

# **WEB PRIVACY POLICY**

Confidentiality and safety are fundamental values for PLAYFUL GAMING, S.L and, consequently, we assume the commitment to guarantee the User's privacy at all times and not to collect unnecessary information. We provide you here all the necessary information about our Privacy Policy in relation to the personal data we collect, making it clear:

- Who is responsible for processing your data.
- For what purposes we collect the data we request.
- What is the legitimacy for its processing.
- How long we keep them.
- To which recipients is your data are communicated.
- What your rights are.

## **1. DATA CONTROLLER**

PLAYFUL GAMING, S.L  
MARINA 16-18, 18B (08005). BARCELONA - SPAIN  
soporte@playfulbet.com

Hereinafter, "Playfulbet", "we" or the "Controller".

## **2. PERSONAL DATA**

Personal Data refers to any information or data that can identify you directly or indirectly. Personal Data includes information such as e-mail, zip code, phone number, user names, personal preferences, purchasing habits, and user-generated content, among others. It may also include unique numeric identifiers such as your computer's IP address, as well as other information we get about you through cookies.

This privacy policy covers all personal data collected and used by Playfulbet.

The user (you) hereby warrants that the Personal Data provided is true and accurate and takes responsibility on notifying about any changes or modifications. Any loss or damage caused to the Website, to the Controller or to any third-party through the communication of erroneous, inaccurate or incomplete information in the registration forms will be the sole responsibility of the user.

We may collect or receive your data through our website, forms or pages on social media, among others. In some cases, you provide us with your Personal Data directly (for example, when you create an account, or when you contact us or group companies), or in other cases, we collect it (for example, by using cookies to understand the way you use our website).

**3. PURPOSE, LEGITIMATION, AND CONSERVATION** of the processing of the data sent through:

### **• SIGNING UP ON THE PLATFORM:**

When you register on the Platform, you must enter a valid e-mail, select a password and choose a user name. You will be able to modify your access e-mail or password later on in your Platform profile. The password will be strictly confidential, personal and non-transferable. You agree not to divulge your account information or make it accessible to third parties. You will be solely responsible in case of use of such data

by third parties, including the statements made in the Platform, or any other action carried out through the use of the username and/or password.

You guarantee that all data on your identity and legitimacy provided to Playfulbet in their registration forms of the Platform are true, accurate and complete. You also take responsibility for keeping your data up to date. In the event that you provide any false, inaccurate or incomplete data or if Playfulbet considers that there are reasonable grounds to doubt the truthfulness, accuracy, and completeness of them, Playfulbet may deny you access and present or future use of the Platform or any of its content and/or services.

- Purposes:

1. Management of the registration service and signing up to the platform.
2. Loyalty and quality services.
3. Offering products and services according to your interests, if you tick the acceptance box. The delivery of commercial information may include marketing communications, promotions and offers related to electronics, technology, video games, betting houses, catering and digital gift cards, among other products from our partners.

At Playfulbet, we use the information derived from your behavior and your use of the Platform in an analytical and aggregated manner to carry out improvements in the operation of the Platform and provide statistics of commercial interest to our licensees.

- Legitimation: Your express consent. The acceptance of our Terms and Conditions.
  - Conservation: Until the subscription is canceled and the user demands that they are deleted.
- SUBSCRIPTION TO OUR NEWSLETTER:
- Purpose: Offering products and services according to your interests, if you tick the acceptance box. The delivery of commercial information may include marketing communications, promotions and offers related to electronics, technology, video games, betting houses, catering and digital gift cards, among other products from our partners.
  - Legitimation: The user's consent when subscribing to our commercial mailings and/or newsletters.
  - Conservation: Until the interested party revokes the consent and requests the cancellation of the service.

• SOCIAL LOGIN:

The Playfulbet.com platform also allows registration by synchronizing services with third parties (that means, logging-in with Facebook and Twitter accounts). If you follow a link to any of these websites, please note that you share your social profile information with us. Shared personal data depends on your social media platform settings. Visit the social media platform in question and read thoroughly its privacy policy to understand how your personal data is shared and used in this context.

- **E-MAIL DELIVERY:**

- Purpose: To respond to your requests for information, other petitions, and answer questions and inquiries.
- Legitimation: The user's consent when requesting information from us via e-mail.
- Conservation: Once your request is answered by e-mail if it has not generated a new processing.

- **PRIZE REQUEST:**

- Purpose: To be able to redeem the Coins obtained by the user in exchange for one or several prizes, as well as to send the requested prize to the informed postal address.
- Legitimation: The user's consent when he/she requests that the prize be sent to the postal address indicated in the form.
- Conservation: Once the corresponding prize has been sent, if it has not generated a new processing.

**Your duty to provide us with your personal data and the consequences of not doing so:**

The provision of personal data requires a minimum age of 14 years, or where appropriate, to have sufficient legal capacity to hire a service.

The personal data requested are necessary to process your requests and/or provide you with the services you may hire, so if you do not make them available to us, we will not be able to attend to you correctly or provide you with the service you have requested.

In any case, we reserve the right to decide whether or not to include your personal data and other information in our databases.

#### **4. RECIPIENTS OF YOUR DATA**

Your personal data may be communicated to:

- Third parties to deliver the prize, such as postal, logistics, courier or delivery services.
- Third parties that help us provide IT services, such as platform providers, hosting services, maintenance and support in our databases, as well as in our software and applications that may contain data about you.
- Third parties that help us provide digital services, loyalty programs, identity management, ratings and reviews, CRM, web analytics and search engines.
- Advertising, marketing, digital media and social media agencies to help us deliver advertising, marketing and other campaigns, to analyze their effectiveness and to manage your inquiries and questions.

- In order to keep the efficiency of our service, your data may occasionally be communicated to service providers that may be located in the United States of America or other countries or territories outside the European Economic Area. However, we will ensure that any communication of your personal information, whether made by us or those third parties whom with we share your personal information, complies with applicable law.

## **5. RIGHTS IN RELATION TO YOUR PERSONAL DATA**

Any person can withdraw their consent at any time when it has been given for the processing of their data. In no case, the withdrawal of this consent conditions the execution of the subscription contract or the relations generated previously.

You may also exercise the following rights:

- Request access to or rectification of your personal data when they are inaccurate.
- Request its deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected.
- Request the limitation of its processing in certain circumstances.
- Request opposition to the processing of your data for reasons related to your particular situation.
- Request the portability of data in the cases provided for in the regulations.
- Other rights recognized in the applicable regulations.

Where and how to request your Rights: By means of a letter addressed to the person in charge at their postal or electronic address (indicated in point 1), indicating the subject "Personal Data", and specifying the right you wish to exercise and with respect to which personal data.

In the event of a dispute with the company regarding the processing of your data, you may lodge a complaint with the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

## **6. SAFETY OF YOUR PERSONAL DATA**

With the aim of keeping your personal data safe, we inform you that we have taken all technical and organizational measures necessary to keep the supplied personal data safe from its alteration, loss and unauthorized access or processing.

## **7. UPDATING YOUR DATA**

It is important that in order for us to keep your personal data up to date, you inform us whenever there has been any change in them; otherwise, we are not responsible for their veracity.

We are not responsible for the privacy policy regarding the personal data you may provide to third parties through the links available on our website.

## **8. CONTACT**

If you have any questions or concerns about how we treat and use your personal data or wish to exercise any of the rights described above, please contact

[soporte@playfulbet.com](mailto:soporte@playfulbet.com)