



# Privacy Policy

PB-COM-012-01

## 1. Introduction

This Privacy Policy is issued by Vavada B.V. , which was registered on March 21 , 2017, under registration number 143168(0) with the registration address at Hanchi Snoa 19, Trias Building, Curacao. (hereinafter referred to as the "Company") and outlines how the Company collects, proceses, and safeguards the personal data of its Clients. By accessing or utilizing the services provided by the Company, the Client agrees to comply with the terms set forth in this document.

For the purposes of this Privacy Policy, a "Client" refers to any individual who creates an account on the Company's website, engages with its services, or otherwise interacts with the Company in relation to its gaming activities. By doing so, the Client acknowledges their obligation to adhere to the Terms and Conditions set forth by the Company, including compliance with identity verification, legal gaming age, and any applicable jurisdictional requirements.

## 2. Data Collection

The Company collects and proceses the following categories of information:

- Personal Data: full name, date of birth, adress, contact details, and payment/transaction information.
- Usage Data: interactions with the platform, including gaming activity, session details, and preferences.
- Verification Data: documents such as passports or other goverment-issued identification to fulfill Know Your Customer (KYC) requirements.
- Technical Data: information related to IP addresses, browser configurations, and operating systems.

## 3. Purpose of Data Collection

Data collected by the Company is utilized for the following purposes:

- To provide and enhance the services offered.
- To process payments and manage withdrawals securely.
- To comply with legal obligations, including those related to Anti-Money Laundering (AML) and KYC.
- To detect and prevent fraudulent activities.
- To personalize and improve the Client experience.

## 4. Sharing of Data

The Company may disclose personal data to third parties under specific circumstances, including:

- Legal Compliance: to comply with aplicable laws, regulations, or governmental requests.
- Service Providers: to trusted third parties assisting in the delivery of services, such as payment processing or identity verification.
- Corporate Transactions: in the event of a merger, aquisition, or sale of the Company's assets.

## 5. Client Rights

The Client is entitled to excercise the following rights concerning their personal data:

- **Access:** the Client may request a copy of the personal data held by the Company by submitting a formal request.
- **Correction:** if any of the Client's personal data is inaccurate or incomplete, the Client may request its correction.
- **Erasure:** the Client may request the deletion of their personal data, provided such deletion does not conflict with the Company's legal or regulatory obligations.
- **Restriction:** the Client may ask the Company to limit the processing of their personal data under certain circumstances.
- **Withdrawal of consent:** where the processing of personal data is based on the Client's consent, the Client may withdraw their consent at any time by notifying the support team.

To exercise these rights, the Client should contact the Company's support team via the provided contact channels. The Company will process all requests within the timeframes established by applicable laws.

## 6. Data Security

The Company takes data security seriously and employs a combination of technical, administrative, and physical safeguards to ensure the confidentiality, integrity, and availability of personal data. These measures include:

- **Encryption:** all sensitive data, such as payment details and identification documents, is encrypted both in transit and at rest to prevent unauthorized access.
- **Access Control:** access to personal data is restricted to authorized personnel only, who are required to adhere to strict confidentiality agreements.
- **Regular Audits:** the Company conducts periodic audits and risk assessments to identify vulnerabilities and ensure compliance with security protocols.
- **Incident Response Plan:** in the event of a data breach, the Company has a robust incident response plan in place to mitigate risks and notify affected Clients as required by applicable laws.

Despite these measures, the Company advises Clients to take precautions, such as using strong passwords and safeguarding account details, to further protect their information.

## 7. Data Retention

The Company retains personal data for as long as necessary to fulfill the purposes outlined in these Privacy Policy and to fulfill legal and regulatory requirements. Data is retained for a minimum of 5 years following account closure, unless a longer retention period is required by the law.

## 8. Jurisdiction and Compliance

This Privacy Policy is governed by the laws of Curacao. The Company adheres to international data protection standards, including the General Data Protection Regulation (GDPR), where applicable, to ensure robust protection of Client data. Regular reviews of internal policies and procedures are conducted to ensure continued compliance. In cases where local laws conflict with this Privacy Policy, local laws shall take precedence.

Clients are advised to familiarize themselves with the data protection laws applicable to their jurisdiction. Any legal disputes or claims arising in connection with this Privacy Policy will be subject to the exclusive jurisdiction of the courts of Curacao.

## 9. Cookies and Tracking Technologies

The Company utilizes cookies and similar tracking technologies to optimize the Client's experience and improve the platform's functionality. Cookies may be used for:

- Session Management: ensuring secure login and session continuity.
- Performance Monitoring: tracking site performance and identifying areas for improvement.
- Personalization: delivering tailored content and recommendations based on Client preferences.
- Advertising: managing and displaying relevant promotional materials.

Clients can manage their cookie preferences through browser settings. However, disabling certain cookies may affect the functionality and performance of the platform. Detailed information on the use of cookies is available in the Company's Cookie Policy.

## 10. Responsible Gaming and Self-Exclusion

The Company is committed to promoting responsible gaming and offers rules to help Clients manage their gaming habits. These rules include options to enjoy Company products without causing harm to the Client's mental health. All requests to activate or adjust these solutions must be made through the Company's support team. Clients can contact the support team for assistance in implementing any responsible gaming measures.

For a detailed description of all available responsible gaming rules, Clients are encouraged to visit the "Responsible Gaming" section on the Company's website. This section provides comprehensive information on how to control their gaming habits, how to activate self-exclusion to suspend access to gaming services, as well as additional resources for seeking help with gaming-related issues.

The Company also collaborates with reputable organizations that specialize in addressing problem gambling. Contact information and links to these organizations are available in the "Responsible Gaming" section of the website. Clients are strongly encouraged to use these resources if they need support.

## 11. Verification Policy

To ensure compliance with AML and KYC regulations, the Company requires Clients to complete a verification process. The verification process is mandatory for all Clients who use the services of the Company. The verification includes identity verification (submission of government-issued identification documents, such as passports or national ID cards), address verification (proof of residence, such as utility bills), etc. Failure to provide the required documentation may result in account suspension or restriction.

The Company reserves the right to use third-party verification services to ensure compliance with its obligations. Independently request additional information or documentation from the Client to verify their identity, address, or source of funds. Measures are implemented to uphold regulatory standards and ensure the integrity of the platform.

## **12. Contact Information**

Clients with questions or concerns regarding this Privacy Policy may contact the Company at [support@vavada.net](mailto:support@vavada.net). The Company reserves the right to amend this Privacy Policy at its discretion. Any updates will take effect immediately upon publication. Continued use of the Company's services constitutes acceptance of the revised terms.