

## Privacy Notice

This Privacy Notice describes how Games & More BV ("Games & More BV", "Us", "We", "Our" or "Company", as appropriate) collects, use, stores, shares or keeps your personal information when you use our services through our website and mobile application. It also describes your data protection rights, including a right to object to some of the processing which We carry out.

The data controller for your Personal information is:

In this Privacy Policy, you can learn about:

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We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By visiting the Company's websites, mobile apps or other online properties, or by creating an account through our

Services, you hereby indicate that you have read and understood this Privacy Policy.

## 1. Your Agreement to the Privacy Policy

Agreement: By using the Service, you ("User" or "you") agree to the terms of this Privacy Policy as may be amended by Us from time to time, save that we will ask you separately, when you provide us with your details whether you consent to receiving promotional communications from: (a) Us; and also (b) third party providers of goods and services with whom we may share your details. Amendments: We reserve the right to amend this Privacy Policy from time to time. Any amendment will come into effect immediately upon such change being notified on the Sites. We therefore encourage you to visit this Privacy Policy from time to time to make sure that you are aware of the current version and any changes that we may make.

## 2. What information we collect

We collect two types of information from our Users:

### Personal Information

The first type of information which we collect is information that identifies or may reasonably identify an individual reasonable effort ("Personal Information"). Personal Information which is being gathered may consist of the following:

Account details: When you open an account and register to use the Services, you will be asked to provide us certain details about yourself, such as: first and last name, email address, gender, birth date, personal numeric code, age, physical address, ID number, fiscal code, phone number and occupation. In addition, we may collect certain information as required under various gambling regulations, as well as Know Your Client ("KYC") and Anti-Money Laundering ("AML") regulatory requirements, such as your source of funds.

Governmental-issued ID: In certain instances, you may be required to provide a copy of a governmental-issued ID, for identity verification process. Please note that this information is required for certain features of our Services.

Gaming information: in order for us to provide the Services, we automatically record different information related to your account and use of our Services, including with respect to your transactions,

deposits, balances, bets, withdraws, bonuses and winnings. We also collect information regarding potential gambling problems or addictions, based on your patterns of gambling across our services, in order to ensure a responsible gaming environment and as required by law.

**Financial information:** In order for you to enjoy all of the functions of the Services (e.g. place bets, perform purchases, play in tournaments, etc.), payment information will be collected from you, such as your currency, credit card number, payment method and bank account details.

**Voluntary information:** We also collect information which you provide us voluntarily, such as information provided by our VIP customers. For example, when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of the Services, such as on the chat feature and in games. This includes information you are willing to share with us for the purpose of improving and developing our relationship with you, as well as for maintaining your stratification from our services (for example, information about your marital status and family, your hobbies and interests, and other information you share with us through surveys).

**Device information:** We 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. UDID, IMEI and MAC address), browser fingerprinting, IP address and geo-location data.

**Telephone calls:** We record or monitor telephone calls for customer support, training and/or security purposes.

**Events:** during our events, we conduct interviews and take photos and videos, which may feature attendees, speakers, sponsors or exhibitors. Where photos and videos are taken that feature you as an attendee, speaker, sponsor or exhibitor, we may use those photos and videos for promotional purposes. We may also use your interview for promotional purposes (such as by quoting you).

**Social networks:** When you register through your social network account (such as your Facebook account), to use the Services or connect your player account with such account, we will have access to basic information from your social network account, such as your name, birthdate, profile picture and friends' list, as well as information you made publicly available on such account.

In addition, when using the Services, you may be able via your social network to "Invite a Friend" to use the Services. Should the person accept your invitation, we may obtain Personal Information from him/her such as: name, email address, phone number and date of birth. We will use the Personal Information for the purposes set out herein and disclose such information only to third parties as detailed in this Privacy Policy.

**Information we collect from third parties:** We 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 a User(s), which may be made available or gathered via the User's use of the Services ("Non-Personal Information").

Non-Personal Information which is being collected consists of technical information and aggregated usage information, and may contain, among other things, the User's operating system, type of browser, screen resolution, browser and keyboard language, the User's 'click-stream' and activities on the Services, the period of time the User visited the Services 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 browser and operating system your device uses, language preference, access time and the domain name of the website from which you linked to the Services; etc.).

**Gameplay information:** We record game play information including, amongst other things, your deposits, bets, bonuses, game session duration and your high scores. We may also share and publish such information through any of our Platforms.

**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 Software 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 applications' usage, logfiles, 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 anonymize 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.

### 3. Conditions for Processing Personal Information

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

#### Consent

Our processing of your personal information will primarily be necessary for us to provide you with the Service. On occasion we may ask for your consent to processing personal information in a discrete manner, in this instance your personal information will be processed in accordance with such consent and you will be able to withdraw this consent in writing at any time. By way of example, your consent will be needed in order to send you marketing and promotional communications. Please note that we will not share your data with companies outside of our company for them to use for their own marketing purposes.

#### Fulfilment of a contract, compliance with a legal obligation

It may also be 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 the conditions of our gambling licences and complying with any anti-money laundering legislation.

#### Legitimate interests

Finally, we may 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 following a restructure or for internal administrative purposes; (ii) where we identify certain companies that can offer you additional benefits to our Service or provide us with valuable information about your use of our Service; (iii) detection and retention of information pertaining to those with responsible gambling issues. Note that if you self-exclude yourself on any of our Sites for responsible gaming reasons, such restrictions may be extended to or be replicated on accounts that you may hold with Games & More BV; (iv) processing for the purposes of ensuring network and information security, including preventing unauthorized access to our electronic communications network; (v) safeguarding the integrity of sports by combating suspicious betting patterns as well as reporting and sharing information related to such patterns; (vi) adhering to regulatory and statutory requirements; (vii) devising a tailored reward scheme for players.

#### 4. Minors

The Services are not designed or directed to persons under the age of 18 with respect to the use of the Services ("Legally of Age"). If you are not Legally of Age, you should not download or use the Services nor provide any Personal Information to us.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a user who is not Legally of Age has shared any information, we may discard such information unless it is needed to comply with any legal or statutory obligation binding upon us. If you have any reason to believe that a minor has shared any information with us, please contact us.

#### 5. Information use and legal basis

To provide a requested service or carry out a contract with you:

Provide customer support and service messages, including messages requesting your feedback on our services and notifying you about changes to our website, services or changes to our terms, conditions and policies.

To conduct security reviews at any time to validate your identity, age, the registration information provided by you and to verify your use of our services and your financial transactions for potential breach of our Terms of Services and of applicable law. Security reviews may include for example, ordering a credit report and/or otherwise verifying the information you provide against third-party databases.

To process any of your online transactions and payments (including disclosing your personal information to third party payment processors, ESPs, and other financial institutions as necessary).

To conduct our business and pursue our legitimate interests:

To investigate and address enquiries, questions and complaints and respond to any feedback.

To post in-game activity to your newsfeed and share content with other.

To assist your participation in third-party promotions, market research and events.

Customer telephone and chat conversations may be recorded to allow us to improve the quality of our customer service and our products, train staff and to record what is said in the event of a subsequent complaint.

Provide you with promotional offers and information where you have indicated or we have inferred an interest in our Products.

We monitor use of our websites and online services, and use your personal information to help us improve and protect our content, services and websites, both online and offline.

We use personal information to personalise our website and services for you.

We monitor customer accounts to prevent the use of unfair practices in our website.

We use personal information to investigate any complaints received from you or from others, about our websites or our services.

We may be required to share your data with trusted third parties who provide us with services relevant to our provision of our gambling services, including customer support, information security, payments, marketing, data analysis, research and surveys.

We will use personal information in connection with legal claims, and for compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

We use your personal information in order to build up a profile of your demographics, likely behaviours and preferences. This is used to inform the decisions we make in relation to the services, content and promotions we offer. We also report on the different contribution to our commercial performance from different customer profiles. We create profiles through manual or automated processes, including from third-party providers.

In accordance with your preferences:

Subject to your marketing preferences (if applicable) , we will use your personal

information to deliver marketing communications which may be of interest across various platforms, such as email, text message (which includes WhatsApp, and Skype instant messenger), telephone, mail post, online, inbox messaging, push notifications or other available channels to provide you with information regarding our products, services and promotions, including other gaming products.

To share your contact details with selected media partners and affiliates for the purposes of them being able to offer their own marketing services to you. We only do this where we have your consent and in line with your marketing preferences.

To enter you into surveys or promotions you have agreed to.

We place cookies and use similar technologies.

On other occasions where we ask you for your permission, we will use your personal information for the purpose which we explain at that time.

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. You can opt-out of this at any time by updating your marketing preference.

For purposes which are required by law:

In response to requests by government or law enforcement authorities conducting an investigation.

Investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law.

## 6. Automated decision making

We may use automated decision making (i.e. decisions taken without human intervention), including profiling to; create a description of your demographics, past behaviours, likely future behaviours and preferences.

This helps us:

to provide you the personally targeted content and offers through our platform, and through our

marketing communications;

to provide differential services to customers related to payments and withdrawals, customer service and other operational services; and

to comply with legal and regulatory regulations, fraud, anti-money laundering and responsible gaming.

If you disagree with the outcome of an automated decision please contact us using the details in the Rights section and we will review the decision.

## 7. Disclosing your personal information

We may disclose information about you:

to third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include providers of website hosting, maintenance, call center operation, identity checking, information verification services, marketing, data analysis, research and surveys, third-party electronic payment processors and/or financial institutions to process financial transactions and other organizations that provide technical support, process your online transactions and maintain your account;

with law enforcement and public authorities in order to comply with any legal obligation or where We believe we are under a duty to comply with an obligation.

with third parties in order to enforce our terms of use and any other agreement; or to protect the rights, property, safety, or security of the Games & More BV, third parties or the public;

with other online gaming sites, banks, credit card companies, and appropriate agencies, where you are found to have cheated or attempted to defraud us or any other user of our services, which may include but not limited to game manipulation, payment fraud, or prohibited transaction (including money laundering); and

with third parties in the event of sale, purchase of assets, merger, bankruptcy or reorganization proceeding.

## 8. International transfers

Since we operate globally, 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) or other means (such as ensuring that the European Commission decisions determined that such jurisdictions offer adequate level of protection). For more information about the transfer of your personal data outside of the EEA, please contact us.

## 9. Marketing

The Company 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 Group's business partners and affiliates (collectively: "Marketing Affiliates"), which we believe may interest you.

We may also share and disclose Personal Information with our Marketing Affiliates for the purpose of providing you different marketing offers, which we, or our Marketing Affiliates, believe are relevant for you. Our Marketing Affiliates may use this Personal Information for different marketing techniques, such as direct email, post, SMS and telephone marketing purposes. We will use your Personal Information for the purpose of providing you with promotional materials solely where we have a legitimate interest in doing so, or where we have obtained your affirmative consent. You may at any time decline receiving further marketing offers from us or from Marketing Affiliates by either: following the guidelines available on the marketing communications, (such as selecting the opt-out link inserted in the promotional emails) via "My Account" page on the site or by contacting support. Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

Please note: you can control the delivery of certain advertising or social campaigns through the settings offered by the respective third party platforms (e.g. Facebook). In addition, if you download any of our mobile applications to your device from the Apple App Store or Google Play, the only way to prevent receipt of notifications is by changing the settings on the device itself.

## 10. Targeted advertising

We use third-party advertising technology to serve advertisements when you visit the Platform and use the Services. You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA").

For more information regarding this practice by NAI members and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: [http://www.networkadvertising.org/optout\\_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp) & <http://www.aboutads.info/choices>.

## 11. With whom we share information

We do not rent, sell, or 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 purpose, as stipulated in this Privacy Policy.

We share Personal Information with any of the following recipients:

- Any replacement service provider that we engage with to operate the Platforms;

- Affiliated companies;

- Gaming providers;

- 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;

- Credit reporting agencies ("CRAs") and credit reference bureaus, including for conducting name, address and age checks. In order to open an account for you, we will supply your personal information to credit reference agencies and they will provide us information about you. This may include:

  - Identity and contact data;

Information from your credit application;

Information about your financial situation and financial history;

Public information (including the electoral register);

Shared credit details; and

Fraud prevention information.

We do so to check your identity, manage your account and prevent criminal activity. The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, their data retention periods and your data protection rights with the CRAs are explained in more details at the websites below:

TransUnion (Callcredit): <https://www.transunion.co.uk/crain>

Equifax: <https://www.equifax.co.uk/crain>

Experian: <https://www.experian.co.uk/crain/>

Payment service providers, payment processors and banks;

Any third parties who provides services in relation to the operation or promotion of the applicable Company's brands;

Any third party who provides you with a tangible prize;

Any third parties who organize offline events or tournaments on behalf of or in conjunction with any companies within the Company;

Hotels and flight companies (such as in the context of offline events and promotions);

Auditors, contractors or legal/financial/other advisers of any of the Company'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; and

Potential purchasers, successors or investors in the company, 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 the company (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"); and

Whenever we believe in good faith that disclosure is necessary to protect our rights or legal claims, enforce our policies (including our Terms of Services and Privacy Policy), 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.

## 12. Your rights

By law, you have a number of rights when it comes to your information. You can exercise any of these rights by contacting us through our contact information below.

The right to object to processing. You have the right to object to certain types of processing, including processing for direct marketing.

The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights.

The right of access. You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).

The right to rectification. You are entitled to have your information corrected if it is inaccurate or

incomplete. You can request that we rectify any errors in information that we hold.

The right to erasure. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information that we hold. This right is not absolute and will not apply when legitimate and overriding reasons apply.

The right to restrict processing. You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but will not use it further.

The right to data portability. You have rights to obtain and reuse your information for your own purposes across different services. This is not a general right however and there are exceptions.

The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your information with your national data protection regulator. See How to contact us section below.

The right to withdraw consent. If you have given your consent to anything we do with your information you can withdraw your consent to the processing of your information at any time.

### 13. How to contact us

If you have any questions, or wish to exercise any of your rights, please contact Us:

By email: [customerservice@lucaspalace.com](mailto:customerservice@lucaspalace.com)

By visiting this page on our website: <https://lucaspalace.com/>

If your country has a data protection authority, you have the right to contact it with any questions or concerns. If we cannot resolve your questions or concerns, you also have the right to seek judicial remedy before a national court

### 14. Cookies

Cookies are text-only strings of information that are downloaded to your personal desktop, laptop

computer or mobile device (each a "Device") when you visit a website. They are then sent back to the originating website on each subsequent visit, or to another website that recognizes those cookies. Please see: [www.allaboutcookies.org](http://www.allaboutcookies.org) for information about what cookies are and what they do. Cookies are very useful and are used for many different purposes. These include allowing you to navigate between pages efficiently, remembering your preferences, and generally improving user experience. Sometimes cookies are used to help ensure that adverts you see online are relevant to you and your interests. We use cookies in order to track referrals to our Sites, to remember your preferences, and to generate anonymized statistical data, which we use to improve the user experience on our Sites. We also use cookies to measure the effectiveness of our advertising campaigns, to limit the number of times you see an advertisement, to remember that you have visited a website, and to provide advertisements that are more relevant to your interests.

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 Services and/or we will send you an e-mail regarding such changes to the applicable e-mail address that you provided to us.

The Privacy Policy has been drafted in the English language. In the event of any discrepancy between the meanings of any translated versions of the Privacy Policy and the English language version, the meaning of the English language version shall prevail, to the extent permissible by domestic law in the jurisdiction you reside in.