



GLOBAL POKER PRIVACY POLICY

VERSION: 2.7

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At VGW, we are committed to protecting and respecting your privacy and maintaining the confidence and trust of our customers. This privacy policy ("Privacy Policy") explains how your personal information is collected, why it is collected and how it is kept secure. We are committed to complying with obligations under all applicable global data privacy laws, including the General Data Protection Regulation ('GDPR'), the California Consumer Privacy Act ('CCPA'), the Virginia Consumer Data Protection Act ('VCDPA'), the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA) (and any provincial substantially similar law as applicable) and the Australian Privacy Act 1988 (Cth) (the 'Privacy Act') (including the Australian Privacy Principles set out in the Privacy Act (the 'APPs')).

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This Privacy Policy governs the manner in which VGW Holdings Limited, VGW Malta Limited, VGW GP Limited, VGW Games Limited, VGW Administration Malta Limited, VGW US, Inc., VGW Luckyland Inc., VGW Holdings US Inc., and VGW Canada Inc. that forms the VGW group ("VGW Group") collect, use, maintain and disclose information collected from Global Poker through <https://globalpoker.com/> and any subdomains, subpages, successor sites or any application accessible via our website. This Privacy Policy applies to the Global Poker Website and all products and services offered through the Global Poker Website.

1. DATA CONTROLLER

1.1 This Privacy Policy is issued on behalf of the VGW Group so when we mention "VGW", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the VGW Group responsible for processing your data.

1.2 The data controller responsible for processing data collected through your use of the Global Poker Website (including any data you may provide through the Global Poker Website when you purchase a product or service or take part in a promotion or competition) is VGW GP Limited having its registered address at Trident Park, Notabile Gardens, No6 – Level 3, Central Business District, Mdina Road, Zone 2 Birkirkara CBD2010 Malta (the "Data Controller").

2. TYPE OF INFORMATION WE COLLECT

2.1 Personal Information is any information about you, whether it is true or not, where your identity is apparent or can reasonably be ascertained from that information. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as Personal Information. Anonymous information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual. Aggregate information means information about groups or categories of customers, which does not identify and cannot reasonably be used to identify an individual customer.

2.2 We collect two basic types of information – Personal Information and anonymous information (as defined above at clause 2.1) – and we may use personal and anonymous information to create a third type of information, aggregate information (also defined at clause 2.1). We collect:

- a) contact details such as your first name and surname, email address, residential address and mobile or other phone numbers;
- b) personal information such as gender, age, age range or your image; account login details, including your username, password and pictures associated with your profile;
- c) information sent bilaterally or within a small group using email, post or other methods of communication;
- d) information we obtain from a third party, such as a site or platform provider (including Facebook), about your use of or interest in our services;
- e) transaction information you provide when you make a purchase, request a redemption or otherwise use our Global Poker Website, such as your postal address, phone number and payment or redemption information including banking and financial details, credit card details and bank account statements;
- f) location information including location information provided by a mobile or other device interacting with one of our Websites, including the Global Poker Website, or associated with your IP address, where we are permitted by law to process this information;
- g) activity, technical and device information about your use of our Global Poker Website, such as the content you view, the time and duration of your visit on our Global Poker Website, how often you use our services, how you first heard about our Global Poker Website, your preferences and information about your interaction with the content offered through our Global Poker Website, your hardware model, device type, other unique device identifiers, operating system version, browser type and IP address;
- h) government identifiers such as passport, driver's license, social security numbers where we are required to do so for tax or other legal reasons; and
- i) sensitive information such as biometric data, geolocation, drivers licenses and financial information to comply with our legal and regulatory purposes.

3. HOW WE COLLECT YOUR INFORMATION

3.1 We collect information in a variety of ways, as set out below. You confirm that any contact information you provide is true and accurate.

3.2 **Information you provide to us directly** including when you visit our Global Poker Website, register on the Global Poker Website, purchase products on our Global Poker Website, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Global Poker Website.

3.3 In addition to collecting information via our Global Poker Website, we collect information from you by telephone, video or in correspondence (including email, live chat, mail, text message or social media). All telephone or video calls between you and VGW Group representatives may be recorded for training, quality control and compliance purposes and by continuing with any such call you consent to it being recorded.

3.4 Information you provide when using our services

We also collect information about your use of our products and services through a variety of technologies that are present when you visit our Websites, including the Global Poker Website, or use our applications on third party sites or platforms (whether or not you are logged in or registered) including cookies, flash cookies, pixels, tags and application programming interfaces ("API"). Please see the section entitled "Personal Data Collected via Technology" below for further information. Analytics tools are also used by us to collect information, including when you visit our Global Poker Website or use our applications or services on third party sites or platforms.

3.5 Information we receive from third party service providers

Finally, we also use trusted sources to update or supplement the information you provided, or we have collected, including in order to verify or validate information (for example, postal address, documentation and names).

4. PERSONAL DATA COLLECTED VIA TECHNOLOGY

4.1 When you interact with our Global Poker Website, we try to make that experience simple and useful. We and our partners use industry standard identifiers, such as cookies or other similar technologies.

4.2 Our Global Poker Website may use technologies to enhance your experience. These technologies are small files that are placed on your computer, tablet, mobile phone or other devices when you visit a website. They allow us to record certain pieces of information whenever you visit or interact with the Global Poker Website. Usage information may include, in part, browser type, operating system, device type, an estimate of your geographic location associated with your IP address, the location of your mobile device, the page served, the time, referring URLs and other information normally transmitted in HTTP requests. This statistical data provides us with information about your use of the services, such as general engagement with a page, the type of content on that page and how long you stay on that page. Usage information is generally non-identifying but if VGW associates it with you as a specific and identifiable person, VGW will treat it as Personal Information.

4.3 The following are examples of these types of technologies:

- a) **APIs.** 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 end users.
- b) **Cookies.** These are small text files placed in your device browsers to store your preferences. Most browsers allow you to block and delete cookies. However, if you do that, the service may not work properly.
- c) **Event tagging.** Event tagging (including Facebook App Events) allows us to track actions that occur on the Global Poker Website such as application installs and purchase events. By tracking these events we can view analytics, measure ad performance, and build audiences for ad targeting.
- d) **Mobile device identifiers.** We may share the advertising identifier associated with your mobile device or tablet (such as the Apple IDFA and Google Advertising ID) with advertisers. It is used to identify your device for internet-based advertising. For instructions for using the advertising choice mechanisms provided by the most popular mobile operating systems, visit the NAI's Mobile Choices page [here](#).
- e) **Pixel tags/web beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Global Poker 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 has 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 on or forwarded.

5. HOW WE USE COLLECTED INFORMATION

5.1 We use the information collected to operate our Global Poker Website and to provide our products and services, to facilitate your financial transactions, to respond to your questions and to fulfill all applicable regulatory requirements such as anti-fraud checks and other checks required by applicable anti-money laundering and other legislation.

5.2 In accordance with applicable laws and any elections made available to you, VGW may collect and use your information for the following specific purposes:

- a) **To provide and manage the services you request** - This includes, for example, processing your registration, setting up and looking after your account, including checks made to guard against fraud.
- b) **To improve customer service and our services** - Information you provide helps us respond to your customer service requests more efficiently; we may use feedback you provide to improve our products and services.
- c) **To process payments** - We may use the information you provide when placing an order to service that order (including to satisfy our customer due diligence requirements and to establish the source of funds where necessary). We do not share this information with our service providers except to the extent necessary to provide the service.
- d) **To personalize user experience** - We may use information which has been aggregated to understand how our users as a group use the services and resources provided on our Global Poker Website.
- e) **To contact you about our services including marketing** - For example by email, live chat, telephone, text message, mail or social media; to manage promotions and competitions you choose to enter. We may periodically contact you with offers and information about our products and services, including in connection with your accounts, promotions, contests, online surveys, new features that you are entitled to access, and other important information. Please see the section entitled 'Your Privacy Rights' for your opt out rights.
- f) **To send important notices to you** - From time to time, we may send important notices to you, such as communications about purchases you have made, or legal notices regarding the changes to our terms and conditions or other policies. This information is important to your interactions with us and you acknowledge that you may not opt-out of receiving these communications.
- g) **To comply with our legal and regulatory obligations** - We may use information we collect about you to assess your social gameplay activity for responsible social gameplay purposes, for taxation purposes, to comply with fraud and anti-money laundering laws (including to establish the source of funds where a transaction is involved) or to comply with any other legal or regulatory obligations (including the detection, investigation and prevention of activity that violates our terms and conditions or that may be illegal).
- h) **To offer alternative dispute resolution services** - We may provide information we collect about you to our service provider partner for the specific purpose of resolving any disputes that have not been satisfactorily resolved through our internal processes.
- i) **To conduct market research and analysis** - to analyse how you interact with our products and services; to monitor and analyse usage and activity trends; and for other research, analytical and statistical purposes.

5.3 Automated Decision Making

We do not use automated decision making within the definition of global data protection laws.

5.4 Behavioural Advertising

We may partner with a third party service provider to either display advertising on our Global Poker Website or any application accessible via our Global Poker Website or to manage our advertising on other websites (for example, using custom audiences on Facebook). Our third party service provider may use technologies such as cookies to gather information about your activities on our Global Poker Website and other websites in order to provide you advertising based on your browsing activities and interests.

5.5 If you wish to opt-out of interest-based advertising click [here](#) (or if located in Canada click [here](#)). Please note you will continue to receive generic advertisements.

6. YOUR PRIVACY RIGHTS

6.1 Marketing Communications

If we process your personal information for the purpose of direct advertising, you have the right to object at any time to this processing; this also applies to profiling, where appropriate, insofar as it is associated with such direct advertising.

6.2 You may opt-out of receiving commercial messages from us by following the instructions contained in those messages or by contacting Customer Support. In the event of your objection to processing for the purpose of direct advertising, we will no longer process your personal information for these purposes.

6.3 Cookies

You can change your preferences with regards to cookies and other trackers at any time by clicking on the Your Privacy Choices link at the bottom of our [Global Poker Website](#).

7. EXERCISING YOUR PRIVACY RIGHTS

7.1 We appreciate that by law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. These rights include the right to access the personal information we hold about you, the right to object to the processing of your data, the right to update and correct the information we hold about you, and the right to withdraw any consent provided. In some circumstances, you can ask us to delete the personal information we hold about you.

7.2 To exercise the rights described at clause 7.1 please complete the Global Poker Customer Request Form [here](#), or alternatively email dataprivacy@vgw.co.

7.3 We will not discriminate against you (e.g., through denying products and services or providing a different level or quality of goods or services) for exercising any of the rights afforded to you.

7.4 If you would like to use an agent authorized in accordance with applicable law to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to exercise those rights on your behalf.

7.5 Right to Complain to a Supervisory Authority

You also have the right to complain to the relevant data protection supervisory authority about VGW's processing of your personal information. Please complete the Global Poker Customer Request Form [here](#), or alternatively email dataprivacy@vgw.co.

8. HOW WE PROTECT YOUR INFORMATION

8.1 We have in place physical, electronic and operational procedures to protect the information that we collect. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Global Poker Website. Our security measures are reviewed regularly and updated in keeping up with technological advances.

8.2 We use reasonable means to protect your personal information from misuse, interference, or loss, as well as any unauthorised access, modification or disclosure.

8.3 If we believe that a notifiable data breach has occurred, we will comply with the legislative requirements to notify you of the data breach and any steps taken by VGW to contain and investigate the data breach.

9. HOW LONG WILL WE RETAIN YOUR INFORMATION

9.1 We will retain your information for a period of time to reasonably fulfil the purposes specified in this Privacy Policy, unless a longer retention period is required by law.

9.2 We will take reasonable steps to destroy or permanently de-identify any Personal Information where:

- a) we no longer need the Personal Information for any purpose for which the Personal Information was collected or for a related purpose; and
- b) we are not required by law, a regulator or a court/tribunal order, to retain the Personal Information.

10. SHARING YOUR INFORMATION

10.1 We do not sell, trade, or rent your personal information. However, there are circumstances when we share your personal data with the following categories of third parties:

- a) Affiliates – other companies in the VGW Group;
- b) Service providers – other companies who provide services to you on our behalf; and
- c) Third parties that interact with us in connection with the services we perform.

10.2 If data will be shared with a third party, we require them to maintain the same protections over your data that we provide directly to you and to only perform services on our behalf. Simply put, they are prohibited from using your personal information for purposes other than those requested by us or required by law.

10.3 With Third Parties

We only share information with third parties in limited circumstances including the following:

- a) when you allow us to share your information with third parties;
- b) when providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;
- c) with our service providers who enable us to provide our services, such as companies that help us with technology services, storing and combining data, processing payments and redemptions or providing relevant marketing and advertising for our products and services. These service providers will have access to your personal information only to perform services on VGW's behalf and are prohibited from using your personal information for purposes other than those requested by us or required by law. Where service providers use personal information for their own purposes, where permitted by law, such service providers will act as the data controller of that data;
- d) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, when ordered to do so by any regulatory body and/or under any legal provision contained in the governing law of a particular jurisdiction;
- e) when instructing and authorizing the financial institution with which a user's account is held to disclose any information as may be requested by a regulator in respect of the user's account;
- f) to enforce our terms and conditions set out on our Global Poker Website, to protect our rights and property and the rights and property of our customers and third parties, to detect fraud or other illegal activities, and to comply with law or legal processes; and
- g) to perform customer due diligence including ID verification.

10.4 We make available an API provided by Google Maps in order to allow you to have access to an address auto-complete function on our Global Poker Website. The use of Google Maps for this purpose by you is subject to the then current Google Maps/Google Earth Additional Terms of Service at https://maps.google.com/help/terms_maps.html and Google Privacy Policy at <https://www.google.com/policies/privacy>.

10.5 We may ask you to provide your image to assist us in verifying your identity. We do this by using facial recognition technology provided by service providers (including, but not limited to, Jumio Corporation) that determines whether the photo you take matches the photo in your identification document. The facial recognition technology provided by these service providers collects information from your image capture, including biometric data, and may share this information with us. Biometric data is stored by the third party service provider in accordance with its privacy policy. It is stored until such time as the initial purpose for collecting or obtaining such information has been satisfied or within 3 years of your last interaction with us, whichever occurs first, provided we have no other legal obligation to retain such information for any longer period.

10.6 We may also share generic aggregated demographic information not linked to any personal identification information regarding visitors to and users of our Global Poker Website with our business partners, trusted affiliates and advertisers for the purposes outlined above.

10.7 Transfers

The VGW Group operates in several international jurisdictions and personal information we collect may be transferred to, and stored and processed by, individual companies in the VGW Group or third parties in the European Union, the United States, Canada, Australia, the Philippines or any other country in which we or our service providers maintain facilities. We will ensure that transfers of personal information to any country or organization are subject to appropriate safeguards. Additionally, when transferring personal information from the European Union, we may use standard contractual clauses approved by the European Commission or otherwise adopt other means in accordance with European data protection laws for ensuring adequate safeguards.

11. OTHER IMPORTANT INFORMATION

11.1 Minors

Protecting the privacy of children is especially important to VGW. For that reason, we never knowingly collect or maintain information from individuals under the age of 18, and no part of our Global Poker Website is structured to attract anyone under the age of 18. VGW does not offer or direct any of its services or products, including Global Poker to individuals under the age of 18.

12. CHANGES TO THIS PRIVACY POLICY

12.1 This Privacy Policy may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of material changes and, where required by law, will obtain your consent. Notice may be by the posting of such changes on our Global Poker Website or by other means in accordance with applicable laws.

12.2 Any changes to the Privacy Policy will become effective when the updated policy is posted on our Global Poker Website.

12.3 We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

12.4 This Privacy Policy, in effect as of the last modified date stated below, supersedes and replaces any and all Privacy Policies previously in effect.

13. CONTACTING US

13.1 If you have specific questions regarding your personal information or how we use it, please contact our Data Protection Officer directly by email at dataprivacy@vgw.co or alternatively, please complete the Global Poker Customer Request Form [here](#).