

# Welcome to the Privacy & Cookie Policy

## The Privacy Policy

### Introduction

This Policy applies to our websites, applications, products or services that link to this policy or do not have a separate privacy policy (collectively our “Services”).

This purpose of this privacy policy is to give you a better understanding of:

- [Information we collect](#)
- [How do we use this information](#)
- [How is the information shared](#)
- [Your rights](#)
- [Other useful privacy & data security related matters](#)
- [How to contact us](#)

We hope you take the time to read this policy. It is important to check back often for updates to this policy. If we make changes we consider to be important, we will let you know by placing a notice on the relevant Service and/or contact you using other methods such as email.

### Who is the Data Controller?

The Fortune Auction data is completely managed by us. We have a safe database that collects this data.

### And, what about the Data Protection Officer, or is it DPO?

Yes, Fortune Auction has appointed a Data Protection Officer ('DPO'). While our DPO can be reached at [techsupport@fortuneauction360.com](mailto:techsupport@fortuneauction360.com) our Customer Service team will be your initial point of contact if you wish to exercise your rights. Please see the 'Your Rights' section below.

### Information we collect

**When you use our Services, we collect the following types of information:**

## Information you provide us:

We collect information about you during the account registration process for any of our Services. This information may include, but is not limited to your name, postal address, e-mail address, phone number, credit/debit card details and any other details as might be requested from you for the purpose of registration and/or continued use of our Services.

We may also collect information from you if you request information or customer support.

## Additional Information collected:

We may also collect the following information:

1. name, contact information and message if you contact us or participate in a survey, contest or promotion;
2. details such as traffic information, location data and other communication data (including IP address and browser type) collected by your availing of the Services;
3. device information including unique device identifier;
4. pages visited and content viewed, links and buttons clicked, URLs visited before and after you use our Service. For more information about cookies and how to manage them please see our Cookie Policy;
5. information and communications on forums on the websites, including chat rooms and message boards, profile comments, in-game challenges and chat messaging with game operators or other users;
6. your bidding, deposits, payments, payment method and other account transactions - these are routinely analysed to assist us in improving the Services we provide to you;
7. your telephone or Live Chat conversations – either to place a bet or a customer service call;
8. your response to marketing campaigns from us or through our third parties i.e. open/click on such emails;
9. your social media profile details (name, profile photo and other information you make available to us) when you connect with or contact us through a social media account;
10. information derived based on profiling activity (see below); and
11. information from third party databases to comply with our legal and regulatory obligations.

## Third Party and Publicly Available Sources

Not all the personal information we hold about you will always come directly from you. We may also collect information from third parties such as our partners, service providers and publicly available websites (i.e. social media platforms), to comply with our legal and regulatory obligations, offer Services we think may be of interest, to help us maintain data accuracy and provide and enhance the Services.

If you log into one of our products through Facebook or Google, Facebook or Google provides us with some of your Facebook user details. We may use these details for the purposes of our registration process and to market our products and Services to you on Facebook.

## Cookie Collection

We collect browser and cookie information when you first navigate to our websites. We use cookies to give you a better customer experience and for use of access. Certain cookies will allow you to leave and re-enter our Websites without re-entering your password. This will be monitored by a web server. For more information on the use of cookies, how you can control their use, and information relating to our internet-based and mobile advertising, see our cookies policy [here](#).

## How do we use this information

We process personal information for these Services- and business-related purposes:

- **Account setup, verification and management:** We use personal information such as your name, email address, phone number, and information about your device to set up and administer your account, provide technical and customer support and training, verify your identity, process payment information and send important account and Service information. To allow quicker account registration should you open a bidding account with another company, we use the verification documents submitted to Fortune Auction to comply with our legal and regulatory requirements.

As a condition to using our Services, we will ask you to share your precise geolocation so we can ensure that we are authorised to provide the Services to you in your location. The above processing is required in order for us to provide the Services to you pursuant to our [terms and conditions](#).

To verify your age and accuracy of your registration details, including disclosure of such information to third parties e.g. financial institutions and third party reference agencies. This is required for the purpose of our complying with our legal obligations

We may also use personal information to enforce our terms and conditions.

- **Personalisation:** We use personal information to deliver and suggest tailored content to personalise your experience with our Services. This is processing which is necessary for the purpose of our legitimate interests in delivering or presenting relevant content to our customers.
- **Marketing and events:** Subject to any preferences you have expressed (where applicable), we use personal information to deliver marketing and event communications to you across various platforms, such as email, telephone, text messaging, direct mail,

online, push notification or otherwise. We will do this during the period of your relationship with us and, unless specifically instructed otherwise by you, for a reasonable period of time after the relationship has ended in order to inform you about products, services, promotions and special offers which we think may be of interest to you.

If we send you a marketing email or SMS, it will include instructions on how to opt out of receiving these marketing communications in the future. You can also manage your information and update your marketing preferences through the “My Account” tab when you login to your account. Please allow up to 48 hours for any changes you make to your marketing preferences to be fully processed. Please remember that even if you opt out of receiving marketing emails, we may still send you important Service information related to your accounts and subscriptions.

Most browsers and applications also allow you to control notifications settings. For example, when you first download our bidding application on IOS, you will be asked to allow or block notifications from our application. Please refer to your browser/app settings for full details.

We will, from time to time, send you marketing material which may be of particular interest to you based upon your behaviours i.e. your bidding and gameplay activity, trends and interests. These marketing messages will provide you with information about the products, services, active promotions or offers available to you by any company within the Group and information about products and services provided by our selected partners and third parties.

Except where we use your personal data for marketing purposes on the basis of your prior written consent and subject to any opt out preferences you notify us in respect of electronic direct marketing communications, we process personal data for marketing purposes as necessary for the purpose of our legitimate interests in promoting our products and services.

We may publish players' aliases and/or chat names, along with any winnings and prizes received, on our websites in accordance with our legitimate interests.

- **Risk Management:** In order to provide the Services to you and for our legitimate purposes, we process personal data to evaluate and manage risks to our business.
- **Show and measure ads and Services:** We use a combination of information including but not limited to, advertising cookies, your email address, your device identifier, phone number, DOB, address and your onsite activity to show you targeted and relevant advertisements on a selection of whitelisted websites across the world wide web and social media websites. This information can also be used to measure and analyse the effectiveness and reach of these ads, to help us improve and refine our marketing strategy in accordance with our legitimate interests.

- **Surveys and polls:** If you choose to participate in a survey or poll, any personal information you provide may be used for marketing or market research purposes in accordance with our legitimate interests.
- **Diagnostics, research and development:** We use personal information for internal research and development purposes, to help diagnose system problems, to administer our websites, to improve and test the features and functions of our Services, to develop new content, products and services. To carry out testing and analysis. This processing is necessary for the purpose of our legitimate interests.
- **Chat rooms, messaging, and community forums:** A number of our Services provide features including chat rooms, messaging services, and community forums for collaboration, peer connection, games, and information exchange purposes. Depending upon the Service, the personal information you choose to post, share, upload, or make available is public and visible to others who use those Services. You should never post or share any information that is confidential or about others unless you have permission to do so. We may use information you provide in community and event profiles and forums to personalise your experience and to make content and peer connection recommendations. These services may have their own Terms of Use and, where appropriate, their own privacy statements.
- **Legal and regulatory obligations:** We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; or fraud. We may also use personal information to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; and (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence.
- **Profiling:** In accordance with our legitimate interests detailed below or to comply with our legal obligations, we carry out profiling and analysis based upon your location data, age, bidding and gameplay activity, interests and behaviours for the following purposes:
  1. Customer segmentation to offer you tailored products and services, and more relevant marketing. For example, if the majority of your bids are placed on home appliances or electronics, we will aim to primarily send you marketing material related to home appliances or electronics;
  2. Risk and trading analysis; and
  3. Licensing and legal obligations i.e. Responsible Gambling, Anti Money Laundering, Age Verification, prevention of fraud and to ensure the integrity of auctioning events.
- **Other purposes:** We may be required to use and retain personal information for; loss prevention; and to protect our rights, privacy, safety, or property, or those of other persons in accordance with our legitimate interests.

# How is the information shared

Your personal information may be transferred or disclosed to any company within the Group or, subject to appropriate agreement, to third parties, for the processing of that personal information based on our instructions and in compliance with this policy and any other appropriate confidentiality and security measures.

## Within the Group:

Any reference to the "Group" within this Policy and all or any of its direct or indirect subsidiary undertakings, joint venture partners, and their related companies wherever located in the world may exist from time to time including, but not limited to, MTN, Fortune Auction, Airtel, Payment Gateways. Any member of our partners may use and share, within the group and with its advisors, the information you provide and other information it holds about you for the following purposes:

- Account set up, verification and management;
- Marketing and events
- Risk management; and
- Legal and regulatory obligations.

## Our third-party service providers & partners:

The Group may, from time to time, retain trusted third parties to process your information to provide us with services globally, including for customer support, information technology, payments, sales, marketing, data analysis, research and surveys. As part of our agreements with our partners, we may be required to share your information for the purposes of calculating fees and benefits owed.

## Third parties for legal reasons:

We will share personal information when we believe it is required, such as:

- To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence;
- In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings); and
- To protect our rights, users, systems, and Services.

## Regulatory or Bidding body

Your personal information including, but not limited to, your registration details, bidding records, records of payments, device information etc., may also be disclosed to any regulatory or bidding body (with whom the Group has agreements (Memoranda of Understanding or "MOUs") for the sharing of such data) in connection with policing the integrity or enforcing the rules of a sport or game and/or prevention and detection of crime and where the Group considers that there are reasonable grounds to suspect that you may be involved in a breach of such rules or the law, have knowledge of a breach of such rules or the law or otherwise pose a threat to the integrity of the relevant sport or game based upon our assessment of your bidding behaviours or it may be based on information provided to us by a regulatory body. Those bodies may then use your personal information to investigate and act on any such breaches in accordance with their procedures.

## International Transfers

Our Partners operate businesses in multiple jurisdictions some of which are not located in the African Economic Area ("AEA"). Countries outside the AEA do sometimes have strong data protection laws. Where we transfer personal information from the AEA to other countries in which applicable laws do not offer the same level of data privacy protection as in your home country, we take measures to provide an appropriate level of data privacy protection. For example, we use approved contractual clauses, intragroup agreements and other measures designed to ensure that the recipients of your personal information protect it. We take steps to ensure that the information we collect is processed according to this privacy policy and the requirements of the applicable law wherever the data is located. Please contact us below if you require further information.

## Your rights

Under the General Data Protection Regulation, you, as a data subject, have a number of rights which are detailed below. Some of these only apply in specific circumstances and are qualified in several respects by exemptions in data protection legislation. We will advise you in our response to your request if we are relying on any such exemptions.

- **Access to personal data:** You have a right to request a copy of the personal information that we hold about you. Should you wish to make such a request, please see the Contact Us section for information on how to contact us.  
You should include adequate information to identify yourself and such other relevant information that will reasonably assist us in fulfilling your request. Your request will be dealt with as soon as possible.
- **Correction of personal data:** You can request us to rectify and correct any personal data that we are processing about you which is incorrect. We provide you with account settings and tools to access the information associated with your account.
- **Right to withdraw consent:** Where we have relied upon your consent to process your personal data, you have the right to withdraw that consent.



To opt out of marketing, you can use the unsubscribe link found in the marketing communication you receive from us. For other marketing preferences, you can "Contact Us" option within the relevant Service to opt out.

- **Right of erasure:** You can request us to erase your personal data where there is no compelling reason to continue processing. This right only applies in certain circumstances, it is not a guaranteed or absolute right.
- **Right to data portability:** This right allows you to obtain your personal data that you have provided to us with your consent or which was necessary for us to provide you with our products and services in a format which enables you to transfer that personal data to another organisation. You may have the right to have your personal data transferred by us directly to the other organisation, if this is technically feasible.
- **Right to restrict processing of personal data:** You have the right in certain circumstances to request that we suspend our processing of your personal data. Where we suspend our processing of your personal data we will still be permitted to store your personal data, but any other processing of this information will require your consent, subject to certain exemptions.
- **Right to object to processing of personal data:** You have the right to object to our use of your personal data which is processed on the basis of our legitimate interests. However, we may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so or we need to process your personal data in connection with any legal claims. You can exercise your right to object to any profiling that takes place in the course of our use of cookies by managing your settings preferences, as outlined in our Cookie Policy. You also have the right to object to any profiling that is carried out for the purpose of direct marketing. You can exercise this right by using the unsubscribe link found in the marketing communication that you receive from us
- **Rights relating to automated decision making and profiling:** You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. This right means you can request that we involve one of our employees or representatives in the decision-making process. We are satisfied that we do not make automated decisions of this nature.

## How to contact us

For any requests related to your personal information or any of your rights referenced above, please feel free to contact us in one of the following ways.

You can Use the phone or email information at the footer of the website. We also have a live platform to communicate with us.

## Filing a complaint



If you are not satisfied with how we manage your personal data, you have a right to make a complaint to your local Data Protection Authority.

## **Other useful privacy & data security related matters**

### **Retention**

We retain personal information for as long as we reasonably require it for legal or business purposes. For the unregulated jurisdictions in which operate, and subject to us not having a legal or regulatory requirement or a risk management reason for retaining your information for a longer period, your information will not be kept for longer than 7 years post account closure. Please note that we may be required in certain circumstances to retain your information indefinitely (for example under our procedures on responsible gambling and self-exclusion). We will take all necessary steps to ensure that the privacy of information is maintained for the period of retention.

### **Security**

We recognise that online security and data protection is an area of vital importance for all our customers, so it is important to us that you have confidence in the security of your personal details before you register an account. We are committed to employing security measures to protect your information from access by unauthorised persons and to prevent accidental or unlawful processing, disclosure, destruction, loss, alteration and damage. Our technological security solutions are very advanced and are governed by a mature framework. Our approach is focused on preventing risks. In order to help us in this regard, we employ pseudonymization and encryption whenever possible to reduce the impact of any potential incidents. As the security of some communications via the internet is not completely secure, we cannot guarantee the security of any information that you disclose using your internet connection. You accept the inherent security implications of using the internet and the Group will accept no liability for any direct, consequential, incidental, indirect, or punitive losses or damages arising out of such an occurrence.

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## **The Cookie Policy**

# Cookie Notice

You should be aware that when you access or use our content, products and services, we may collect information from your devices through the use of 'cookies'. Cookies perform various different functions, and the purpose of this policy is to give you a clearer understanding of:

- [What are cookies?](#)
- [Why do we use cookies?](#)
- [How we use cookies?](#)
- [How can you control the use of cookies?](#)
- [Contact Us](#)

## What are cookies?

Cookies are text files containing a small amount of information that are downloaded to your device when you visit a website. Your browser makes cookies available each time you visit our websites. below here to see how you can control the use of cookies.

## Why do we use cookies?

Cookies are used by our websites to improve your online experience and to ensure that relevant content and functions are delivered and used more effectively.

We use both session cookies and persistent cookies to perform various functions across our sites.

Session cookies are downloaded to your device temporarily for the period that you browse a particular website; these cookies might allow you to navigate between pages more efficiently or enable websites to remember the preferences you select. Persistent cookies can be used to help websites remember you as a returning visitor or ensure the online adverts you receive are more relevant to your interests.

## How we use cookies?

When you visit our websites, Cookies will be placed on your device in two ways. Cookies placed by Fortune Auction, as the site operator, are called "first party" Cookies. Cookies may also be placed on your device by a party other than Fortune Auction. Such cookies are known as "third party" cookies. Examples of the uses of third party cookies include collecting information about browser habits and providing tailored content to you.

While there are many different uses for first and third party cookies, the cookies used by us all fall into one of the following four main categories of cookies:

- Strictly Necessary Cookies
- Functionality Cookies

- Performance Cookies
- Third Party Marketing / Targeting Cookies

Set out below is more information on these categories of cookies, including their purpose and whether these cookies collect personal data:

## **Cookie Type**

### **Strictly Necessary Cookies**

#### **Purpose**

These cookies are strictly necessary to enable you to navigate our websites and to use the features you have requested during the course of your bidding experience (such as using your bid slip). They are used to provide content to you, as a user, and to provide products and services that you have requested.

Such cookies are essential to help your device download or stream information so that you can navigate around our websites, use its features and allow you to return to pages you have previously visited.

#### **More information**

Here are some examples of strictly necessary cookies:

- To position information on your device or screen so that you can see and use our websites;
- To keep you logged in when you use our website so you are not required to log in every time you visit; and
- Remember and update your selections in your bid slip during a live session up to the time of its placement.

These cookies do not remember your preferences or username beyond your current visit.

#### **Data Collection**

Yes some of these cookies do collect your personal data in order to function. They may collect the following types of personal data:

- IP address
- Location data
- Identify you as being logged in our websites

#### **Cookie Validity**

These cookies are deleted when you close your web browser (browser session). below here to see how you can control the use of cookies.

## **Cookie Type**

### **Functionality Cookies**

#### **Purpose**

These cookies are used to recognise you when you return to our websites and allow us to remember the choices you make and to enable us to provide improved features. They also enhance the functionality of our websites by storing your preferences. Functional cookies record information about choices you've made (such as language preference) and allow us to provide more personal features.

#### **More information**

Here are some examples of the uses of functionality cookies:

- To remember your preferences and settings such as language, location and marketing preferences, since your last visit;
- To remember selections in your bid slip;
- To remember if you have used a specific product on the website; and
- To show you relevant 'related article' links.

#### **Data Collection**

Some of these cookies do collect your personal data, to enable us to provide the services as outlined above.

#### **Cookie Validity**

Functional cookies expire after a maximum of 2 years. Functionality cookies can be deleted from your browser history at any point before their expiry time. below here to see how you can control the use of cookies.

#### **Cookie Type**

##### **Performance Cookies**

##### **Purpose**

These cookies are used to collect information on website usage. Such cookies are used to provide aggregated statistics on visitors to our websites. These statistics are used for internal purposes to help us to test and improve the performance of our websites, providing a better user experience.

#### **More information**

Here are some examples of the uses of performance cookies:

- To provide statistics on how our websites are used;
- To see how effective our adverts are; and
- To assess errors within the user experience.

Additionally, we use a number of tools to assess cookie information at an aggregate level to carry out analytical functions on our site including, Google Analytics and Maximizer.

#### **Data Collection**

While these cookies do not identify you personally while you are not logged in, they will collect your browser information and anonymised data, for the purposes outlined above.

In certain cases, some of these cookies are managed by third parties such as Google Analytics. These third parties are not capable of using these cookies for any purpose other than those outlined above and they are unable to identify with these cookies.

### **Cookie Validity**

Performance cookies are valid for varying periods. Some performance cookies are deleted once you close your browser, while others have an indefinite validity period. Such cookies can be deleted at any stage using your browser settings. below here to see how you can control the use of cookies.

### **Cookie Type**

#### **Third Party Marketing / Targeting Cookies**

##### **Purpose**

These cookies are used to deliver partners advertisements relevant to you, based upon your interests.

They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign.

##### **More information**

These cookies record your visit to our website, the pages you have visited and the products you have selected. We will use this information to make our website and the advertising displayed more relevant to your interests. We may also share this information with third parties for this purpose and to measure the effectiveness of an advertising campaign.

Targeting cookies are also used to:

- Collect information about browser habits to target website content and to target advertising;
- Link to social media networks who may use this information about your visit to target advertising to you;
- To provide advertisers with information on your visit so that they can present you with adverts that you may be interested in;
- Deliver content and marketing communications tailored to your interests based on information from your visit;
- • To perform geotargeting, which allows our adverts to be displayed on third party webpages, based upon your location;
- To perform site retargeting. A retargeting pixel (a tiny unit of code) on our webpage leaves a cookie in the user's browser, which causes our adverts to be displayed or to not be displayed to you when you visit certain websites within the retargeting network (e.g. Google Display Network); and

- To perform search retargeting, which allows our adverts to be displayed on third party webpages, based upon your previous web search activities.

### **Data Collection**

Third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies on our websites. These cookies are likely to be analytical/performance cookies, or targeting cookies. Please note that no personal data is collected, an advertiser is unable to associate the cookie with a particular individual's name, address or other personal information.

These cookies are placed by third party advertising networks with our permission.

### **Cookie Validity**

Third party cookies are valid for varying periods. Some cookies expire up to 13 months after they are last updated. below here to see how you can change your consent settings to the use of these cookies.

## **How can you control the use of cookies?**

You can amend your browser settings to block some or all cookies. To do this, follow the instructions provided by your preferred web browser. For your ease of reference we have provided the links below which provide instructions on how to remove and delete cookies for some of the more common web browsers. Please be aware that if you block cookies from the websites, some or all the website's functions may not perform as intended:

- [Firefox](#)
- [Internet Explorer](#)
- [Google Chrome](#)
- [Safari](#)

Mobile phone users may have to refer to their handset manual for details on how to block cookies using their mobile browser. For more information about online behavioural advertising cookies and opt-out controls, please go to <http://www.youronlinechoices.eu/>. More information regarding opting out of platform based advertising can be found at <https://www.appnexus.com/platform-privacy-policy>.

## **Contact Us**

If you have any questions about how we use Cookies, you can contact us by emailing [techsupport@fortuneauction360.com](mailto:techsupport@fortuneauction360.com).

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