



1. GENERAL

As a data controller, we have a legal obligation under gambling regulations to process personal data from players in order to allow them to participate in games and provide them with ancillary services. This Privacy Policy explains what personal data we collect from players, why we collect it and how we utilise it.

The website spinbet.com ("Casino", "Website", "Company", "We", "Us", "Our") is owned and operated by Pretense Flip N.V. incorporated and registered in Curacao with company number 160797 whose registered office is at Groot Kwartierweg 10, Willemstad, Curacao. Scrummy Limited, registration number: HE 439236. Registered address: Stavrodromiou, 69, Flat/Office 201, Larnaca, 6045 Cyprus is acting as a payment Agent on behalf of the license-holding entity Pretense Flip N.V. hereinafter 'Us/We/The Casino/The Company'

If you have any other questions regarding this Privacy Policy or protection of your data, please feel free to contact our Data Protection Officer at data@spinbet.com

By registering a Player Account with the Website you confirm your consent with this Privacy Policy. If you do not agree with the terms of this Privacy Policy and do not wish to provide us with the personal information we require, please do not use this website.

Please note that this Privacy Policy constitutes an agreement between you and the Company. We may periodically make modifications to this Policy. While we will do our best to notify you of such changes, we recommend that you revisit this Privacy Policy regularly. Your continued use of the Website and/or its services will constitute your consent to the Privacy Policy.

2. INFORMATION WE COLLECT

The Personal Information which we may request to use and process shall include, without limitation:

- Any of the information that you provide to us when filling in the forms on our account registration pages, as well as any other data that you further submit via the Website or email (e.g. first and last name, date of birth, email address, phone number);
- Correspondence made with us via the Website, email, web chat or through other means of communication;

- All Player Account transaction history, whether this takes place via the Website(s) or via other means of communication;
- Website logins and their details, including traffic data, GeoIP location data, browser/device data, weblogs, activity logs and other traffic information recorded in our system;
- Documents and proofs reasonably requested by us to verify your account, to process deposits or withdrawals and to conduct anti-fraud checks (on our own initiative or as required by applicable legislation). Such proofs may include passport scans, payment slips, bank statements, etc.
- Survey participations or any other customer assessments that we may carry out from time to time.

3. HOW WE USE YOUR INFORMATION

We process the Personal Information we collect from you in order to deliver our services. In particular, we will use your data for the following purposes:

- Processing your bets and transactions. This includes your use of credit card and online payment systems;
- Providing you with gaming and other ancillary services that you seek from our Website;
- Rendering customer support, such as assistance with setting up and managing your account;
- Identifying and performing the necessary verification checks;
- Providing registered players with information about our promotional offers, or providing promotional information from our selected business partners, associates and affiliates (only if players specifically consented to receiving such marketing material);
- Complying with legal responsibilities, including complying with anti-money laundering (AML) and combating the financing of terrorism (CFT) laws;
- Monitoring and investigating transactions for the purposes of preventing fraud, terms abuse, money laundering and other illegal or irregular gaming activities;
- Analysing customer trends through market study assessments (participation in surveys is not obligatory and you can always choose not to take part);
- Conducting research and statistical analysis of aggregated data.

4. MARKETING COMMUNICATION

Unless you have elected not to receive promotional materials, we may use your Personal Information, including your email address and phone number, to send you marketing communications regarding products, services and promotions. This may include information about products and services from our business partners, such as casino game providers. Whenever you decide to stop receiving such marketing and advertising material, you may opt out of this in your Player Account settings or by contacting our customer support at support@spinbet.com.

Additionally, note that by accepting any contest prize or winnings from us, you consent to the use of your name and/or nickname for advertising and promotional purposes without additional compensation, except where prohibited by law.

5. OBTAINING PERSONAL INFORMATION

We shall not collect any Personal Information about you without your knowledge. We may, however, automatically collect certain data about you where you would have provided such information through the use of our services and through your interactions with us.

We may also lawfully receive certain Personal Information from online vendors and service providers, such as fraud prevention companies. In addition, we retain the right to engage the services of third-party providers to render technical support, so as to process your online transactions and source gaming content.

Please understand that we may be granted access to any information you may provide to such vendors, service providers and third-party e-commerce services. Rest assured that we will use and safeguard any Personal Information so obtained, as set out in this Policy. Any information that you provide will only be disclosed to third parties outside the Company in accordance with this Privacy Policy, and we shall take any necessary steps to ensure that our agreements with third-party service providers always protect your private information.

DATA RECIPIENTS

We may pass information that you have given us to other entities within our group of companies and to our business partners. These companies include our parent companies, their parent companies and all of the subsidiaries of these respective companies, as well as other companies with whom we carry out business and hold necessary agreements. Data processing of your information may be undertaken by Pretense Flip N.V. or by another company in the group of companies, which may use a third party to fulfill such data processing needs.

Employees of the Company, more specifically Data Protection Officer, Money Laundering Officer, Payments & Anti-Fraud analysts, Customer Support agents, Customer Retention team members, VIP player managers as well as other selected employees, shall also have access to your Personal Information for the purpose of executing their duties and providing you with assistance.

Our employees who have access to, or are associated with the processing of the player's personal information, have signed confidentiality agreements to respect the confidential nature of the player's information pursuant to applicable gaming, data protection and privacy laws.

In order to provide you with an efficient service, we and/or our service providers might require transferring your personal data from one country to another in the European Union (EU) and European Free Trade Association (EFTA) regions and also to some data processors that may

be based outside of the European Economic Area (EEA). Therefore, by browsing the Website and communicating electronically with us, you acknowledge and agree to our (or our suppliers or sub-contractors) processing of your data in these countries. We shall always use our best efforts to ensure that your information and data is treated securely and in accordance with this Privacy Policy.

7. RELEASING DATA TO THIRD PARTIES

We do not sell or rent your personal data to third parties.

We may disclose your personal information if required by law, regulation, or other legal subpoena or warrant. We may also disclose your personal information to a regulatory or law enforcement agency if we believe it to be necessary to protect the legitimate interests of the Company, its customers or any third party.

Personal data will only be disclosed to third parties in the following cases:

- Where we are required to do so by law;
- If the Website needs to share data with its payment processors to facilitate payment transactions in accordance with their privacy policies. (In particular, most banking card transactions are processed by Paysafe whose privacy policy applies to such transactions);
- To comply with our legal and regulatory duties and responsibilities to the relevant licensing and regulatory authorities as well as all duties and responsibilities owed under any other applicable legislation and to any other applicable regulators in other jurisdictions;
- When the Company believes that disclosure is necessary to protect the Company's or the player's safety, or the safety of others, investigate fraud, or respond to a government request;
- If our marketing service providers require the data to carry out their tasks;
- To any other third party with the player's prior consent to do so.

We use third-party data processors to process limited personal data on our behalf. Such service providers support the Website, especially relating to hosting and operating the websites, marketing, analytics, improving the websites, and sending email newsletters. We shall ensure that the transfer of the Personal Data to the recipient is compliant with applicable Data Protection Legislation and that the same obligations are imposed on the processor as is imposed on us under the respective Services Agreement.

Our websites may also include social media features (e.g. "share" or "like" buttons). Such features are provided by third-party social media platforms such as Facebook. Where data is collected this way, its processing is governed by the privacy policy of the respective social media platforms.

In addition to the above, we may also release personal data if we acquire any new businesses. Should the Company undergo any changes to its structure such as a merger, acquisition by another company or a partial acquisition, it is most likely that our customers' personal data will be included within the sale or transfer. We will, as part of our Policy, inform our players by email prior to affecting such transfer of personal data.

Please note our content may link to third party websites to provide relevant references. We are not responsible for such external content, which may contain separate privacy policies and data processing disclosures.

8. DATA RETENTION

As stated under our Terms and Conditions both, you and the Casino can decide to have your Player Account closed at any time. Following closure of your account, we will retain your personal data on record for as long as required by law. This data shall only be used should it be required by competent authorities in cases of enquiries regarding financial and fiscal records, fraud, money laundering or investigations into any other illegal activity.

You are to note that due to anti-money laundering regulations in licensed gaming jurisdictions in the European Union, we are obliged to retain personal data of players submitted during registration and any data passed on during the operative period of a Player Account for a minimum of five years from last player transaction or account closure. Therefore, requests for erasure prior to the lapse of this period cannot be entertained.

9. SECURITY OF YOUR DATA

We hereby acknowledge that in collecting and processing your Personal Information for the purposes of managing your Player Account, we are bound by strict legal provisions on the protection of personal data.

Consequently, we endeavour to protect your personal information and respect your privacy in accordance with best business practices and applicable regulations. Being committed to providing secure services to players, and we will take all reasonable precautions to ensure that all the data that you have submitted to us remains safe.

Player Accounts can only be accessed with the player's unique ID and password. You may also set up two-factor authentication (2FA) as additional protection from unauthorised use of your account. You are responsible for keeping your login information confidential and making sure it cannot be accessed by another person.

10. CONTACTING US

You may always contact us in regards to this Policy should you wish to:

- Confirm the accuracy of the personal information we have collected about you;
- Enquire about our use of your personal information;
- Prohibit future use of your data for direct marketing purposes;
- Update or rectify any information that you have provided us (in such cases you shall provide any evidence we may reasonably require to effect such changes). Note it is illegal to provide us with false information about you and it is your responsibility to ensure that we are always updated with your correct data.

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please contact the DPO at data@spinbet.com

In addition, as per Article 77 of the GDPR, you have the right lodge a complaint related to your data processing to a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of an alleged infringement.

11. COOKIE POLICY

When you visit the Website, our system automatically collects information about your visit, such as your browser, IP address, and the referring website. This collection may be done in conjunction with our platform providers and partners. We may receive from them general demographic or usage data of our Website visitors. We do not use automatically collected information to identify you personally without receiving additional consent.

To collect the information in question we use cookies and similar tracking tools. Cookies are small text files that are stored on your computer or equipment when you visit our web pages. Some of the cookies are essential for the Website to operate; others improve your Website experience and help us deliver a better service. Below are the types of cookies we use and their purposes.

Required cookies: enable the navigation and basic functionality of the websites, e.g., access to member areas of the Website.

Functional cookies: allow us to analyse your website usage and your selections on the website (e.g. your session key, language, or region), so we can save these settings and offer you a more personalised experience.

Advertising cookies: allow us to gauge how effective our content marketing is. These cookies are provided by our partners to track website visits and new player registrations from advertising. We do not share your personal information (such as name or email) to affiliated partners except for site visit data collected directly by such Advertising Cookies. However your site visit data may be linked with other personal information collected through other sources by the providers. The latter external data processing is governed by the privacy notices and policies of these third-party providers.

In addition to the above, we use a number of third party service providers who also set cookies on this Website, in order to deliver the services that they are providing to us. Such services include, but are not limited to, helping us to improve your experience by tracking your activity on the Website, measuring the effectiveness of the Website and the effectiveness of our marketing campaigns.

Most online browsers automatically accept cookies. If you prefer, it is possible to block some or all cookies, or to delete cookies that have already been set by modifying your browser settings. However, we recommend that you do not block or delete your cookies as this may restrict your use of our Website.

12. NETENT GAMES

When you play casino games developed by NetEnt, NetEnt's Privacy Policy also applies. This policy can be found [here](#).