

Privacy Policy Document

Game Payment Technology Limited (“GPT”) is committed to safeguarding the privacy expectations of its users (“you” or “your”). Accordingly, GPT have put in place this Privacy Policy, which outlines our data protection practices, including how we collect, use, disclose and protect your Personal Information, as well as your rights with respect to your Personal Information.

This Privacy Policy, covers the following areas:

- **THE INFORMATION WE COLLECT**
- **CONDITIONS FOR PROCESSING OF PERSONAL INFORMATION**
- **MINORS**
- **USING THE COLLECTED INFORMATION**
- **MARKETING**
- **SHARING INFORMATION**
- **INTERNATIONAL TRANSFER OF INFORMATION**
- **THIRD PARTY TRACKING TECHNOLOGIES**
- **THIRD PARTY SERVICES**
- **RETENTION OF PERSONAL INFORMATION**
- **YOUR RIGHTS**
- **HOW WE KEEP YOUR INFORMATION SECURED**
- **CHANGES TO THE PRIVACY POLICY**
- **HOW TO CONTACT US**

We encourage you to read the Privacy Policy carefully. By installing the Game Payment App (“App”) and by creating an account, you hereby indicate that you have read and understood this Privacy Policy.

If you are using the App, your personal information use will also be governed by Yoti Ltd's (“Yoti”) privacy policy. Yoti provides us with an age verification and identity platform and assists in the assessment of each user’s or potential user’s age prior to such user’s registration on the App. Yoti’s privacy policy is available at <https://www.yoti.com/privacypolicy/>.

THE INFORMATION WE COLLECT

We collect two types of information from our users:

Personal Information

The first type of information that we collect is information that identifies or may reasonably identify an individual (“**Personal Information**”). Personal Information that is being gathered may consist of the following:

- **Account details:** When you download the App and register to use the services the App provides (“**Services**”) by creating an account, you will be asked to provide the following details about yourself:
 - First name
 - Last name
 - Address
 - Birth date
 - Mobile telephone number
 - Email address
 - Password

- Photographic facial image

In addition, we may collect certain information as required under various gaming regulations, as well as Know Your Client ("KYC") and Anti-Money Laundering ("AML") regulatory requirements, such as your source of funds.

- **Address information:** We store your home address and country. This is in order to confirm (via our payment processor) when you use a debit card to purchase play credit ("**Credit**"), the card is registered to the same address.
- **Gaming information:** In order for us to provide the Services, we automatically record information related to your account and use of our Services, including with respect to your transactions, deposits, balances, withdraws, bonuses and winnings. We may also collect information that indicates potential gambling problems or addictions in order to ensure a responsible gaming environment and as required of the operators by law.
- **Financial information:** In order for you to enjoy all of the functions of the Services and use Credit to play on gaming and non-gaming machines, payment information will be collected from you, including full records of your financial transactions, such as purchases/withdrawals of Credit as well as allowing you to set your safe bet limit, take a break from your account and close your account.
- **Voluntary information:** We collect information which you provide us voluntarily, such as when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of the Services. This includes information you are willing to share with us for the purpose of improving and developing our relationship with you.
- **Geolocation information:** If you allow geolocation services on your device we shall store your geolocation details including your longitude and latitude against each financial transaction (machine deposits and withdrawals and card deposits into your account and withdrawals back to card), in order to detect suspicious patterns of play and to enhance the Services by understanding regional play.
- **Device information:** We may collect specific types of connection details and information with regard to your device, software or hardware that may identify you, such as: device's unique identifiers (e.g. UUID and MAC address), browser fingerprinting and IP address.
- **Telephone calls:** We may record or monitor telephone calls for customer support, training and/or security purposes.
- **Yoti:** When you provide age verification data via a Yoti account to use the Services we will have access to basic information from Yoti, being your name and whether you are over the age of 18.
- **Freshdesk:** We use Freshdesk to provide a support portal to you. As part of this service Freshdesk may collect data from you including but not limited to your name and email address. Freshdesk's privacy policy is available at https://www.freshworks.com/privacy/?_ga=2.263054533.878707382.1575299666-650019219.1575299666.
- **Information we collect from third parties:** We may collect Personal Information from third party service providers, such as information about your credit history from credit agencies and other financial information which is relevant to the provision of the Services, as well as information which is gathered in order to verify your identity and prevent fraudulent or illegal activity.

Non-personal Information

The second type of information is un-identified and non-identifiable information pertaining to you, which may be made available or gathered via your use of the Service ("**Non-Personal Information**").

Non-Personal Information which is being collected consists of technical information and aggregated usage information, and may contain, among other things, your operating system, screen resolution, keyboard language, your 'click-stream' and activities on the App, the period of time you visited the App and related time stamps, etc.

For avoidance of doubt, any Non-personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

Types of Non-personal Information we collect from or about you:

- **Log-in history and technical information:** In order to enhance the functionality of the Services and to provide you with a better user experience, we collect technical information transmitted by your device, including certain software and hardware information (e.g. the type of operating system your device uses, language preference, access time of the App; etc.).
- **Gameplay information:** We record game play information including, amongst other things, your deposits, bonuses and game session duration.
- **Device and connection information:** We collect information from the particular device you are using, for security and fraud detection and prevention purposes. For example, we may gather information with regard to other software which is running simultaneously with the App for detecting if you are using software which is associated with fraudulent activity (e.g. robots, malware, etc.) or checking if the connection you are using is via a VPN or proxy.
- **Analytics information:** We collect information about your use of the Services, such as App usage, log files, user activity (e.g. pages viewed, the amount of time spent on particular pages, online browsing, clicks, actions, etc.), time stamps, alerts, etc. This information is collected for amongst other things troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Services.
- **Anonymous information:** We may anonymise or de-identify the information collected by the Services or via other means so that the information cannot, on its own, personally identify you. Our use and disclosure of such aggregated or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation and for any purpose, such as for advertising or marketing purposes.

CONDITIONS FOR PROCESSING PERSONAL INFORMATION

We will process your Personal Information for a variety of reasons, each of which is prescribed by relevant data protection laws.

- **Fulfilment of a contract, compliance with a legal obligation**
It is necessary for us to process your Personal Information where it is necessary for the performance of a contract or in order for us to comply with our various legal and/or regulatory responsibilities, including, but not limited to complying with any AML and KYC legislation.
- **Legitimate interests**
We also process your Personal Information where we deem such processing to be in our (or a third party's) legitimate interests and provided always that such processing will not prejudice your interests, rights and freedoms. Examples of us processing in accordance with legitimate interests would include: (i) where we disclose your Personal Information to any one or more of our associate/subsidiary companies following a restructure or for internal administrative purposes; (ii) detection and retention of information pertaining to those with responsible gaming issues; (iii) processing for the purposes of ensuring network and information security, including preventing unauthorised access to our electronic communications network; (iv) safeguarding the integrity of our Services by combatting, reporting and sharing information related to

suspicious betting patterns or fraudulent activities; (v) adhering to regulatory and statutory requirements; (vi) devising a tailored reward scheme for players; and (vii) sharing personal information with our advisers and professional services providers (such as auditors) for ensuring our compliance with regulatory requirements and industry best practices.

- **Consent**

Our processing of your Personal Information will primarily be necessary for us to provide you with the Services. However, if you provide your consent to receive marketing we will on certain occasions provide marketing information (such as promotions and marketing material). If you have agreed to receive marketing you can opt out at a later date. If you no longer wish to be contacted for marketing purposes, please update your account preferences within the App.

MINORS

Use of the Services in relation to gaming machines is not designed or directed to persons under the age of 18.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a person under the age of 18 is using the Services in relation to gaming machines and has shared any information, we may discard such information unless it is needed to comply with any legal or statutory obligation binding upon us.

USING THE COLLECTED INFORMATION

We may use your Personal Information for the purposes listed below:

- To set up, manage and update your account.
- To provide and operate the Services (such as for purchasing Credits and payment processing).
- To communicate with you and to keep you informed of our latest service updates .
- To market our Services (see more below under "Marketing"), as well as to serve you advertisements, including behavioural advertising.
- To conduct analytics, statistical and research purposes, in order to improve and customise the Services to your needs and interests (such as by compiling aggregated reports about the usage of certain features of our Services).
- For customer relationship management purposes, and to support and troubleshoot the Services and to respond to your queries.
- To enable us to further develop, customise and improve the Services based on your common preferences and uses.
- To provide you with a responsible gaming environment.
- To communicate with you and to process any of your requests to exercise your user rights.
- To identify and authenticate your access to certain features of the Services.
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardise or negatively affect the integrity of the Services, including by identifying risks associated with your activity on the App.
- To investigate violations of our policies and the Terms as well as enforce our policies and the Terms.
- To investigate and resolve disputes in connection with your use of the Services.
- To assist us with meeting our regulatory obligations or as required by law or regulation, including for the purpose of ascertaining your source of funds or income, or as required by other governmental authorities, or to comply with any legal process or respond to a government request.
- In addition, we use your Personal Information upon your specific and informed consent, such as for certain marketing and promotional activities.

Where you have not consented (or have withdrawn your consent) to the processing of your Personal Information by us, we may continue to process your Personal Information (a) where processing is required for the performance of the contract (i.e. the Terms) between you and us; and/or (b) where processing is necessary for

compliance with a legal obligation to which we are subject; (c) where processing is necessary for the purposes of a legitimate interest of GPT.

MARKETING

Subject to your express consent, GPT will use your Personal Information, such as your name, home address, email address, telephone number etc., ourselves or by using our third party subcontractors for the purpose of providing you with promotional materials, concerning the Services as well as products, services, websites and applications which relate to the Services ("**Marketing Affiliates**"), which we believe may interest you.

If you have consented to receiving marketing offers, you may at any time decline receiving further marketing offers from us or from Marketing Affiliates by updating your account preferences within the App.

SHARING INFORMATION

We do not share your Personal Information with third parties ("**Recipients**") except as described in this Privacy Policy. The Personal Information will be disclosed to Recipients only to the extent required for the specific purposes, as stipulated in this Privacy Policy.

We may share Personal Information with any of the following recipients:

- Any replacement service provider that we engage with to operate the App.
- Companies within the GPT group and other affiliated companies.
- Subcontractors and third-party service providers, as well as their subcontractors, which by way of example include (but is not limited to) cloud computing companies, marketing affiliates, identity verification and fraud prevention services, and other data verifiers.
- Payment service providers, payment processors and banks.
- Auditors, contractors or legal/financial/other advisers of any of the GPT's business processes.
- Any third parties who investigate, detect or prevent fraudulent or illegal activity or enable us to enforce our policies, including in order to ascertain your source of income or funds (e.g. governmental authorities, law enforcement bodies, banks and other investigatory bodies).
- Gambling addictions bodies.
- Licensing authorities, governmental and regulatory bodies, in accordance with applicable laws and regulations.
- Potential purchasers, successors or investors in GPT, or in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, reorganization, bankruptcy, consolidation or asset sale of an asset or transfer in the operation thereof) in relation to GPT (in such event, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy).

In addition to the purposes listed in this Privacy Policy, we share Personal Information with those Recipients for any of the following purposes:

- Storing such information on our behalf, for example by using cloud computing service providers.
- Processing such information to assist us with our business operations (e.g. to process payments and your deposits; authenticate your access; auditing our operations; detect and prevent fraudulent or illegal activity; etc.).
- Performing research, technical diagnostics or analytics.
- Communicating targeted advertising, as well as promotional and informational materials, in accordance with our marketing policy (see above, in the section titled "Marketing").
- Whenever we believe in good faith that disclosure is necessary to protect our rights or legal claims, enforce our policies (including our Terms), protect your safety or the safety of others, as well as to investigate or prevent any fraud, for security reasons or to help us with any other related technical issue.

INTERNATIONAL TRANSFER OF INFORMATION

It may be necessary for the provision of Services and to the extent required for the specific purpose, as stipulated in this Privacy Policy to transfer your Personal Information to countries outside the European Economic Area. The data protection and other laws of these countries may not be as comprehensive as those in the European Economic Area.

We use best efforts to ensure that your Personal Information is protected in accordance with our Privacy Policy, through contractual means (such as by using the standard contractual clauses approved by the European Commission for data transfer, as available at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en) or other means (such as ensuring that the European Commission decisions determined that such jurisdictions offer adequate level of protection).

THIRD PARTY TRACKING TECHNOLOGIES

When you access our Services (for example when you use the App), we use (and authorize third parties to use) web beacons, cookies, pixels, scripts, tags and other technologies ("**Tracking Technologies**").

The Tracking Technologies allow us to automatically collect information about you and your device (for example your computer or mobile device), for different purposes, such as in order to enhance your navigation on our Services, improve the performance of our Services and customize your experience on our Services. We also use this information to collect statistics about the usage of our Services, perform analytics, deliver content which is tailored to your interests and administer services to our users, advertisers, publishers, customers and partners.

THIRD PARTY SERVICES

While using the Services you may encounter links to third party websites, services or applications. Please keep in mind that this Privacy Policy does not apply to any third-party websites, services or applications, even if they are accessible, downloadable, or otherwise distributed through the Services.

RETENTION OF PERSONAL INFORMATION

If you have registered an account through our Services, GPT will retain your Personal Information during the period your account is active. In addition, GPT will retain your Personal Information for additional periods, as strictly necessary to enable GPT to meet its legal obligations under applicable laws or regulations, such as the applicable gaming regulations, KYC and AML regulations, as well as to meet GPT's contractual obligations.

In addition, the Group may retain your Personal Information for longer periods, provided that retaining such information is strictly necessary for GPT's legitimate interests, such as fraud prevention and record keeping, responsible gaming reasons, resolving or exercising claims regarding potential disputes, and where GPT is guided to do so by the applicable supervisory authority.

YOUR RIGHTS

You may contact us by raising a support ticket within the "*Support*" section of the App), and request:

- With regard to consent-based processing, access or delete any Personal Information relating to you.
- To change or update any Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted). Note that you may also request that we will correct errors with regard to your Personal Information (except in cases where the information is required to be kept in its original format under any applicable laws and regulations).
- That we will restrict or cease any further use of your Personal Information.
- That we will provide the Personal Information in a machine-readable format.
- To object to the processing of your Personal Information (such as for marketing purposes).
- To withdraw your consent to our processing activities (provided that such processing activities rely on your consent, and not on a different legal basis).

- To not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where such processing is necessary for the performance of the contract between you and us, or it is based on your explicit consent, as provided hereunder.

Please note that these rights are not absolute and requests are subject to any applicable legal requirements, including gaming regulations and other legal and ethical reporting or document retention obligations. We may also rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion, in accordance with our internal policies.

HOW WE KEEP YOUR INFORMATION SECURED

We take great care in implementing and maintaining the security of the Services and your information. We have put in place appropriate physical and technological safeguards to help prevent unauthorised access, to maintain data security, and to use correctly the information we collect online. These safeguards vary based on the sensitivity of the information that we collect and store.

We employ industry standard procedures and controls to ensure the safety of our users' information, such as:

- Secure network topology, which includes intrusion prevention and Firewall systems.
- Encrypted communication.
- Authentication and Access Control.
- External and Internal audit tests; etc.

CHANGES TO THE PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this Privacy Policy on the App and/or we will send you an e-mail regarding such changes to the applicable e-mail address that you provided to us. Such substantial changes will take effect no less than fourteen (14) days after such notice was provided. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date, and your continued use of the Services after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

HOW TO CONTACT US

As set out above we use Freshdesk to provide a dedicated support portal. This may be accessed in the "Support" section of the App or by following the link at <https://gamepayment.freshdesk.com/support/home>.

We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time. If you are unsatisfied with our response, you can lodge a complaint with the applicable data protection supervisory authority.

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