

EMPIRE GAMBLIX LTD PRIVACY POLICY

Effective Date: _____ 2022

Empire Gamblix LTD - a company incorporated and validly existing under the laws of United Kingdom under registration number 14005243, having its registered office at College House, 17 King Edwards Road, Ruislip, England, HA4 7AE, United Kingdom (hereinafter “**we**”) owns Empire Gamblix Invest Gambling Platform (hereinafter - “**Platform**”).

By using the Platform, you (“**User**” or “**you**” or “**your**”) provide your consent to be compliant with this Privacy Policy (“**Policy**”), which regulates collecting, using, disclosing, and handling your information (hereinafter “**Personal data**”) in connection with your access to and use of the Platform. If you have any objections to this Privacy Policy, you should not access, sign up for or use the Platform.

We are committed to protecting the privacy and security of the Personal data you provide to us, and we will only collect, use and share your information in ways described in this Policy.

Your decision to use Platform and provide your Personal data is voluntary. You may choose not to provide requested information online or restrict the use of cookies, but this may limit the use of the Platform.

If you wish to contact us, please, do it via Email: empire@gamblix.co

1. ACCEPTANCE

- 1.1. Please read the Policy carefully before you use or access our Platform. By accepting this Privacy Policy, you agree with our collection, storage, use and disclosure of your information as described in the following sections. Please note that if you disagree with anything in this Privacy Policy, you must not use the Platform.

2. CHILDREN'S PRIVACY

- 2.1. All services that can be provided by the Platform and described in this Policy are not for anyone under the age of 16. If you are under 16 years old, please, do not use our Platform. If you have obtained the information that someone under the age of 16 uses our Platform, please, contact us.
- 2.2. We do not knowingly collect private information from children under 16 years old. Users under the age of 16 should use this Platform with the permission or accompaniment of their parents. If you are a parent or guardian, and you know that your child has provided us with Personal data, please contact us so that we will be able to take the necessary actions.

3. WHAT INFORMATION DO WE COLLECT AND FOR WHAT PURPOSES?

- 3.1. You may find below the Personal data categories and the purposes of such collection and/or processing that we arrange.

The purpose we process your Personal data	<div> Categories of Personal data </div> <div> Legal basis for the processing </div> <div> The term of storage </div> <div> we use </div>
To provide you with access to our Platform	<div>login and email</div> <div>Contract (Terms of Use)</div> <div>As long as we keep your Account on the Platform</div>
Safety and security	<div>login and password</div> <div>Legitimate interest</div> <div>As long as we keep your Account on the Platform</div>
<div>Customer Support</div> <div>Communications on our behalf</div>	<div> <div>- email</div> <div>- messengers credential (not required)</div> <div>Contract (Terms of Use)</div> <div>As long as we keep your Account on the Platform</div> </div> <div> <div>- financial info</div> <div>(accounts details, transaction ID, dates, etc.)</div> <div>Contract (Terms of Use)</div> <div>As long as we keep your Account on the Platform</div> </div> <div> <div>- email</div> <div>- User's details (address, name, surname, User ID, etc.)</div> <div>Contract (Terms of Use)</div> <div>As long as we keep your Account on the Platform</div> </div> <div> <div>- conversation correspondence</div> </div>
Compliance with legal obligations and Research and development	<div>Automatically collected data:</div> <div> <div>- Google Analytics</div> <div>Legitimate interest</div> <div>As long as we keep your Account on the Platform</div> </div> <div> <div>- User-Agent</div> </div> <div> <div>- IP - address</div> </div> <div> <div>- type (advertiser or webmaster)</div> </div>

3.2. We need your consent to provide you with further access to our Platform. Also, we want to ensure safe work of the Platform and to be compliant with law. We won't collect or process your Personal data until obtaining your consent. Your consent may not always mean your specific actions. If you continue to use our Platform, you are deemed to have agreed to the terms and conditions specified in this Policy.

4. PURPOSE OF USING PERSONAL DATA

4.1. We process Personal Data of Users for the purposes set out in this Policy:

- 4.1.1. To provide the services and to develop business and commercial relationships with you.
- 4.1.2. To develop, provide, improve, update, correct errors in the Platform and/or expand the services;
- 4.1.3. To provide internal quality and security controls, protect against fraudulent or illegal activities and hold those responsible for such activities accountable;
- 4.1.4. To measure the interest and interaction of Users with the Platform;
- 4.1.5. To tailor content and offers displayed on the Platform as well as on other resources;
- 4.1.6. To authenticate and verify the identity of Users and verify the accuracy of the information provided;
- 4.1.7. To respond to enquiries and complaints and to communicate with Users;
- 4.1.8. To enforce the law, including protecting our rights or the rights of third parties;
- 4.1.9. To prevent or stop activity that we may consider illegal, fraudulent, unethical;
- 4.1.10. To conduct research and analysis on our target audience of Users;
- 4.1.11. To perform financial and accounting obligations;
- 4.1.12. To create contextual, targeting, media and other types of advertising.

5. DATA SECURITY AND DPO

- 5.1. We make every effort to ensure that the storage of Personal data, to the extent possible, complies with the GDPR and CCPA. Given that no method of transmitting information over the Internet is completely secure, Empire Gamblix LTD cannot and does not guarantee the security of any information you transmit.
- 5.2. We carry out measures to secure the storage of Personal data in accordance with Article [32 GDPR](#), such as: anonymization and encryption, ensuring the confidentiality, integrity, availability and stability of processing services, timely restoration of access to data and testing the effectiveness of protective measures.
- 5.3. To improve the control of data storage and security, Empire Gamblix LTD may engage a Data Protection Officer (hereinafter “**DPO**”) who is responsible for compliance with the law on the protection of Personal data, in accordance with Articles [37, 38, 39 GDPR](#), namely to perform the following tasks:
 - 5.3.1. informing the controller and data processor about obligations under the data protection regulation;
 - 5.3.2. monitoring compliance with the norms and requirements of the regulations;
 - 5.3.3. representation in bodies supervising compliance with the regulations;
 - 5.3.4. advising in any situation affecting the regulation;
 - 5.3.5. accept and consider requests and complaints from Users to protect their rights, in accordance with the Policy.

5.4. We create measures to securely store the collected Personal data on servers and hosting, as well as provide AES-192-CBC data encryption, md5 hashing and anonymization. Access to the Platform is encrypted using standard Transport Layer Security (“TLS”) technology. We also use strict HTTPS transport security.

5.4.1. **Access control and management system.** Several levels of protection are used, when granting access to confidential data.

5.4.2. **Data transfer control.** Data flow through internal Empire Gamblix LTD networks is protected.

5.4.3. **Data Input Control.** Empire Gamblix LTD checks the changes made or the deletion of data from processing systems.

5.4.4. **Availability control.** Personal data is protected against accidental destruction or loss.

5.4.5. **Data integrity control.** Empire Gamblix LTD uses firewalls, anti-virus software and conducts external and internal penetration testing.

5.5. Empire Gamblix LTD shall not be liable for leakage, unauthorised collection and disclosure, resale and misuse of Personal data by third parties.

6. INTERNATIONAL TRANSFERS AND DISCLOSURE OF PERSONAL DATA

6.1. Empire Gamblix LTD is a European company registered in United Kingdom; we process and store Personal data in the European Union.

6.2. We may disclose your Personal data to third parties to make our Platform work smoothly and to operate our business under the following conditions. Your data can be shared with Service Providers and Subprocessors. For example, the Platform administration and our managers may have access to certain databases, containing your Personal data. Also, our lead developers may access it from time to time in order to ensure the correctness of the Platform’s functioning.

6.3. In some cases, we may buy or sell the assets of Empire Gamblix LTD. The Users’ Personal data in these types of transfers is one of the transferred business assets. Empire Gamblix LTD may disclose Users' Personal data to third parties in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposal of all or any part of our business, assets or shares, including in connection with any bankruptcy.

6.4. When we share Personal data with third parties, we will comply with the safeguards required by the [GDPR](#) and the Policy. When transferring data, we rely on approved data transfer mechanisms, which may include [Standard contractual clauses](#) for international transfers approved by the EDPB and [GDPR](#). You may request a copy of the standard contractual clauses relating to your Personal data, if any.

6.5. If you choose to use the Platform or provide your information to us, your information may be transferred to, processed and maintained on servers or databases located outside of the country or jurisdiction where you are located. Such countries may have laws that are less protective than the country in which you reside. If you do not want your information transferred to or processed or maintained outside of the country or jurisdiction where you are located, you should not use the Platform.

7. PERIOD FOR RETAINING PERSONAL DATA

7.1. When you provide access to Personal data, you consent to the transfer, storage and processing of Personal data. In turn, we undertake to take all necessary measures to ensure that Personal data is processed in compliance with

security rules and in accordance with the Policy provisions.

- 7.2. Personal data is stored until the User requests its deletion, or for 3 years from the date of receipt of such data, if such storage is necessary to account for statistical, financial, corporate and commercial data. If you would like to have your information deleted, please contact us.
- 7.3. We may retain Personal data for as long as necessary to provide the Services or fulfil our obligations, resolve disputes, prevent misuse, and enforce agreements.
- 7.4. The Personal data that we process and store is the Users' property.
- 7.5. In the event of a change in Personal data that is necessary for the correct provision/receipt of the Services, Users are responsible for notifying us of such changes.

8. LINKS TO OTHER WEBSITES

- 8.1. We expressly disclaim any warranties or other representations regarding the content or web-pages you may get access to. Please note if the Platform contains links to other websites and resources, also provided by Advertisers or Webmasters, and the content available via these links is provided with prior moderation but without permanent control. We do not control the content of these websites or resources and are not responsible for them or for any loss or damage that may result to you and your Personal data. If you use such links, you do so entirely at your own risk and subject to the terms of use, privacy policies of such Advertisers or Webmasters.

We are not responsible for the actions of third parties with whom you share Personal or sensitive data, and we have no authority to manage or control third-party solicitations.

9. EMAILING AND PROMO

- 9.1. By providing Personal data, you agree that Empire Gamblix LTD reserves the right to contact you with commercial and non-commercial offers, unless you notify us that you do not want to receive further communications from us.
- 9.2. If you do not want to receive commercial and non-commercial offers, you must opt-out of such notifications by clicking the "opt-out" link located at the bottom of each promotional e-mail, or you can write us an e-mail to the mail: empire@gamblix.co.

10. YOUR RIGHTS

- 10.1. Consistent with different data protection regulations, the Platform provides you the choice of accessing, editing, or removing certain information, as well as choices about how we contact you. You may change or correct your Account information through your Account settings. You may also remove certain optional information that you no longer wish to be publicly visible. You can also request to permanently close your Account and delete your Personal data. Depending on your location, you may also benefit from a number of rights with respect to your information. While some of these rights apply generally, certain rights apply in limited cases.
- 10.2. You may request a copy of your Personal data in an easily accessible format and information explaining how that information is used.
- 10.3. You have the right to request that we rectify inaccurate information about you. By visiting your account settings, you can correct and change certain Personal data associated with your Account.
- 10.4. In certain cases where we process your Personal data, you may also have the right to restrict or limit the ways in which we use your Personal data.
- 10.5. In certain circumstances, you have the right to request the deletion of your Personal data, except information we

are required to retain by law, regulation, or to protect the safety, security, and integrity of Empire Gamblix LTD.

- 10.6. If we process your Personal data based on our legitimate interests as explained above, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons. Where we use your Personal data for direct marketing purposes, you can object using the unsubscribe link in such communications or changing your Account email settings.
- 10.7. Where we rely on consent, you can choose to withdraw your consent to our processing of your Personal data using specific features provided to enable you to withdraw consent, like an email unsubscribe link or your Account privacy preferences. This is without prejudice to your right to generally permanently close your account and delete your Personal data.

11. CALIFORNIA PRIVACY RIGHTS

11.1. The California Consumer Privacy Act (“CCPA”) provides California residents with the additional rights listed here. To exercise these rights, see the “Exercising Your California Privacy Rights” subsection below.

11.2. Social sharing features

- 11.2.1. You have the right to know and see what information we have collected about you over the past 12 months, including:
- 11.2.1.1. The categories of information we have collected about you;
 - 11.2.1.2. The categories of sources from which the information is collected;
 - 11.2.1.3. The business or commercial purpose for collecting your information;
 - 11.2.1.4. The categories of third parties with whom we have shared your information; and
 - 11.2.1.5. The specific pieces of information we have collected about you if applicable.

11.3. Right to Delete Personal Data

- 11.3.1. You have the right to request us to delete the information we have collected from you (and direct our service providers to do the same). There are a number of exceptions, however, that include, but are not limited to, when the information is necessary for us or a third party to do any of the following:
- 11.3.1.1. Complete your transaction;
 - 11.3.1.2. Provide you a good or service;
 - 11.3.1.3. Perform a contract between us and you;
 - 11.3.1.4. Protect your security and prosecute those responsible for breaching it;
 - 11.3.1.5. Fix our system in the case of a bug;
 - 11.3.1.6. Protect the free speech rights of you or other Users;
 - 11.3.1.7. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.);
 - 11.3.1.8. Engage in public or peer-reviewed scientific, historical or statistical research in the public interests that adheres to all other applicable ethics and privacy laws;
 - 11.3.1.9. Comply with a legal obligation; or to make other internal and lawful uses of the information

that are compatible with the context in which you provided it.

11.4. Other Rights

11.4.1. You can request certain information about our disclosure of your information to third parties for their own direct marketing purposes during the preceding calendar year (to the extent we have shared information for such purposes within the given period). This request is free of charge and may be addressed once a year. You also have the right not to be discriminated against for exercising any of the rights listed above.

11.5. Exercising Your California Privacy Rights

11.5.1. To request access to or deletion of your Personal data, to opt-out or to exercise any other rights under California law, please please contact us at empire@gamblix.co.

12. RESPONSE TIMING AND FORMAT

12.1. We aim to respond to a User request for access or deletion of their data within 30 days after receiving that request. If we require more time, we will inform you of the reason and extension period in writing.

13. CHANGES TO THIS POLICY

13.1. We have the right to amend, update and supplement the Policy from time to time to ensure the safety of Personal data and compliance with the requirements of GDPR/CCPA legislation.

13.2. In the event of significant changes that relate to Personal data, we notify Users of such changes by posting news on the Platform and/or using an informational e-mail newsletter.

13.3. In the event that you unsubscribe from emails in which we inform you about changes to the legal documentation, you remain responsible for reviewing them.

13.4. After making changes to the Privacy Policy, we have the right to request the repeated Users' consent with the updated Policy.

13.5. Our electronic or otherwise retained copies of the Privacy Policy shall be deemed to be the original, complete, valid and enforceable version of this Policy in effect at the time of your use of the Platform.

14. CONTACT US

14.1. If you have any questions regarding collection and processing of your data, please, contact us at: empire@gamblix.co.

14.2. If you have an outstanding privacy or data usage concern that we have not satisfied, any questions or complaints regarding the Platform or this Policy, please, contact us at: empire@gamblix.co.