

Privacy Policy

Our website is managed by Sunstar Impact N.V. (hereinafter referred to as The Website).

The website, which includes all of the entities specified below under "The Group" section, including its affiliates (collectively, the "Company"), offers online gambling services, such as casino, and sports gambling (collectively, the "Services") via its own in-house brands (each, an "In-House Brand"; together with the Company: "Group", "we", "our" or "us").

The Group is deeply committed to safeguard the privacy expectations of its users ("User(s)", "you" or "your") following the best-established practices. Accordingly, we have put in place this Privacy Policy, which outlines our data protection practices, including how we collect, use, disclose, process and protect your Personal Information, as well as your rights with respect to your Personal Information.

We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By visiting the Group's websites, mobile apps or other online properties, or by creating an account through our Services, you hereby agree to the Privacy Policy.

1.The Group

The Group provides the Services through the following applications and platforms (collectively the "Platforms"):

- This internet website;
- Downloadable applications and software ("Software"), such as native applications which are distributed through mobile application stores and PC and Mac desktop software which can be downloaded to your computer;
- Non-downloadable online applications (e.g. flash applications, HTML5 applications, etc.); and
- Facebook applications.

2.What information we collect?

We collect two types of information from our Users:

- **Personal Information** The first type of information is information that identifies or may reasonably identify an individual reasonable effort ("**Personal Information**"). Personal Information which is being gathered may consist of the following:
 - **Registration details:** When you open an account and register to use the Services, you will be asked to provide us certain details about yourself, such as: first and last name, email address, gender, birth data, physical address, ID number, phone number, occupation, etc. In addition, we may collect certain information as required under various Know KYC and Anti-Money Laundering regulatory requirements, such as your source of funds.
 - **Governmental-issued ID:** In certain instances, you will be required to provide a copy of a governmental-issued ID, for identity verification process. Please note that this information is required for certain features of our Services.
 - **Gaming information: in order for us to provide the Services, we automatically record different information related to your account and use of our Services, including with respect to your transactions, deposits, balances, bets, withdraws, bonuses and winnings.**

- **Payment information:** In order for you to enjoy all of the functions of the Services (e.g. place bets, perform purchases etc.), payment information will be collected from you, such as your currency, credit card number and bank account details.
- **Voluntary information:** We also collect information which you provide us voluntarily. For example, when you respond to communications from us, communicate with us via email or share additional information about yourself through your use of the Services, such as on the chat feature and in games.
- **Device information:** We collect specific types of connection details and information with regard to your device, software or hardware that may identify you, such as: device's unique identifiers (e.g. UDID, IMEI, MAC address), browser fingerprinting, IP address and geo-location data.
- **Telephone calls:** We record or monitor telephone calls for customer support, training and/or security purposes.
- **Social networks:** When you register through your social network account (such as your Facebook account), to use the Services or connect your player account with such account, we will have access to basic information from your social network account, such as your name, birthdate, profile picture and friends' list, as well as information you made publicly available on such account.
- In addition, when using the Services, you may be able via your social network to "Invite a Friend" to use the Services. Should the person accept your invitation, we may obtain Personal Information from him/her such as: name, email address, phone number and date of birth. We will use the Personal Information for the purposes set out herein and disclose such information only to third parties as detailed in this Privacy Policy.
- **Information we collect from third parties:** We collect Personal Information from third party service providers, such as information about your credit history from credit agencies and other financial information which is relevant to the provision of the Services, as well as information which is gathered in order to verify your identity and prevent fraudulent or illegal activity.
- Non-personal information

The second type of information is un-identified and non-identifiable information pertaining to a User(s), which may be made available or gathered via the User's use of the Services ("Non-Personal Information").

Non-Personal Information which is being collected consists of technical information and aggregated usage information, and may contain, among other things, the User's operating system, type of browser, screen resolution, browser and keyboard language, the User's 'click-stream' and activities on the Services, the period of time the User visited the Services and related time stamps, etc.

For avoidance of doubt, any Non-personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

Types of Non-personal Information we collect from or about you:

- **Technical information:** In order to enhance the functionality of the Services and to provide you with a better user experience, we collect technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time and the domain name of the website from which you linked to the Services; etc.).
- **Gameplay information:** We record game play information including, amongst other things, your deposits, bets, bonuses, game session duration and your high scores. We may also share and publish such information through any of our Platforms.
- **Device and connection information:** If you download the Software to your device, we may collect information from the particular device you are using, for security and fraud detection and prevention purposes. For example, we may gather information with regard to other software which is running simultaneously with the Software for detecting if you are using software which is associated with fraudulent activity (e.g. robots, malware, etc.) or checking if the connection you are using is via a VPN or proxy.
- **Analytics information:** We collect information about your use of the Services, such as applications' usage, log files, user activity (e.g. pages viewed, the amount of time spent on particular pages, online browsing, clicks, actions, etc.), time stamps, alerts, etc. This information is collected for amongst other things troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Services.
- **Anonymous information:** We may anonymize or de-identify the information collected by the Services or via other means so that the information cannot, on its own, personally identify you. Our use and disclosure of such aggregated or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation and for any purpose, such as for advertising or marketing purposes.

3.Minors

The Services are not designed or directed to persons under the age of 18 or persons under the age of legal consent with respect to the use of the Services of any jurisdiction, whichever is higher ("Legally of Age"). If you are not Legally of Age, you should not download or use the Services nor provide any Personal Information to us.

We reserve the right to access and verify any Personal Information collected from you. In the event that we become aware that a user who is not Legally of Age has shared any information, we may discard such information. If you have any reason to believe that a minor has shared any information with us, please contact us at support@sunstarimpactnv.com

4.How we use the collected information?

We use your Personal Information for the purposes listed below:

- To set up, manage and update your account;
- To provide and operate the Services (such as for betting and payment processing);
- To communicate with you and to keep you informed of our latest updates to our Services and special offers;
- To market our Services (see more below under "Marketing"), as well as to serve you advertisements, including behavioral advertising;

- To conduct analytics, statistical and research purposes, in order to improve and customize the Services to your needs and interests (such as by compiling aggregated reports about the usage of certain features of our Services);
- For Customer Relationship Management purposes, and to support and troubleshoot the Services and to respond to your queries;
- To enable us to further develop, customize and improve the Services based on Users' common preferences and uses;
- To provide you with a responsible gaming environment;
- To communicate with you and to process any of your requests to exercise your User Rights;
- To identify and authenticate your access to certain features of the Services;
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the Services, including by identifying risks associated with your activity on our Services;
- To investigate violations of our policies and User Agreement as well as enforce our policies and the User Agreement;
- To investigate and resolve disputes in connection with your use of the Services; and
- As required by law or regulation (such as Know Your Customer ("KYC") and Anti-Money Laundering regulatory requirements), or as required by other governmental authorities, or to comply with a subpoena or similar legal process or respond to a government request.

5. Marketing

The Group will use your Personal Information, such as your name, home address, email address, telephone number etc., ourselves or by using our third party subcontractors for the purpose of providing you with promotional materials, concerning the Services as well as products, services, websites and applications which relate to: (i) other companies within the Group; (ii) or (ii) the Group's business partners and affiliates (collectively: "**Marketing Affiliates**"), which we believe may interest you.

We may also share and disclose Personal Information with our Marketing Affiliates for the purpose of providing you different marketing offers, which we, or our Marketing Affiliates, believe are relevant for you. Our Marketing Affiliates may use this Personal Information for different marketing techniques, such as direct email, post, SMS and telephone marketing purposes.

You may at any time decline receiving further marketing offers from us or from Marketing Affiliates by contacting us at support@sunstarimpactnv.com or by unsubscribing from receiving marketing materials by following the guidelines available on the marketing communications (such as clicking on an "unsubscribe" button). Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

6. Cookies Policy

We use cookies in order to provide you with a high-quality and personalised experience.

A cookie is a small text file that is stored on your computer, laptop or mobile device when you visit a website or use applications. Cookies may be used for many different purposes such as remembering your preferences, following your use of the Website and improving your user experience.

We use three different types of cookies:

Essential Cookies- These cookies are necessary for the Website to function properly or to provide a service which you request. These cookies are usually only set in response to your actions, such as in the case of auto form filling or logging in. Your browser can be set to block these cookies but the Website will not perform properly if you decide to do so.

Functionality Cookies - These cookies help to provide you with a more personalised user experience and are used by us and select third parties whose services feature on our pages. Blocking these cookies will disable these services and may affect your Website experience.

Performance Cookies - These cookies collect information about how you use a website or application and assist us in improving the performance of our Website. Blocking these cookies means that we cannot work effectively to improve the usability of our Website.

Cookies may be stored either for the duration of your visit to the Website or for repeat visits:

Session Cookies - These cookies allows us to link your actions during a browser session. A browser session starts when you open the browser window and finishes when you close it. Session cookies are created temporarily and are deleted once the browser window is closed.

Persistent Cookies - These cookies remains on your device for a set period of time specified in the cookie and activated each time you visit the Website that created that particular cookie.

You may modify your browser so that it will not accept cookies. Please see the "Help" section of your browser for instructions.

7.Targeted Advertising

We use third-party advertising technology to serve advertisements when you visit the Platform and use the Services. You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative (" **NAI**") and the Digital Advertising Alliance (" **DAA**").

For more information regarding this practice by NAI members and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: www.networkadvertising.org/optout_nonppii.asp and www.aboutads.info/choices .

8.With whom we share information?

We do not rent, sell, or share your Personal Information with third parties ("Recipients") except as described in this Privacy Policy. The Personal Information will be disclosed to Recipients only to the extent required for the specific purpose, as stipulated in this Privacy Policy.

We share Personal Information with any of the following recipients:

- Any replacement service provider that we engage with to operate the Platforms;
- Companies within the Group and other affiliated companies;
- Gaming providers;
- Subcontractors and third party service providers, as well as their subcontractors, which by way of example include (but is not limited to) cloud computing companies, marketing affiliates, identity verification and fraud prevention services, and other data verifiers;

- Credit reporting agencies;
- Payment service providers, payment processors and banks;
- Any third parties who provides services in relation to the operation or promotion of the applicable Group's brands;
- Any third parties who organize offline events or tournaments on behalf of or in conjunction with any companies within the Group;
- Hotels and flight companies (such as in the context of offline events and promotions);
- Auditors, contractors or legal/financial/other advisers of any of the Group's business processes;
- Any third parties who investigate, detect or prevent fraudulent or illegal activity (e.g. governmental authorities, police, banks and other investigatory organizations);
- Licensing authorities, governmental and regulatory bodies, in accordance with applicable laws and regulations; and
- Potential purchasers, successors or investors in any of the companies within the Group, or in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, reorganization, bankruptcy, consolidation or asset sale of an asset or transfer in the operation thereof) in relation to any company within the Group (in such event, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy).

In addition to the purposes listed in this Privacy Policy, we share Personal Information with those Recipients for any of the following purposes:

- Storing such information on our behalf, for example by using cloud computing service providers;
- Processing such information to assist us with our business operations (e.g. to process payments and your deposits; authenticate your access; auditing our operations; detect and prevent fraudulent or illegal activity; etc.);
- Performing research, technical diagnostics or analytics;
- Communicating targeted advertising, as well as promotional and informational materials, in accordance with our marketing policy (see above, in the section titled "Marketing"); and
- Whenever we believe in good faith that disclosure is necessary to protect our rights or legal claims, enforce our policies (including our User Agreement and Privacy Policy), protect your safety or the safety of others, as well as to investigate or prevent any fraud, for security reasons or to help us with any other related technical issue.

9. Transfer Of Information

Since we operate globally, it may be necessary to transfer your Personal Information to countries outside the European Union. The data protection and other laws of these countries may not be as comprehensive as those in the European Union.

We use best efforts to ensure that your Personal Information is protected in accordance with our privacy policy, through contractual means (such as by using the contractual clauses approved by the relevant regulators for data transfer) or other means (such as ensuring that the jurisdiction imposes adequate safeguards for data protection).

If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly at support@sunstarimpactnv.com.

10.Third Party Tracking Technologies

When you visit or access our Services (for example when you visit our websites), we use (and authorize third parties to use) web beacons, cookies, pixels, scripts, tags and other technologies (" **Tracking Technologies**").

The Tracking Technologies allow us to automatically collect information about you and your online behavior, as well as your device (for example your computer or mobile device), for different purposes, such as in order to enhance your navigation on our Services, improve our Services' performance and customize your experience on our Services. We also use this information to collect statistics about the usage of our Services, perform analytics, deliver content which is tailored to your interests and administer services to our Users, advertisers, publishers, customers and partners.

We also allow third parties to collect information about you through Tracking Technologies. To learn more please visit our [Cookie Policy](#).

11.Third Party Services

While using the Services you may encounter links to third party websites, services or applications. Please keep in mind that this Privacy Policy does not apply to any third party websites, services or applications, even if they are accessible, downloadable, or otherwise distributed through the Services.

Please be advised that such third party websites, services or applications are independent from the Group. We assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third party websites and/or services. We encourage you to carefully read the privacy policies and the terms of use of such third party websites and/or services, as their terms, not ours, will apply to any of your interactions with such third parties.

You should always review their privacy practices carefully before providing Personal Information to such third parties.

You are knowingly and voluntarily assuming all risks of using any third-party websites, services or applications. You agree that we shall have no liability whatsoever with respect to such third party sites and your usage of them.

12.Retention Of Personal Information

If you have registered with an account through our Services, the Group will retain your Personal Information during the period your account is active. In addition, the Group will retain your Personal Data for additional periods, to enable the Group to meet its legal obligations under applicable laws or regulations, such as the applicable gambling regulations, Know-Your-Customer and Anti-Money Laundering regulations.

In addition, the Group may retain your Personal Information for longer periods, provided that retaining such information is necessary for the Group's legitimate interests, such as fraud prevention and record keeping.

13.Your Rights

You may contact us at any time by email (at: support@sunstarimpactnv.com), and request:

1. To access or delete any Personal Information relating to you;

2. To change or update any Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted). Note that you may also request that we will correct errors with regard to your Personal Information (except in cases where the information is required to be kept in its original format under any applicable laws and regulations);
3. That we will restrict or cease any further use of your Personal Information;
4. That we will provide the Personal Information you volunteered to us in a machine-readable format.

Please note that these rights are not absolute and requests are subject to any applicable legal requirements, including gambling regulations and other legal and ethical reporting or document retention obligations. We may also rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion, in accordance with our internal policies.

14. How We Keep Your Information Secured

We take great care in implementing and maintaining the security of the Services and your information. We have put in place appropriate physical and technological safeguards to help prevent unauthorized access, to maintain data security, and to use correctly the information we collect online. These safeguards vary based on the sensitivity of the information that we collect and store.

We employ industry standard procedures and controls to ensure the safety of our users' information, such as:

- Secure network topology, which includes intrusion prevention and Firewall systems;
- Encrypted communication;
- Authentication and Access Control;
- External and Internal audit tests; etc.

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse the Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

15. Changes To The Privacy Policy

We reserve the right to change this Privacy Policy at any time, so please re-visit this page frequently. We will provide notice of substantial changes of this Privacy Policy on the Services and/or we will send you an e-mail regarding such changes to the applicable e-mail address that you provided to us. Such substantial changes will take effect seven (7) days after such notice was provided on any of the above mentioned methods. Otherwise, all other changes to this Privacy Policy are effective as of the stated "Last Revised" date, and your continued use of the Services after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes.

16. How To Contact Us

If you have any general questions about the Services or the information that we collect about you and how we use it, please contact us via email at support@sunstarimpactnv.com.

Attn: Data Protection Officer

We will make an effort to reply within a reasonable timeframe. Please feel free to reach out to us at any time. If you are unsatisfied with our response, you can reach out to the applicable data protection supervisory authority.