

Exhibit 2 b
PRIVACY POLICY

PRIVACY POLICY

Version [6]

Last updated on 2023-02-21

SUMMARY

- This privacy policy explains how we process personal data when providing access to the learning platform Gameplan, a product of Learn2Esport, for school education in esports.
- The service Gameplan is hosted on www.gameplan.com ("Website"), (with the platform in this Exhibit jointly defined as the "Service") and provided by Learn2Esport Education Global AB ("Learn2Esport"), corp. reg. no. 559165-5781 having the address S:t Olofsgatan 35, 753 30 Uppsala, Sweden (also "we" or "us").
- In case you are using our Service as part of your education in school, your school is mainly responsible for how your personal data is processed and we, in that aspect, assume the role of sub-contractor (processor of personal data) in relation to your school. In case you have questions regarding the processing of personal data, you may therefore first need to contact your school.
- When you sign in to and use the Service, Learn2Esport will process your personal data in order to provide the Service by, for instance, administering your account, secure access to the Service, personalize and improve your user experience, and otherwise provide the Service as described in the user conditions and in fulfilling certain legal obligations.
- If you have any questions, please contact us at info@learn2esport.com.

TABLE OF CONTENTS

- 1. Introduction**
- 2. Processing of personal data**
- 3. Data we process**
- 4. For what purpose do we process your personal data?**
- 5. When and how we share personal data with others**
- 6. Your rights**
- 7. Security of your personal data**
- 8. For how long is personal data stored?**
- 9. Cookies**
- 10. Legal compliance**
- 11. Other things you should know**
- 12. Changes to this privacy policy**
- 13. Contact**

1. INTRODUCTION

Learn2Esport is a software developer that offers several web-based services.

This privacy policy describes Learn2Esport's handling and routines regarding the collection and processing of personal data in relation to the Service. At Learn2Esport, we take a structured approach and work to process personal data in a correct and lawful manner.

Since data protection and privacy questions are a long-term commitment, we may update this text from time to time when the Service is updated and we enact new privacy policies.

In situations when you use Learn2Esport's services as part of your education in school, your school has the role of personal data controller and Learn2Esport is in this regard mainly responsible for the administrative use of your personal data. In that situation, Learn2Esport is the processor of personal data since your school determines the purposes and means of the processing of your personal data. In case you have questions regarding how your personal data is processed in the course of education, please contact your school. Other questions regarding the privacy policy may be directed to us by email info@learn2esport.com.

2. PROCESSING OF PERSONAL DATA

This document constitutes a policy which we have created covering our collection, use, and processing of personal data in order to enable you to access updated information regarding our processing of personal data. "Personal data" means any information that can be used to directly or indirectly identify a natural person such as, for instance, name, address, phone number, and email address.

Learn2Esport collects and uses your personal data when you use the Service in order to enable access to the platform or at any other time when you decide to engage with us by other means. Our processing of personal data is done in accordance with Swedish data protection law and the General Data Protection Regulation ("GDPR").

3. DATA THAT WE USE

Creation of a profile and use of the Service

The Service provides a learning platform for school education in esports. As a teacher, you will receive access to an admin control panel where you can create courses, timetables, lectures, and study material. As a student, you will receive access to other functionalities that allow you to submit and present statistics and comment on lectures.

In order to enable Learn2Esport to provide the Service, we collect and use the following personal data: first and family name, email address, password, IP address, profile picture(s), biography, game account, game journal (which you fill in by yourself), results (such as exam results) and teacher feedback. Learn2Esport furthermore processes any additional data that you or any other party choose to submit when using the Service.

Your communication with Learn2Esport

If you communicate with us by email, post, or any other form of communication, we may keep such communications and information therein in order to answer your inquiry, manage your complaint, or take similar action.

4. FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

Learn2Esport processes your personal data in order to provide the Service wherein you may create a profile and use the platform in order to administer or take part in school education. All processing of personal data in the course of education and in relation to support in connection to the Service is conducted by Learn2Esport in the role of being the processor of personal data on behalf of the controller. As such, Learn2Esport does not determine the purposes and means of the processing, which is done by the controller of personal data, usually your education provider.

Learn2Esport processes personal data as a controller only in the cases below and for the purposes and in accordance with the legal basis stated below.

Learn2Esport processes personal data in order to send notifications and messages by email or by other means to for example inform regarding updates to the Service and user conditions. In order to improve and develop our services, user statistics may be analyzed in order to secure technical functionality. Learn2Esport may also process personal data to ensure that the user conditions of the Service are complied with, to enforce the user conditions including safeguarding your rights and property and for data security. If you contact our support, we may collect the personal data necessary in order to assist you and, if needed, to contact you regarding, if any, follow-ups. We may also contact you using the information in relation to your account that you have left for this purpose. Additionally, we may collect other information regarding communication with our users, such as feedback.

Legal basis for the processing of personal data where Learn2Esport is the controller of personal data

All processing of personal data that is conducted in accordance with the above is based on Learn2Esport's legitimate interests. In this regard, we assess that all mentioned purposes can be deemed as pursuing legitimate interests within the definition laid out in the GDPR. We find the legitimate interests, seen in their context, outweigh the registered persons' fundamental rights and freedoms regarding data protection and that the processing, therefore, is lawful for these purposes. In this regard, we specifically recognize that the described processing is of a character the registered persons reasonably can expect from using similar services and that no processing of sensitive data is conducted.

5. WHEN AND HOW WE SHARE PERSONAL DATA WITH OTHERS

We share your personal data with our business partners for e.g. hosting services and with your school when it is necessary in order to provide the Service. Moreover, all information that we process by being the processor of personal data is shared with the controller of personal data, as a rule, your educational coordinator.

We do not sell personal data to any party and we only share personal data with third parties that facilitate the providing of the Service, such as sub-contractors for e.g. hosting (for whom we are responsible). We do not share personal data in other cases unless;

- (i) you request it or approve it;
- (ii) the data must be disclosed in order to comply with the law or a contract (for instance to comply with an injunction, fulfill a contract that we have established with you, or to protect our rights, property, and data security for the Service, or other users or our employees;
- (iii) in order to manage emergency or events constituting force majeure; or
- (iv) to handle disputes, claims, or to reply to persons acting on your behalf.

All processing of personal data within our role as controller occurs within the EU/EEA.

6. YOUR RIGHTS

In situations when you use the Service in the course of education at your school, your school is the controller of personal data and Learn2Esport is consequently only responsible for the administrative management of your personal data. In that situation, Learn2Esport is the processor of personal data since your school determines the purposes and the means of the processing. If you have any questions regarding your personal data that is processed in relation to your education, we ask you to first contact your school or your education coordinator.

The below rights may be exercised with Learn2Esport in relation to the processing that we conduct as controller of personal data.

As a registered person, you have the right to inquire whether your personal data is processed and, if that

is the case, request access to your stored personal data (so-called access right). If you find that any of your personal data, in any regard, is inaccurate or incomplete, you may request that your data is either rectified or supplemented. You may also object to our processing of personal data at any time and demand that the processing shall cease. Additionally, you may require that the processing of your personal data is limited and therewith stop Learn2Esport from further processing the personal data. You may also demand that your personal data is deleted. Additionally, if you are under the age of 18, your parent or guardian may request that your data is deleted, limited or stopped from being processed. Finally, you have the right to demand that your personal data is disclosed in a format readable by machine or that it shall be moved to another controller of personal data (so-called data portability).

To exercise your rights in accordance with the above, you may contact Learn2Esport by email at info@learn2esport.com. If you would like to make a complaint regarding our processing of personal data, you may do so by contacting the Swedish supervisory authority Integritetsskyddsmyndigheten.

Website: www.imy.se

Email: imy@imy.se

Phone: (+46) 8-657 61 00

Address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm, Sweden

7. SECURITY OF YOUR PERSONAL DATA

We protect the information and the personal data that is shared with us by using the Service with appropriate technical and organizational measures. We update and continuously test our security technology.

Physical security: Our servers are located in a locked data center equipped with an alarm system. The data center is protected around the clock and has double perimeter protection with separate authorization systems, camera surveillance, and all access are logged.

Transfer and communication: All communication between our server and between the website and user is encrypted using Secure Socket Layer ("SSL").

Password protection: The login procedure is completely encrypted which means that no information is sent as unencrypted text. The user's password is stored in a one-way encrypted format.

Automatic logout: In order to mitigate the risk that unauthorized persons gain access to information if a computer is left unattended, the system will automatically logout the user following a pre-decided timespan.

Logging and traceability: All teacher login and login attempts are logged using timestamps and IP address is saved. The same applies to SSH login in relation to the servers. Following several failed login attempts, access from a certain IP address may consequently be blocked.

Backups: Critical service information is copied daily in several layers in accordance with a rotating scheme that ensures that no data is lost. The backup copies are stored in a secure manner separate from the original data.

Firewall and protection against malicious software: Firewall and an array of technical, administrative, and organizational measures, limit remote access and protect our servers against unauthorized access and malicious software, destruction, and alteration.

We limit access to your personal data to our employees that need such access to provide the Service. Our employees are given relevant information and education regarding personal data processing in accordance with a year-plan for education. We will adapt disciplinary measures in order to uphold our employees' sense of privacy responsibility.

Should there ever be a breach in data, please see our [Cyber Security Incident Plan](#).

8. FOR HOW LONG IS THE PERSONAL DATA STORED?

We store your personal data as long as it is necessary in order to provide the Service, or as long as it is required to fulfill our legal obligations.

All direct marketing that is related to the Service, or any other service provided by Learn2Esport, will not be sent to an account that has not been active for a period of 24 months. You have the right to object to the processing of your personal data for direct marketing purposes and may, at any given time, revoke your earlier given consent.

Criteria for determining the storage period of your personal data may be:

For how long will we need personal data in order to provide the Service? This encompasses, among other things, your need to login and use Learn2Esport. If you terminate your account, we will automatically erase your personal data following sixty (60) days. The reason for us saving your personal for six months is to ensure that you as a user will have the possibility to restore your account and

therefore not lose any of your user data. Up to the point where we have finally erased your personal data, you may resume your account at any time and therewith regain access to the Service. If you decide to restore your account, your personal data will not be erased unless if you once again decide to terminate your user account.

9. COOKIES

We collect information using cookies. For more information regarding our use of similar technology and analytics tools and how you can prevent the use of cookies, please see our Cookie Policy.

10. LEGAL COMPLIANCE

Please be advised that our Services may contain links to and from third party websites of our Partners (such as gaming providers), advertisers, social media sites, and other services. If you follow a link to any of these websites, please note that these websites have their own privacy policies, and we do not accept any responsibility or liability for their privacy policies or content.

Learn2Esport uses Student Data for the sole purpose of providing our Services, in accordance with all relevant contractual agreements. We do not own or control Student Data, which belongs to the Student and/or the School that contracts with Learn2Esport to provide our Services to the Student.

As set forth in our agreements with Schools, our Services are designed to provide protections for Student Data as required by applicable privacy laws, which include:

- **The Family Educational Rights and Privacy Act (“FERPA”):** Our Service, along with the data protection policies set forth herein, are designed to satisfy our obligation to protect personal information from Students’ educational records under FERPA. We commit to working with Schools to satisfy all compliance obligations under FERPA.
- **Children’s Online Privacy Protection Act (“COPPA”):** Learn2Esport does NOT knowingly collect, use, or share any information from children under the age of 13 without verifiable consent from a parent or guardian. A School may not permit a child under 13 to register for our Service to compete on the School’s esports team, unless the School represents that it has the authority to provide all required consents for Learn2Esport to collect and use such Student’s personal information in the manner contemplated by this Privacy Policy and as permitted by COPPA. Please contact us at info@gameplan.com if you believe we have inadvertently collected personal information of a child under 13 without proper consent so that we may delete such data as soon as possible.
- **Students Online Personal Information Protection Act (“SOPIPA”):** This Privacy Policy and our Services are designed to comply with SOPIPA. Learn2Esport does not use Student Data for targeted advertising purposes. We also do not use the information we collect to create a Student profile except in furtherance of providing the features and functions of the Service. We never sell Student Data unless the sale is made in conjunction with corporate transaction, such as a merger, acquisition, bankruptcy, or other sale of assets, in which case we will make efforts to ensure the successor entity honors this Privacy Policy and/or we will notify the School and provide an opportunity to opt-out by deleting Student accounts prior to the data transfer.
- **California Assembly Bill 1584 (“AB 1584”):** This Privacy Policy and our Services are designed to comply with AB 1584. Pupil records obtained by Learn2Esport from a local educational agency (“LEA”) remain the property of and under the control of the LEA. Parents, legal guardians, or eligible pupils may review personally identifiable information in the pupil’s records and correct any errors by contacting their LEA directly. In the event of an unauthorized disclosure of a pupil’s records, Learn2Esport will notify the LEA and will provide the LEA with information to be shared with the affected parent(s), legal guardians(s), or eligible pupil(s). Pupil records will be deleted and/or de-identified in accordance with our agreements with each School and as described in this Privacy Policy.
- **Connecticut Act Concerning Student Data Privacy:** In compliance with the requirements of the Connecticut Act Concerning Student Data Privacy, Conn. Gen. Stat. Ann. § 10-234aa-dd, Learn2Esport has developed a terms-of-service addendum. Please contact us at info@gameplan.com to find out about incorporating the Connecticut Addendum into your agreement with Learn2Esport.

11. OTHER THINGS YOU SHOULD KNOW

Third-party links:

You should be aware that when you are browsing our website, you may be directed to other websites where personal data is collected and processed beyond our control.

Changes of ownership:

If the ownership of our business is changed, we may transfer and disclose your information, user account, and personal data to the new owner in order to enable the new owner to keep providing the Service to you. The new owner shall adhere to the requirements herein and other commitments as presented in this privacy policy or any other, at the time valid, privacy policy.

12. CHANGES TO THIS PRIVACY POLICY

We may from time to time update and develop our service offer concerning the platform Learn2Esport. Therefore, we may also update this privacy policy. In case of substantial changes, you will be notified prior to these entering into force and you may choose to stop using the Service. If the changes are minor (e.g. updating the name of the supervisory authority) and does not impact how Learn2Esport processes data, we reserve the right to update and change this privacy policy without any prior notification other than keeping an updated version of the policy available on our website.

13. CONTACT

Please contact us in case of any other questions regarding the processing of personal data at info@learn2esport.com .