

DATA PROTECTION POLICY

Golden Palace attaches great importance to the privacy and security of your personal data.

The purpose of this data protection policy is to inform you in a clear, simple and transparent manner about the processing of personal data that you entrust to us, or that we may collect during your navigation on our websites or mobile www.goldenpalacesports.be (hereinafter the "Site"), about their possible transfer to third parties, and about the rights and options you have to control your personal information and protect your privacy.

The Site is published by CONCEPT V GAMES S.A., registered with the ECB under number 0843.578.514, whose registered office is located at 1120 Brussels, Avenue des Croix de Guerre 120, Belgium.

www.goldenpalacesports.be is operated by STARGAMES S.A., registered with the ECB under number 0454.910.402, with registered office at Avenue des Croix de Guerre 120, 1120 Brussels, Belgium, which has a license granted by the Gaming Commission of class F1+ 126426 for the operation of betting through the internet.

STARGAMES S.A. is hereinafter referred to as "the Operator" or "Golden Palace".

When opening a Player Account on the Site, the User communicates personal data (hereinafter "the Data") to Golden Palace which processes them.

Golden Palace is the controller of personal data collected on the Site within the meaning of the applicable regulations on personal data and in particular the EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "GDPR").

I. What is personal data?

Personal data is any information relating to a person who can be identified directly or indirectly by reference to one or more elements that are specific to him or her, such as his or her surname, first name, national registration number, bank account, postal or e-mail address or an IP address, etc.

II. Why does Golden Palace collect my personal data?

Golden Palace collects and processes your data in order to :

- allow you to create an account on our Site;
- manage your access to your account on the Site;
- send you "commercial" communications if you have opted for this option;
- ensure the security of online transactions, prevent fraud and payment incidents, in particular through automated processing of your data. As part of the fight against fraud, we also monitor the ratio of deposits to "pay-out" requests - we inform you if we find that they are disproportionate and take appropriate action if necessary;
- manage the "Player" relationship in the context of requests for information or complaints that you may send us via our website, our Customer Service or our pages on social networks;
- manage and optimize your customer experience through a better knowledge of our members;

- Provide a personalized gaming experience that matches your tastes and preferences;
- Carry out statistical analyses to develop steering, measurement and reporting tools in order to adapt and improve our sales and marketing activities;
- subject to your consent :
 - to send you information about our special offers, news and events on the communication media you have selected;
 - send you communications announcing the opening of tournaments for which you have requested to be informed (brand alerts);
 - send you surveys and polls to collect your feedback on our site to improve the user experience;
- ensure the exercise of your rights in accordance with Article VIII below;

Golden Palace informs you that you can change your choices in terms of communications on the site at any time, via the "My Profile" section.

III. When may we collect your personal data?

We may collect your personal data in connection with :

- the creation of your Player account on our Site, directly when you complete the account creation form on the Site,
- your agreement to receive certain commercial communications from us by email and/or by notification on your smartphone;
- your registration to contests or other events we organize;
- surveys or satisfaction polls about your player experience;
- interaction with our company via its official page or via private message on social networks;
- your exchanges with our Customer Service via the Site, by telephone or by email;
- your navigation on our Site through the use of cookies or similar technologies (hereinafter "Cookies" as defined in the Cookie Usage Policy below) or when you click on advertisements related to our sales;

IV. What personal data may we collect?

(i) In the course of our business we may collect certain data directly from you for the purposes detailed in Section II of this policy.

The information we collect is :

- full name ;
- like;
- place and date of birth ;
- national registry number,
- home ;
- phone number,
- email address;
- IP address;
- Your job,
- banking data during deposits and withdrawals on the Site;
- photocopy of the identity card for withdrawals on the Site;
- Connection, game and transaction history.

Please note that your bank details are not transmitted unencrypted on the servers of Golden Palace. Payments are made via a secure payment platform, compliant with the PCI-DSS standard, and supplemented by control measures, to ensure the security of transactions made on the Website and to fight against fraud. The details of your credit card communicated during

your deposit or withdrawal transaction are never transmitted unencrypted over the network: they are encrypted using the TLS (Transport Layer Security) protocol.

- the information that you may be required to communicate to our Customer Service Department in the context of the management of your requests for information or your complaints;
- the information you provide when you leave a review of a product or service on our site;
- your Facebook profile information such as your name, profile picture, date of birth and email address. You have the option of not transferring some of this data. To learn more, click on the "Edit this" link on the Facebook tool.

(i) In order to ensure the security of payments during transactions on the Site, to avoid fraud and thus to protect you, we may also collect data and proceed with automated processing of these data, the purpose of which is to control and/or have the deposits controlled by one of our service providers and to verify the regularity of the information transmitted to them during their placement on our Site. In the event that a deposit is reported, an individual verification of this report is carried out by our fraud prevention department.

(ii) Finally, we may collect information relating to the use of our Site, in particular your navigation (IP address, pages, products and services visited or searched, links clicked, etc.). In the same way, we can collect data relating to the consultation of the emails which we address to you for statistical purposes and commercial prospection. Some of this information may be collected through the use of cookies placed on your terminal while you are browsing our site. To learn more about cookies, see our [cookie policy](#).

V. What are the legal grounds for processing your data

Golden Palace processes your personal data on the following legal grounds:

- Contract Fulfillment: The processing of your data is necessary to fulfill the contract entered into between you and Golden Palace when you create an account on the Site, and by accepting the Golden Palace Terms and Conditions;
- Legitimate Interest: Golden Palace also processes User Data on the basis of a legitimate interest, commensurate with the rights of the User in order to offer its services, ensure the proper functioning of the services and improve the services offered to meet the needs of the Users.
- Consent: Golden Palace carries out processing following your express consent. This is the case for specific purposes, for example, in order to propose general or personalized offers via the sending of newsletters, sms, emails, mails based on the consent of the User. The User has the right to revoke his consent at any time by changing the option on his personal account or by sending a request to the email address support@goldenpalace.be ;
- Compliance with legal obligations: Golden Palace may carry out processing in the context of compliance with its legal obligations. For example, the Operator is required to identify its Users and to keep this Data in accordance with the Act of 7 May 1999 on gambling, betting, gaming establishments and the protection of players and the Act of 18 September 2017 on the prevention of money laundering and terrorist financing and the restriction of the use of cash and their various Royal Decrees of execution. The Operator shall also transmit such Data to the Gaming Commission.

VI. Who will receive your personal data?

Your personal data is processed by Golden Palace staff. We ensure that only authorized persons within Golden Palace have access to your personal data when necessary for the purpose of managing our business relationship or our legal obligations.

We may also share your personal information:

Golden Palace's service providers for the purpose of operating the Service;

- to potential business partners after obtaining the User's consent;
- to the Gaming Commission;
- to administrative or judicial authorities
- to subcontractors such as:
 - our hosting and maintenance service providers for the site and our dematerialized solutions for collecting personal data;
 - our payment service providers ;
 - our fraud prevention and fight against fraud providers;
 - our marketing solutions providers;
 - our providers of management of commercial prospecting and communication via social networks;
 - our customer service providers;
 - our contest organization providers;

Golden Palace may also be required to disclose your data to third parties to meet legal, regulatory or contractual obligations, or to respond to requests from legally authorized authorities.

The User declares that Golden Palace has fully informed him/her of the rules relating to the use of the Site and its Services.

Golden Palace recommends to the User not to communicate any Data concerning him/her by email or fax, except if the Operator has expressly requested it. It is the User's responsibility to scrupulously check beforehand that the Operator is indeed the originator of such requests.

VII. How long do we keep your data?

Golden Palace has defined retention periods for your personal data in accordance with its legal obligations and the recommendations of the competent data protection authorities. User Data is stored on Golden Palace's gaming servers and at Data Center in Belgium. All Data is stored in encrypted and secure files. No third party can access this Data. In the event that a third party gains access to these files, Golden Palace agrees to make every effort to ensure that the information contained in these files remains unreadable.

In accordance with the legislation in force, Golden Palace is obliged to keep the photocopy of the identity card or the document having served for the identification of the User at least ten years from the last activity of the player on the Site.

For marketing purposes, legitimate interest, services, the Data are kept for a period necessary to the purpose of the processing.

VIII. What are your rights and how do you exercise them?

In accordance with the regulations in force, in particular the GDPR, you have the right to obtain the right to access and rectify your personal data, as well as the right to request its erasure, to object to its processing and to obtain the limitation of its processing for legitimate reasons or portability insofar as applicable.

You also have the right to formulate directives concerning the conservation, deletion and communication of your personal data after your death.

1) Right of access

The User has the right to obtain from Golden Palace confirmation as to whether or not Data relating to him or her is being processed and to have access to his or her Data as well as to the information referred to in Article 15 of the GDPR.

2) Right of rectification

In accordance with Article 16 of the GDPR, the User has the right to have inaccurate Data corrected as soon as possible and has the right to have incomplete Data completed.

3) Right to erasure ("right to be forgotten")

The User has the right to request that Golden Palace delete his or her Data as soon as possible and Golden Palace has an obligation to delete such data in accordance with Article 17 of the GDPR where any of the following grounds apply:

- a) The Data is no longer necessary for the purposes for which it was collected or otherwise processed;
- b) The User withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- c) The User objects to the automated processing of his/her Data (profiling) and there is no compelling legitimate reason for the processing or the User objects to the processing for the purpose of prospecting;
- d) The Data has been processed unlawfully;
- e) The Data must be deleted to comply with a legal obligation that is provided for by Union law or by the law of the Member State to which Golden Palace is subject.

However, this right cannot be applied when the processing is necessary in particular:

- a) To comply with a legal obligation which requires the processing provided for by the law of the Union or by the law of the Member State to which Golden Palace is subject (e.g. Law of Gaming, anti-money laundering law);
- (b) The establishment, exercise or defense of legal rights.

4) Right to limit the processing

The User has the right to obtain from Golden Palace the limitation of the processing of his/her Data when:

- a) The Data is inaccurate;
- b) The processing is unlawful and the User objects to their deletion and demands instead the limitation of their use;
- c) Golden Palace no longer requires the Data for the purposes of processing but the Data is still necessary for the User to establish, exercise or defend legal claims;
- d) The User has objected to the processing during the verification of whether the legitimate reasons pursued by Golden Palace prevail over those of the User.

5) Right to request the transfer of your Data to another data controller

The User may request that his or her Data transmitted to Golden Palace be transferred to another data controller without Golden Palace's interference in accordance with Article 20 of the GDPR.

6) Right to object to the processing of your Data

The User may object at any time to the processing of his or her Data which is necessary for the performance of a mission of public interest or necessary for the purposes of the legitimate interests pursued by Golden Palace.

The User may object at any time to the processing of his or her Data for canvassing purposes, including profiling.

These rights can be exercised directly with Golden Palace by

- By email at support@goldenpalace.be
- By going to the Site, in the "My Profile" section, where you can modify certain parameters;
- By mail to the following address Golden Palace, Avenue des Croix de Guerre 120, 1120 Brussels

A reply will be sent to you within one (1) month following the date of receipt of your request.

To oppose the processing of your data for commercial prospecting purposes, you can contact us as indicated above or at any time modify your choices in terms of communications on the Site, in the "My Profile" section.

To inform us that you do not wish to benefit from our personalization service, you can contact us as indicated above or change this setting via "My Profile".

You also have the right to complain to the competent data protection authority.

- Belgium: Data Protection Authority / Rue de la Presse 35, 1000 Brussels /+32 (0)2 274 48 00 / contact@apd-gba.be

IX. Contact details of the Data Protection Officer (DPO) and right to lodge a complaint

In accordance with Article 37 of the RGPD, a Data Protection Officer has been appointed:

Mr Serge Sacré. For any question concerning the processing of Data, the Data Protection Officer can be reached by phone at 02/201.11.77 or by email at the following address: serge.sacre@citexar.be

X. Data Security

In accordance with the GDPR, the Operator undertakes to take all necessary measures, in view of the nature of the data and the risks associated with their processing, to preserve the security of the Data concerning the User and in particular to prevent the Data from being distorted or accessed by unauthorized third parties. Technical measures include anonymization and organizational measures include internal audits.

When Golden Palace uses subcontractors to carry out processing, Golden Palace undertakes to ensure that they provide sufficient guarantees regarding the implementation of technical and organizational measures.

When a processing is likely to generate a high risk for the rights and freedoms of Users, Golden Palace proceeds before the processing to an impact analysis in accordance with Article 35 of the GDPR.

XI. Cookies

Golden Palace uses cookies on its website. You can find more information in our [cookie policy](#)

XII. Changes

Golden Palace may change this data protection policy at any time. If Golden Palace makes any material changes to the way it processes your personal data, to its data protection policy or to its cookie policy itself, Golden Palace will notify you on the Site or by other means, such as email, so that you can review the changes before you use the Site.

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