

CyberBoxer GDPR Compliance Statement

1. General Information

CyberBoxer processes a limited set of gameplay-related data. The following categories are collected:

- Game results (punch strength, score, weight class),
- Animated avatars generated from short video recordings,
- Machine serial number,
- Timestamp of the game session.

No sensitive personal data (such as biometric identifiers, addresses, or financial data) is collected.

2. Player Notification

Players are clearly informed about data recording and have the option to opt out:

- A notice on the protective padding reads:
“This machine records a short video of the player to create an animated avatar for the leaderboard. If you do not consent to being recorded, simply press the OPT-OUT button before punching the bag. By continuing without opting out, you agree to the use of your image for display on the machine’s high score screen.”
- Before each punch, the screen shows “Press to skip photo” with arrows pointing to the opt-out buttons above the display.

3. GDPR Principles

CyberBoxer follows all core GDPR principles:

- Lawfulness, fairness, and transparency - players are notified and can opt out.
- Purpose limitation - data is used only for gameplay, leaderboards, and optional sharing.
- Data minimization - only essential data is processed.
- Accuracy - data is stored as provided without alteration.
- Storage limitation - avatars and results are retained only for defined durations.
- Integrity and confidentiality - secure transfer and restricted access.
- Accountability - internal procedures and logs ensure compliance.

4. Video Storage and Lifetime

4.1. Machine Local Storage

- Avatars are stored locally for a default lifetime of 24 hours.
- Since the machine does not have a real-time clock, if permanently offline, timekeeping is based on actual powered-on time.
- Operators may reset the entire leaderboard or avatars only (scores are preserved).

4.2. Remote Web Server (Online Leaderboard)

- Avatars are mirrored on the online leaderboard.
- When an avatar is removed from the machine, the server also stops displaying it.
- If a player shares their result via social media (Facebook, WhatsApp, X), the server retains the avatar for 2 days to keep the shared link active.

4.3. Leaderboard Merger Device

- Mirrors the leaderboard of connected machines.
- When an avatar expires on the source machine, it is also removed from the Leaderboard Merger.

5. Storage Access and Display

Avatars may be displayed on the machine screen, leaderboard merger displays, and the online leaderboard. The website allows users to download their avatar as an MP4 video.

Direct file access is restricted to the administrator.

6. QR Codes

Two types of QR codes are used:

- Default QR Code - links to the machine's leaderboard.
- Targeted QR Code - shown for 12 seconds after a punch, linking to the player's individual result page.

7. Data Security

All data is stored on secure servers located in the EU or other GDPR-compliant jurisdictions. Communication uses HTTPS/TLS encryption. Server access is restricted to authorized personnel only.

8. Data Subject Rights

Withdrawal of consent is available through the opt-out mechanism.

Players have the right to access, rectify, or delete their data, withdraw consent, and lodge complaints with the relevant Data Protection Authority.

9. Certification

CyberBoxer is not certified by a third party. Compliance is ensured through documented internal processes and adherence to GDPR obligations.

10. Contact Information

For GDPR inquiries, contact: support@kriss-sport.com