

1 - PURPOSE

1.1 At Playred, we value our customers and we take all necessary measures to protect your Personal data. The Company obtains certain personally identifiable information about you, to facilitate our relationship and offer you the best possible gambling experience. The purpose of this Privacy Policy is to explain our practices and policies for collecting, using and sharing information and Cookies collected from or about you. This Privacy Policy applies regardless of whether you are accessing the website via a personal computer, a mobile device or any other technology or devices.

For the purposes of the Policy, the data controller is Playred which is operated by TRICKLESS N.V., a company registered in Curacao with Company Number 160941 and with Registered Address at: Zuikertuintjeweg Z/N, Curacao. Ziobit Limited (Company No. 14068750) provides processing service on the website as a Billing Agent and with a registered office located at 2nd floor college house 17 King Edwards Road, Ruislip London, United Kingdom HA47AE.

All rights are served and protected by law. This Policy is based on the following principles:

- The processing of personal data shall take place in a lawful, fair and transparent way;
- The collection, processing and retention of personal data shall only be performed for specified, explicit and legitimate purposes and no further processing will take place which is incompatible with those purposes;
- The collecting and retaining of personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed;
- The personal data shall be accurate and where necessary, kept up to date;
- Every reasonable step shall be taken to ensure that personal data that is inaccurate having regard to the purposes for which they are processed, are erased or rectified without delay;
- Personal data shall be kept in a form which permits identification of the data subject for no longer than it is necessary for the purpose for which the personal data is processed;
- All personal data shall be kept confidential and stored in a manner that ensures appropriate security;
- Personal data shall not be shared with third parties except when necessary in order for them to provide services upon agreement;

Data subjects shall have the right to request access to and rectification or erasure of personal data, or restriction of processing, or to object to processing as well as the right of data portability.

2 - TYPES AND USAGE OF INFORMATION WE COLLECT

In order to, but not limited to: create your account, to comply with regulatory obligations (such as prevention of money laundering and other incidental laws and regulations), internal reporting and business development, to ensure optimal customer experience, ensuring the accuracy and legality of the information provided, we collect your personal information, meaning any data from which you can be personally identified or be identifiable, including but not limited to:

- Personal Identifiers, (e.g. name, surname, date of birth);
- Contact Details (phone number, email address);
- Crypto wallet address;

- Any Payment methods;
- Financial Information,
- Connection Information (e.g. user name, password)
- Location Information (e.g. MAC address and IP address)
- Source of wealth

3 - DISCLOSURE OF PERSONAL INFORMATION

We will not intentionally disclose your personal information to any third party/entities in ways different from what is disclosed in this privacy notice. However, we may disclose your personal information to third parties:

3.1 In the event that we sell or buy any business, assets or shares, we may disclose your personal data to the prospective seller or buyer or any investors or any company within our group (including in the event of insolvency) of such business, assets or shares.

3.2 If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, in order to enforce or apply our Terms and Conditions, or to protect our rights, property, or safety, or those of our customers or others.

3.3 In Order to cooperate with law enforcement agencies to enforce laws, as well as investigate and prosecute unlawful activities such as frauds and scams. We maintain the right to disclose any information about you to law enforcement and other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with any investigation of fraud, scam or other activity that is illegal. In particular, these authorities are:

- Competent Gambling Authority
- Anti-Money Laundering / Counter Terrorism Financing (AML/CTF) agencies
- Law enforcement bodies at the countries we operate

This includes exchanging information with other companies and organizations on grounds of fraud protection and credit risk reduction. These entities may then use your personal information to investigate and act on any such breaches in accordance with their procedures.

3.4 Finally, we may disclose certain personal information to unaffiliated third-party service providers, agents or independent contractors who help us maintain our website and provide other administrative services to us (including, but not limited to, order processing and fulfillment, providing customer service, maintaining and analyzing data, sending customer communications on our behalf, and entry collection, winner selection and prize fulfillment for contests and other promotions or marketing content). We seek to ensure that these unaffiliated third parties will not use the personal information for any other purpose than to provide the administrative services for which they are responsible. We also enter into contracts with these third parties that compel them to meet the privacy standards required by law in handling your personal information, and use the information only for the purposes for which it was conveyed to them. Third parties provide the public with details on the process of

data through their websites or any other available communication assets. Aiming to achieve the purposes described under section 2 of the current policy, the following third parties, may receive your data:

- GENERIC PAYMENT PROCESSORS TO BE DEFINED FOR EACH BRAND
- AML/CTF and anti-fraud services
- Platform Providers
- Services providers

3.5 When you play casino slots developed by casino providers, their relevant privacy policies also apply.

3.6 We will not disclose your personal information with any third parties from countries where there is no adequate data protection regime. However, in the event that such a data transfer occurs, we will take all reasonable steps possible to ensure that your data is treated as securely as it is within our jurisdiction and in accordance with this Privacy Policy and the applicable legislation. Additionally, we will update the current Privacy Policy in order to reflect the cross-border data transfer and the relevant safeguards for your privacy.

4 - HOW LONG WE KEEP YOUR DATA

4.1 It is our policy to only retain client information for as long as is necessary for the purpose for which it was originally obtained, in alignment with the Data Minimisation and Storage Limitation principles. For all purposes below, your data will be retained for a minimum of a five years period, after the termination of the customer relationship. Additionally, we align the retention of your information with potential differentiations arising from the exercising of your data privacy rights (please refer to section 6). However, in some cases some personal information may be retained beyond that time period due to potential legal obligations, legitimate interest purposes, etc...

Such reasons would be issues related to:

- Money laundering
- Taxation
- Players Protection
- Civil Law
- Penal Law
- Any other legal issues

5 - YOUR DATA PRIVACY RIGHTS

5.1 At any point while we are maintaining or processing your data, you have the following rights and can submit a relevant request via your personal account:

- Right of access – you have the right to access the personal data that we hold about you
- Right of rectification – you have the right to correct data that we hold about you that is inaccurate or incomplete. Further analysed in section 7 of the current policy
- Right to erasure – you can ask for the data we hold about you to be erased from our records and we are obliged to satisfy such request in certain circumstances
- Right to restriction on processing – you have the right to request to restrict the processing of your personal information and we are obliged to satisfy such request when certain conditions apply

- Right to data portability – you have the right to have the data we hold about you transferred to another organization
- Right to object – you have the right to object to particular processing activities, under certain conditions
- Right to withdraw consent - where the legal basis for processing your data as set out in section 2 is "Consent", you have the right to withdraw your consent at any time via our dedicated integrated consent management portal in your personal account, without affecting the lawfulness of processing based on such consent before withdrawal.

5.2 You can exercise your rights as follows on a case-by-case basis:

- If you have access to your account
- The right to privacy How to exercise your right
- Right of access Account → Personal info
- The right to receive a copy of your data Send an email through the Contact Us section
- Right of rectification Send an email through the Contact Us section
- The right to erasure Send an email through the Contact Us section
- The right to restriction of data processing Send an email through the Contact Us section
- The right to data portability Send an email through the Contact Us section
- The right to object Send an email through the Contact Us section
- Right to withdraw consent Send an email through the Contact Us section

5.3 We will review your requests and respond with details of the status of the request (acceptance of the request, partial acceptance of the request, rejection of the request) as soon as possible and no more than one month after sending the request. If Playred refuses your Data Privacy Rights request, we will also provide a reason. You have the right to appeal the reason to the competent authorities or the DPO.

5.4 We reserve the right to refuse requests that are placed too frequently, those that require a disproportionate technical effort, those that may have disproportionate technical consequences, those that put others at risk of breach of privacy, or those that are highly impractical.

6 - UPDATING YOUR PERSONAL INFORMATION

6.1 Except for exceptional circumstances, you may review, update or delete certain personal information by, if you are a registered user of the website, logging on and using the tools provided to edit such information. However, certain data that are necessary to check eligibility, such as date of birth or age, cannot be deleted.

6.2 You can obtain a copy of your personal information through your personal account. For your protection, you will be required to provide proof of your identity to obtain such copies. You should include adequate information to identify yourself and such other relevant information that will reasonably assist us in fulfilling your request. If you would like to close your account, you can also contact customer services. If you would like to close your account, this could be done through your personal account. We will comply with such requests unless we have a legitimate ground to not delete the data.

7 - SECURITY

7.1 Protecting your data is of utmost importance for Playred and in this regard, we constantly strive to provide all possible means of assuring your personal data's safekeeping, the restriction of unauthorized access and / or potential alterations. Such means include information security measures consistent with current best practices to protect our customers' privacy. These measures include technical, procedural, monitoring and tracking steps intended to safeguard data from misuse, unauthorized access or disclosure, loss, alteration or destruction.

7.2 No method of transmission over the internet, or other method of electronic storage, is fully secure. Playred cannot secure or warrant the security of any information you transmit to us or store on the service, however, all adequate security systems designed to protect your personal data will be used to prevent it from being stolen, misused or abused, and to avert Personal Data breaches. If you believe your Personal Data has been compromised, please contact us support@playred.com

8 - PROFILING

8.1 We collect your personal data including transactional behavior, gambling activity and practices, cookies and geolocation information, amongst others, in order to provide you with customized and tailored preferences, views and services. The profiling activity allows us to present you with a personalized view and experience on our website.

8.2 The profiling activity also allows us to detect and report potential fraudulent behavior and violation of our Terms and Conditions, potential money laundering practices and responsible gambling behavior, in line with our regulatory/ legal obligations of reporting such incidents to the relevant authorities.

9 - COOKIES

9.1 What Cookies are

Cookies are small text files, mainly consisting of letters and numbers, that are stored on users' devices and saved by their browser when they visit a Website. Our Website uses cookies and similar technologies (e.g., pixel tags, web beacons, clear GIFs, and JavaScript) to recognize our users' web browser, analyse trends and make Our Website more user-friendly, efficient and secure.

In this Cookie Policy, we will refer to cookies and similar technologies simply as "Cookies."

You may find further information about Cookies, including information about how to manage and delete them at <https://allaboutcookies.org/how-to-manage-cookies>

9.2 Cookie Settings

Any user may decide whether or not to accept Cookies. Users may set their browser so that they only allow cookies in individual cases, excluding the acceptance of cookies for all or certain cases and activate the automatic deletion of cookies when closing the browser. By having these settings, a user can still have full access to Our Website, however preferences have to be manually adjusted at each visit and some functionalities may not work optimally.

9.3 Advertising and the use of Cookies

As part of Playred website's operation, and for our own statistical insights of site traffic, our website automatically logs internet IP addresses. We do not register any email addresses of visitors to our website. Playred's advertising system logs IP addresses to supply more accurate advertising features, such as language-specific banners.

Whilst our website may contain links to other third party websites which are operated by parties other than us, we are not responsible for the privacy practices or content of such websites.

10. CHANGES TO OUR PRIVACY POLICY

10.1 We strive to constantly review and update our privacy policy in order to address potential legislative and regulatory requirements, while providing optimal protection of your privacy. Any material changes will be communicated to you via the current web page and/or email address that you provided.

11 - CONTACT US

11.1 If at any time you believe that we have not adhered to the provisions set out within this Privacy Policy or for any other Data Privacy related matter, please contact us through email at support@playred.com.