

PRIVACY POLICY

Esports Association of Malawi

Last Updated: January 2026

1. INTRODUCTION

The Esports Association of Malawi ("**EAM**", "**we**", "**us**", "**our**") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you use our website (www.esports.mw), participate in our tournaments, register for programs, or interact with our organization.

Please read this Privacy Policy carefully. By accessing our website, registering for events, or providing us with personal information, you acknowledge that you have read, understood, and agree to be bound by all the terms of this Privacy Policy.

EAM complies with the **Malawi Data Protection Act (2024)** and applies best practices in data protection in accordance with internationally recognized standards.

2. INFORMATION WE COLLECT

We collect personal data directly from you and, in some cases, from third parties. The types of information we collect include:

2.1 Information You Provide Directly

Account Registration & Profile Information:

- Full name
- Date of birth
- Email address
- Phone number
- Physical address
- Player username/gaming handle
- Game titles and skill level
- School name (if applicable)
- Gaming center affiliation

Tournament & Event Registration:

- Team information
- Competition preferences
- Game titles of interest
- Payment information (if applicable)
- Emergency contact information
- Parental consent (for participants under 18 years old)

Communication & Support:

- Messages sent through contact forms
- Email inquiries
- Support requests
- Feedback and survey responses
- Social media messages and interactions

Partnership & Sponsorship Applications:

- Company name and information
- Contact person details
- Business registration documents
- Banking information (for payments)

2.2 Information Collected Automatically

Website Usage Data:

- IP address
- Browser type and version
- Operating system
- Pages visited and time spent
- Links clicked
- Referring website
- Device type and identifiers
- Approximate location (city/country level)

Cookies & Tracking Technologies:

We use cookies, web beacons, and similar tracking technologies to enhance user experience, analyze website performance, and understand user behavior. You can control cookie settings through your browser preferences.

Event Participation Data:

- Tournament performance data
- Match results and rankings
- Livestream recordings

- Photos and videos taken during events
 - Attendance records
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3. LEGAL BASIS FOR PROCESSING

EAM processes your personal data only where we have a lawful basis to do so. Under the Malawi Data Protection Act (2024), our lawful bases include:

3.1 Consent

We process data with your explicit consent for purposes such as:

- Newsletter subscriptions
- Marketing communications
- Photo/video sharing on social media
- Event attendance records

3.2 Contract Performance

We process data necessary to:

- Fulfill tournament registration and participation
- Deliver training and certification programs
- Process sponsorship agreements
- Manage gaming center partnerships
- Execute payment transactions

3.3 Legal Obligation

We process data to comply with:

- Malawi legal and regulatory requirements
- Sports governance regulations
- Anti-doping policies
- Financial audit requirements

3.4 Legitimate Interest

We process data for purposes such as:

- Improving our services and website
- Fraud prevention and security
- Event management and logistics
- Marketing and promotional activities (with opportunity to opt-out)

- Talent identification and development

3.5 Vital Interest

We may process data to protect the vital interests of our participants (e.g., emergency contact information, medical needs during events).

4. HOW WE USE YOUR INFORMATION

We use your personal data for the following purposes:

4.1 Tournament & Event Management

- Register participants and manage tournament entries
- Track performance and maintain rankings
- Facilitate fair competition and prevent cheating
- Organize event logistics and communications
- Manage payments and prize distribution

4.2 Communication

- Send tournament updates and announcements
- Deliver event invitations and schedules
- Provide technical support and assistance
- Respond to inquiries and feedback
- Send administrative notices

4.3 Marketing & Promotion

- Send newsletters and promotional content
- Feature player spotlights and success stories
- Create case studies and testimonials
- Conduct market research and surveys
- Share event photos and videos (with consent)

4.4 Service Improvement

- Analyze website traffic and user behavior
- Improve website functionality and design
- Develop new programs and features
- Understand user preferences and needs
- Provide personalized recommendations

4.5 Talent Development

- Identify promising athletes
- Recommend coaching and training programs
- Facilitate international competition opportunities
- Create player profiles and statistics
- Support career pathway development

4.6 Legal & Security

- Prevent fraud, abuse, and unauthorized access
- Enforce our Terms of Service
- Comply with legal obligations
- Protect the rights and safety of participants
- Maintain audit trails for accountability

4.7 Partnerships & Sponsorship

- Connect sponsors with relevant audience data (anonymized)
 - Create sponsorship reports and impact metrics
 - Facilitate partner communications
 - Manage contract obligations
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5. DATA SHARING & DISCLOSURE

We do not sell your personal data to third parties. However, we may share your information in the following limited circumstances:

5.1 Service Providers

We share data with third-party service providers who assist us with:

- Website hosting and maintenance
- Email delivery and communication platforms
- Payment processing
- Analytics and data analysis
- Event management software
- Cloud storage and backup

These service providers are contractually obligated to protect your data and use it only for specified purposes.

5.2 International Partners & Federations

To facilitate international competition representation, we may share athlete data with:

- Global Esports Federation
- African Confederation of Electronic Sports (ACES)
- Games of The Future organizers
- Global Esports Games organizers
- Esports Federation of Zambia and other regional bodies

Shared data is limited to information necessary for competition qualification and participation.

5.3 Government & Regulatory Bodies

We may disclose information when required by law or regulation:

- Malawi Communications Regulatory Authority (MACRA)
- Malawi National Sports Council
- Court orders or legal proceedings
- Tax and financial authorities

5.4 Gaming Centers & Schools

We share program information with partner gaming centers and schools with whom participants are affiliated. This enables better program coordination and participant support.

5.5 Sponsors & Media Partners

We may share anonymized, aggregated data with sponsors to demonstrate audience reach and engagement. We do NOT share individual personal data without consent. Tournament results and athlete names may be publicly shared (with athlete consent) for:

- Press releases and media coverage
- Tournament announcements
- Leaderboards and rankings
- Livestream broadcasts

5.6 Legally Required Disclosures

We will disclose personal data when required by law, court order, or governmental request.

6. DATA RETENTION

We retain your personal data only as long as necessary to fulfill the purposes for which it was collected:

Data Type	Retention Period
Tournament Registration	During tournament + 2 years (records)
Player Profiles	Active + 5 years after last activity
Financial Records	7 years (legal requirement)
Event Photos/Videos	Duration of consent + 5 years
Email Communications	3 years from last contact
Website Analytics	24 months
Support Inquiries	2 years after resolution
Inactive Accounts	3 years after last login (then deletion offered)

After the retention period expires, we securely delete or anonymize your data. For some legally required records (financial, audit), we retain data longer as mandated by law.

7. YOUR RIGHTS

Under the Malawi Data Protection Act (2024), you have the following rights:

7.1 Right to Access

You have the right to request a copy of the personal data we hold about you. We will provide this information within 30 days of your request at no cost.

7.2 Right to Rectification

If your personal data is inaccurate or incomplete, you have the right to request correction. We will correct the information promptly.

7.3 Right to Erasure ("Right to be Forgotten")

You may request deletion of your personal data in certain circumstances, such as:

- When data is no longer necessary for its original purpose
- When you withdraw your consent
- When you object to processing and there is no legitimate interest
- When data has been processed unlawfully

Exceptions apply where we have a legal obligation to retain data.

7.4 Right to Data Portability

You have the right to receive your personal data in a structured, commonly-used, machine-readable format and to transmit it to another organization.

7.5 Right to Object

You may object to processing of your personal data for:

- Direct marketing and promotional communications
- Processing based on legitimate interest
- Profiling activities

7.6 Right to Restrict Processing

You may request that we limit the use of your personal data while we verify its accuracy or assess your objection.

7.7 Right to Withdraw Consent

If we rely on your consent to process data, you may withdraw that consent at any time. This does not affect the lawfulness of processing before the withdrawal.

7.8 Exercising Your Rights

To exercise any of these rights, please contact us at:

- **Email:** privacy@esports.mw
- **Mail:** Ethyo House, Blantyre, Malawi
- **Phone:** +265 991 949 453

We will respond to requests within 30 days. If we cannot fulfill your request, we will explain the legal basis for our refusal.

8. DATA SECURITY

EAM implements comprehensive technical and organizational measures to protect your personal data from unauthorized access, disclosure, alteration, and destruction:

8.1 Technical Measures

- **Encryption:** Sensitive data (passwords, financial information) encrypted in transit (HTTPS/SSL) and at rest
- **Access Controls:** User authentication (passwords, multi-factor authentication where applicable)
- **Firewalls & Intrusion Detection:** Network security systems to prevent unauthorized access
- **Regular Backups:** Data backed up regularly to prevent loss
- **Secure Servers:** Data stored on secure, protected servers

- **Software Updates:** Regular security patches and updates

8.2 Organizational Measures

- **Staff Training:** Data protection training for all EAM personnel
- **Access Restrictions:** Personal data accessible only to authorized personnel
- **Confidentiality Agreements:** Staff members sign confidentiality agreements
- **Vendor Management:** Service providers required to maintain security standards
- **Privacy by Design:** Privacy considerations built into new systems
- **Data Protection Impact Assessments:** For high-risk processing

8.3 Data Breach Response

In the event of a personal data breach that poses a risk to your rights and freedoms, EAM will:

- Notify affected individuals within 72 hours
- Report the breach to MACRA (Malawi Communications Regulatory Authority)
- Provide information about the breach and recommended protective measures
- Conduct a thorough investigation and implement corrective measures

9. COOKIES & TRACKING TECHNOLOGIES

9.1 Types of Cookies We Use

Essential Cookies: Required for website functionality (login, security, navigation). Cannot be disabled.

Performance Cookies: Collect information about how you use our website to improve performance and user experience.

Marketing Cookies: Track your interests and browsing behavior to show relevant promotions and advertisements.

Third-Party Cookies: Google Analytics and social media platforms may place cookies on our site.

9.2 Cookie Control

Most browsers allow you to refuse cookies or alert you when cookies are being set. Please refer to your browser's help section to manage cookie preferences. Note that disabling cookies may affect website functionality.

9.3 Opt-Out Options

You can opt out of:

- Google Analytics tracking: [Google Analytics Opt-out Browser Add-on]
 - Marketing emails: Click "Unsubscribe" link in any promotional email
 - Social media tracking: Adjust privacy settings in your social media account
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10. CHILDREN'S PRIVACY

EAM welcomes participants under 18 years old. However, we require parental consent for data processing of minors:

- **Under 13:** Parental/guardian written consent required for all data processing
- **13-18:** Parental/guardian consent required for marketing communications
- **At Any Age:** Parental/guardian consent required for event attendance and data collection

Parents/guardians may contact us to review, modify, or delete their child's data.

11. INTERNATIONAL DATA TRANSFERS

When we share data with international partners (Global Esports Federation, international tournament organizers), we ensure:

- Data transfer agreements comply with Malawi Data Protection Act
 - Recipient organizations maintain equivalent data protection standards
 - Your rights remain protected under applicable laws
 - Transfer is limited to data necessary for competition participation
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12. THIRD-PARTY LINKS & SERVICES

Our website may contain links to third-party websites (social media, sponsors, partners). This Privacy Policy applies only to EAM's services. We are not responsible for:

- Third-party privacy practices
- Data collected by third-party sites
- Content on external websites

Please review third-party privacy policies before providing your information.

13. MARKETING & PROMOTIONAL COMMUNICATIONS

We may send you promotional content, tournament updates, and newsletters based on your interests. You can manage communication preferences by:

- Clicking the "Unsubscribe" link in any email
- Updating your preferences on your account page
- Contacting us at privacy@esports.mw
- Replying to SMS with "STOP"

Opting out of marketing communications does not affect transactional messages (tournament confirmations, payment receipts, etc.).

14. AMENDMENTS TO THIS POLICY

EAM may update this Privacy Policy periodically to reflect:

- Changes in our data practices
- New features or services
- Evolving legal requirements
- Security improvements
- User feedback

We will notify you of material changes by:

- Posting the updated policy on our website
- Updating the "Last Updated" date
- Sending email notification (if changes are significant)

Your continued use of our services indicates acceptance of the updated policy.

15. CONTACT INFORMATION

For questions, concerns, or requests regarding this Privacy Policy and our data practices, please contact:

Data Protection Officer:

- **Email:** privacy@esports.mw
- **Phone:** +265 991 949 453
- **Mailing Address:** Ethyo House, Blantyre, Malawi

Data Protection Authority (Malawi Communications Regulatory Authority):

- **Website:** www.macra.org.mw
- **Email:** dataprotection@macra.org.mw
- **Phone:** +265 1 770 100

We will respond to all data protection inquiries within 30 days.

16. GOVERNING LAW

This Privacy Policy is governed by the laws of the Republic of Malawi. EAM complies with the **Malawi Data Protection Act (2024)** and the **Malawi Constitution** regarding the right to privacy.

SCHEDULE A: LEGITIMATE INTEREST ASSESSMENT

For processing based on legitimate interest, EAM has assessed:

- The nature and purposes of processing
- Necessity and proportionality of data use
- Your expectations regarding data use
- Impact on your privacy rights
- Availability of safeguards

Processing is conducted only where legitimate interest outweighs your privacy rights.

End of Privacy Policy
