

## PRIVACY NOTICE

Kiickr Ltd., a Maltese company bearing registration number C 103411 and having its registered address at Level 5, Spinola Park, Triq Mikiel Ang. Borg, St Julians, SPK 1000, Malta (“Kiickr”, “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 Kiickr 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:

- To evaluate your suitability for this business 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

- To enter into a contractual business relationship between you and us.

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 or Agreement, including:
  - a. Full Name,
  - b. Address
  - c. Contact Email
2. The personal data that You have provided on Our application form or Publisher Agreement including the directors', shareholders' and ultimate beneficial owners' for the due diligence documents:
  - a. Name and Surname;
  - b. Identification documents;
  - c. Residential Address;
  - d. Identification Numbers
  - e. Utility Bills
  - f. Nationality
  - g. Gender
  - h. Date of Birth
  - i. Information about PEP, criminal charges and source of wealth.

It is in Our legitimate interests to decide whether to onboard You as Our Publisher. 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 Publisher, we will not be able to process your application successfully.

We do not collect or process any special categories of personal data (sensitive personal data) through the KYC process. Please refrain from providing any sensitive personal information such as racial or ethnic origin, religious or philosophical beliefs, trade union membership, health data, genetic or biometric data, or information related to criminal records.

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

## **PURPOSE AND METHODS OF USING YOUR PERSONAL DATA**

The purpose and legal basis for collecting the categories of data mentioned in the previous clause are as follows:

- **Name, surname, email address, contact number, bank account information, gender, age, nationality:** This data is essential and relevant for fulfilling our contractual relationship with you. The legal basis is the contractual relationship established when you sign the contractual Agreements, related documents.
- **Name, surname, email address, contact number, gender, age, nationality, identification document, identification number, utility bill, residential address, date of birth:** This data is essential and relevant for meeting our due diligence obligations with you. The legal basis is to perform due diligence and verify you during receiving the Due Diligence Request.
- **Age:** To confirm you are of legal age to receive marketing materials and promotions related to our products and services. This is based on our legal duty to communicate only with individuals who are legally eligible.
- **Age and email address:** To deliver promotional content and direct marketing communications about the Group's various products, services, and brands. This is grounded in the contractual relationship entered into between you and us.
  
- **Name, surname, and contact details collected from interested individuals during business events or similar engagements:** To facilitate the initiation of a business relationship, such as onboarding you or having

business discussions. This processing is based on the data subject's consent and/or our legitimate interest in following up with potential business contacts.

## 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](mailto: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 retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including compliance with legal, accounting, or reporting obligations.

To determine the necessary retention period, we consider the type of personal data and any relevant EU or national laws (such as those related to licensing, tax, or corporate requirements) that mandate specific retention durations. If no such laws apply, we assess whether any contractual terms or potential legal actions from you or third parties might necessitate data retention. In such cases, we retain relevant data to protect ourselves against potential claims or disputes.

When your personal data is no longer needed or the legal basis for its retention expires, we will securely delete or anonymize the data.

If you register as an affiliate, your data will be retained for the duration of the contract. After the agreement ends, we will keep your data for six years to defend against potential legal claims, based on our legitimate interest. For tax and accounting purposes, registration, transaction, and usage data will be kept for ten

years from the transaction date. Direct marketing data will be retained for two years after your contract with us ends.

## **AUTHORISED DISCLOSURES OF PERSONAL DATA TO THIRD PARTIES**

For the purposes of this section, “Game Lounge Group” means any entity holding shares in Kiickr whether directly or indirectly or in which Kiickr holds shares whether indirectly or directly or which is owned (directly or indirectly) by the same shareholder where ‘ownership’ means holding even at least one share in the entity in question or any sister company within the Group.

Without prejudice to anything else contained in this Privacy Policy, personal data relating to You may be shared with authorised third parties located in or outside of the EU/EEA where such disclosures are permitted or required pursuant to Data Protection Laws and/or any other applicable legislation. These authorised third parties may include but are not limited to entities within Game Lounge Group, other

third parties and organizations such as law enforcement agencies, collaborating accounting and auditing firms, regulators, relevant authorities. We may also share such personal data with organisations who have introduced You to Us, third parties which whom You have asked Us or permitted Us to share Your data with or any other third party which We must necessarily share Your personal data with so as to be able to provide the products and/or services which You have requested.

When any such personal data has to be transferred outside of the EEA – European Economic Area, We ensure that all the necessary and appropriate safeguards are in place. We may also disclose personal information to other companies within associated or subsidiary companies and to business partners, or successors in title to Our business. The manner in which data transfer outside the EEA is handled is detailed below.

## **SHARING OF PERSONAL DATA WITH OTHER CATEGORIES OF RECIPIENTS**

We may share your personal data within the Game Lounge Group for the following purposes:

1. Respond to your access requests and answer your GDPR-related questions;
2. When we believe, in good faith, that sharing your personal information is necessary to defend your rights, your safety of others, to investigate fraud or to comply with government requests;
3. To establish, exercise and defend our legal rights;
4. To fulfil our legal obligations to regulatory authorities, in addition to fulfilling our obligations under applicable laws and relevant authorities in other jurisdictions;
5. Investigation, prevention and prosecution of offences;

6. For identification and verification purposes;
7. For online storage purposes.

8. To fulfil your obligations established under the Standard Terms and Conditions

Details on the categories of recipients of the personal data may include:

1. Our technical service providers involved in affiliate services including but not limited to as Netrefer, Google Analytics
2. Partners or Operators whom you are advertising or promoting, as requested according to the Agreement you have signed.

## **CHANGES TO THIS PRIVACY POLICY**

Kiickr 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. For questions, further information about our handling of personal data or for contact with us in other matters, please use the below stated [dpo@gamelounge.com](mailto:dpo@gamelounge.com)