

Privacy Policy — Player 1 Labs

Last updated: 20 May 2026

Introduction

This document describes the data protection policy of Earthcrosser Ventures Limited, trading as Player 1 Labs, registered in Ireland (CRO number 623629), with its registered office at 72 Pearse Street, Dublin 2, D02 DP76.

Player 1 Labs designs and delivers experiential learning programmes and digital training experiences for organisations. As part of delivering these experiences, we sometimes provide participants with access to a web-based learning tool. This policy explains what data we collect in connection with those tools, why we collect it, and how we protect it.

We are committed to handling any data with care, and to complying with the General Data Protection Regulation (GDPR) and applicable Irish and EU data protection law.

Player 1 Labs acts as the **Data Controller** for all data processed through our learning tools. This means we decide what data is collected, for what purpose, and for how long.

1. What data we collect

Our web-based learning tools are designed to minimise data collection. No names, email addresses, or other directly identifying information are collected.

When you use one of our learning tools, we store the following:

- **An anonymous access code** — a unique numerical code assigned to you before the programme begins. This code is never linked to your name or identity within our system.
- **Your content preferences** — for example, which cards, themes, or topics you have selected within the tool. These are saved against your code so the tool remembers your choices when you return.
- **A first login date** — the date on which you first accessed the tool, recorded as a date only (no time, no location).
- **Onboarding status** — a simple flag indicating whether you have completed the introductory steps of the tool.

We do not collect your name, email address, employer, location, IP address, or any other personal identifier. We do not use cookies. We do not track your behaviour across sessions beyond the preferences listed above.

2. Why we collect this data

The data listed above is collected solely to deliver the learning experience. Specifically:

- To allow the tool to remember your content preferences when you return using your code
- To understand at a general level when a programme begins to be used (first login dates in aggregate)

We do not use this data for marketing, research, profiling, or any commercial purpose beyond programme delivery.

The legal basis for this processing is **legitimate interest** — specifically, the operational necessity of providing a functional, personalised learning tool to programme participants.

3. How we store your data

Your preferences are stored securely in Airtable, a cloud-based database service. Access to this database is strictly controlled and limited to authorised Player 1 Labs personnel only.

The tool itself stores a technical identifier (an Airtable record ID) in your browser's local storage. This is a string of characters with no inherent meaning — it is not your code, your name, or any recognisable personal data. It is used only to allow the tool to retrieve your preferences when you return. It is never transmitted to any third party.

4. Third-party service providers

To deliver our learning tools, we rely on the following sub-processors:

- **Airtable** (Formagrid Inc., USA) — used to store participant preferences and programme data. Airtable processes data in accordance with Standard Contractual Clauses approved by the European Commission.
- **Vercel** (Vercel Inc., USA) — used to host and serve the web application. Vercel processes data in accordance with Standard Contractual Clauses approved by the European Commission.

We do not share your data with any other third parties. We do not use analytics tools, advertising networks, or tracking services of any kind.

5. Transfers to third countries

Airtable and Vercel are US-based services. As described above, any transfer of data to these providers is carried out under Standard Contractual Clauses (SCCs) as provided for under Article 46(2) of the GDPR. This means appropriate safeguards are in place to protect your data when it is processed outside the European Economic Area.

6. How long we keep your data

Programme data is retained in Airtable for a maximum of **six months after the programme ends**. After this period, all data associated with that programme is permanently deleted.

If you would like your data to be deleted earlier, you can contact us at the address below and we will action your request without delay.

7. Your rights

Under GDPR, you have the following rights in relation to your data:

- **Right of access** — you can ask us what data we hold about you, free of charge.
- **Right to rectification** — you can ask us to correct any inaccurate data.
- **Right to erasure** — you can ask us to delete your data at any time.
- **Right to restriction** — you can ask us to limit how we use your data.
- **Right to object** — you can object to our processing of your data where it is based on legitimate interest.
- **Right to data portability** — you can request your data in a structured, machine-readable format.
- **No automated decision-making** — your data is never used for profiling or automated decisions about you.

To exercise any of these rights, contact us at info@player1labs.com. We will respond within 30 days.

8. Security

We take appropriate technical and organisational measures to protect the data we hold. These include rate limiting on login attempts, input validation across all data entry points, automatic session expiry, and ensuring that all service credentials are kept server-side and never exposed to the browser.

9. Complaints

If you have concerns about how we handle your data, you have the right to lodge a complaint with the Irish Data Protection Commission:

Data Protection Commission 21 Fitzwilliam Square South Dublin 2, D02 RD28 Ireland Web: www.dataprotection.ie Email: info@dataprotection.ie

10. Changes to this policy

Player 1 Labs reserves the right to update this policy from time to time. Any significant changes will be communicated to relevant programme participants. The date at the top of this document reflects the most recent update.

Contact

For any questions about this policy or about how your data is handled, please contact us at:

Earthcrosser Ventures Limited (trading as Player 1 Labs) 72 Pearse Street Dublin 2, D02 DP76 Ireland CRO Registration Number: 623629 Email: info@player1labs.com Web: player1labs.com