

PRIVACY POLICY

WHO WE ARE

GAMA.BET (otherwise referred to herein as "we" or "us") adheres to Article 27 of the Constitution of Comoros, which protects the confidentiality of correspondence and telecommunications, as well as protects individual computer data.

This Privacy Policy is issued on behalf of "Agrote-85 EOOD" includes the URL WWW.GAMA.BET

The data controller for the URL WWW.GAMA.BET is "Agrote-85 EOOD", a company incorporated in Bulgaria with company number 203491325 and with its registered address at 10A Asen Zlatarov str., represented by Pavel Zdravkov Our Data Protection Officer ("DPO") can be contacted at

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us at support@gama.bet.

By providing your personal information and registering with us or logging on with us when you enter our website, you explicitly consent to us processing and disclosing your personal information in the manner set out in this Privacy Policy, or as otherwise provided in accordance with the Terms & Conditions.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data (or personal information) means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, pc tag, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, correspondence feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

On rare occasions, we may collect health data from you when you forward us specific medical reports. Outside this scenario, we do not collect any special categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your genetic and biometric data). For the avoidance of doubt, data pertaining to self-exclusion requests are not considered to be data related to health.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to fulfil the contract we have or provide you with the service requested.

Please note that any information which you transmit to us by email is not encrypted and is transmitted at your own risk.

3. THE PURPOSE FOR WHICH WE COLLECT YOUR PERSONAL DATA

We have set out below, in a table format, a description of the ways we plan to use your personal data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Information on the balancing test at the basis of the legitimate interest can be obtained upon request by contacting the DPO at dpo@gama.bet

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including the basis of legitimate interest
To register you as a new customer in order to provide our gaming services.	(a) Identity (b) Contact	Performance of a contract with you.
(a) Processing and monitoring your bets. (b) processing card and online payments. (c) payment processing identification, authorization and/or processing. (d) collection of debts.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us and fulfil customer payments). (c) complying with our legal and regulatory obligations.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy. (b) Asking you to leave a review or take a survey.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To enable you to partake in a prize draw, competition or complete a survey.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).
To administer and ensure the security of our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise). (b) Necessary to comply with a legal and regulatory obligation.

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our
Purpose/Activity	Type of data	Lawful basis for processing including the basis of legitimate interest
marketing, customer relationships and experiences.		products and services, to keep our website updated and relevant to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business).
To prevent you from accessing our services when you have disclosed to have gambling addiction sustained by medical evidence such as medical reports.	(a) Health	Necessary to protect your vital interests (Art. 9 (2) c) of the GDPR.

4. WHO WE MIGHT SHARE YOUR INFORMATION WITH

a. For anti-money laundering, fraud detection and/or control purposes, GAMA.BET has the right to transfer your personal data to third parties, including but not limited to third-party suppliers such as the police, financial integrity units, banks, ID and address verification system providers, payment service providers and financial institutions, however, only where we have assurance that they are meeting the same standards on the processing of data and security. We encourage you to read the privacy policies of our third-party suppliers.

b. Furthermore, we reserve the right to disclose your personal data to relevant third parties, such as other GAMA.bet, our regulators, financial integrity units, notably when GAMA.bet has reasonable grounds to suspect irregularities involving your account.

c. Your data will also be shared for regular operational purposes with entities such as cloud services, data centers, payment services, banks, ID verification tools, customer communication tools, game suppliers etc.

- d. We are entitled to share the information we hold on you which includes personal data and/or betting history with sporting bodies in order to investigate fraud, money laundering or sports integrity issues and to comply with our regulatory duties.
- e. We will take all reasonable steps to ensure that your personal data is treated securely and is processed with appropriate care and protection and in line with applicable legal requirements.

5. HOW LONG WE KEEP YOUR INFORMATION

In order to comply with our legal, financial and regulatory requirements we will maintain your information for the minimum length of time required to meet those requirements. After the minimum amount of time for maintaining your data has elapsed and provided, we do not have any other legitimate reason for maintaining your data, your data will be pseudonymized.

The retention period will be implemented in accordance with the applicable requirements of Comoros (10 years minimum).

In the event you make a request for your data to be erased, and such request qualifies under our guidelines for erasure, your personal data will be anonymized. Once anonymized it is no longer recognized as personal data.

If there has been no Account Activity (as defined in our Terms and Conditions) and we have maintained your data for the minimum time required to meet our legal and regulatory requirements, your account will be closed and pseudonymized.

Accounts where there has been an instance of fraud, notification of gambling addiction and/or permanent self-exclusion will not be anonymized so that we may continue to monitor these customers in adherence to our legal and regulatory requirements.

6. KEEPING YOU INFORMED ABOUT OUR PRODUCTS AND SERVICES

We'd love to send you offers, competitions & exclusive content through our various marketing channels. Your data will not be sold or given to any third parties not affiliated with GAMA.BET for marketing purposes without your prior approval.

You can change your marketing preference setting by logging into your GAMA.BET account and going to the "Preferences" page where you can change your marketing preference.

7. HOW WE SECURE YOUR INFORMATION

a. GAMA.BET assures you that your personal data is:

- processed in accordance with your rights.
- processed fairly and lawfully.
- obtained only for the above purposes.
- adequate, relevant and not excessive for its purpose.
- kept in a secure manner.
- not kept longer than is necessary for its purposes.

b. GAMA.BET shall take all reasonable steps to ensure that your information is kept secure and protected. In this regard, we maintain appropriate technical and organizational measures to protect your data against unauthorized or unlawful processing.

8. YOUR RIGHTS

Subject to certain limitations on certain rights you have the following rights in relation to your information. You can exercise any of these rights by contacting support@gama.bet naming the right you are exercising along with the reason for your request, if applicable.

Right of Access: you have the right to request access to your personal data and supplementary information.

Right to Rectification: you have the right to request that inaccurate personal data be rectified or completed if incomplete.

Right to Erasure: you have the right to request erasure of your information where there is no longer a good reason for us to continue processing it. Please ensure that you withdraw your Account Balance prior to sending us the request. The rules enacted under the section 8 of our Terms and Conditions related to the Withdrawal of funds apply. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. It should be noted that this right is not absolute and may be subject to our compelling reasons to maintain that information such as our adherence to legal and regulatory obligations. Please see the section “How long we keep your information” above. In the event we are unable to comply with this request you will be notified.

Right to Restrict Processing: this enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful (i.e. where it does not fall under a legal reason for processing as outlined under section 3. or your information has otherwise been obtained illegally by a third party) but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Please note that this right is not absolute.

Right to Data Portability: you have the right to request the personal data you have provided to us. You may make a data portability request by contacting support@gama.bet .

Right to Object: you have the right to object to our processing of your data. It should be noted that this right is not absolute and may be subject to any reasons we have to maintain that information such as our adherence to legal and regulatory obligations. If you wish to object to direct marketing, please contact support@gama.bet requesting that you no longer wish to receive marketing materials. It should be noted that the

ability to perform our services relies on the processing of certain information, therefore, exercising certain rights may result in a loss of the service or part of it.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. In the event you did not provide all your verification information upon registering with us, this information may be requested to complete your profile. We may also contact you to ask you for further information in relation to your request to speed up our response. Please remember to keep your password confidential.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

It is your responsibility to maintain that your personal information is up to date and accurate. You have the right to lodge a complaint with a supervisory authority in the location of your habitual residence, place of work or place of the alleged infringement. We would, however, appreciate the chance to deal with your concerns before you approach your local authority so please contact us in the first instance.

9. CHANGES TO INFORMATION

Any changes to our Privacy Policy shall be posted on this page and any such changes will become effective upon posting the revised Privacy Policy. If we make any material or substantial changes to this Privacy Policy, we will use reasonable endeavors to inform you by email, notice on the Website or other agreed communications channels. If we plan to use personal data for a new purpose, we update our Privacy Policy and communicate the changes to individuals before starting any new processing.