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# PAGORA

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## Privacy Policy

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## PRIVACY POLICY

This Privacy Policy sets out our data processing methods and the customers' options concerning how the customers' personal information is used. Pagora understands and takes responsibility for providing the customer with clear information about how we use cookies, and we guarantee that people using our website can make the right choice.

## PRIVACY

Pagora undertakes to protect the customers' personal data. This Privacy Policy explains what information we collect when our services are used, why we collect this information, and how we use it. Please note this Privacy Policy will be agreed between the customer and Pagora (hereinafter "We", "Us" or "Our", if applicable). We may periodically make changes to this Privacy Policy and notify the customer of these changes by publishing the modified terms on our platforms.

## CONSENT TO PERSONAL DATA PROCESSING

### RIGHTS OF THE PERSONAL DATA SUBJECT

The processing of the customers' personal data at Pagora starts by way of implicative actions of a personal data subject which express their will to establish a legal relationship with Pagora, not in the form of an oral or written expression of their will, but by their behaviour, from which such intention can be concluded (for example, execution of monetary transactions into their personal account obtained through the Pagora gateway).

Pagora does not require the customers' consent to process the customers' personal data in the following cases:

- where the processing of personal data is necessary to achieve the objectives provided for by international treaties or laws of local jurisdictions, for the performance and discharge of the functions, powers, and duties conferred by law;
- where processing of personal data is necessary for the administration of justice, the execution of a court decision or a decision by another legal body or an official subject to execution in accordance with local laws;
- where processing of personal data is necessary to protect the life, health, or other vital interests of the subject of personal data if obtaining their consent is not possible;
- where processing of personal data is necessary for the purposes of exercising the rights and legitimate interests of Pagora or third parties, or for the achievement of socially significant purposes, provided that this does not violate the rights and freedoms of the customers' personal data;

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- where processing of personal data is carried out for statistical or other research purposes, subject to obligatory anonymization of the customers' personal data, except when personal data is processed for marketing purposes;
- where access to the personal data that is being processed has been provided by the customer to an unlimited number of persons;
- where personal data that is being processed is subject to publication or mandatory disclosure in accordance with the laws of local jurisdictions.

The procedures for the withdrawal of the customer's consent to the processing of the customer's personal data, obtaining information about the availability of the customer's personal data in Pagora, and clarifying, blocking, and destroying the customers' personal data which Pagora holds on request are governed by the "General Data Protection Regulation" (GDPR) and are carried out by us in full.

### OBJECTIVES OF INFORMATION COLLECTION

We collect and process information that can be used for personal identification purposes, including, but not limited to, first name and surname, date of birth, credit card details, home or other address, email address, telephone number or other appropriate Personal information (hereinafter "Information").

The customer may be asked to provide personal information when using our website, registering an account or using our services. The personal information we collect may include such information as:

- contact details (including phone number, email address)
- information on residency (the customers' geographic postal address)
- payment information
- transaction history
- preferences when using the website
- feedback on services

This information is collected, processed, and stored by us on servers, according to the requirements of the legislation we operate in. When the customer interact with services, our servers store the customers' unique activity log, which collects certain administrative and traffic information, including:

- source IP address
- access time
- date of access
- device details
- language used
- type of browser used

This information is needed to ensure we provide services of the highest quality.

We never collect personal information about the customer without the customers' knowledge.



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## MEANS OF GATHERING AND PROCESSING DATA

We may automatically collect certain data, as discussed above, and receive Personal Information about the customer where the customer provide such information voluntarily through the services or other communications and interactions on the Pagora site.

We may also receive personal information from online vendors and service providers, and from customer lists lawfully acquired from third-party suppliers.

In addition, we may use the services of third-party service suppliers for technical support of the customers' online transactions and for maintaining the customers' account.

We will have access to any information the customer provide to such suppliers, service providers, and third-party e-commerce services. We will use the Personal Information in accordance with the provisions of this Privacy Policy.

This information will be disclosed to third parties outside the company only in accordance with this Privacy Policy and the legislation of the customers' state.

## THE USE OF DATA

We use the personal information that the customer provide to us to deliver our Services, to provide customer support, to ensure the necessary security, for the identity verification and checks, to process any of the customers' online transactions, as well as to assist the customers' participation in third-party promotions, that meet certain business conditions, and for any other purposes related to the operation of our gaming Services.

Therefore, during the provision of our services, we may share the customers' personal information with our carefully selected partners (including any other parties that have arrangements with the customer about the sharing of the customers' data).

The customers' personal information may also be used by us to provide the customer with:

- promotional offers and information about our products and services
- promotional offers and information about our partners' products and services, in order to enlarge the range of products provided to the customer and improve our customer service

From time to time, we may request information from the customer via surveys or competitions. Participation in these surveys or competitions is completely voluntary, and the customer has the choice of whether or not to disclose the customers' personal information.

Information requested may include contact details (such as name, correspondence address, telephone number), and geographic information (such as postal code or postal address), age. By taking part in any

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competition or accepting winnings (prizes) from us, the customer consent to the use of the customers' name for promotional purposes without additional remuneration, except where prohibited by law.

If the customer has not unequivocally decided whether to receive promotional information from us, we may use the customers' personal information (including the customers' email address and phone number) to provide the customer with information regarding our products, services, and promotions, including other gaming products (including online poker, casino, betting, backgammon etc.) and third-party products and services carefully selected by us.

## INFORMATION DISCLOSURE

We do not disclose the customers' Personal Information to companies, organisations or individuals not associated with Pagora.

We may disclose the customers' Personal Information to companies, organisations or individuals not associated with Pagora if the customer has given us consent to these actions.

We may disclose the customers' Personal Information if required to do so by applicable law, or if we believe in good faith that such actions are necessary to:

- comply with any legal issue or process that concerns us, any of our websites or services or in circumstances where we are essentially bound by legal obligation
- protect our rights or property
- protect the personal safety of our service users or the public
- If, in our opinion and sole determination, the customer is found to have deceived us or attempted to deceive us, or any other service user in any way, including but not limited to:
  - game tampering
  - payment fraud

If we have grounds to suspect the customer of payment fraud, including the use of stolen credit cards, or any other fraudulent activity, including any payment reversal or other, payment cancellation, or prohibited transactions, including money laundering, we reserve the right to share this information together with the customers' identity information with other online gaming sites, banks, credit card companies, appropriate regulatory agencies, and relevant law enforcement authorities.

For the purpose of public research on the prevention of addiction, the customers' data can be passed on to the relevant institutions.

## ACCESS

The customer may 'opt-out' of receiving any promotional communications either:

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- by choosing to opt-out via the customers' account settings available on our sites or through our services
- in response to a promotional email the customer receives from us
- at any time by sending an email, or by writing to our Customer Services

In addition, the customer may contact us at any time if the customer:

- wants to find out what of the customers' personal information we collect, process, and store, and also from which sources we have obtained it
- wants to confirm the accuracy of the personal information we have collected about the customer
- would like to update the customer's personal information; and/or
- have any complaint regarding our use of the customer's Personal Information

If required, we will update any information the customer has provided to us, given that the customer proves the necessity for such changes and verify the customers' identity.

For the avoidance of doubt, nothing in this Privacy Policy shall allow us to retain the customers' Personal Information if we are required to provide it by the law of the customers' country.

### CONSENT TO SECURITY REVIEWS

We reserve the right to conduct a security review at any time to validate the registration details provided by the customer and to verify the customers' financial transactions and the correct use of our services by the customer, in order to prevent potential breaches of our Terms and Conditions and of any applicable law.

By using our services and thereby agreeing to our Terms and Conditions, the customer authorises us to use the customers' Personal Information and to disclose the customers' Personal Information to third parties for the purposes of validating the information the customer provided during registration and use of our Services, including, where necessary, the transfer of the customers' personal information outside the customers' country.

Security reviews may include but are not limited to ordering a credit report and otherwise verifying the information the customer provide against third-party databases.

### SECURITY

We understand the importance of providing security and the methods needed to secure the confidentiality, integrity, and accessibility of information. We store all personal information we receive directly from the customer in an encrypted and password-protected database stored within our secure network behind active, up-to-date firewall software.



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We also take measures to ensure our subsidiaries, agents, partners, affiliates, and suppliers employ adequate security measures.

### PROTECTION OF MINORS

Our services are not intended for persons under the age of eighteen (18) or the lawful age in their respective jurisdiction.

Any person who provides their information to us through any part of the services confirms to us that they are eighteen (18) years of age (or the lawful age in their respective jurisdiction) or older. It is our policy to uncover attempts by minors to access our services which may require an additional security review.

If we become aware that a minor has attempted to or has submitted personal information via our services, we will not accept their information and will take all steps to purge the information from our records.

### INTERNATIONAL TRANSFERS

Personal information collected by Pagora may be stored and processed in any country in which we or our affiliates, suppliers, partners or agents provide gaming services and services of our gaming platform.

By using our services, the customer expressly consents to any transfer of information outside the customers' country (including to countries that may not be considered as having adequate privacy laws).

Nevertheless, we take steps to ensure that our agents, partners, affiliates, and suppliers, comply with our standards of privacy and this Privacy Policy, regardless of their location.

### THIRD-PARTY RELATIONSHIPS

We cannot ensure the protection of any information that the customer provides to a third-party website that links to our services or of any other information collected by any third party managing it in compliance with our affiliate program (if applicable) or otherwise since these third-party online services and websites are not owned by us and are operated independently from us. Any information collected by these third parties is governed by the privacy policy, if any, of such third party.

### LEGAL DISCLAIMER

We are not responsible for events beyond our direct control.

Due to the complex and ever-changing nature of our technologies and business, we provide comprehensive, but we do not guarantee an error-free, operation regarding the confidentiality of the customers' personal information when the customer visit other websites using links located on our website. If the customer visits other websites, the customer should be aware that the operators of these

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websites can collect the customers' personal information, which they will use in accordance with their privacy policy, which will differ from ours.

We do not guarantee the security of the customers' data, while it is being transmitted through channels of communication.

We are also not responsible for any direct or indirect damage arising from the unlawful use or theft of the customers' Personal Information.

### CONSENT TO PRIVACY POLICY

The customers' use of our services is the customers' voluntary agreement with our Privacy Policy, and the customer thereby gives us the right to collect, process, and store the customers' personal data.

This Privacy Policy should be read in conjunction with our Terms and Conditions and any additional applicable Terms and Conditions published on our platforms and websites.

We may periodically make changes to this Privacy Policy and will notify the customer of these changes by publishing the modified terms on our platforms and websites. The customers' continued use of our services following any changes to this Privacy Policy constitutes the customers' acceptance of the changes.

### ANTI-MONEY LAUNDERING/COMBATING THE FINANCING OF TERRORISM

Pagora betting company carries out all appropriate measures to combat money laundering and international terrorism (AML Policy). Thus, the company has a strong position to prevent all kinds of illegal activity. To fulfil these obligations, the company is bound to inform competent authorities if there is a reason to suspect that funds which were deposited by the User into his account are related to illegal activity or terrorism financing. The company is also obliged to block such funds and to undertake measures provided for by the rules of the AML policy.

Money laundering means:

- hiding or keeping privacy regarding the information about the real source, location, disposal, movement, ownership or other property rights related to property obtained because of illegal activity,
- conversion, moving, obtaining, possession or use of property which was got as the result of criminal activity for the purpose of concealing the illicit source of such property or assisting persons involved in crime to avoid legal consequences of their actions,
- a situation in which the property was obtained as a result of criminal activity committed on the territory of another state.

In order to prevent the infiltration of criminal capital into the economy of the state, many countries fight against money laundering and terrorism financing.



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The company applies internal laws and regulations and special measures to help international organisations in combating money laundering and terrorism financing around the world.

When the customer opens an account, the customer agrees to undertake the following obligations:

- The customer agrees that the customer complies with all applicable laws and regulations on combating money laundering and terrorism financing, including the AML Policy.
- The customer confirms that the customer has no information or any suspicions about the fact that funds used for depositing in the past, present or future, are received from an illegal source, or have any relation to the legalisation of income obtained illegally, or other unlawful activity prohibited by applicable law or the instructions of any international organisations;
- The customer agrees to immediately provide any information we think fit to require according to applicable laws and regulatory requirements in respect of combating the legalisation of funds obtained illegally.

The company collects and keeps the passport or other ID of the User, and reports on all changes made in the account;

The company monitors any suspicious activity on the User's account, as well as operations carried out under special conditions;

The company has the right to ban the User at any time if the company has grounds for supposing that this operation has any relation to money laundering and criminal activity. In accordance with international law, the company is not obliged to inform the User about his suspicious activity and let him know that it has been passed to relevant authorities.

In accordance with the internal AML procedures, the company performs initial and ongoing personal identity verification procedures as provided by the level of risk of each User.

- The company will ask the customer to provide minimal information to confirm the customers' identity.
- The company will record and preserve all data and ID, as well as which methods of confirmation have been used and the results of verification procedures.
- The company will check the customers' personal data to match the list of persons suspected of terrorism, which is formed by the authorised state and independent authorities. A minimum set of identification data includes: the User's full name; date of birth (for individuals); residential address or registered address of the User;
- sources of funds that the customer plan to deposit into the account.

To verify and confirm the authenticity of the above-mentioned data, the company may require the following documents:

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- passport or identification card, or other document equivalents that meet the following requirements: contains the name, date of birth and a photograph of the document holder;
- issued by the national public authorities, a recently obtained receipt for the payment of utility bills (not older than three months) or other documents confirming the address of the User.

The company may also require other additional information, confirmed by relevant documents. In some instances, the company may also require notarised copies of documents from the User.

