

# Vegas Coins Privacy policy

Version 1.0

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Vegas Coins Inc. (**Vegas Coins, we, us, our**) operates the service offering provided via the website at [www.vegascoins.com](http://www.vegascoins.com), and all subdomains, including the Games, Content, features, tools and services made available there (**our Website**), our Affiliate Program and on our associated social media pages (together, the **Platform**).

We take the privacy and security of your Personal Information very seriously. We are committed to complying with our obligations under all applicable data privacy laws, including the *California Consumer Privacy Act* as amended by the *California Privacy Rights Act*, the *Nevada Privacy of Information Collected on the Internet from Consumers Act* and the *Virginia Consumer Data Protection Act*.

This Privacy Policy sets out the types of Personal Information that we collect about users of our Platform (**Users, you, your**), how we use your Personal Information, how we share your Personal Information with others, how we keep it secure, and the control you have over your Personal Information. Please review this Privacy Policy carefully and contact us at [dataprivacy@vegascoins.com](mailto:dataprivacy@vegascoins.com) if you have any questions.

This Privacy Policy should be read in conjunction with, and forms a part of, Vegas Coins [Terms of Use](#). Any capitalized term used in this Privacy Policy that is not defined in this Privacy Policy, has the meaning given to that term in our Terms of Use.

In this Privacy Policy, the term **Personal Information** means any information about you, whether true or not, that can reasonably be used to identify you, or otherwise makes you identifiable.

Any updates or changes to this Privacy Policy will be published on our Website and shall take effect immediately. If we update this Privacy Policy in any way that impacts on your rights or obligations under this Privacy Policy, we will notify you when you next visit our Website and you will be required to re-confirm your acceptance of this Privacy Policy. If, at any time, you do not accept the updated Privacy Policy, then you must cease using our Platform.

## 1. The types of Personal Information we collect

1.1. We may collect the following types of Personal Information via the Platform:

- (a) **Personal Data** such as your name, age, gender, e-mail address, image, residential address, cell phone or other phone number and other information that can directly be used to identify you;
- (b) **Device Data**, being data about any electronic device that you use to access the Platform, including device identifiers, information about the web browser and operating system, IP address and the device settings;
- (c) **Usage Data**, being information about your use of the Platform, such the pages you visit, how often you visit them, how long you spend on them and how you navigate the Platform;
- (d) **Transaction Data**, being information you provide to us when you make a purchase, request a redemption, complete verification or otherwise use the Platform, including the details of your financial accounts that you use with us and associated names,

phone numbers, addresses and banks statements. Please note that we do not keep a record of your full card details; and

- (e) **Geolocation Data**, being information about your approximate location provided by an electronic device that you use to access the Platform.
- 1.2. We may also collect anonymous data about you, which is information about you that does not directly or indirectly identify you or any other individual.
- 1.3. We may also collect aggregated data about you, which is information about all or a subset of our Users that does not directly or indirectly identify you or any other individual.

## **2. How we collect your Personal Information**

- 2.1. We collect Personal Information, including Personal Data and Transaction Data, directly from you when you provide it to us. This usually occurs when you:
  - (a) make a purchase with us;
  - (b) send us an email or other communication;
  - (c) join any of our social media pages that we control;
  - (d) register for an account with us;
  - (e) provide documents and information required by us to complete our verification checks;
  - (f) participate in our promotions, surveys, and/or contests;
  - (g) apply to, and participate in, our marketing affiliate program (**Affiliate Program**);
  - (h) log in to our Website; and
  - (i) play our Games.
- 2.2. We also collect Personal Information, including Device Data, Usage Data and Geolocation Data, through automated means when you visit our Platform and navigate through it (**Automated Data**), such as:
  - (a) the IP address of your electronic device that you use to access the Platform;
  - (b) the unique identifiers and characteristics of your electronic device that you use to access the Platform;
  - (c) the characteristics of the web browser used on your electronic device that you use to access the Platform;
  - (d) the operating system of your electronic device that you use to access the Platform;
  - (e) the language preferences of your electronic device that you use to access the Platform;
  - (f) the URLs via which you access the Platform;
  - (g) information about actions that you take on the Platform;
  - (h) when you visit the Platform; and
  - (i) the pages you accessed on the platform.
- 2.3. We also use trusted third-party sources to update, supplement and verify the validity of the Personal Information we have collected.

## **3. How we collect Automated Data**

- 3.1. When you interact with our Website, we try to make that experience simple and useful. Automated Data is collected automatically as you navigate our Website. This includes

Device Data, Usage Data and Geolocation Data. To collect this information, we and our partners employ various methods, including APIs, cookies and pixel tags/web beacons.

- 3.2. APIs work by allowing different types of software to communicate with each other. They make life a lot easier for programmers and provide a better experience for Users.
- 3.3. Cookies are small text files placed in your electronic device's web browser to store your preferences. Most web browsers automatically accept cookies. If you prefer not to have cookies on your system, you can configure your browser to reject them. Refer to your browser's specific instructions for guidance. However, please be aware that refusing cookies may impair certain features of our Website that are available to others.
- 3.4. A pixel tag (also known as a web beacon) is a piece of code embedded on our Website that collects information about your engagement on that web page. The use of a pixel allows us to record, for example, that a User visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted upon or forwarded.

#### **4. How we use the Personal Information we collect**

- 4.1. We will use your Personal Information in the following circumstances:
  - (a) To operate the Platform and to provide our products and services to you;
  - (b) To facilitate financial transactions that you have requested;
  - (c) To respond to any queries and complaints you make;
  - (d) To complete our verification checks
  - (e) Where you have asked us to do so, or consented to us doing so;
  - (f) Where we need to do so in order to perform a contract we have entered into with you;
  - (g) Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests;
  - (h) To comply with and perform our obligations in respect of our Affiliate Program;
  - (i) Where we need to comply with a legal or regulatory obligation.
- 4.2. We share your Personal Information with the following third-parties, which may include third parties located outside of your local jurisdiction:
  - (a) **To procure hosting of our Website:** We disclose your Personal Information to our upstream hosting suppliers who host our Website. Our hosting suppliers host that Personal Information on their computer servers;
  - (b) **As required to provide the services made available by us via our Platform:** We may work with third-parties that (i) manage our databases of User information; (ii) assist us with undertaking direct marketing; (iii) provide fraud prevention services; (iv) provide technical support; and (v) provide customer support. These services may require us to disclose your Personal Information, however we require the service providers to keep all such Personal Information confidential and to only use it to perform their obligations to us.
  - (c) **For the handling of claims and complaints:** In such circumstances, we may disclose your Personal Information to our insurers and lawyers;

- (d) **To send out newsletters and other relevant marketing materials to Users:** We may disclose your Personal Information to our email, marketing and newsletter service providers for such purposes;
  - (e) **For professional advice:** When providing information to our legal, accounting and/or financial advisors, or to debt collectors for debt collection purposes, or when we need to obtain their advice, or where we require their representation in relation to a legal dispute;
  - (f) **If we sell the whole or part of our business or the shares in our companies or merge with another entity:** In which case, we will provide to the purchaser or another entity the Personal Information that is the subject of the sale or merger;
  - (g) **To comply with our geolocation verification, identity verification and prevention of financial crime policies:** We use external service providers, such as Sumsup, to verify your geolocation, verify the validity of documents containing your Personal Information that you provide, and to undertake PEP, sanctions and adverse media checks.
  - (h) **Where required by law:** Where we have a legal or regulatory obligation to do so, including to cooperate with law enforcement or regulatory investigations, to protect against misuse or unauthorized use of the Platform, and to protect the rights, property and safety of Users and the public; and
  - (i) **Publication on the Platform, including on our social media pages:** Where we have your consent to do so, we may publish your name and photo on the Platform, including on our social media pages that we control, to promote our products, services and/or events.
- 4.3. If we share your Personal Information with a third-party, we will take reasonable steps to ensure that your information is protected to the same standard as we protect our own and we prohibit them from using your Personal Information for purposes other than those requested by us or required by law.
- 5. If you refuse to provide us with Personal Information**
- 5.1. When you register a Customer Account on our Website, we need to collect Personal Information from you in order to identify you and setup a Customer Account for you on our Website. We will also collect Personal Information from you when you use our Website, when you enter the Personal Information into our Website, when you contact us for customer support and assistance with your Customer Account and for the other purposes set out in this Privacy Policy.
  - 5.2. When you apply to participate in our Affiliate Program, we need to collect Personal Information from you in order to identify you and setup an affiliate account for you on the Platform (**Affiliate Account**). We will also collect Personal Information from you when you use our Platform, when you enter the Personal Information into our Platform, when you contact us for affiliate support and assistance with your Affiliate Account and for the other purposes set out in this Privacy Policy.
  - 5.3. You have the option of not identifying yourself or using a pseudonym when contacting us to enquire about our Website or our Affiliate Program, but not if you register a Customer

Account or Affiliate Account and/or contact us about your Customer Account or Affiliate Account.

- 5.4. If you refuse to provide us with the Personal Information we request when registering a Customer Account or Affiliate Account, we may be unable to offer you certain services or process your requests effectively.

## 6. How long we retain your Personal Information

- 6.1. We will retain your Personal Information for the minimum period required to fulfill the purposes specified in this Privacy Policy (**Retention Policy**), which will be determined based on:
  - (a) the time we need to retain the information in order to achieve the purposes for which it was collected;
  - (b) our legal, regulatory, finance, accounting and reporting obligations that relate to the information;
  - (c) our operational requirements; and
  - (d) the need to retain it for any actual or anticipated litigation, investigation and/or dispute.
- 6.2. We will take reasonable steps to destroy or permanently de-identify any Personal Information in accordance with our Retention Policy, provided that we are not required by law, a regulator or any court or tribunal, to retain the Personal Information.

## 7. Security

- 7.1. We take our data privacy obligations very seriously. Accordingly, we only process Personal Information in a manner that ensures appropriate security of the Personal Information, including by protecting the Personal Information against unauthorized or unlawful processing and against accidental loss, destruction or damage using appropriate technical and organizational measures.
- 7.2. Despite our best endeavors to safeguard your data, it is not possible to ensure the absolute security of data transmissions over the Internet. Although we will employ appropriate measures to safeguard the information you transmit via the Platform, any transmission of Personal Information is at your own risk. We cannot guarantee that such information will not be intercepted by third parties, and we are not liable for any breach of the security of your Personal Information arising from events beyond our reasonable control.

## 8. Third-Party Links

- 8.1. The Platform may include links to third-party websites, plug-ins and applications (**Third-Party Links**). Clicking on Third-Party Links may allow third parties to collect or share data about you. We do not control or endorse these Third-Party Links and we are not responsible for their privacy practices, or the content available on these websites.
- 8.2. We encourage you to read such third-parties' privacy policies so that you understand how they may collect and process your Personal Information. These privacy policies may differ significantly from ours, and we have no control over the operation of those websites or apps or the manner in which they collect, store, or process data.

- 8.3. If you use a third-party website or application (e.g., Facebook or Google) to access the Platform, your activities on such third-party websites or apps are governed by the privacy practices of those sites or apps. We are not liable for any data sharing by these third parties.

## **9. Behavioral Advertising**

- 9.1. You may come across promotions for our products and services on the Platform and other websites and mobile applications. This is because we collaborate with third-party advertisers to carry out remarketing and retargeting initiatives. By partnering with these advertisers, we can tailor messages to our Users based on their interests, demographics, context, and other factors. These third-party advertisers monitor your online activities across different websites and mobile apps by gathering information through automated methods like third-party cookies, web server logs, and web beacons. They use this data to display advertisements that are tailored to your specific interests.
- 9.2. The information collected by our advertising partners may include details about your visits to websites and mobile apps participating in relevant advertising networks, including the pages or ads you view and your interactions on these platforms. This data collection occurs on both our Platform and third-party websites and mobile apps involved in the advertising networks.
- 9.3. Some of these third-party advertising companies may be members of the Network Advertising Initiative, which offers a single platform for opting out of behavioral advertising from member companies, available [here](#).
- 9.4. If you do not want to receive behavioral advertising, you may opt-out by updating the ad tracking settings on your electronic device that you use to access the Platform, by turning on the “Limit Ad Tracking” functionality. You may be able to download apps such as the Digital Advertising Alliance’s “AppChoices” app, which offers controls regarding the collection and use of cross-website data for tailored advertising. You can also opt-out of behavioral advertising on your browser [here](#).
- 9.5. When you use the opt-out tools described above, please note that: (a) even if you opt-out, we may still collect some data about your activity on the Platform for operational reasons (e.g fraud prevention), however it will not be used by us for the purpose of targeting advertisements to you; and (b) if you use more than one (1) browser or electronic device to access the Platform, you may need to apply an opt-out on each such browser or device. These opt-out tools are not provided by us and we do not endorse, control or operate them or the advertisers and others that use them.

## **10. Control over how we use your Personal Information and opting-out**

- 10.1. You can control how we use your Personal Information in the following ways:

- (a) **Tracking:** You can set any browser that you use to access the Platform to reject some or all cookies, or to notify you when a cookie is sent. We suggest that you consult with the Help function on each of your browsers to understand how to apply these settings on your specific browsers. If you opt-out of receiving cookies, some functionality on the Platform that is available to others, may be impaired for you.

- (b) **Promotional marketing materials:** If you no longer wish to receive promotional marketing materials from us, you can update your marketing communication preferences at any time by clicking on the “unsubscribe” link in the footer of those communications or email [support@vegascoins.com](mailto:support@vegascoins.com). If you opt-out of receiving promotional marketing communications from us, you will still receive service-related communications from us, such as an email confirming that a Prize redemption has been processed to you.
- (c) **Analytics:** Our Website uses Google Analytics, a web analysis service provided by Google, Inc. (**Google Analytics** or **Google**). Google Analytics uses cookies, which are small text files stored on your computer, to facilitate an analysis of your use of our Website. The information generated by these cookies, including the timing, location, and frequency of your site visits, as well as your IP address, is sent to Google's servers in the United States and stored there. Google may share this information with third parties as required by law or when such third parties process the data on Google's behalf. Google assures that it will never link your IP address with other data in its possession. Adjusting your browser settings can prevent the installation of cookies, as explained elsewhere in this Privacy Policy, but this may limit your access to the full functionality of our Website. In addition to cookies, Google Analytics also offers a deactivation add-on [here](#) for most current browsers that provides you with more control over what data Google can collect on websites you access. The add-on instructs the JavaScript (ga.js) used by Google Analytics not to transmit any information about website visits to Google Analytics. However, the browser deactivation add-on offered by Google Analytics does not prevent information from being transmitted to us or to other web analysis services we may engage. Google Analytics also utilizes electronic images known as web beacons (sometimes referred to as single pixel gifs) in conjunction with cookies to compile aggregated statistics for analyzing how our Website is used.

## **11. Children**

- 11.1. We do not knowingly permit any person under the age of 18 to use the Platform, and we do not knowingly collect, use or disclose Personal Information from any individual that is under 18 years of age.
- 11.2. If you believe that a minor may have provided us with Personal Information and you would like for us to delete that information, please contact us at [datapriva@vegascoins.com](mailto:datapriva@vegascoins.com).
- 11.3. If we become aware that we have collected Personal Information about a minor, we will promptly take reasonable steps to delete such information from our systems.

## **12. Your rights over your Personal Information**

- 12.1. By law, you may have certain rights concerning the Personal Information about you that we collect and store. Please contact us at [datapriva@vegascoins.com](mailto:datapriva@vegascoins.com) if you wish to exercise any of these rights.
- 12.2. You have the right to access Personal Information about you that we hold, the right to object to the processing of your Personal Information and the right to withdraw any consent given via this Privacy Policy.

## **13. Information for residents of Nevada**

- 13.1. Under the *Nevada Privacy of Information Collected on the Internet from Consumers Act (NPICIC)*, residents of Nevada who have made a purchase on our Website or that have applied to participate in our Affiliate Program may opt out of the “sale” of their “Covered Information” (as those terms are defined in the NPICIC) by us for financial consideration to a person for that person to license or sell such information to additional persons. While we may share your “Covered Information” with third-parties that we believe can provide you with offers and promotions for goods and services of interest to you, we are of the view that this would not qualify as a “sale” under the NPICIC.
- 13.2. If you are a Nevada resident who has made a purchase on our Website or that has applied to participate in our Affiliate Program, you may submit a request to record your preference to opt out of us “selling” your information by sending us a written request at [dataprivity@vegascoins.com](mailto:dataprivity@vegascoins.com). We will take reasonable steps to verify your identity and that the request came from you.

#### **14. Information for residents of California**

- 14.1. As a resident of California, you have the right to (a) request that we disclose the categories and specific pieces of Personal Information that we collect about you; (b) have that Personal Information deleted; (c) opt out of the sale of your Personal Information (if any); (d) correct inaccurate Personal Information that we hold about you; (e) limit the use and disclosure of sensitive Personal Information if we use such Personal Information to infer characteristics about you (we do not currently use sensitive Personal Information for this purpose); and (f) the right not to be discriminated against for exercising these rights.
- 14.2. You have the right to be informed as to how we respond to “Do Not Track” settings. We do not currently respond to “Do Not Track” settings but we adhere to the standards set out in this Privacy Policy.
- 14.3. To exercise your California privacy rights, please send us a written request at [dataprivity@vegascoins.com](mailto:dataprivity@vegascoins.com). We will take reasonable steps to verify your identity and that the request came from you. You also have the right to designate an agent to act on your behalf. Your agent must prove that they are duly authorized by providing a signed written statement or a copy of a power of attorney. Exercising these rights will not result in denial of access to the Platform or any other discriminatory treatment.
- 14.4. We may sell information that directly identifies you (such as name, phone number, address). You can opt out of this by sending us a written request to [dataprivity@vegascoins.com](mailto:dataprivity@vegascoins.com).
- 14.5. If you are a resident of California and under the age of 19, you can view, correct, or delete Personal Information provided by you or publicly posted by you, by sending us an email to [dataprivity@vegascoins.com](mailto:dataprivity@vegascoins.com) and requesting that we delete the specific content. Our Website is only intended for individuals that are at least of the age of legal majority.

#### **15. Contacting us**

- 15.1. If you have any questions about your Personal Information, how we collect or use it, or wish to exercise your rights, please contact our Privacy Officer by email at [dataprivity@vegascoins.com](mailto:dataprivity@vegascoins.com).