

FIRSTPRESS — PRIVACY POLICY

Effective date: 12 March 2026

Important note. This Privacy Policy describes how FirstPress processes personal data when users visit, register for, purchase from, or use the platform and related services.

1. Controller

The controller responsible for data processing is:

Kostiantyn Zimbil FirstPress

Hermannstr. 3, 59929 Brilon, Germany

Email: support.firstpress@gmail.com

2. Scope

This Privacy Policy applies to the FirstPress website, user accounts, tournament participation, subscriptions, payments, support communication, and related platform functions. Currently, no payments or financial transactions are processed on the platform.

3. Minimum age

The platform is intended only for persons who are at least 18 years old. If we become aware that an account was created contrary to this requirement, we may suspend or delete that account.

4. Categories of personal data

We may process the following categories of personal data:

Account and profile data, such as email address, username, account ID, password hash, account-related status and user settings.

Tournament and platform content, such as uploaded audio files, track titles, metadata, voting-related data, leaderboard data, and participation history.

Payment and billing data, such as payment status, subscription plan, transaction identifiers, billing country, and fraud-screening information received from payment providers. We do not store full card details.

Technical and usage data, such as IP address, browser type, device information, log data, timestamps, session data, and security-related events.

Communication data, such as support requests, emails, and messages we receive from users.

5. Purposes and legal bases

We process personal data for the following purposes and on the following legal bases under Article 6(1) GDPR:

To create and administer user accounts, provide access to the platform, run tournaments, calculate rankings, manage platform functionality and user access, and perform the contract with the user (Art. 6(1)(b) GDPR).

To comply with legal obligations, including accounting, tax, anti-fraud, and compliance duties (Art. 6(1)(c) GDPR).

To ensure platform security, prevent abuse, investigate suspicious activity, defend legal claims, improve the reliability of the service, and enforce our Terms of Use based on our legitimate interests (Art. 6(1)(f) GDPR).

To process optional analytics, marketing, or other non-essential cookies and comparable technologies where consent is required (Art. 6(1)(a) GDPR).

6. Whether users must provide data

Certain personal data is required to create an account, purchase subscriptions or tokens, participate in tournaments, and use core platform functions. If a user does not provide the required data, we may be unable to provide the relevant service.

7. Recipients and processors

We may disclose personal data to the following categories of recipients where necessary:

Hosting, infrastructure, storage, and content delivery providers.

Payment processors and payment-related fraud prevention providers.

Email delivery, authentication, customer support, and security service providers.

Professional advisers, authorities, courts, or other third parties where disclosure is legally required or necessary to establish, exercise, or defend legal claims.

Where tournament functionality requires it, certain user-provided content and related account identifiers may be visible to other users on the platform, for example in tournaments, voting areas, profiles, and leaderboards.

8. International data transfers

Personal data may be processed in the European Union or the European Economic Area and, where service providers are located outside the EU/EEA, in third countries.

If personal data is transferred to a third country without an adequacy decision, we rely on appropriate safeguards under Article 46 GDPR, such as the European Commission's Standard Contractual Clauses, together with supplementary measures where required.

9. Cookies and similar technologies

We use technically necessary cookies and similar technologies required to operate the platform, maintain sessions, provide security functions, and store essential settings.

Analytics, marketing, or other non-essential cookies are used only where the user has given valid consent, if consent is legally required.

Users may manage their preferences via the cookie banner or settings made available on the platform. Browser-level controls may also affect cookie storage.

10. Automated processing

Certain platform functions are automated, including ranking calculations, tournament status handling, leaderboard placement, token accounting, and fraud or abuse checks.

These processes are used to operate the platform according to predefined rules and generally do not constitute automated decision-making producing legal effects or similarly significant effects within the meaning of Article 22 GDPR.

11. Retention periods

We retain personal data only for as long as necessary for the purposes described in this Privacy Policy or as required by law.

Account data is generally retained for as long as the account remains active and for a limited period thereafter where needed for legal, security, or evidentiary reasons.

Billing and payment records are retained for the period required by tax and commercial law.

Security logs and technical logs are retained for as long as reasonably necessary for security, troubleshooting, abuse prevention, and evidentiary purposes.

Uploaded content may remain stored for tournament operation, records, dispute handling, and platform integrity for as long as needed for those purposes or until deletion is possible without overriding legitimate reasons for retention.

12. Data subject rights

Under the GDPR, users may have the right to request access to their personal data, rectification of inaccurate data, erasure, restriction of processing, data portability, and objection to processing based on Article 6(1)(e) or (f) GDPR.

Where processing is based on consent, consent can be withdrawn at any time with effect for the future.

Users also have the right to lodge a complaint with a competent supervisory authority. For private businesses located in North Rhine-Westphalia, the competent supervisory authority is generally the Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen (LDI NRW).

13. Security

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, alteration, disclosure, or misuse. However, no method of transmission or storage is completely secure.

14. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. The current version will be published on the platform. Material changes may also be communicated by additional means where appropriate.

15. Contact

For privacy-related questions or requests concerning personal data, users may contact us at support.firstpress@gmail.com