

## PRIVACY POLICY

Pursuant to Articles 13 and 14 of the European General Regulation on the protection of personal data and the free movement of such data of 27 April 2016 No. 2016/679 (hereinafter "GDPR"), the Website's publication director informs you of the following.

The following developments represent the Personal Data protection policy (hereinafter "**Privacy Policy**").

### Art 1. Definitions

For the purposes of the Privacy Policy, the terms and expressions identified by a capital letter have the meaning indicated below, whether they are used in the singular or plural.

<b>« Conditions »</b>	means the general conditions accessible on the website (hereinafter "Conditions")
<b>« Cookies »</b>	means all the information deposited in the User's terminal on the Website and stored in the form of text files of limited size to recognize the User's computer, tablet or cell phone for the services and products offered on the Website, offering personalized media and analyzing Winerz traffic
<b>« Personal Data »</b>	means any personal data presenting nominative information of an identifiable person in the person of the User, and in particular pseudonym, title, date of birth, age, postal address, e-mail address (number).
<b>« User data »</b>	means Personal Data, including personal identifiers and the Processing of communications addressed to Users, of which the User is the owner, and which Winerz captures and/or processes in connection with the performance of the services
<b>« Plateforme »</b>	means the software made available to the User on the Website to play games and participate in tournaments.
<b>« Policy »</b>	means the Winerz privacy policy incorporating all stipulations regarding the processing of personal data in accordance with the GDPR and applicable laws
<b>« DP regulations »</b>	means the Data Protection Act, Chapter 586 of May 2018 of the European Parliament and of the Council of April 2016, and all regulations of individuals with regard to the processing of Personal Data and such data.

<b>« Services »</b>	means the services offered by Winerz and subscribed
<b>« Website »</b>	means indiscriminately the website <a href="http://www.winerz.com">www.winerz.com</a> application.
<b>« Subcontractor »</b>	means the natural or legal person, public authority or Processor of Personal Data on behalf of the Controller.
<b>« Processing »</b>	means any operation(s) or set of operations performed on or with Personal Data and applied to data or sets of Personal Data including recording, storage, adaptation or modification, retrieval, transmission, dissemination or any other form of communication, as well as the blocking, erasure or destruction.
<b>« Users »</b>	means any person accessing the Website concerned

## Art 2. Object

Winerz assures its Users of the security and confidentiality of their User Data and is committed to the protection of Personal Data in accordance with the GDPR and in compliance with the Policy.

The Policy provides targeted and detailed information on the specific Processing of Personal Data and defines the commitments of Winerz as a Processing Controller within the meaning of the GDPR, with regard to the respect of Personal Data collected and processed when using the Platform, browsing the Website and/or when the User contacts Winerz.

## Art 3. Scope of application

The Policy applies to Users of the Platform and/or Website Services, and more specifically to the Processing of Personal Data carried out within the framework of the Conditions and described below (Article 6).

The Policy describes how Winerz collects and uses User Data when browsing the Website and registering and/or accessing the Platform in order to provide its Services to Users.

User acknowledges and agrees that the Policy is an integral part of the Terms.

## Art 4. Consent

By registering for the Platform and accessing [Winerz.com](http://Winerz.com), the User acknowledges and agrees that Winerz may collect, process, store and/or

use User Data submitted to Winerz. In the absence of consent, Winerz may not be able to provide all or part of the Services.

The User acknowledges and agrees that consent is not the sole basis for the collection and Processing of Personal Data by Winerz.

The User has the right to withdraw consent at any time by writing to the following email address [admin@winerz.com](mailto:admin@winerz.com) or to the registered office of Alpha Wolf Gaming OÜ, Harju maakond, Tallinn, Kesklinna linnaosa, Sakala tn 10, 10141

At the time of the subscription of the Services and within the framework of their use, Winerz collects various categories of Personal Data, namely:

- identification and contact data:
  - name,
  - first name,
  - pseudonym,
  - date of birth,
  - postal address,
  - e-mail address
- connection data:
  - IP address of your computer,
  - login ID,
  - password
- financial data:
  - means of payment,
  - bank account information ("RIB"),
  - payment history (approved or declined),
- location data:
  - postal address,
  - computer location,
- Business Data:
  - competition participation history,
  - wins, losses,
  - amount of bets,
  - amounts won,
  - frequency of use of the Platform,

Winerz may request additional Personal Information in order to securely identify the User or for legal purposes, including to ensure secure methods of identification, proof of address and financing, and to ascertain the actual existence of the User.

Similarly, other information may be obtained from other sources including, but not limited to:

- Users' comments on the Website and/or Platform,

- Users or third parties providing information in connection with claims or disputes,
- marketing providers,
- public or administrative sources.

The User acknowledges and agrees that Winerz may associate information collected from these sources with other information in its possession. In this case, Winerz will take all legally required steps to inform the User about the source and category of Personal Data collected and processed, except where disclosure by Winerz is expressly prohibited, including in connection with investigations by authorities for money laundering.

The User may choose to associate his or her User account with social networks such as Facebook, Instagram or other to share his or her performances on the Platform. In these circumstances, the User acknowledges and agrees that Personal Data about him/her may be collected from his/her accounts on his/her associated social networks.

Finally, the User agrees and acknowledges that without the provision of certain Personal Data, Winerz may not be able to provide all or part of the Services.

#### Art 6. Use of User Data

User Data is collected and processed solely on the basis of the legal grounds provided by the PD Regulation, namely:

**As part of the execution of the General Conditions (contractual purpose)** to manage the User account;

- identification and authentication of the User,
- communications with the User,
- technical and commercial assistance,
- management of disputes (pre-litigation and litigation),
- management and exercise of the rights and requests of the Users relating to their Personal Data,
- provision of the Services,
- access and operation of the Platform and/or the Website with the possibility of exclusion of Users,
- hosting of Personal Data,
- declaration to the administrations and realization of any administrative formality,
- subscription to the newsletter or to the Winerz mailing list.

**For legitimate interests or, where applicable, on the basis of the User's consent:**

- fight against fraud and/or money laundering,
- enrichment and enhancement of customer and prospect databases,
- provision of localized and personalized content according to state regulations,
- development and improvement of the Services by Winerz or third parties and commercial prospecting,
- carrying out statistical studies and analyses,
- to measure the audience and access flows to the Website and the Platform.

It is also collected and used by Winerz to ensure compliance with its legal and regulatory obligations as defined by the legislation in force, after having informed the User, unless prohibited by law or if its intervention is justified by a reason of public order.

Winerz may collect and process Personal Data for commercial prospecting purposes by sending electronic communications for direct prospecting or from its partners.

The User may object to this by following the procedure described in Article 9 - **Users' rights**.

In accordance with the DP Regulation, Winerz, undertakes to:

- process the User's Personal Data only for the sole purpose(s) mentioned above,
- guarantee the confidentiality of the User Data processed in application of the Conditions,
- ensure that persons authorized to process User Data under the Terms undertake to respect the confidentiality thereof or are subject to an appropriate legal obligation of confidentiality,
- take into account, with respect to the Services, the Platform and/or the Services, the principles of protection of Personal Data by design and protection of Personal Data by default.

In the event that Winerz needs to process Personal Data for a new purpose unrelated to the above, the User will be informed in advance so that he/she can exercise his/her rights in relation to such Processing.

#### Art 7. Recipients of Personal Data

User Data may be processed by any duly authorised person within Winerz (members and staff), as well as by service providers or administrations with whom Winerz is in contact.

It is established that the use of service providers is necessary for the proper execution of the contract concluded between the User and Winerz.

If the recipients are required to process User Data outside the European Union, the transfers will be carried out in compliance with the DP Regulation. Any disclosure to third parties will be made in accordance with the PD Regulation in force, after commitment on their part to maintain the confidentiality of all information received, and assurance that their staff members are bound by similar obligations.

Finally, Winerz reserves the right to disclose the processed User Data to Third Parties if such communications are permitted by the laws in force in Estonia, including, but not limited to: .

- in the event that Winerz becomes subject to a merger, assignment, acquisition, restructuring, or transfer,
- to protect and defend the rights and interests of Winerz, the security or that of its subsidiaries, the rights of the Users of the Platform including the rights of the User concerned
- to comply with any legal or judicial obligation,
- to satisfy the requirements of any other applicable law, such as anti-money laundering legislation.

#### Art 8. Duration of retention of User Data

Winerz undertakes to keep User Data only for as long as is necessary to achieve the purposes mentioned in Article 6 above or to enable Winerz to meet its legal obligations.

The "necessary" criterion is determined :

- according to the category of Personal Data and the quality of the relationship between Winerz and the User,
- the rules applicable to the specific Services offered by Winerz,
- European and/or Estonian laws,

allowing Winerz to keep certain User Data for a specific period of time, particularly with regard to limitation periods.

Personal Data used for commercial prospecting purposes may be kept for a maximum period of three (3) years from the end of the commercial relationship.

At the end of the Terms, Winerz is authorized to keep the User Data once it has been anonymized in order to use it for purely statistical purposes.

#### Art 9 User Rights

The User has the following rights:

Right of access	<p>access the following information and data:</p> <ul style="list-style-type: none"> <li>• the purposes of the Processing;</li> <li>• the categories of Personal Data concerned;</li> <li>• the recipients or categories of recipients to whom the Personal Data has been communicated, in particular recipients who are established in a Member State or organizations,</li> <li>• where possible, the period of time for which the Personal Data is stored, and, where possible, the criteria used to determine this period</li> <li>• the existence of the right to request from Winerz the rectification or a limitation of the processing of the Personal Data relating to such processing</li> <li>• the right to lodge a complaint with a supervisory authority</li> <li>• when Personal Data is not collected from the User, any available information as to the source of the Personal Data</li> <li>• the existence of automated decision-making, including profiling, referred to in paragraphs 1 and 4, and, at least in such cases, useful information as well as the significance and the expected consequences for the data subject.</li> </ul>
Right to withdraw consent	consent has been given by the User.
Right of rectification	right to obtain from Winerz, as soon as possible, the rectification of the Personal Data concerning inaccuracies or incomplete or misleading information for the purposes of the processing, the User has the right to obtain this rectification as soon as possible, including by providing a complementary declaration if necessary.
Right to erasure (right to be forgotten)	<p>right to request the deletion of User Data in the following cases:</p> <ul style="list-style-type: none"> <li>• the User Data is no longer necessary for the purposes for which it was collected or processed,</li> <li>• the User has exercised his right to object,</li> <li>• the User goes back on the consent given to Winerz and the controller,</li> <li>• the User Data has been the object of an illicit Processing,</li> <li>• the User Data must be deleted to comply with a legal obligation under EU law or by the law of the Member State to which Winerz is subject.</li> </ul>
Right to object	right to object at any time, for reasons relating to his or her particular situation, to the Processing of Personal Data. The Processing of Personal Data will cease, unless compelling and legitimate reasons allowing the continuation of the Processing exist.
Right to the limitation of the Treatment	<p>Right to request the limitation of the Processing of Personal Data in the following cases:</p> <ul style="list-style-type: none"> <li>• the accuracy of the Personal Data is contested by the data subject and Winerz to verify the accuracy of the Personal Data</li> <li>• the Processing is unlawful and the data subject objects to the Processing and requests instead the restriction of its use,</li> <li>• Winerz no longer needs the Personal Data for the purpose for which it was collected or processed, unless necessary for the User for the establishment, exercise or defence of a legal claim.</li> </ul>

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- the User has objected to the Processing of his/her Personal Data and whether the legitimate grounds pursued by Winerz prevail

Right to portability right to request the provision of the Personal Data collected and processed in a machine-readable structured format, and to transfer them directly to another controller. Processing is based on consent, or on a contract concluded between the User and the controller, or the Processing is carried out by automated processes.

The User can also define directives concerning the conservation, deletion and communication of his Personal Data after his death.

The methods for exercising the User's rights are indicated in Article 15 - Contact.

Before being able to respond to the User exercising his or her rights, Winerz may need to verify the identity of the User to ensure the security of the User Data and to ensure that Personal Data is not disclosed to unauthorized persons.

Winerz will provide a copy of the requested User Data, without prejudice to the rights and freedoms of others, including Winerz, within one month after receipt of the request, it being specified that this period may be extended by two months in the event of a strong request and given the complexity of the User's request. In the latter case, the User will be duly informed.

The User also has the possibility to refer to the European Union Data Protection Representatives (EUDPR) at the following addresses:

Address: Rue Wiertz 60, 1047 Bruxelles/Brussel

Email: [edps@edps.europa.eu](mailto:edps@edps.europa.eu)

#### Art 10. Security of Personal Data

Winerz implements the appropriate technical and organizational measures in order to guarantee a level of security adapted to the risks. The respect of the security and the protection of the Users' Data is mandatory for all YouSoc's collaborators as well as for its Subcontractors.

Winerz shall not be liable for any action or omission on the part of the User or any third party in connection with Personal Data before it is collected and processed by Winerz, including, but not limited to, any transfer of Personal Data by the User to Winerz to a state with a lower level of data protection than that in force in the European Union by any technological means (including, but not limited to WhatsApp, Skype, Instagram, Facebook, Dropbox. ).

Winerz is in no way responsible for the security of the User's data in transit over the Internet, unless Winerz's responsibility explicitly results from an Estonian law.

Notwithstanding the foregoing, Winerz cannot guarantee that the data transmission or storage system is 100% secure. Subcontractors with access to User Data are specifically required to apply appropriate technical and organizational security measures to protect the processed User Data from unauthorized or accidental disclosure, loss or destruction and from any unlawful form of Processing.

Links to third party websites are clearly marked. Winerz is in no way responsible for the content of these sites, their general conditions and privacy policy, and can in no way be considered as endorsing their content and contractual provisions. The User agrees to review the terms and conditions and privacy policies of such third party websites.

#### Art 11. Notification of violations of Personal Data

Winerz undertakes to notify the User, as soon as possible after becoming aware of it, of any breach of security of Personal Data resulting in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to Personal Data transmitted, stored or otherwise processed, as well as the measures taken by Winerz in order to remedy the incident, to mitigate its negative consequences and to prevent the occurrence of a similar incident in the future.

#### Art 12. Documentation

Winerz declares that it has a register listing all categories of Processing activities carried out under the General Conditions including:

- the identification of the Data Controller and his contact details,
- all the Processing carried out within the framework of the General Conditions and for the purposes described in Article 6,
- the technical and organisational security measures detailed in Article 10.

Winerz provides the User with the necessary documentation showing compliance with the obligations of the Policy.

#### Art 13. Transfer

Winerz may be required to transfer User Data for the strict needs of the execution of the Conditions, subject to informing the User in advance. In all cases, Winerz shall refrain from transferring User Data, without putting in place the appropriate tools for the supervision of these transfers in application of article 46 of the RGPD, outside :

- the European Union, or
- the European Economic Area, or
- countries recognized as having an adequate level of security by the European Commission, including companies established in the United States of America certified "Privacy Shield".

## Art 14. Cookies

### **14.1 Purpose**

Winerz may deposit, collect and process Cookies on the User's terminal when the User connects and navigates on the Website.

Cookies only store the identification code to the exclusion of any other Personal Data of the User. Thus, the deposit of Cookies carried out within the framework of the use of the Website does not make it possible to identify the User personally but records information relating to the browsing of his terminal on the Website that Winerz can process during the User's subsequent visits to the Website.

### **14.2. Consent**

For technical or functional Cookies, an information banner is displayed when the User first connects to the Website in order to inform him or her, prior to the deposit of these Cookies

- of their presence and their precise purpose,
- of the possibility, if necessary, to oppose their deposit on their terminal and to change the parameters by clicking on a link present in the banner, and
- that the continuation of the browsing implies consent to the deposit of Cookies on their terminal.

The User gives his consent by checking the accept button on the "Cookies" banner when browsing the Website.

The User may withdraw his consent at any time and oppose the use of Cookies by setting his Internet browser. However, the User is advised that his refusal to deposit Cookies is likely to hinder navigation on the Website.

### **14.3. Purpose**

The collection and Processing of Cookies allows Winerz :

- to record all information relating to its navigation on the Website, i.e. all information relating to the pages consulted and the dates and times of consultation of the Website,
- to establish statistics and volumes of visits and use of the Website, in order to improve its interest and ergonomics,

- to recognize the browser of any User as a former registered visitor, in order to remember its use on the Website,
- to adapt the presentation of the Platform and/or the Website to the display preferences of the User's terminal (in particular the language used, the display resolution and the operating system used) when they visit the Website.

#### **14.4. The duration of the conservation of Cookies**

The retention of Cookies shall not exceed twelve (12) months from their first deposit in the User's terminal.

#### **14.5. Type of Cookies**

##### **Technical cookies**

The exclusive purpose is to allow or facilitate navigation

- Cookies to identify the User when accessing the Website.
- Authentication cookies, which identify the User once he/she has logged in to his/her account on the Platform, and this, for the duration of a session (allowing participation in tournaments, wagering on the various tournaments, withdrawal of prize pools).
- Security cookies, used to detect authentication abuse.
- Media player cookies, used to store technical data to play video or audio content, for the duration of a session.
- User interface personalization cookies, used to store User preferences, such as language settings or font preferences, for the duration of a session, or for the duration of the User's account.
- Content sharing plug-in, allowing the sharing of content

##### **Functional cookies**

Are not strictly necessary to benefit from the Services, the Platform and/or the Website, even if recommended to access the full range of Services and improve the User experience.

- Preference cookies that avoid the User having to enter certain information each time he/she accesses the Website and/or the Platform.
- Statistical cookies allow Winerz to improve its Services. They store information about Users (in particular, first and last visits to the Website, first connection to the Platform, frequency of use of the Website and its Services and connection times, the way in which the User became aware of the Website).
- Marketing cookies keep track of the User's browsing habits allowing Winerz to provide Services that may be of interest to the User.

### **Technical cookies**

between members connected to a social network

### **Functional cookies**

## **14.6. Setting of Cookies**

The User is informed that the setting of cookies varies according to the browser.

As an indication, the User can follow the following procedures:

- **Mozilla Firefox**

In the Mozilla Firefox menu, the User:

- selects the "Content Blocking" button, then the "Privacy and Security" option.
- Unchecks the "Standard" option,
- Choose the "Custom" option, and check the "Cookies" box,
- Select the desired option from the drop-down menu. The "Third Party Trackers" option blocks all cookies, the "Custom" option allows you to block specific sites.

The link below indicates the steps to follow:

<https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences>

- **Internet Explorer**

In the Internet Explorer menu, the User :

- opens the Internet Options menu,
- opens the Privacy tab, chooses between the different levels of settings offered, specifically sets certain sites. For example, to block the Website's Cookies, the User will have to:
  - enter the link [www.Winerz.com](http://www.Winerz.com), and
  - click on Refuse.

The link below indicates the manipulations to follow:

<https://support.microsoft.com/fr-fr/help/4027947/windows-delete-cookies>

- **Google Chrome**

In the Chrome menu, the User:

- selects the "Preferences" tab,
  - select the "Settings" tab,
  - Check the "Advanced Settings" box at the bottom of the page,
  - select the "Privacy" box in the menu, then "Website settings", then "Cookies and website data",
  - several options are offered to the User.
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- the option "Block third-party cookies - Prevent third-party websites from recording and reading cookie data". In this case, the Cookies of all visited sites are blocked and the local data are kept until the User leaves his browsing session.
  - the option "Allow sites to save and read cookie data (recommended)".
- 
- the User can specifically parameterize certain sites.

For example, the User shall:

- Add on the tab "Block" Cookies of the site the link [www.Winerz.com](http://www.Winerz.com),
- click on the "Add" button.

The following link shows the steps to follow:

<https://support.google.com/chrome/answer/95647?hl=fr>.

## Art 15. Contact

The User can exercise his rights at any time. To do so, the User will have to send a registered letter with acknowledgement of receipt, enclosing a copy of his identity card to the head office of Alpha Wolf Gaming OÜ, Harju maakond, Tallinn, Kesklinna linnaosa, Sakala tn 10, 10141 or by e-mail to the following address [admin@winerz.com](mailto:admin@winerz.com), for any question relating to the use of the User Data made by Winerz within the framework of the General Conditions, or, to exercise his rights indicated in Article 9 of the Policy.

## Article 16. Modification of the privacy policy

Winerz reserves the right to make any changes to the Policy, which will then be posted on the Website and/or notified directly by e-mail to the User. In the event that the new stipulations do not suit the User, the User must cease to use the Website's Services without delay.