

PINK LADIES GAMES

Privacy Policy

What we do with information about you, and what you can ask us to do about it

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Applies to	Participants, team captains, spectators, and visitors to pinkladiesgames.ae
Questions	info@pinkladiesgames.com

1. About this policy

This policy explains what we do with information about you when you join our waitlist, book a team, take part in the Pink Ladies Games, come along as a spectator, visit our website or hear from us by email.

If you work for us as crew, a referee, a volunteer or a supplier, or you have applied to, a separate notice covers your information and we give it to you when you join. If you have not received it, ask.

We have written it to be read, not to be survived. If anything in it is unclear, write to us and we will explain it in plain words.

The short version. We collect what we need to run the event and to tell you about it. We do not sell your data. We do not receive the results of any medical consultation at the event. We photograph and film the event and you can ask to be left out. You can ask us at any time what we hold, and ask us to correct it, delete it or stop using it.

2. Who is responsible for your information

The controller of your personal data is **Hercules Trophy Middle East FZ-LLC, trading as Pink Ladies Games**, a company registered in Dubai, United Arab Emirates under trade licence number 2705/2012, with its registered office at Fujairah - Creative Tower P.O.Box 4422 Fujairah.

For anything to do with your personal data, write to **info@pinkladiesgames.com**. Your request goes to Yves Vekemans, who is responsible for answering it.

We handle personal data under UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, the PDPL. The Executive Regulations to that law had not been issued at the date of this policy, so where the law leaves a point open we apply the stricter European standard rather than the looser reading.

We also market this event in Europe where the General Data Protection Regulation applies to what we do, we comply with it, and where it does not, we hold ourselves to the same standard anyway. That is why the legal basis table in section 7 gives the European reference alongside the UAE one. [If the Organiser targets the EU market, a representative in the Union must be appointed under Article 27 of the GDPR and named here.]

3. What this policy covers at a glance

When	What we collect	Why
You book a team	Team Captain and participant details, emergency contact, payment confirmation	To create the contract, take payment, register your team and run the event
Before the event	Health information you choose to tell us, dietary needs, kit sizes	To keep you safe on the day and to get the logistics right
On the day	Attendance, photographs and video, incident and first aid records	To run the event, to record and promote it, and to meet our safety obligations
Afterwards	Feedback, results, marketing preferences	To improve the next edition and to stay in touch if you want us to
Any time you visit the site	Device and usage data through cookies and tags	To make the site work, to measure it and, with your consent, to advertise

4. The information we collect

4.1 Information you might give us

Category	Examples
Identity	First and last name, date of birth or age confirmation, nationality where a venue requires it
Contact	Email address, mobile number, city, postal address where we send something to you
Team	Team name, your role in the team, the other members of your team, whether you are joining as a company, a community or with friends
Booking and payment	Booking reference, amount paid, date, currency, the last four digits and card type as confirmed by our payment provider, and any invoice details you give us
Health	Anything you choose to tell us about a medical condition, injury, allergy, pregnancy, medication or accessibility need, and your emergency contact
Preferences	T-shirt or kit size, marketing choices, language
Dietary needs	What you cannot eat. We treat this as health or belief information, because that is usually what it reveals, and we handle it under section 5
What you say to us	Emails, messages, survey answers, feedback, complaints and the notes we make when we deal with them

4.2 Information your Team Captain gives us about you

Teams are booked by one person who then invites you to join. That means we receive your name, email and emergency details from you directly.

4.3 Information we create about you

Some information is not given to us at all; we generate it. This includes whether you attended, which battles your Team took part in and how it scored, any first aid given or incident recorded involving you, notes we make when we deal with a query or a complaint, and CCTV footage recorded at the venue.

CCTV at The Sevens Stadium is operated by the venue for security and safety. The venue is the controller of that footage and holds it under its own retention policy. We see it only where there has been an incident and we ask for it.

4.4 Information we collect automatically

When you use our website we collect the IP address, device type, browser, operating system, referring page, the pages you look at, how long you stay and what you click. This comes from cookies and similar technologies and is described in section 14.

4.5 Information we get from other people

- Our payment provider tells us that a payment succeeded or failed, and gives us a reference. It does not give us your full card number.
- Our venue partner may give us access, parking or incident information relating to the event site.
- Where you engage with our advertising on Meta, LinkedIn or Google, those platforms tell us in aggregate how the advertising performed. Where you click through, they may tell us that a visit came from a campaign.
- Where a company books teams for its staff, we receive participant details from that company and it is responsible for having told its people.

5. Health information, and the medical partner

Health information is Sensitive Personal Data as defined in Article 1 of the PDPL, and we hold as little of it as we can. The PDPL does not set a separate legal basis regime for sensitive data the way European law does; we apply the stricter European standard to it by choice, not because the law compels us to.

5.1 What we hold

We hold only what you tell us at booking or on the day so that we can keep you safe: a condition we should know about, an allergy, a medication, an accessibility need, and your emergency contact.

We are honest about the basis for this. Telling us is a condition of taking part, so we do not describe it as consent: consent you cannot refuse without losing your place is not real consent. We rely instead on our legitimate interest in running a safe event and on our duty of care to you, and on the protection of your vital interests where there is an emergency and you cannot speak for yourself. Under European law we rely on Article 9(2)(c) for the emergency case and Article 9(2)(f) where the information is needed to establish or defend a claim. Where you tell us something we did not ask for, we rely on your explicit consent for that, and you can withdraw it.

If you would rather not tell us something, you can say so. We will then decide, with you, whether there is a battle you should sit out. We would much rather have that conversation than not know.

Access to this information is limited to the small number of people who need it to run the event safely: the event director, the crew lead responsible for your battle zone and the first aid team.

5.2 What we do not hold

The breast health consultations at the event are provided by Allied Medical Center as an independent controller of your data, under its own licence, its own professional confidentiality and its own privacy notice. We do not receive your consultation, your result, your referral or the fact that you attended. If you want to know how that information is handled, ask Allied Medical Center directly, and we will point you to the right contact.

Where we report to sponsors and partners on the awareness impact of the event, we use only aggregate numbers supplied by the medical partner, for example the total number of consultations held. Those numbers do not identify anyone and cannot be traced back to an individual.

6. Photography and film

The event is photographed and filmed, and images of identifiable people are personal data.

Use	What we rely on	What you can do
Crowd, action and atmosphere images used to record the event, report to sponsors and partners, and promote future editions	Our legitimate interest in recording and promoting an event you chose to attend, balanced against your privacy, and notice given before and at the event	Tell us before the event or speak to crew on the day; ask us afterwards to remove a specific image
A close-up, portrait or interview where you are clearly the subject, used in paid advertising or by a sponsor	Your specific consent, asked for at the time	Say no, or withdraw consent later
Images of children brought as spectators	The consent of the accompanying parent or guardian	Withdraw consent at any time
Images you take yourself and post	Nothing to do with us	Your own choice, subject to the event rules and UAE law on photographing others

To ask us to leave you out, or to take an image down, write to info@pinkladiesgames.com. We will remove it from the channels we control and stop using it going forward. We cannot recall material already printed, already published by a media outlet, or posted by another attendee.

7. Why we use your information, and on what basis

UAE law allows us to process personal data with your consent, and also without consent where one of the grounds in Article 4 of the PDPL applies. This table sets out, for each thing we do, the data involved and the ground we rely on. The European equivalent is given in brackets for participants in the EU.

What we do	Data used	Our legal ground
Create and administer your booking, register your team, issue joining instructions	Identity, contact, team, booking	Necessary to perform the contract with you, or to take steps at your request before it (GDPR Art. 6(1)(b))
Take and reconcile payment, issue invoices and handle refunds	Booking and payment	Performance of the contract, and our obligation under UAE tax and commercial law to keep accounting records (GDPR Art. 6(1)(b), and Art. 6(1)(f) for the UAE obligation, since Art. 6(1)(c) covers European law only)
Keep you safe on the day and respond to an incident	Health, emergency contact, incident records	Your explicit consent for health data, protection of your vital interests in an emergency, and our legitimate interest in running a safe event (GDPR Art. 6(1)(a), (d), (f) and Art. 9(2)(a), (c))
Order kit and manage logistics	Preferences	Performance of the contract (GDPR Art. 6(1)(b))

What we do	Data used	Our legal ground
Cater for you safely	Dietary needs, allergies	Performance of the contract, and your explicit consent for the underlying health or belief information (GDPR Art. 6(1)(b) and Art. 9(2)(a))
Record and promote the event	Photography and film	Our legitimate interest in recording and promoting the event, with notice and an opt-out; consent for advertising close-ups (GDPR Art. 6(1)(f) and (a))
Send you marketing after you opted in	Identity, contact, preferences	Your consent (GDPR Art. 6(1)(a))
Tell past participants about the next edition	Identity, contact	Our legitimate interest in contacting people who have taken part before, with an unsubscribe in every message (GDPR Art. 6(1)(f))
Measure and improve the website and our advertising	Device and usage data	Your consent through the cookie banner for anything beyond what is strictly necessary (GDPR Art. 6(1)(a))
Report to sponsors, partners	Aggregate numbers, and event photography and film	Our legitimate interest in reporting on an event they funded. Sponsors receive no participant lists, no contact details and no health information (GDPR Art. 6(1)(f))
Handle a complaint, an insurance claim or a legal matter	Whatever is relevant, including incident records	Our legitimate interest in establishing or defending our position (GDPR Art. 6(1)(f), and Art. 9(2)(f) for any health information involved)
Meet our obligations to UAE authorities, including permits, safety and tax	Whatever is required	Legal obligation under UAE law, which for European purposes is our legitimate interest in complying with the law that applies to us (GDPR Art. 6(1)(f))

Where we rely on legitimate interest, we have weighed our interest against your privacy and concluded that ours does not override your rights. You can ask us for the reasoning behind any of these assessments and you can object at any time, as explained in section 13.

8. Marketing, and how to stop it

1. If you have taken part before, we may email you about the next edition without asking again, because you are an existing participant and would reasonably expect it. Every message has an unsubscribe link.
2. We do not sell your details, and we do not pass your contact details to sponsors so that they can market to you. A sponsor gets your details only if you deliberately give them to that sponsor, for example at their stall or through their own form.
3. To stop marketing, click unsubscribe in any email or write to info@pinkladiesgames.com. We will act on it within a few days. You will still receive the operational messages you need about a booking you have made.
4. Our marketing emails are sent through our marketing platform, which records whether a message was delivered, opened and clicked so we can tell what is worth sending.

8.1 Text messages and WhatsApp

We may use SMS or WhatsApp to reach a Team Captain quickly about something operational: a change of time, a weather decision, where to park. That is part of running your booking, not marketing. We will only send you marketing by SMS or WhatsApp if you have separately agreed to it, and you can stop it by replying to any message.

9. Who we share your information with

We share personal data only where there is a reason to, and we put a written data processing agreement in place with every supplier who handles data on our behalf.

Who	What they get	Why
Stripe, our payment provider	Payment and booking data	To take payment. Stripe is an independent controller for fraud prevention and its own legal obligations
Our website and landing page platform	Form submissions, device data	To host the site and the booking and waitlist forms
Our marketing and CRM platform	Identity, contact, preferences, engagement	To send email and manage the participant relationship
Our team registration platform	Identity, contact, team data	To register teams and manage team composition
Google, Meta and LinkedIn	Device and usage data, and where you consent, advertising identifiers	Analytics and advertising, described in section 14
The venue operator	Attendance numbers, access lists, incident reports	Site access, safety and insurance
Allied Medical Center	Nothing about you from us	The medical partner is an independent controller; we do not pass it your data and it does not pass us yours
Crew, referees, photographers and suppliers	Only what the role needs, on the day	To run the event
Our insurers and legal advisers	What is relevant to a claim	To handle a claim or a legal matter
Sponsors, partners	Aggregate numbers, and event photography and film in which you may appear	Reporting on reach and impact. They never receive participant lists, contact details or health information, and they may not use event imagery in paid advertising without the specific consent described in section 6
Government and regulatory authorities	What the law requires	Legal obligation, including permits, safety and tax

If our business or the Pink Ladies Games format is ever sold or transferred, participant data may transfer with it. We would tell you first and the buyer would be bound by this policy until it published its own.

10. Sending information outside the UAE

Most of the platforms we use are operated from outside the United Arab Emirates, mainly in the European Union, and the United States. That means your data is transferred out of the UAE.

Articles 22 and 23 of the PDPL allow this where the receiving country gives adequate protection, or where there is an appropriate contractual safeguard, or where you have consented. No adequacy decisions had been issued by the UAE Data Office at the date of this policy, and the Executive Regulations that will set out what a compliant contractual safeguard must contain had not been published either. Until they are, we do the following and we will re-paper our contracts once the UAE requirements are known:

- we require the contract with every supplier to contain the European Commission's Standard Contractual Clauses, or equivalent binding commitments, together with our own security, deletion and audit requirements;
- we rely on a UAE adequacy recognition where and when one is issued for the country concerned; and
- we rely on your explicit consent only where nothing else is available and we have explained the risk to you first.

You can ask us at info@pinkladiesgames.ae which safeguard applies to a particular supplier and we will tell you.

11. How long we keep it

What	How long	Why that long
Booking and participant records	5 years after the event	Limitation periods for contractual claims in the UAE
Payment and accounting records	5 years from the end of the tax period, or longer where the law requires	UAE tax and commercial record-keeping obligations
Health and dietary information, whether given at booking or on the day	Deleted within 90 days after the event, unless it relates to an incident	It has no purpose once the event is over
Incident, first aid and insurance records	7 years, or longer where a claim is open	Personal injury limitation and insurance requirements
Photography and film	Kept indefinitely as a record of the event, subject to your right to object	The archive is the history of the event; individual images are removed on request
Marketing contact data and preferences	Until you unsubscribe, and then a minimal suppression record kept indefinitely	The suppression record is what stops us contacting you again by mistake
Website analytics data	Up to 14 months in identifiable form	Enough for year-on-year comparison
Attendance and battle results	5 years, with the event record kept as anonymised statistics afterwards	Part of the event record and of any claim about what happened
CCTV at the venue	Held by the venue operator under its own policy, typically 30 days	Security and incident investigation; we hold a copy only where an incident requires it
Correspondence and complaints	3 years from closure, or longer where a dispute is open	To handle a repeat issue and to show what we did

When a retention period ends we delete the data or anonymise it so that it can no longer be linked to you. Anonymised statistics may be kept indefinitely.

12. How we protect it

- Access is limited to the people who need it for their role, and removed when the role ends.
- Accounts on our platforms require strong passwords and, where the platform supports it, two-factor authentication.
- Data is encrypted in transit, and at rest by the platforms we use.
- We do not hold card numbers. Payment card data goes directly to Stripe.
- Every supplier that processes data for us is under a written agreement covering confidentiality, security and deletion.
- Crew and volunteers are briefed before the event on what they may and may not do with participant information.

If a breach occurs that is likely to prejudice your privacy, confidentiality or security, we will notify the UAE Data Office and, where the risk to you is material, we will notify you, in line with Article 9 of the PDPL.

13. Your rights

Under the PDPL you have the following rights. They are free to use and we will answer within 30 days, or tell you if we need longer and why.

Right	What it means in practice
To be informed and to get access	Ask us what we hold about you, why, who we share it with and where it goes, and get a copy
To have it corrected	Tell us something is wrong or out of date and we will fix it
To have it deleted	Ask us to erase your data, unless we need to keep it for a legal or contractual reason we will explain
To restrict what we do with it	Ask us to hold your data but stop using it, for example while a dispute about accuracy is resolved
To object	Object to anything we do on the basis of legitimate interest, including photography and marketing. For marketing we will always stop
To withdraw consent	Where we rely on consent, take it back at any time. This does not undo anything we did before you withdrew it
To have your data transferred	Ask for your data in a structured, machine-readable format, or ask us to send it to someone else where technically possible
To object to automated decisions	We do not make decisions about you by automated means, so there should be nothing to object to. If that ever changes we will tell you first
To complain	To us first, and then to the UAE Data Office if you are not satisfied

To use any of these rights, write to info@pinkladiesgames.com. We may ask you to confirm who you are before we act, so that we do not give your data to someone else.

If you are in the European Union or the European Economic Area, you have the equivalent rights under the GDPR and you may also complain to the supervisory authority where you live.

14. Cookies and similar technologies

Our website uses cookies and tags. Anything beyond what is strictly necessary is set only after you agree through the banner, and you can change your mind at any time through the cookie settings link in the footer.

Category	What is used	What it does	Consent needed
Strictly necessary	Session and security cookies set by our website platform and by Stripe	Keeps the site working, keeps a booking session alive, protects against fraud	No
Analytics	Google Analytics 4, deployed through Google Tag Manager	Tells us how many people visit, which pages they use and where they drop out of the booking flow	Yes
Marketing and advertising	Meta Pixel, LinkedIn Insight Tag, Google Ads	Measures whether our advertising works and lets us show relevant ads to people who have visited	Yes
Marketing automation	Our CRM and email platform tracking code	Links a website visit to a waitlist or booking record so that we send you the right email, not the wrong one	Yes

All of these tags are managed through a single Google Tag Manager container so that we can see exactly what is running on the site. Tags added in future will appear in this policy before they go live.

Typical lifespan	What it covers
Session only, deleted when you close the browser	Security and booking-session cookies
Up to 2 years	The Google Analytics identifier that distinguishes one visitor from another
Up to 90 days	Meta and LinkedIn advertising identifiers
Up to 12 months	Your cookie choice itself, so we do not ask you again on every visit

Advertising and analytics tags are held until you make a choice on the banner, and only fire if you accept. Exact cookie names and durations are listed in the cookie settings panel on the website, which is generated from the live tag container so that it cannot drift out of date.

Most browsers let you block or delete cookies through their settings. Blocking strictly necessary cookies will stop the booking form from working.

15. Children

Participation in the battles is limited to adults. We do not knowingly collect data about children through the website, the waitlist or the booking flow, and we do not direct our advertising at children.

Children are welcome as spectators with a responsible adult. Where a child appears in event photography, we rely on the consent of the accompanying parent or guardian and we will remove an image on request without asking why.

If you believe we hold information about a child that we should not, write to info@pinkladiesgames.com and we will delete it.

16. Our own governance

We carry out an impact assessment before we start any processing that could carry a high risk to you, as Article 21 of the PDPL requires. We did one for the handling of health information at the event and for the use of event photography, and we will do another before we add anything materially new.

[Confirm whether a Data Protection Officer is required under Article 10 of the PDPL for the scale of processing involved, appoint one if so, and name the appointment here.]

17. Automated decision-making

We do not make any decision about you that produces a legal or similarly significant effect using automated processing alone. Places are allocated by the order in which completed bookings are paid, not by a profiling system.

18. Changes to this policy

We update this policy when what we do changes, when we add a tool, or when the law changes, in particular when the Executive Regulations to the PDPL are issued. The version and effective date at the top of this document tell you which version you are reading.

If a change materially affects how we use data we already hold about you, we will tell you by email before it takes effect.

19. Contact us, and how to complain

Reason	Where to write
Anything about your personal data, including all the rights in section 13	info@pinkladiesgames.com
Photography: asking to be left out, or to take an image down	info@pinkladiesgames.com
Bookings, changes to your team, joining instructions	info@pinkladiesgames.com
Breast health consultations at the event	Allied Medical Center directly, as the independent controller of that information

Please come to us first. If we cannot resolve it, you may complain to the UAE Data Office, the federal authority responsible for personal data protection, and nothing in this policy limits that right.

Document control

Version	Effective from	Summary of change
2.0	1 September 2025	Update

How to reach us. Write to info@pinkladiesgames.com for anything about your personal data

Language. This document is published in English. Where it is translated into Arabic or any other language and the versions differ, the English version governs, except where UAE law requires otherwise.