

PRIVACY & MANAGEMENT OF PERSONAL DATA

1. General Information

The Company, BMbit N.V. (hereinafter "Betmaster") a company incorporated under the laws of Curacao, having its address at: Hanchi Snoa 19, TRIAS Building, Willemstad, Curacao is committed to the protection of players' personal data. This Privacy Policy describes the way in which BMbit N.V. processes personal data and informs players about their rights. Personal data means any information relating to an identified or identifiable individual. The processing of players' data complies with all applicable data protection regulations including the European General Data Protection Regulation (GDPR).

By accepting this Privacy Policy, the player confirms his (hereinafter referred to as a neutral term and applicable to both sexes) consent to the use of his personal data as set out in this Privacy Policy.

1.1. Data Controller

The data controller of BMbit N.V. is:

BMbit N.V.
Hanchi Snoa 19, TRIAS Building,
Willemstad, Curacao
Registration Number 156146

1.2. Data Protection Officer

For any privacy issues or for further information on Betmaster's data processing activities please contact the data protection officer of BMbit N.V.:

BMbit N.V.
Hanchi Snoa 19, TRIAS Building,
Willemstad, Curacao
E-Mail support@betmaster.bet

2. How Betmaster Processes Personal Data

2.1. General Information

In the following it is described how Betmaster processes personal data and how such processing is justified. Betmaster only processes personal data:

- 2.1.1. when the player has given consent with such processing,
- 2.1.2. when processing is necessary for the performance of the services provided by Betmaster,
- 2.1.3. when processing is necessary for compliance with a legal obligation to which Betmaster is subject, or
- 2.1.4. when processing is necessary for the purposes of the legitimate interests pursued by Betmaster or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the player.

2.2. Not providing personal data may mean that Betmaster is unable to provide services to the player.

2.3. Data Collected when visiting the Website.

During the visit of the website www.betmaster.bet our system automatically collects information which is generated by the browser of the visitor of our Website and stores the data in log files on a temporary basis including but not limited to:

- 2.3.1. the IP address of the requesting computer,
- 2.3.2. the date and the time,
- 2.3.3. the operating system,
- 2.3.4. the browser used by the player.

2.4. The log files may contain IP addresses which allow identification of a player.

2.5. Such collection is necessary for the performance of the services provided and for the purpose of our legitimate interests in order to enable the use of the site by the visitor, to optimize the website and in order to identify dysfunctions and abuse of Betmaster services.

2.6. Data Collected upon Registration

Betmaster collects players' personal data during registration process (and during ongoing KYC monitoring at a later stage in time) including but not limited to:

- 2.6.1. first name and last name

- 2.6.2. gender
- 2.6.3. complete address
- 2.6.4. date of birth
- 2.6.5. a verifiable email address
- 2.6.6. mobile phone number
- 2.6.7. username and password
- 2.6.8. in certain countries id-card or social security number

- 2.7. Players will be requested - at any given time and in line with applicable laws and regulations, particularly the current regulations to prevent money laundering and the financing of terrorism - to submit further documents to verify their identity and to enable security identity checks, such as a copy of a valid ID issued by the competent authority, e.g., passport, personal identity card, driver's license, a utility bill (e.g. for gas, electricity or a lease contract).
- 2.8. Following registration, players may change or ask to delete their personal data at any time by contacting support@betmaster.bet. Every player is to update his personal data without delay once information provided to Betmaster is no longer correct or is incomplete.
- 2.9. Betmaster may also collect information from third party databases.
- 2.10. The collection of such data is required for us to provide our services to the player. The verification of the players' age and identity is necessary for complying with legal obligations. It may also be necessary for enforcing our contractual agreements and is therefore in our legitimate interest.
- 2.11. Data collected for Payment Services

If players deposit funds into the Betmaster account by credit card, the processing of particularly the following additional personal data is required:

- 2.11.1. first name and last name of cardholder
- 2.11.2. name of credit card company
- 2.11.3. credit card number
- 2.11.4. expiry date of credit card, CVC code and password

- 2.12. For a transfer of winnings into the player's bank account, particularly the following personal data has to be collected:

- 2.12.1. name and surname of account holder
- 2.12.2. name of bank
- 2.12.3. IBAN
- 2.12.4. SWIFT code

Such data may be transmitted to payment providers. The collection of this data is necessary for performing payment services.

- 2.13. Additional Data collected when using Betmaster Services
 - 2.13.1. Profiles

Betmaster processes information that is collected by cookies, log files, clear gifs, and/or by third parties' support in order to create player profiles. A profile contains information on individual players including preferences concerning the activities of the player. This information is related to the players' personal and identifiable data and used to provide and improve our services to the benefit of the player. Profiles are also used to design each player's experience on the Betmaster website individually and to provide specific marketing information.

2.13.2. Log files

- 2.13.2.1 Betmaster uses log files. These include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp and the number of clicks to analyze trends for administration of the site, to track players' movements on the site, and to gather usable comprehensive demographic information. IP addresses are related to the provision of web-based services with personally identifiable information.
- 2.13.2.2. The collection of such data is required for us to provide our services to the player. It is also necessary to protect our customers and ourselves from crime and to comply with legal obligations. It is also in our legitimate interest to improve and promote our services.

2.14. Communication with Players

- 2.14.1. Betmaster stores communication with players including requests for information or customer support. This applies to communication via email, the website or other means of communication including telephone. Telephone calls are recorded for training and security purposes.
- 2.14.2. Betmaster uses the Crisp IM SARL is a company registered at 2 Boulevard de Launay, 44100 Nantes, France (registration number: 833085806) technology (<https://crisp.chat/en/>) and the technical infrastructure is provided by DigitalOcean, Vultr and Cloudflare, relayed all over the world ("CRISP"). CRISP enables Live Chat and similar functionalities on the website. For more information on how CRISP deals with data see <https://crisp.chat/en/privacy/>.
- 2.14.3. The collection of the player's personal data is required for us to provide our services to the player and to comply with legal obligations. It may also be necessary for enforcing our contractual agreements and therefore, in our legitimate interest.

2.15. Marketing activities

- 2.15.1. Subject to the player's account settings his personal data may be used by Betmaster for marketing activities across various channels including mail, email, telephone call as well as electronic/instant

messaging. The use of the player's personal data for marketing activities may be cancelled or restricted to certain communication channels at any time. Players may either adjust the respective account settings or contact our service department by email to support@betmaster.be. Due to the nature of the technical workflow involved, updates to the respective account settings may take up to 5 working days before they become effective.

- 2.15.2. Whenever a player has not consented to the use of his personal data for marketing purposes Betmaster processes personal data for marketing purposes only as necessary for the purpose of our legitimate interests in promoting our services.

2.16. Cookies, third party Content and Trackers

A cookie is a piece of data saved on the player's computer and linked to specific user information. For cookies, third party services, social media plugins and the use of trackers see Sec. 6 below.

2.17. Other Purposes

It may be necessary to process personal data for additional purposes. However, Betmaster will only process personal data if and to the extent that one or more conditions set out in Sec. 2.1 are met.

3. Disclosure of Personal Data

3.1. General Information

- 3.1.1. Player's personal data is treated as strictly confidential. Personal player data may be disclosed to third parties:
- 3.1.1.1. if the player has given consent with such disclosure,
 - 3.1.1.2. if the player has chosen a forum and initiated the disclosure,
 - 3.1.1.3. the disclosure is necessary for compliance with legal obligations to which Betmaster is subject, or
 - 3.1.1.4. when the disclosure is necessary for the purposes of the legitimate interests pursued by Betmaster or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the player.
- 3.1.2. Betmaster only transfers data to states outside of the EU/EEA provided the recipient guarantees a standard of data protection comparable to European standards (e.g. by agreeing to approved contractual clauses, intragroup agreements or other measures designed to ensure that the recipients of personal data protect them). Betmaster assumes no liability for data transfers outside the EU/EEA in case the player has chosen to disclose his data or has initiated communication with a third party regarding Betmaster services.
- 3.1.3. In the following clauses 3.2 to 3.7 it is described how Betmaster shares personal data. Additional information is laid down in Sec. 4 below: Cookies, Third Party Services, Social Media Plugins and Trackers.

3.2. Sharing of personal data within the Betmaster Group

Personal data may be transferred or disclosed to any company within the Betmaster Group. Betmaster Group means all group companies and their related companies.

3.3. Sharing of personal data with Service Providers

- 3.3.1. Betmaster may share personal data with other third-party service providers, when players request a service, which Betmaster offers partly or fully through the third-party provider, such as casino games, virtual sports or eSports. For these products provided via the game provider websites' additional provisions may apply.
- 3.3.2. Betmaster makes also use of trusted third parties to process players' personal data including but not limited to payment services, information technology, statistics and reporting, customer support, sales, marketing related services. Pursuant to applicable data protection regulations including the General Data Protection Regulation these third parties are contractually bound to Betmaster and obliged to treat players' data securely and confidentially. Their use of the said data is restricted to the extent required to fulfil the respective task. Betmaster only transfers data to states outside the EU/European Economic Area provided that the recipient guarantees a standard of data protection comparable to that in place in Europe.

3.4. Sharing of personal data for KYC, the Prevention of Fraud and Money Laundering

- 3.4.1. In order to complete players' identity verification, to carry out security checks, to assess players' compliance with our Terms and Conditions and legal obligations including the prevention of money laundering, the financing of terrorism and the protection of minors, player data may be matched against third party databases of including but not limited to SumSub, GetID, GB Group plc, Jumio Corporation, Bisnode Austria GmbH.
- 3.4.2. Upon any indication of transactions and/or activities that may raise suspicions of criminal activities, Betmaster will report to the relevant parties in charge (e.g. police, sporting associations, private associations aiming at the prevention of criminal and fraudulent activities in sports betting and/or games of chance).
- 3.4.3. In this context, data on players' activities and personal data may also be transferred in the framework of an early warning system to the European Sports Security Association (ESSA) and the respective sports federations.
- 3.4.4. Furthermore, Betmaster reserves the right to record telephone calls with players and forward recordings to law enforcement agencies if there is precise evidence of criminal offences.

- 3.4.5. With the acceptance of the General Terms and Conditions and this Privacy Policy, the player grants his explicit consent to these procedures including requests for credit information and the matching of data provided against databases of third parties.
- 3.4.6. The sharing of players' data might also be necessary to protect players and Betmaster from crime and to comply with legal obligations.
- 3.4.7. Within the framework of this contractual relationship, we transmit collected personal data for the purpose of requesting, implementing, and terminating this business relationship, as well as data regarding non-contractual conduct or fraudulent conduct to anti-money laundering prevention, fraud prevention and creditworthiness service providers.
- 3.4.8. The legal basis for these transfers is set out in point (b) of Article 6 (1) and point (f) of Article 6 (1) General Data Protection Regulation (GDPR). Data transfers based on point (f) of Article 6 (1) GDPR may only take place insofar as this is necessary for maintaining the legitimate interests of our company or those of a third party and is not outweighed by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

3.5. Sharing of data with Regulatory and Enforcement Authorities

In order to comply with its legal obligations, Betmaster may be required to transfer players' registration details, identification documentation, financial transactions, gaming transactions and general information about player accounts to regulatory and enforcement authorities within the EU/EEA. The said disclosure shall also include any disclosure to the Financial Intelligence Authorities in accordance with our legal obligation in terms of the Anti Money Laundering Directive EU (2015/849).

3.6. Sharing of anonymized Data

Betmaster's commitment to the protection of personal data notwithstanding, the company reserves the right to publish gaming data (e.g. achieved results), the player's first name, the initial of the surname as well as the player's country of residence on the Betmaster website as long as the player remains, directly and indirectly, unidentifiable.

3.7. Sharing of personal data for other purposes

- 3.7.1. It may be necessary to share personal data for additional purposes. However, Betmaster will only disclose personal data if and to the extent that one or more conditions set out in Sec. 5 a. are met.
- 3.7.2. Betmaster may process and disclose personal data to a third party which a player has contacted for solving disputes, giving feedback on Betmaster services or for any other purpose pursued by the player. Betmaster processes and discloses player's personal data in such cases in order to respond to any inquiries by such third parties that the player has reached out to. Betmaster will not assume any liability for the accuracy, integrity and confidentiality of such data processing. Nor will Betmaster assume any liability for the fulfilment of any other GDPR requirements in case a player has on its own motion and initiative contacted a third party concerning Betmaster services. Betmaster reserves the right to respond to all correspondence initiated by a player with a third party and to assume that the information presented by such third party chosen by the player is true and accurate.

3.8. Limitation of liability

- 3.8.1. Betmaster does not control nor assume any responsibility for any third party websites that contain illegal or defamatory content and that might include a link to Betmaster websites or URLs. Betmaster does not accept any responsibility from third party websites that contain content such as, but not limited to:
 - 3.8.1.1. Adult Entertainment;
 - 3.8.1.2. Child Pornography;
 - 3.8.1.3. Drug Paraphernalia;
 - 3.8.1.4. Internet Gun Sales;
 - 3.8.1.5. Unlicensed Forex brokers;
 - 3.8.1.6. Sexual Encounter Firms;
 - 3.8.1.7. Unlicensed Money Transmitters;
 - 3.8.1.8. Ammunition Sales;
 - 3.8.1.9. Escort Services;
 - 3.8.1.10. Firearms/Fireworks Sales;
 - 3.8.1.11. Government Grants;
 - 3.8.1.12. Home Based Charities;
 - 3.8.1.13. Loans or other financial services;
 - 3.8.1.14. Pharmaceutical Sales;
 - 3.8.1.15. Pornography;
 - 3.8.1.16. Telemarketing;
 - 3.8.1.17. Tobacco Sales.

4. Third Party Services and Trackers

4.1. Third Party Services

- 4.1.1. Betmaster may use plugins and active script contents (including JavaScript) from third party services for the purpose of functionality of its websites or services, evaluating user behavior and the improvement of its offers. Betmaster reserves the right to use additional plugins and active script contents at any time.
- 4.1.2. Below Betmaster informs about the data collected by the several categories of third-party services deployed with the offers of Betmaster. For such third-party services additional privacy provisions of these third-party services may apply.

The following description of third-party services may not be exhaustive and Betmaster reserves the right to use additional third-party services at any time provided that appropriate measures to protect personal data are in place.

4.2. Tracking software

- 4.2.1. Betmaster uses tracking software for the purpose of evaluating the user's preferences and therefore to improve the offers of Betmaster. Tracking software collects user data such as IP address, accessing website, advertisement preferences and further marketing information. The following tracking software is integrated to the websites: <https://www.finteza.com/>

4.3. Analytic software

- 4.3.1. Betmaster uses website analytics tools for the purpose of understanding the player's behavior on the Betmaster websites and therefore optimize the services provided by Betmaster. Website analytics tools collect data by using cookies and IP address tracking for that purpose. For further information on the use of cookies on the Betmaster websites, please refer to the Cookie Policy. The following website analytics tools are integrated to the websites of Betmaster:
- 4.3.2. Google Analytics/Tag Manager/Firebase. Google Analytics uses various techniques, including cookies to help the website analyze how users use the site. The information obtained by Google Analytics about your use of the website will be transmitted to and stored by Google on servers, which may be operated outside member states of the European Union as well outside states party to the Agreement on the European Economic Area. This website uses a Google Analytics tracking code, to which IP anonymization is added to enable anonymized collection of IP addresses (so-called IP masking). Google will use this information on behalf of the website operator for evaluating your use of the website, compiling reports on website activity and for providing other services relating to website activity and internet usage to the website operator. Google Analytics will not associate your IP address with any other data held by Google. Google Tag manager is managing all Google and third-party tags in one place. Google firebase is monitoring and analyzing the performance of Betmaster's mobile applications. Players may refuse the use of Google cookies by selecting the appropriate settings on your browser. However, by doing so players may not be able to use the full functionality of this website.

<http://www.google.com/analytics/learn/privacy.html> . <https://tools.google.com/dlpage/gaoptout/>

4.4. Third Party Games Providers

Within the casino offers of Betmaster, casino games provided by third party game providers may be deployed. For these games provided via the game provider websites additional provisions may apply. More information about these third-party providers are provided in the general Terms and Conditions. Betmaster reserves the right to use additional casino game providers at any time.

4.5. Customer Service (Live Chat)

- 4.5.1. Betmaster uses the Crisp IM SARL is a company registered at 2 Boulevard de Launay, 44100 Nantes, France (registration number: 833085806) technology (<https://crisp.chat/en/>) and the technical infrastructure is provided by DigitalOcean, Vultr and Cloudflare, relayed all over the world ("CRISP"). CRISP enables Live Chat and similar functionalities on the website. For more information on how CRISP deals with data see <https://crisp.chat/en/privacy/>.
- 4.5.2. We use CRISP for the purpose of providing our customers with the best possible consulting and support experience on this website and related services. For reasons arising from your particular situation, you have the right at any time to object to this processing of your personal data based on Art. 6 (1) a) GDPR. If you object to the processing, request a copy of your data, correct, or delete it, please contact us at support@betmaster.be

4.6. Co-Browsing

Co-Browsing is a web-based, download-free screen sharing technology. If the User consents, CRISP allows an authorized and trained employee of our company to connect to the user's session on this website. When employees connect, it helps them better understand the user's concern to find more targeted solutions faster. Through co-browsing, the following information is continuously transmitted and processed: Mouse movements, scrolling behavior, clicks, form input (sensitive input is excluded from transmission by default), position on website, subpages visited, time on page, browser, operating system, type of terminal, screen resolution, anonymized IP address, place of access (city/nation). Processing is carried out based on Art. 6 (1) a) GDPR with the user's consent.

4.7. Desktop Co-Browsing

Desktop Co-Browsing is a download-free screen sharing technology. If the User consents, CRISP allows an authorized and trained employee of our company to connect to the User's desktop (view only). When employees connect, it helps them better understand the user's concern to find more targeted solutions faster. Through screen sharing an image-by-image stream (video) is established. Processing is carried out based on Art. 6 (1) a) GDPR with the user's consent.

4.8. Live Chat

Live Chat takes customer inquiries. such inquiries will also be answered through the live chat. Chatbots also do this automatically. When a customer starts the chat, the affected person's browser transmits the IP address by default, which is immediately discarded and is therefore not saved. Basically, further personal data can be exchanged in a chat conversation between the person concerned and the client - either automatically by a chatbot or manually by an employee of the client. The

data of the person concerned can be categorized within CRISP and saved together with the chat conversation. The data collected via the chat will be completely deleted by the chatvisor after a reasonable time. The personal data are processed in accordance with Art. 6 Para. 1 b GDPR to fulfill a contract to which the data subject is a party or to carry out pre-contractual measures that are carried out at the request of the data subject.

5. Retention

Personal data is kept by Betmaster as long as a player is a customer of Betmaster. Whenever a player closes his Betmaster account, the personal data saved in the system will remain stored for the minimum length of time required to comply with the purposes set out in this Privacy Policy and applicable legal obligations. Personal Data may also be stored longer if it cannot be deleted for technical and/or legal reasons.

6. Data Security

- 6.1. All data will be processed in an automated manner. Betmaster takes all adequate technical and organizational measures to protect players' data from access by unauthorized persons and to prevent accidental or unlawful processing, disclosure, destruction, loss, alteration, or damage. In particular payment information will always be encrypted when data is being processed.
- 6.2. Whereas sensitive information is protected online by SSL encryption, Betmaster makes any reasonable effort to ensure the protection of players' data in all other areas, too.
- 6.3. Only authorized employees of Betmaster, or employees of third parties contractually bound to compliance with the principles of data protection, have access to players' information. Betmaster monitors the trustworthiness and reliability of all its employees. At regular intervals, all employees are given training on the applicable security and data protection standards. All relevant servers are located in a secure environment.

7. Data Encryption

- 7.1. In order to protect players' personal data during communication with the web browser, Betmaster uses encryption technology. In addition, online transactions are shielded by the security system of a worldwide-accredited partner.

8. Other Technical Security Measures

In addition, all player data is protected from unauthorized access by firewall and intrusion prevention systems.

9. Players' Rights

- 9.1. The player has the right to:
 - 9.1.1. request access to personal data
 - 9.1.2. request correction of personal data
 - 9.1.3. withdraw the consent to the processing of data (e.g. for marketing activities)
 - 9.1.4. request erasure of personal data
 - 9.1.5. receive data in a structured, commonly used and machine-readable format (data portability)
 - 9.1.6. request the restriction of processing personal data
 - 9.1.7. to object to the processing of personal data.
- 9.2. Some of these rights may only apply under certain circumstances as set forth in data protection legislation including the General Data Protection Regulation.
- 9.3. All requests related to personal data or any rights mentioned above may be addressed to the contact details mentioned in Sec. 3 above.

10. Filing a Complaint

If the player is not satisfied with how we handle your personal data, the player is entitled to file a complaint to the competent data protection authority.

11. Amendments to this Data Protection Policy

This Data Protection Policy is subject to change from time to time. Although players will always be informed about any changes, it is recommended to review this policy and potential amendments regularly.