

The Privacy Policy

Updated March 23, 2021

This Privacy Policy (hereinafter referred to as the “Policy”) explains:

- what type of information we collect, how we use it and why we collect it (collection purposes);
- how and where we store your information;
- how we protect personal data;
- your rights to select and manage personal data;
- how we notify of changes in the Privacy Policy;
- how to contact us;
- the Cookies Policy (addendum).

We collect your personal data when you visit and use the Company Website, register on the Company Website or place a Bet through the Company Website and/or applications.

What Type of Information We Collect, How We Use It and Why We Collect It (Collection Purposes)

The type of information collected depends on how you use the Company Website and/or the Company's mobile applications.

The Information We Receive from You

We collect information about you when you fill out various forms on the Company Website – e.g., registering on the website, entering your personal account details, sending a query in a Chat, participating in surveys, as well as on the following occasions:

- set up and management of your account;
- compliance with the registration rules and verification of the accuracy of the information provided;
- access to our website, services or applications through the resources of third parties, including by means of the login or user ID in social networks;
- sending queries, letters or other communications addressed to us;
- user support including via the interactive online help center (Chat), while maintaining communication with us (including helping users with issues pertaining to their account or the Company Website/mobile application of the Company, keeping in touch and responding to specific requests or questions);

- participation in promotions, marketing and publicity activities pertaining to the Company Website and/or the Mobile application of the Company.

We may also collect the following information:

- your preferences;
- your betting history and bid patterns;
- information detected by our systems about any potentially fraudulent or criminal activity or money laundering.

When registering with the Company Website (including through the mobile application of the Company) we ask you to provide the following information necessary for the use thereof:

- your mobile telephone number or e-mail address.

We do not collect information about your payment methods or other financial information (e.g., a bank card or an electronic wallet). This data is collected by the payment systems integrated with the Company Website. In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption - TLS 1.2 and application layer with algorithm AES and key length 256 bit.

We do not collect or process information on the race or nationality of the users, their political views, religious or philosophical beliefs, health status, or sexual preferences.

You have the right to independently determine the type and extent of information you are willing to provide. Yet, be advised that in the event that you decline to provide us with all the necessary information we will not be able to deliver the requested services.

To ensure a safe and fair environment, resolve disputes, investigate and eliminate fraud and illegal conduct, to verify the compliance with both the law and our agreements and rules, we may request the following additional information:

- for establishing your identity and/or verification of your age, your identification documents;
- for verification of your address, a bank statement, utility bill, or other documents;
- for the validation of a payment transaction or a withdrawal of funds, the documents requested by our partners - payment systems or agents, in accordance with the professional requirements for combating money laundering and illegal financial transactions.

Automatic Collection of Information

If you use the Company Website and/or the mobile applications of the Company, the following information is automatically collected:

- your IP address;
- mobile and other hardware or device identifiers;
- Browser information and your preferred language;
- referring and exit pages, including landing pages and pages viewed;
- details about how you use the Company Website and/or the Company's mobile applications.

We may also collect and store information locally on your device using various mechanisms like cookies, browser web storage (including HTML 5), and application data caches.

How We Use Information About You and Why We Do It

We collect, use and process information about you to provide you with our services available on the Company Website (including through the mobile applications of the Company), as well as for other purposes, including:

- updating the users' data;
- monitoring your gambling patterns and identifying possible violations of the responsible gaming principles;
- monitoring the compliance with the established limits on deposits;
- activation or authentication of bids, the record of your bet history and statistics;
- sending out offers and promotions (with your consent);
- delivery and evaluation of the effectiveness of advertising;
- recording your preferences and dynamic delivery of content;
- developing loyalty programs;
- improvement and development of the Company Website, Mobile application of the Company and the management thereof;
- collection and preparation of statistics, delivery of statistical reports, analytics and analysis of the use of our services by you and other clients;
- monitoring gambling activity;
- announcing important changes introduced to the Company Website and/or the mobile applications of the Company, technical updates, and amendments to the Client Agreement;
- measuring the operation of the Company Website and/or the mobile applications of the Company;
- identifying, diagnosing and fixing errors on the Company Site and/or the mobile applications of the Company;
- delivery of software updates to you and other clients;
- compliance with legal and regulatory requirements;
- prevention of offenses;

- ensuring a safe and honest service environment, resolving disputes, investigating and eliminating fraud and illegal conduct, compliance with the legal requirements and with the agreements and rules of the Company.

We do not sell your personal information to third parties.

Information Sharing

We do not disclose to third parties for their own use your personal data which may serve to reveal your identity (your name, email address, mailing address, etc.), without your consent. In exceptional cases when it is required by law, essential to protect our rights or the property or business of our clients or third parties, we may provide personal information to third parties in the scope not exceeding that which is required by law or justified by the purpose.

We may disclose to third parties only anonymous or aggregated information, as well as other data which cannot serve to reveal your identity (e.g., gaming statistics).

For the purpose of collecting or processing personal data for our internal needs (e.g., for conducting market research) we may hire third parties in your home country or abroad, including outside of the European Economic Area (EEA). The personal data collected or received by third-party agents or service providers may be used by such entities only in our interests and for the purposes specified in the Policy.

In the event of a reorganization, merger, sale or bankruptcy of the Company we may pass all the collected information to a relevant third party and undertake to obtain your consent if required by law.

We may need, for the purpose of delivering our services, to transfer data (including your information) to other firms within our group of companies. You can obtain information concerning our group of companies by contacting our support service either via Chat or e-mail.

We do not control the information sent from your browser to third parties who obtain information during their normal online activities (e.g. analytical companies or advertising networks). In the event that social communication technologies from third parties are integrated on the Company Website or our applications (for example, the LIKE button in Facebook), such third parties may collect information when you use the Company Website and/or our applications.

We do not control nor assume any responsibility for any third party websites that contain illegal or defamatory content and that might include a link to our websites or URLs. We do not accept any responsibility from third party websites that contain content such as, but not limited to:

- 1) Adult Entertainment;
- 2) Child Pornography;
- 3) Drug Paraphernalia;
- 4) Internet Gun Sales;
- 5) Unlicensed Forex brokers;
- 6) Sexual Encounter Firms;
- 7) Unlicensed Money Transmitters;
- 8) Ammunition Sales;
- 9) Escort Services;
- 10) Firearms/Fireworks Sales;
- 11) Government Grants;
- 12) Home Based Charities;
- 13) Loans or other financial services;
- 14) Pharmaceutical Sales;
- 15) Pornography;
- 16) Telemarketing;
- 17) Tobacco Sales.

Statistics

We use statistics to find out the ways in which our clients use the Company Website or our applications. This information assists us in improving our Company Website and applications and deliver improved services to our clients. We obtain information on statistics from third parties who collect information about which pages you view, the amount of time you spend on each of them or on the Website in general, the way you access the site and the links you clicked on prior thereto. Such information is collected using cookies that do not store your personal data, such as name, address, etc.

If you use our applications on your mobile devices, we receive the statistics on downloads and launches of our applications from the App Store, Google Market and

other mobile platforms providers. We do not receive your personal data from mobile platforms.

Third-party analytical services integrated into our products may share with us the information they collect when connected to us and the information they collect independently on various websites. Many such companies collect and use information in accordance with their own privacy policies.

IP Addresses

An IP address is an address assigned to the computer when it goes online (on the Internet). We do not have access to any personal identification information, yet, our software uses IP addresses but only with the purpose of collecting and analyzing the data on the number of clients from a certain territory. We also use your IP address to help diagnose our server problems or for administering our website.

Marketing

We may contact you regarding promotions, products or services that may be of interest to you, but only if you have granted your consent to receiving such marketing communications. You can update your marketing preferences, as well as decline receiving notifications at any time through our support service.

We may also perform a certain profiling of you and your activities in relation to our services in order to send you more suitable marketing communications. This profiling will be carried out based on the use of the Company Website and/or applications. You can cancel profiling at any time through our support service.

How and Where We Store Your Information

Information is collected by our Company (referred to as the Company). The activities of the Company are governed by Curaçao eGaming.

The personal data collected by us may be stored and processed for the purposes set forth in the Policy, in any country where Company, its subsidiaries or third-party agents operate. By using the Company Website and/or our applications you acknowledge the possibility that your personal data could be transferred to recipients in other countries that may not provide the same level of privacy protection as do the laws of your country of residence or citizenship.

We retain your personal data for the duration necessary to provide you with the Services. Accordingly, your personal data must be retained for up to 7 years from either the closure of your account (if applicable) or the last time you have contacted us. If your personal data is no longer in need of processing we will delete it. However, please note that we may be subject to legal or regulatory requirements for the storage of personal

data for a longer period, in particular in accordance with any applicable statutory limitation period.

How We Protect Personal Information

Protecting information on our clients is the most important task for us, and we take a number of steps in this regard, including encryption of important financial information. Yet, there is no such thing as absolutely reliable protective measures. This means that we cannot guarantee the security of your information and that we assume no responsibility for the unauthorized use thereof.

You accept inherent risks by providing information and operating online through the Internet and you shall not hold us responsible for any breach of security unless such breach of security is due to the fact that we failed to provide the appropriate technical and organizational safeguards in accordance with the requirements for the protection of personal data.

Children

Protecting the privacy of children online is extremely important to us. Our Company Website and applications are intended for the use by individuals over 18 years of age only. To verify the information provided to us we request additional information pursuant to the Policy.

Your Rights with Respect to Selecting and Managing Your Personal Data

You have the following rights with respect to your personal data:

- the right to access your personal data stored by us;
- the right to obtain certain personal data in a machine-readable format (for example, in Microsoft Excel, Adobe Acrobat, or similar);
- the right to object to processing;
- the right to correct inaccurate personal data;
- the right to erase certain personal data in the following circumstances: if we no longer need to process it; when you withdraw your consent thereto; when you object; when your personal data was illegally processed; or when the deletion of your personal data is required in accordance with a legal obligation;
- the right to request an explanation of the logic used by us in making decisions concerning you solely by automated means;
- the right to complain to your national data protection regulator;

- when we specifically requested your consent to the processing of your personal data and do not have other legal basis for being certain that you have the right to withdraw such consent; and
- the right to object to direct marketing either by refusing direct marketing through contacting the support service or by rejecting the appropriate communication. You also have the right to object to any profiling to the extent that applies only to direct marketing.

You can also view and update your preferences with the assistance of our support team. If the basis for collecting and using information about you is your consent, you can revoke such consent at any time. To contact our support service, use the Chat. Please be aware that while we make every effort to satisfy your requests in regard to your rights, such rights are not absolute rights. This means that we may be forced to reject your request or satisfy it only in part.

When you make a request regarding your rights, we will need to verify your identity. We may also ask you to clarify your request. If we receive duplicate requests or have reason to believe that these requests are unreasonable, we reserve the right not to respond.

You can deactivate your account or have the personal information associated therewith deleted by contacting our support service. In this case, you will lose access to our services associated with this account. Please be advised that the Company may store the information necessary to resolve disputes, comply with our User Agreements or protect our legal rights, as well as to comply with technical and legal requirements and restrictions related to security, fair business practices and the use of our products. In all other cases, we will store your information for as long as it is reasonably necessary to provide you with our services, create and improve our products, comply with the law and conduct our business activities.

You can also adjust your browser settings to block certain types of online tracking, such as cookies (for more details, see the Cookie Policy addendum to the Policy, which is an integral part thereof).

If you are not certain of your rights or are concerned about the way your personal data may be processed, you can contact us through our support service: send a message to the Chat.

The Right to Apply to An Authorized Data Protection Body

If you live in the EU or are an EU citizen, you have the right to contact an authorized body regulating the protection of confidential data in your area. You can find the contact details of authorized bodies regulating the protection of confidential data in the EU at ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

The Method of Notifying Our Clients of Changes to the Privacy Policy

From time to time, we may make changes to the Policy; therefore, we recommend that you review it regularly. We reserve the right to autonomously decide on the methods of notifying you of amendments to the Policy, including a decision not to give special notifications, except by publishing a new version of the text of the Policy on the Company Website. If, pursuant to the current legislation on the protection of confidential data, we are required to provide you with an extended notification or to obtain your permission to make said changes, we will comply with such requirements.

The date of the last update of this Policy is indicated at the top of this document.

This Policy is an integral part of the Client Agreement. You can read the text of the Client Agreement in the "Rules" section on the Company Website.

The original text of the Policy is written in English. Translations into any other languages are based on the original text in English. The original text in English shall prevail, including in the event of a discrepancy between the original text of the Policy in English and the texts thereof in other languages.

How to contact us

In the event that you have any complaints or questions about the Policy, contact us through the support Chat. To send a message in the support Chat, go to your account, select HELP DESK from the menu and send your message.

Cookies Policy

What Cookies Are

When interacting with the Company Website, the use of your browser may lead to storing cookies. Cookies are small amounts of data. They help improve the use of the website and provide a personalized service. In addition, cookies help us comply with certain legal requirements.

Cookies are not capable of transmitting viruses or install malicious programs on your computer.

What Kinds and Types of Cookies We Use and Why

Different types of cookies perform different functions. We use cookies for the following purposes:

- to save the settings you are using (e.g., language);
- to use the account when placing bets;
- to use the account for the whole duration of your use of the Company Website;
- to collect information about technical problems on the Company Website;
- to collect information about your use of the Company Website for marketing purposes;
- to detect violations of the Client Agreement, e.g. cookies that allow us to detect duplicate or linked accounts, as well as misuse of bonuses;
- for obtaining information on the device you use when interacting with the Company Website (e.g. device type, geographical location, browser information, and IP address);
- to comply with certain legal requirements, such as money laundering and social responsibility for countering the use of our services for the financing of terrorism;
- to determine the jurisdiction wherefrom you are placing your bet (for the purpose of complying with local legislation).

We obtain information from the cookies we use only at the time that you visit the Company Site.

Data obtained from our use of cookies may be transferred to third parties if we are required to disclose such information on the basis of applicable laws.

Managing Cookies

You can change the cookies settings, e.g., disable cookies in your browser or set up the option of receiving a notification on sent cookies. If you have any questions regarding the configuration of your browser you can visit the HELP page on the website of the company, the browser whereof you are using.

In the event that you do not wish to use cookies and set up your browser accordingly, you may lose the capability to use a number of the features offered on the Company Website. In particular, the Company Website and our services may not work as they should. Moreover, they may not work at all.

By continuing the use of the Company Website, you agree to the use of cookies.

Should you have any questions about the Cookie Policy you can contact us through our support service by sending a message in the Chat.

This Cookies Policy is an integral part of the Privacy Policy.