



PRIVACY NOTICE

Game Lounge Limited, a Maltese company bearing registration number C 53144 and having its registered address at Level 5, Spinola Park, Triq Mikiel Ang. Borg, St Julians, SPK 1000, Malta (“Game Lounge”, “Us”, “We” or “Our”) is a controller in relation to data. This means that We are responsible for deciding how We hold and use data about You.

This privacy policy (hereafter referred to as the “Policy”) outlines the manner in which We handle the information and data which You have provided to Us and which enables Us to be able to effectively manage the relationship which You have with Us. This Policy should make you aware of how and why your data will be used, namely for the purposes of the onboarding exercise, and how long it will usually be retained for.

Any data You will provide or which We already hold will be processed in line with and in the manner set out in this Policy.

DATA PROTECTION LAWS AND PRINCIPLES

All processing of Data performed by Game Lounge as envisaged in this Privacy Policy shall be carried out in line with:

1. The Maltese Data Protection Act, Chapter 586 of the Laws of Malta (hereafter referred to as the “DPA”) as well as any other subsidiary legislation issued under the DPA, as may be amended from time to time; and
2. Regulation (EU) 2016/679 of The European Parliament And of 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, And Repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as “the Regulation” or “GDPR”).

The DPA and the GDPR shall hereafter be collectively referred to as the “Data Protection Laws”.

We determine the means and purposes of the processing of Data and therefore act as the “Data Controller” in terms of the applicable Data Protection Laws.

We collect and process your personal data for the following purposes:

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- To evaluate your suitability as a Partner and identify and assess with whom we are conducting business
- Complying with Legal Obligations: To comply with applicable laws, regulations, or legal requirements related to our Igaming Industry

We will comply with data protection law and principles, which means that your data will be:

- A. Used lawfully, fairly and in a transparent way;
- B. Collected only for valid purposes that We have clearly explained to You and not used in any way that is incompatible with those purposes;
- C. Relevant to the purposes We have told You about and limited only to those purposes;
- D. Accurate and kept up to date;
- E. Kept only as long as necessary for the purposes We have told You about; and
- F. Kept securely. We have put in place appropriate security measures to prevent Your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, We limit access to Your data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process Your data on Our instructions and they are subject to a duty of confidentiality.

INFORMATION HELD

In connection with Your application for work with Us, We will collect, store, and use the following categories of information about You:

1. The information You have provided on Our application form, including:
 - a. company name,
 - b. company registration number,
 - c. registered office address,
 - d. contact details;
2. The personal data that You have provided on Our application form including the directors', shareholders' and ultimate beneficial owners':
 - a. Name and Surname;
 - b. ID / Passport documents; and
 - c. Residential Address
 - d. Nationality

It is in Our legitimate interests to decide whether to onboard You as Our partner. We will treat and handle this information which We collect about You with utmost confidentiality and with appropriate security measures and safeguards in place.



If You fail to provide information when requested, which is necessary for Us to consider whether to onboard You as Our partner, we will not be able to process your application successfully.

By reading This Policy You understand and acknowledge that Your data may be processed in the manner set out in this policy.

DATA SUBJECT RIGHTS

We undertake to assist You in the best way possible should You choose to exercise any of Your rights with respect to Your data. In certain cases, We might need to verify Your identity prior to acceding to Your request to exercise any relevant right. This is another appropriate security measure to ensure that data is not disclosed to any person who has no right to receive it.

a. Right of Access

This enables You to receive a copy of the data We hold about You and to check that We are lawfully processing it. You may send an email to Us on dpo@gamelounge.com, requesting this confirmation and a copy of the data which We hold about You.

b. Right to Correction

All reasonable efforts are made to keep any data We may hold about You up-to-date and as accurate as possible. You can check the information that We hold about You at any time by contacting Us in the manner explained above. If You find any inaccuracies, We will correct them and where required, delete them as necessary.

c. Right to Deletion or restriction

This enables You to request:

- i. the deletion or removal of data where there is no good reason for Us continuing to process it; or
- ii. the suspension of the processing of data about You, for example if You want Us to establish its accuracy or the reason for processing it.

Note however, that We may not always be able to comply with a deletion request for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Please note that none of these data subject rights are absolute, and they must generally be weighed against Our own legal obligations and legitimate interests. If a



decision is taken to override Your data subject request, You will be informed of this along with the reasons for Our decision.

INTERNET COMMUNICATIONS

You are aware that data sent via the Internet may be transmitted across international borders even where the sender and receiver of information are located in the same country. We cannot be held responsible for anything done or omitted to be done by You or any third party in connection with any data prior to Our receiving it including but not limited to any transfers of data from You to Us via a country having a lower level of data protection than that in place in the European Union, and this, by any technological means whatsoever (for example, WhatsApp, Skype, Dropbox etc.).

Moreover, We shall accept no responsibility or liability whatsoever for the security of Your data while in transit through the internet unless Our responsibility results explicitly from a law having effect in Malta.

DATA RETENTION

We will retain Your data throughout the duration of our contractual relationship with You and for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. After this period, We will securely destroy Your data in accordance with applicable laws and regulations.

CHANGES TO THIS PRIVACY POLICY

Game Lounge reserves the right to make changes to the privacy policy at any time. Any changes to this Policy will be communicated to you in due course.