

# Privacy Notice

## What is the Purpose of this Privacy Notice?

This Privacy Notice is a public declaration of how our organisation applies Data Protection principles or the business's privacy practices. This document aims to familiarise you as a visitor or customer of this website with how our organisation *collects, uses, retains and discloses* your personal information. This Privacy Notice will inform you as a data subject of your rights and how to get in touch with our organisation. This Privacy Notice will promote transparency and give you as an individual (data subject) more control over the way your data is collected and used by our organisation; for how long our organisation will store your data.

## Privacy Notice Version Control:

This privacy notice ("Privacy Notice") was last updated on May 22, 2023.

## Privacy Notice Download:

Please click [here](#) to download this Privacy Notice as a PDF file or to print it.

## Introduction

Your privacy is important to us, and we are committed to protecting your personal data. We will be transparent and open about why we collect your personal data and how we use it. Where you have choices or rights, we will explain these to you.

This Privacy Notice explains how Jet10 uses your personal data when you're using our website – [www.jet10.io](http://www.jet10.io) ("website" or "site").

Our Privacy Notice explains how we use your personal data, whether you are just visiting, making a deposit or playing one of our games. Please take the time to read all the sections carefully.

Please note that all our employees undertake regular training on information security and must comply with confidentiality obligations and internal policies and procedures whenever they handle your information.

If you do not agree with any statements in this Privacy Notice, please do not proceed further on our website. Please be aware that registering an account on our website, placing bets and transferring funds will be deemed confirmation of the complete agreement with our Terms and Conditions and our Privacy Notice. You have the right to cease using the website at any time; however, we may still be legally required to retain some of your personal data.

We may periodically make changes to this Privacy Notice and will notify you of these changes by posting the modified terms on our website. We recommend that you revisit this Privacy Notice regularly.

## Who Is in Control of Your Information?

Throughout this Privacy Notice, "Jet10", "we", "our", "organisation", "company", and "us" relates to **VL Entertainment Limited**, a company incorporated under the laws of the Isle of Man (company number 018736V) whose registered office is at PEVERIL BUILDINGS, PEVERIL SQUARE, DOUGLAS, IM99 1RZ, Isle of Man. We hold an online gambling license with a permitted domain name [www.jet10.io](http://www.jet10.io) under the license ("**Services**" or "**services**") to operate online Casino games (RNG and Live Dealer), General Betting (Fixed Odds) and B2B software provision, issued on October 19, 2021, by the Isle of Man Gambling Supervision Commission.

We are registered as a 'Controller' and 'Processor' with [the Isle of Man Information Commissioner under registration number R003003](#). A 'Controller' is a person or company who determines how and why your personal data is used. A 'Processor' only follows contractual instructions from another controller regarding the processing of personal data; is given the personal data by another controller or told by another controller what data to collect.

Our company's infrastructure means that all personal data is processed on legal grounds. We have processes to ensure that only those related to the organisation (staff, board, steering group) who need to access your data can do so. By default, only the company's team have access to all collected personal data and others, such as board and steering group members, are granted access on an as-needed basis.

Some data may be shared with third parties, and where this happens, this is always indicated in the relevant registry for processing personal data.

Before we ask for your data, we always apply the following tests to determine whether it is appropriate:

Purpose test – why are we collecting this data?

Necessity test – is it essential that we collect this data?

VL Entertainment Limited will always value and respect the privacy of its customers. Your privacy is important to you and us, and we make the following promise: VL Entertainment Limited is committed to protecting your privacy. We believe in using your personal information to make things simpler and better for you. We will always keep your data safe. We'll be transparent and open with you about why we collect your personal information and how we use it. Where you have choices or rights, we'll explain them to you and respect your wishes.

### **Storage of Your Personal Data**

VL Entertainment Limited is not an EU-domiciled organisation, with primary offices in the Isle of Man. The Isle of Man is not part of the United Kingdom, nor is it part of the European Union. The Isle of Man is a self-governing British Crown Dependency - with its parliament, government and laws.

We hold your information:

1. On servers based in the Netherlands - our website is hosted in the EU. In addition to our EU-based staff, they may be accessed by staff outside the EU if deemed necessary.
2. The company's primary offices are in the Isle of Man. As stated above, your personal data may be transferred outside the European Union or the European Economic Area.
3. We use [G Suite](#) for our primary operations: Drive for file storage; Docs, Sheets and Slides for productivity and collaboration; Calendar for calendaring; Gmail with custom email addresses at jet10.io domain communication; and an Admin panel for managing users and the services.
4. Our payment processors and banking arrangements are provided by third parties duly listed on the website, under their terms and conditions, privacy policies, and in compliance with applicable legislation.

Your personal data is stored for the minimum time necessary, as stated below in section "Retention".

We understand the importance of security and the techniques needed to secure information, see section "Security" below.

### **Our Data Protection Officer**

Any comments, questions or suggestions about this privacy notice or our handling of your personal data should be emailed to our Data Protection Officer ("DPO") at [dpo@jet10.com](mailto:dpo@jet10.com).

Alternatively, you can contact us at our office using the following postal address:

Data Protection Officer  
VL Entertainment Limited,  
PO Box 227, PEVERIL BUILDINGS, PEVERIL SQUARE, DOUGLAS, IM99 1RZ, Isle of Man

### **Data We Collect About You**

We collect two types of data and information from our customers:

**1) Personal Data:** This can be used to identify an individual. The personal data we collect through our Services includes information which is submitted directly by you, such as phone number; full name; e-mail address; home address; date of birth; payment means (e.g. credit card number); and other financial information that we may need to provide our Services. We also collect Personal Information from your device (e.g. geolocation data, IP address) and information on your activity on the Services (e.g. pages viewed, online browsing, clicks, actions, etc.).

**2) Non-personal Data:** This is un-identified and non-identifiable data about you which may be made available or gathered via your use of the Services. We are not aware of the identity of the user from which the Non-personal data was collected. Non-personal data which is being gathered may include your aggregated usage information and technical information transmitted by your device, including specific 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.), to enhance the functionality of our Services.

**If we combine Personal Data with Non-personal data,** the combined information will be treated as Personal Data for as long as it remains combined.

We will process the categories of your personal data for the reasons outlined in this Privacy Notice and accordance with the relevant data protection legislation: General Data Protection Regulation (EU GDPR), Data Protection Law 2018 and any other data protection law.

We collect information about you:

- 1) **Directly from you:** Jet10 collects personal information about you whenever you use our Services. Some of it you provide directly to us. Other information is collected during your interactions with us, such as the bets you place, online chats, or other communication with our customer support team and through cookies.
- 2) **From your devices:** We collect information from your devices for accessing our website.
- 3) **From Cookies:** We may collect information about your device, including your IP address, operating system and browser type, for system administration. This is statistical data about your browsing actions and patterns and does not identify you as an individual. Cookies contain information that is transferred to your computer's hard drive. They help us improve our website and deliver better and more personalised Services.
- 4) **From external companies to help us comply with our legal and regulatory KYC and Social Responsibility obligations:**
  - a) When you open your account, we may cross-reference the information you supplied to us with external/governmental companies for AML and ID verification processes, as well as to ascertain whether you are registered with them because you asked not to be allowed to gamble or receive marketing.
  - b) We use publicly available information (on social media sites and the like) to help verify information provided, and we log and save the results.
  - c) In addition to the information collection methods outlined above, we also use the services of Brite (<https://britepayments.com/>) to validate the identity of our Finnish customers. This includes using validated data from banks to verify personal details provided by customers during the account creation process. This helps us comply with our legal and regulatory obligations related to KYC and social responsibility
- 5) **From external companies as part of a business or asset transfer:**

We may collect personal data about you from third parties from time to time. If you are a former customer of our partner and your data was passed to this website, we will have acquired the different categories of your personal data (which may or may not be applicable depending on the process) from your previous online betting and gaming provider to integrate your former account into this website platforms and systems and to provide our gambling services to you by our Terms and Conditions.

We collect the following types of personal data in compliance with the applicable legislation or on the legal grounds of legitimate interests, contractual performance, and consent where appropriate:

### **Personal Data (Which Can Be Used to Identify an Individual)**

You provide this information to us in setting up an account, placing bets and using the website services. This information is required to give you access to certain parts of our website and related services. This data is collected when you:

- Register an account with Jet10
- Voluntarily provide it when using the website
- Provide it when in contact with our customer support team

The information includes your:

- Username

- First and surname
- Date of birth
- Email address
- Residential address
- Phone number
- Identification documents
- Proof of address documents
- Transaction history
- Website usage preferences
- Any other information you provide us when using our platforms
- Credit/debit card details or other payment information

The information is also required for billing purposes and minors' protection. You can amend and update this information by contacting Customer Support at [jet10support.io](mailto:jet10support.io). This data is for internal use and is never passed to any third parties except those stated below.

### **Non-Personal Data and Traffic Analysis (Unidentified and Non-Identifiable Data About You Which May Be Made Available or Gathered via Your Use of the Website)**

Jet10 strives to make our website as user-friendly as possible and easy to find on the internet. Jet10 collects data on how you use the site, which does not identify you personally. This includes but is not limited to your IP address (a number that identifies a specific device on the internet and is required for your device to communicate with websites), hardware model, operating system and version number. When you interact with the Services, our servers keep an activity log unique to you that collects certain administrative and traffic information, including but not limited to:

- Source IP address;
- Time of access;
- Date of access;
- Web page(s) visited;
- Software crash reports;
- Type of browser used.

This information is essential for the provision and quality of our Services.

### **Cookies**

What are Cookies?

'Cookies' are small text files stored in your web browser that let us recognise your computer when you visit our website. Cookies are essential to keep certain parts of our website functioning correctly and securely. We also use them to make things quicker, easier and more personal to you and to help us understand how our website is used.

To do all these things, cookies collect personal data about you whenever you use our website. You can choose whether to accept or reject some or all types of cookies and control this through your device's browser settings. If you then continue to use our website without adjusting your browser settings, we will use cookies as set out in the sections below, so to help you make an informed choice, it's essential to know why we use the different types of cookie and what that means for your online experience. This section summarises the main points and tells you how switching off the other cookies will affect your experience on our website.

The cookies also enable JET10 to find out which advertisement brought you to our website. If we collect such information, you will remain personally unidentifiable, and we will not share this information with any unconnected third party.

The Cookies we use fall into the following categories:

#### Strictly Necessary

This cookie allows you to navigate the website and use essential features like secure areas and online registration. These cookies don't gather any information about you that could be used for marketing or remembering where you've been on

the internet. These cookies are essential in our being able to guarantee the performance of our website; should you disable them, we won't be able to ensure your security or predict how our website will perform during your visit.

#### Performance

This type of cookie collects information about how you use our website, e.g. which pages you visit and if you experience any errors. The information collected is anonymous and is only used to help us improve how our website works, gauge what interests our users and assess the effectiveness of advertising.

#### Functionality

This type of cookie remembers your preferences for tools found on our website, so you don't have to re-set them each time you visit. Some of them are managed by third parties. They may, for instance, determine whether you see the latest or oldest comments about an article first. They may also help us greet you by name or remember your choice of language or region).

#### Targeting/Tracking

These cookies are used to analyse what advertising might be most relevant to a website user based on the website's areas.

Jet10 uses cookies to ensure our website works efficiently and enhances your visits to our platforms. Jet10 website uses cookies for the following purposes:

- To ensure your bets (as you are the account holder) places are associated with you;
- To ensure that you as the account holder receive any bonuses eligible for you;
- To allow an analysis of Jet10 website traffic so we can make suitable improvements;

#### **Please be aware that using the Jet10 website without enabling cookies is impossible.**

It is important to remember that if you access a third-party website, they may use cookies over which we have no control. Please ensure you read the Privacy Notice and Cookie Policy for each third-party website you visit.

#### **How to Control the Cookies?**

Modern browsers allow you to see your cookies and clear them individually or entirely by changing your cookie settings. Cookie settings are typically found in your browser's 'options' or 'preferences' menu. Otherwise, it would help if you used the 'Help' option in your browser for more details. You may also find the links below helpful:

- [Cookie settings in Chrome.](#)
- [Cookie settings in Firefox.](#)
- [Cookie settings in Microsoft Edge.](#)
- [Cookie settings in Safari.](#)

You can block cookies by activating the settings on your browser, allowing you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site. We endeavour to make all parts of our site accessible to everyone, but if you block some cookies, particularly Strictly Necessary cookies, your access might be impaired. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies as soon you visit our site.

Your first visit to our site may generate a pop-up header alerting you to this privacy notice and will re-appear only if you change your cookie settings from time to time.

## **How and Why We Use Your Personal Data**

We use and share your personal data as described in this Privacy Notice. The Personal Data will be disclosed to a third party only to the extent required for the specific purpose, as stipulated in this Privacy Notice. In such cases, we need the relevant third party to agree to process such data in compliance with our Privacy Notice.

We will not disclose your Personal Data to any third parties outside the European Union in countries with no adequate data protection regime. However, if such a data transfer occurs, we will take all reasonable steps to ensure that your data is treated as securely as it is within the European Union and by this Privacy Notice and the applicable legislation.

Where the data processing is by your consent, you have the right to withdraw your consent at any time in writing to our contact details mentioned in this Policy Notice or by following any relevant process to withdraw your consent. Withdrawal of your consent does not affect the lawfulness of treating your data before its revocation.

Regularly, we may be regulatory required to produce reports containing non-personal data. The reports consist of the number of self exclusions, number of registrations, number of complaints, and number of suspicious transactions reported to authorities.

We use your personal data in a range of ways that fall into the following categories:

- To provide you with the products or services you have requested.
- To meet our legal or regulatory obligations.
- To monitor our website performance.
- To provide you with marketing information.
- Organisations that provide services on our behalf.
- Google Analytics.
- The Legitimate interest in sharing your data with other third parties.

Your rights over personal data differ according to which category and lawful basis these fall into. This section provides more information about each category, the rights it gives you, and how to exercise these rights. **These rights are in bold, following each category.**

## Providing Our Products and Services

We use your personal data to enable you to use our websites, set up your account, participate in the online casino, and provide customer service assistance.

To set up your account and provide our Services (for example, the identification and verification of your details, processing your payments) - the legal basis for this processing activity is the performance of the contract, fulfilment of a legal obligation/regulatory obligation.

To identify and authenticate your access to certain features on our website - the legal basis for this processing activity is your consent.

Our team will contact you and keep you informed of our latest updates - the legal basis for this processing activity is your consent.

To send you advertisements - the legal basis for this processing activity is your consent.

To respond to your queries - the legal basis for this processing activity is your consent.

To investigate violations and enforce our policies, as required by law, regulation or other governmental authority, to comply with a subpoena or similar legal process or respond to a government request - the legal basis for this processing activity is the legal obligations of our organisation.

To audit certain elements of our business - the legal basis for this processing activity are legal obligations.

When we decide or sell, transfer or otherwise dispose of any part of our business in the future, we may share your information with prospective purchasers and our professional advisors for that purpose.

To provide our products and services, we share your information with external organisations working on our behalf. Further information can be found in the "Sharing your Personal Data" section below.

**This category covers the essential activities required for us to provide you with the services you use or have signed up for. If you don't want your information used in this way, your option is not to use our services and close your account.**

## **Legal and Regulatory Requirements**

Jet10 will use your identification document and proof of address to check your details for us to protect our users from fraudulent behaviour and to promote responsible gambling.

We may conduct a security review at any time to validate the registration data you provided and verify your use of the services and your financial transactions for potential breach of our Terms and Conditions and applicable law. Security reviews may include but are not limited to ordering a credit report and otherwise verifying the information you provide against third-party databases.

**We must carry out these activities to provide our products and services legally, responsibly, and in line with the requirements stipulated by regulators. We cannot provide you with our services without carrying out these activities; if you don't want your information used in this way, your option is not to use our services and close your account.**

## **To Monitor Our Website Performance.**

As detailed above, we use cookies and traffic analysis to improve the performance of our website and the services available. We have a legitimate interest in carrying out these activities, and we ensure that we minimise any impact on your privacy.

**You have the 'right to object' to activities carried out for our legitimate interest if you believe your right to privacy outweighs our legitimate business interests. However, as the activities involved are central to our business, you may need to close your account if you wish to object further than managing your cookies.**

## **Marketing**

If you have given us your consent to do so, we may send you offers and promotions via email, SMS or online. We do not share your information with third parties to use for their marketing.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for them. Please check these policies before you submit any personal data to these websites.

**You have the right to withdraw consent or update your marketing preferences at any time.**

**Organisations That Provide Services on Our Behalf** We may share your personal data with external organisations that carry out a range of services on behalf of JET10. We carry out checks to ensure that the companies we work with will give your data the same level of care and protection as we do. They and we are obliged to handle your information by all applicable data protection laws, and we must also put in place contractual measures reinforcing those obligations.

The main functions that are or may be carried out, entirely or in part, by third parties are listed below:

- Management and execution of marketing campaigns.
- Payment processing and verification.
- Anti-fraud and Anti-money laundering checks (Including but not limited to Enhance Due Diligence reports utilising publicly available sources and ID verification).
- Checks to detect unfair use of our products and services.
- Web hosting, online content services and data storage.
- Management of offers.
- Data analytics and data cleansing.
- Market research and collecting or analysing customer feedback.
- IT services and support.
- Audit-, Legal- & Compliance- related services.
- Data in favour of regulators to access and view.
- Analysis of gambling habits to ascertain potentially risky behaviours.

## The Use of Google Analytics

We may use Google Analytics for 'analytical' purposes, such as to keep track of user/customer browsing patterns and to build up a profile for a customised browser experience for you. Google Analytics is a popular web analytics service provided by Google, Inc. Google Analytics uses cookies to help us analyse how customers use our website. Your opt-out choice is applied only to your browser, so if you use different browsers, you must opt out in each. This opt-out is cookie-based, so if you delete your cookies, you will no longer be opted out and need to opt-out again—Google Analytics, which you can control through your browser settings: opt-out. Please visit <https://tools.google.com/dlpage/gaoptout>.

**The Legitimate Interest of Sharing Your Data with Other Third Parties** We may also share personal data with selected third parties to measure and improve customer experience, circulate new offers and promotions that may be of interest on various similar third parties products/services and facilitate the resolution of customer complaints and disputes. This sharing takes place further to legitimate interests (which do not override your fundamental rights and freedoms) or under another suitable lawful basis identified by us.

We may also process your data for any future acquisitions, sales, restructuring or other business or asset disposals or transfers of any part of our business from time to time. This may include sharing your data with third-party prospective purchasers, bidders, investors, professional advisors and other relevant persons regarding the transaction. Such data sharing will take place further to our legitimate interests (which do not override your fundamental rights and freedoms) in disposing of or restructuring our business interests or under another suitable lawful basis identified by us under the relevant data protection legislation at the appropriate time. Where this is the case, you will receive notice of any such transfer before it takes place, along with further details about how your personal data will be processed at the appropriate time.

## Your Rights

As a data subject whose personal data we hold, you have certain rights (please read below or visit the Isle of Man Information Commissioner's website - <https://www.inforights.im/organisations/data-protection-law-2018/rights/>).

If you wish to exercise any of these rights, please email [dpo@jet10.com](mailto:dpo@jet10.com) or use the information supplied in the Contact us section on our website. To process your request, we will need to verify your identity.

Suppose you believe your privacy rights have been infringed or disagree with our decision about your privacy rights. In that case, you have the right to complain to [the relevant supervisory authority](#).

## The Right to Be Informed

As a data controller, we must provide clear and transparent information about our data processing activities. This is provided by this privacy notice and any related communications we may send you.

## Your Rights to Rectification

If you believe the personal data we hold on you is inaccurate or incomplete, you have the right for this to be rectified. This may be used with the right to restrict processing to ensure that incorrect/incomplete information is not processed until it is corrected. For any information that cannot be updated through My Account, don't hesitate to contact [jet10support@io](mailto:jet10support@io).

## Your Right to Request a Copy of Your Personal Data (Right of Access)

You may request a copy of the personal data we hold about you for free. If you would like a copy of the personal data we hold about you, you should request it through live chat or by emailing [dpo@jet10.com](mailto:dpo@jet10.com), and we will provide you with a form to complete. The form is not compulsory but helps us promptly provide you with the information you are looking for. To ensure the security of your personal data, we will ask you for valid proof of identity. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you within one month, as well as the following information:

- Why do we have your data.
- What types of data do we have.
- Who can access your data.



- For how long do we foresee storing this data.

If your request is unusually complex and likely to take longer than a month, we will let you know as soon as possible and tell you how long we think it will take. Such requests may also incur an administration cost.

We will explain if there are exceptional circumstances that mean we can refuse to provide the information. Otherwise, we will comply with all data requests. We will inform you if answering requests is likely to require additional time.

## **Your Right to Complain to the Regulator**

Suppose you believe your privacy rights have been infringed or disagree with our decision about your privacy rights. In that case, you have the right to complain to the Isle of Man Information Commissioner. Further information on making a complaint to the Isle of Man Information Commissioner can be found [here](#).

## **The Right to Erasure (The ‘Right to Be Forgotten’)**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. We will take all reasonable steps to ensure erasure. However, we may have to retain certain information for legal and regulatory purposes – The DPO will explain this to you.

## **The Right to Restrict Processing**

You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies, you may exercise the right to restrict processing:

- The accuracy of the personal data is contested.
- Processing of personal data is unlawful.
- We no longer need personal data for processing, but personal data is required for part of a legal process.
- The right to object has been exercised, and processing is restricted pending a decision on the processing status.

## **The Right to Object**

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for direct marketing.

## **The Right to Data Portability**

You may request your personal data set for yourself or to be transferred to another controller or processor, provided in a commonly used and machine-readable format.

## **Sharing Your Personal Data**

We may disclose your personal data to third parties:

- If we are under a duty to disclose or share your personal data to comply with any legal or regulatory obligation; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for anti-money laundering, the prevention of terrorist financing, fraud protection and credit risk reduction;
- To enforce or apply the terms of this notice or any other agreements;
- To assist us in providing you with the products and services you request, including but not limited to third-party software providers, payments or marketing;
- If, in our sole determination, you are found to have cheated or attempted to defraud us or other users of the service in any way, including but not limited to game manipulation or payment fraud;
- For research on the prevention of addiction (this data will be made anonymous);

- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If a third party acquires us or substantially all of our assets, personal data held by our customers and us will be one of the transferred assets.

Personal data collected on the services may be stored and processed in any country where our affiliates, suppliers or agents maintain facilities. Using our services, you expressly consent to any information transfer outside your country. When we transfer any part of your personal data outside the EEA or adequate jurisdictions, we will take reasonable steps to ensure that it is treated as securely as it is within the EEA or adequate jurisdictions. These steps include but are not limited to the following:

- Binding corporate rules;
- Model contracts.

## **Security**

We understand the importance of security and the techniques needed to secure information. We store all the personal data we receive directly from you in an encrypted and password-protected database residing within our secure network behind active state-of-the-art firewall software. (Our Services support SSL Version 3 with 128-bit encryption). We also ensure our subsidiaries, agents, affiliates and suppliers employ adequate security measures.

We guarantee that your personal and financial information remains 100% secure and confidential. We employ industry-standard security protocols to ensure that all transactions, including deposits and withdrawals, are carried out safely. This technology protects you from having your information intercepted by anyone other than the service on the website while it is being transmitted between you and the website.

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including risks to data subjects' rights and freedoms, is at the heart of our project. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should know the many security risks and take appropriate steps to safeguard your information. We accept no liability in respect of breaches beyond our control sphere.

## **Retention**

We retain personal data for as long as we reasonably require it for legal or business purposes. In determining data retention periods, Jet10 considers local laws, contractual obligations, and the expectations and requirements of our customers. We securely delete or destroy your personal data when we no longer need it.

The length of time for which we keep different types of personal information can vary, depending on why we originally obtained them, the reason we process them and the legal requirements that apply to them. When setting our data retention and deletion timescales, we take into account a range of factors, including applicable regulations and standards relating to gambling and gaming, anti-money laundering, taxation, payment processing and complaint handling, the need to prevent or detect crime or another misuse of our services, and audit requirements. To fulfil our requirements, some of your personal data will need to be retained after you cease to be a customer. When we no longer need it to meet the above requirements, we delete it securely or anonymise it.

## **Third-Party Practices**

We cannot ensure the protection of any information that you provide to a third-party online site that links to or from the services or any information collected by any third party administering our affiliate program (if applicable) or any other program since these third-party online sites are owned and operated independently from us. Any information collected by these third parties is governed by the privacy policy or notice or statement of such a third party.

Our website may contain links to websites outside our control and not covered by this Privacy Notice. If you access other sites using the links provided, the operators of these sites may collect information from you that they will use by their privacy policy or notice, or statement, which may differ from ours. We are not responsible solely for the operators of these websites and shall be responsible for their functionality or possible errors on the linked sites.

## **Disclaimer**

The Services and our website operate 'AS-IS' and 'AS-AVAILABLE' without liability. We are not responsible for events beyond our direct control. Due to the complex and ever-changing nature of our technology and business, we cannot guarantee, nor do we claim, that there will be error-free performance regarding the privacy of your personal information. We will not be liable for indirect, incidental, consequential or punitive damages relating to using or releasing said personal data.

## **Limits of Confidentiality**

We may be required to disclose your personal information under certain circumstances for legal reasons. Reasons for this may include:

1. To protect and defend our rights or property;
2. To comply with any legal process served on us.