the age entered does not meet the minimum requirement, access to certain features or the entire App may be restricted. The system automatically checks the age entered against the minimum age requirement set for the App. Users who do not meet the age requirement will be denied access to age-restricted content or services to comply with legal regulations and protect minors.

We also use profiling to personalise your experience and deliver targeted content. This profiling does not produce legal or similarly significant effects. Where profiling is used for direct marketing or automated decisions with significant impact, we will obtain your explicit consent.

Disclosures of your personal data

We may share your personal data with the following third parties:

- **External third parties.**

- Your Appstore Provider and mobile network operator to allow you to install the App.
- Service providers acting as processors based in the USA and the European Union who provide IT and system administration services, hosting services for our App and data storage and analysis.
- Our professional advisors based in the United Kingdom including lawyers, auditors, insurers, consultants who provide legal, accounting, insurance and services.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- HM Revenue and Customs, regulators, law enforcement, public authorities or other third parties based in the UK where necessary to exercise our rights or comply with a legal obligation.

International transfers

Whenever we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Secretary of State or the European Commission.
- Where we use certain service providers located outside the UK or EEA, for example to the United States, we use specific contracts approved by the UK or European Commission which give personal data the same protection it has in the UK and EEA.

Please contact the data privacy manager using the contact details above if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

Data security

All information you provide to us is stored on our secure servers and located in the UK, EEA or USA. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our App or Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Once we have received your information, we will use strict procedures and security features to protect your personal data from loss, unauthorised use or access.

We will collect and store personal data on your device using application data caches and browser web storage (including HTTPS) and other technology. Please see our cookies policy.

We have put in place procedures to detect and respond to personal data breaches and notify you and any applicable regulator when we are legally required to do so.

Data retention

In some circumstances you can ask us to delete your data: see [Your legal rights](#) below for further information.

Once we no longer have a legal right to hold your personal data, we will delete or, in some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

If you do not use the App for a period of 2 years, then we will treat the account as expired and will delete your personal data.

You can request to delete your account by selecting the "Delete Account?" option in the settings section of the App. To prevent accidental deletions, a confirmation pop-up will appear with the message: "Are you sure? This action is permanent." You will need to confirm by selecting "YES DELETE" or cancel by selecting "No – Cancel". Once you confirm the deletion, your account will be scheduled for permanent deletion in 7 days. If you re-open the app within this 7-day period, your deletion request will be automatically revoked. If you re-open the app during the 7-day period, a pop-up will notify you: "As you have re-opened Crowd Legends, your requested account deletion has now been cancelled. You can continue playing the game." You can acknowledge this by selecting 'Ok'. After 7 days, all user data associated with your account will be permanently deleted. This includes:

- Revoking user tokens for accounts using 'Sign in with Apple' via REST API.
- Revoking user tokens for accounts using Google sign-in.
- Deleting guest accounts in the same manner.

Your legal rights

You have the following rights under data protection laws in relation to your personal data.

- **Access.** Request access to and/or a copy of the personal data we process about you (commonly known as a data subject access request). This enables you to check that we are lawfully processing it.
- **Correction.** Request correction of any incomplete or inaccurate data we hold about you. (We may need to verify the accuracy of the new data you provide to us.)
- **Deletion.** Request us to delete or remove personal data where there is no good reason for us continuing to process it. You also can ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we have processed your information unlawfully or where we need to erase your personal data to comply with law. (In some cases, we may need to continue to retain some of your personal data where required by law. If these apply, we will notify you at the time of our response.)
- **Objection.** Object to us processing your personal data where (a) we are relying on legitimate interests as the lawful basis and you feel the processing impacts on your fundamental rights and freedoms, or (b) the processing is for direct marketing purposes. In some cases, we may refuse your objection if we can demonstrate that we have compelling legitimate grounds to continue processing your information which override your rights and freedoms.
- **Restriction.** Request that we restrict or suspend our processing of your personal data:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful, but you do not want us to erase it;

- where we no longer require it, but you need us to hold onto it to establish, exercise or defend legal claims; or
- you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Data portability.** Request we transfer certain of your personal data to you or your chosen third party in a structured, commonly used, machine-readable format. This right only applies to information processed by automated means that we process on the lawful bases of consent or performance of a contract. This includes Profile Data, Transaction Data, and Connected Data.
- **Withdraw consent.** Withdraw your consent at any time where we are relying on consent to process your personal data. Please know that this does not affect the lawfulness of any processing carried out before you withdraw your consent, and after withdrawal, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Complain to the data protection regulator.** If you are unhappy with how we process your personal data, we ask that you contact us first using the details below so that we have the chance to put it right. However, you also have the right to make a complaint to the Information Commissioner's Office (ICO) or, for users in the EU, your local Data Protection Authority (DPA) at any time. For complaints within the EU, you can contact your local DPA. A list of DPAs in each EU member state can be found here - https://edpb.europa.eu/about-edpb/board/members_en. You can exercise any of these rights at any time by contacting us at contact@532design.com.

You can also use the Cookies banner to give or withdraw your consent to or disable our processing of your Cookies Data.

Description of categories of personal data

- **Identity Data:** first name, last name, nationality, title, date of birth and Profile Data.
- **Contact Data:** first name, last name, contact address, email address and telephone numbers, your communication preferences and copies of the communications between you and us.
- **Profile Data:** your email address, username and password.
- **Transaction Data:** billing and delivery addresses, payment card details, history of your payments, purchases, deliveries, returns and refunds and the applicable terms and conditions of your purchases.
- **Device Data:** the type of device you use, your unique device identifier, mobile network information, your mobile operating system, the type of mobile browser you use, IP address, and, time zone setting.
- **Usage Data:** logs and detail of your use of our Apps and Services, being the dates and times on which you download, access and update the App and our Services, any error or debugging information, and the resources that you access and the actions we and you take in relation to them and Cookies Data.
- **Security Data:** information we collect about your use of the App, our Services and our Sites in order to ensure your and our other users' safety and security, being Usage Data, and Cookies Data.

- **Cookies Data:** the information collected through the cookies and similar technologies listed in our Cookies Notice available [here](#).
- **Direct Marketing Data:** your direct marketing preferences, consents for receiving direct marketing from us and/or our third parties and the history of the direct marketing communications we have sent to you.
- **Location Data:** your current location as disclosed by your region's App store, GPS technology, WiFi connections, your IP address for the time period where you have permitted us to collect it.
- **Connected Data:** information stored on your Device that you permit the App to connect to, being login information.
- **Personalisation Data:** Cookies Data, Device Data, Content Data, Transaction Data, Connected Data, Social Media Data, Usage Data, Location Data, and the preferences we have inferred you have and use to personalise the App and Services.
- **Player Data:** names, photographs, career statistics and professional achievements of professional football players used in the game. This data is sourced from publicly available sources and licensed providers, and is processed under our legitimate interest in providing a realistic and engaging game experience.