

PRIVACY POLICY

Bet Invest Ltd. (hereinafter collectively referred to as “**BetInvest**”, “**we**” and/or “**us**”), a company incorporated in UK, with company number 8348255 and with registered office at 15 Foxfield Close, Northwood, Greater London, HA6 3 NU, UK, adhere to the Data Protection Act 2018 of Parliament of the United Kingdom (“**DPA**”) and the Regulation EU 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation [“**GDPR**”]).

By this document BetInvest explains how we collect, process and store Personal data, belonging to its Customers within the EU (hereinafter referred to as “**you**”) via the BetInvest Website: <https://www.betinvest.com> (the “**Website**”).

For the purposes of this document the terms, stipulated below, have the following meanings:

“**Consent**” means freely given, specific, informed and unambiguous indication of your agreement to the processing of your Personal data by BetInvest.

“**Controller**” means natural or legal person, which alone or jointly determines the purposes and means of the processing of Personal data. **Bet Invest Ltd. is a controller in the meaning of the GDPR, DPA and this Privacy Policy.**

“**Data subject**” means an identified or identifiable natural person; an identifiable natural person is one, who can be identified, directly or indirectly, in particular by reference to its Personal data. **You are Data subject in the meaning of the GDPR and DPA.**

“**Personal data**” means any information, relating to you, that helps us directly or indirectly identify you as a Data subject.

1. WHICH PERSONAL DATA DO WE COLLECT?

Personal data that we may collect, store and process includes:

- information, provided by you to us by filling in forms on Website or any other information you submit to us via Website, email, telephone, Skype and/or Live Chat (e.g. name, surname, ID number, address, email);
- records of correspondence, whether via the Website, email, telephone or other means;
- your responses to marketing campaigns from us.

2. HOW WILL WE USE YOUR PERSONAL DATA?

BetInvest will use your personal information and data together with other information for lawful processing, based on the following legal grounds:

- **as a legal obligation** by virtue of gaming legislation or any other specific law that implies to the BetInvest business activity;
- **as our legitimate interest** to pursuit BetInvest commercial and business objectives. Please, be noted such processing is necessary and we will provide relevant balancing test to ensure such processing is lawful and conducted only for specified, explicit and legitimate purposes, e.g. anti-fraud measures, risk assessment, personalization and web-analytics;
- **within performance of the contracts** due to the contractual obligations BetInvest entered with you (by your acceptance of BetInvest T&C) and any third party (by signing relevant agreements), provided, however, processing of your Personal data is strictly limited for performance of obligations, stipulated therein;
- **upon receiving your Consent** only within the time we have your Consent to proceed your Personal data and for purposes you agreed to.

We process your Personal data for Services and business-related purposes, stipulated below:

- complying with our legal and regulatory duties;
- engaging you in surveys and polls, related to the rendered Services;
- providing you with information about promotional offers and our products and services.

3. WITH WHOM YOUR PERSONAL DATA IS SHARED?

We share your Personal data with:

1. The Affiliates of Bet Invest Ltd. “Affiliates” for the purposes of this Privacy Policy includes all or any of direct or indirect subsidiary undertakings, joint venture partners, and their related companies of the Bet Invest Ltd. We may share your Personal data with our Affiliates for marketing research and data analysis and comply with legal and regulatory obligations.

2. Third Parties (marketing agencies and other trusted partners). BetInvest tries to examine preferences of its Customers by means of data analysis, research and surveys and render those Services that will satisfy such needs. For this purpose, we may also transfer a part of your Personal data to relevant marketing agencies. All these processors may receive only a part of your Personal data, strictly limited to the needs of such transmission and compliance of such processors with their legal and regulatory obligations. For protection of your Personal data relevant preventive measures will be taken by BetInvest prior to transfer thereof.

3. International transfers. BetInvest runs its business activity worldwide. However, some countries outside the European Economic Area (hereinafter - “EEA”), do not have effective legislation in the data protection sphere. To ensure

the appropriate level of protection, we add relevant contractual clauses, designed to offer the same level of protection of Personal data as within the EEA.

We would like to emphasize that BetInvest makes its best efforts to assure the protection of Personal data while it is cooperating with any third parties. In addition, we try to secure your rights and information, by verifying whether the above-mentioned data is processed pursuant to the GDPR and DPA standards, as well as other requirements of the applicable legislation.

4. WHERE YOUR PERSONAL DATA IS STORED?

We store your Personal data in the data centers within the European Economic Area. While transferring your information to data centers we limit the processing course to the strictly necessary extent and proportionate for the purposes of ensuring network and information security. In addition, the security of such transmission is preserved by using of computer security incident response teams (CSIRTs), computer emergency response teams (CERTs) and other applicable means to endure the high-level of protection.

Moreover, data centers use Operational Metrics (all traffic data, cryptographically-hashed samples of files, clickstream information, logged snippets of transmitted content, IP-trust scores and other server activity data and all analytic products derived therefrom).

5. HOW LONG YOUR PERSONAL DATA IS STORED?

BetInvest will store your Personal data under the lawful basis for relevant retention period. Thus, such information will be processed until you delete your account on the Website and further within the reasonable period due to the applicable legislative grounds.

6. WHAT ARE YOUR RIGHTS?

Both GDPR and DPA entitle you to the range of specific rights to your Personal data. Please, make sure you examine the following list with due care and are fully aware of it. In addition, we would like to stress some rights can be enjoyed only when special circumstances occur.

I. Right to be informed regarding your Personal data. By this Privacy Policy BetInvest tries to highlight the most contradicting issues concerning secure of your Personal data to keep you informed. In a case any provisions of this Privacy Policy are to be altered, this page will be uploaded correspondently.

II. Right to access. It is your right to receive confirmation from us whether we process your Personal data. Also you are entitled to request us to clarify which yours Personal data is in our possession. In addition, you may request a copy of Personal data undergoing processing.

III. Right to rectification. You have a right to rectify inaccurate Personal data of you in our possession.

IV. Right to be forgotten. You are entitled to erasure your Personal data in our possession whether specific circumstances arose. The named grounds apply if the collected data is no longer necessary for the established purposes, you withdraw your consent to process thereof, your Personal data is unlawfully processed, no overriding legitimate grounds to process your information are presented and/or your Personal data is to be erased due to legal obligations. However, please, be noted BetInvest is not bound to comply with such a request whether processing of your Personal data is necessary to exercise the right of freedom of expression and information, comply with a legal obligation in the public interest or in the exercise of official authority and/or establish, exercise or defend legal claims.

V. Right to restriction of processing. You have the right to request the suspension of your Personal data processing, for example, whether the accuracy of the data is in a question.

VI. Right to data portability. You are entitled to transfer your Personal data in our possession to any other data controller. Moreover, you have a right to receive the information on your Personal data from BetInvest in a structured, commonly used and machine-readable format. While presenting the above-mentioned data to you, BetInvest will take all protective measures to assure your Personal data is securely transmitted upon the request by using end-to-end encryption or any other strong authentication measures.

VII. Right to object. You have the right to object processing of your Personal data. However, where legitimate grounds to process your information override your interests and rights, BetInvest preserves the right to continue such processing.

IX. Right not to be subject to automated decision-making. You are entitled no to be subject of automated decision procedure. BetInvest assures you all core matters, related to your Personal data are resolved by our team.

7. HOW COULD YOU ENJOY YOUR RIGHTS?

To enjoy any of the above-mentioned rights you are entitled to provide us with a special request. Should you wish to make such a request, please, contact us via following e-mail: dpo@betinvest.com.

Your application should include adequate identifying information and appropriate documents to affirm your application. BetInvest will deal with yours concerns within 30 days and response to you upon each issue arose.

Moreover, whether you did not receive a response to your request within the stipulated term or you are not satisfied in our processing of your Personal data, you are entitled to apply to your local Data protection authority.

8. CONSENT

By registering on the Website as a Customer of BetInvest and/or using our Services you explicitly consent to the processing of your Personal data by the BetInvest and to the terms and conditions of this Privacy Policy. Please, make sure you understand all your rights and obligations, stipulated hereunder and in other legal documents, placed on the Website.

9. FURTHER INFORMATION

BetInvest always aims to make its Customers aware of their rights and obligations. Please, make sure you read carefully this Privacy Policy and other legal documents, placed on the Website.

In a case you have some doubt according our Services or need any additional assistance, don not hesitate to contact us via following e-mail: dpo@betinvest.com.

10. UPDATE

Last update of this Privacy Policy: December 22, 2018