

Privacy Notice

1. General Information

- 1.1. We, BM Baltics Ltd ('Betmaster' or 'Company' or 'We' or 'Us'), is committed to protecting your personal data ('Your Personal Data'), as our customer or a user of our website ('You' or 'Customer' or 'User').
- 1.2. This privacy notice ('Privacy Notice') describes the way in which Betmaster collects, processes, uses, stores and protects Your Personal Data and informs You, as a data subject, of the rights You have with respect to the processing of Your Personal Data. This Privacy Notice is intended to provide You with information on how We collect and process Your Personal Data through or in connection with Your use of this Website and our Services.
- 1.3. In collecting and processing Your Personal Data, Betmaster complies with the Laws of Malta and will process Your Personal Data in accordance with EU General Data Protection Regulation (the 'GDPR').
- 1.4. Any terms or conditions that are not defined in this Privacy Notice shall follow the definitions in accordance with Company's General Terms and Conditions.
- 1.5. By visiting our Website and using our Services, You acknowledge reading and fully considering this Privacy Notice.

2. Data Controller

- 2.1. The **data controller** of Your Personal Data is **BM Baltics Ltd**, a Maltese Company with Maltese registration number C 98652 and Estonian registration number 65559453, having its registered address at The Edge Court, Office 2, Guze Duca Street, Hal Qormi QRM 9088, Malta.

3. Data Protection Officer

- 3.1. For any privacy issues or for further information on how Betmaster uses Your Personal Data please contact our Data Protection Officer through the following email address: dpo@betmaster.ee
- 3.2. Any notice, demand, request or other communication which You address to Betmaster shall either be sent by certified mail, return receipt requested, or by e-mail. All communication done by e-mail shall be deemed received on the business day following the day of transmission.

4. Definitions

- 4.1. **Account** means an account provided to You by Betmaster upon Your registration and acceptance of the General Terms and Conditions for use of the Services.
- 4.2. **Consent** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her;
- 4.3. **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data;
- 4.4. **GDPR** – the General Data Protection Regulation (EU) 2016/679, of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC, as amended, replaced or superseded and in force from time to time.
- 4.5. **Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online

identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- 4.6. **Processing** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 4.7. **Processor** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the controller;
- 4.8. **Recipient** means a natural or legal person, public authority, agency or another body, to which the Personal Data are disclosed, whether a third party or not. Public authorities which may receive Personal Data in the framework of a particular inquiry in accordance with law shall not be regarded as recipients;
- 4.9. **Services** – the Services provided by Betmaster through the Website.
- 4.10. **Third party** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process Personal Data;
- 4.11. **Website** means a group of interrelated websites owned and operated by BM Baltics Ltd, available in the Internet via address: www.betmaster.ee
- 4.12. **User** – any person who registers an Account or accesses and browses the Website ('You', 'Your').

5. Principles of Personal Data Processing

- 5.1. We fully respect Your fundamental rights and consider protection of Your Personal Data to be a priority. Accordingly, when processing Your Personal Data, We follow the following basic principles:
 - 5.1.1. We submit Your Personal Data only to lawful and fair processing, and We maintain full transparency vis-à-vis the way We handle Your Personal Data.
 - 5.1.2. We collect and process Your Personal Data only for specified, explicit, and legitimate purposes as outlined in this Privacy Notice, and We do not process it further in any manner incompatible with these purposes.
 - 5.1.3. We process Your Personal Data only to the extent that it is necessary and appropriate to the purposes for which it is collected.
 - 5.1.4. We make reasonable efforts to ensure that Your Personal Data is accurate and, where necessary, updated with regard to the purposes of the processing, taking all reasonable steps to immediately delete or correct it in case of inaccuracy.
 - 5.1.5. We process Your Personal Data in a manner that guarantees its security by using appropriate technical and organizational measures.
- 5.2. In general, We comply with all applicable laws statutory obligations, as Data Controller of Your Personal Data.

6. Type of Processed Personal Data

Betmaster processes the following Personal Data:

6.1. Personal Data Processed when Visiting the Website

During the visit of the Website www.betmaster.ee our system automatically processes information which is generated by the browser of the visitor of our Website and stores them in log files on a temporary basis including but not limited to:

- the IP address of the requesting computer;
- the date and the time;
- the operating system
- the browser used by the User.

The log files may contain IP addresses which allow identification of the User.

6.2. Personal Data Processed Upon Registration

- first name and last name
- gender
- date of birth
- verifiable email address
- username and password
- national identification number

Customers may be requested at any given time and in line with applicable laws and regulations to submit further documents to verify their identity and to enable security identity checks.

Customers will be identified when registering by electronic means but may be asked to - at any time and in accordance with applicable laws and regulations, in particular with regard to money laundering and terrorist financing - submit additional documents to verify their identity and to enable identity checks, such as a copy or a valid ID card, e.g. passport, ID document, driving licence, invoice for public services (e.g. electricity or rental agreement).

After registration, Customers can change their Personal Data at any time by contacting our customer support (with certain exceptions such as first name, last name, date of birth). Each Customer must ensure to keep their Personal Data updated, without delay, when the Personal Data that has been provided to Betmaster is no longer accurate or incomplete.

Betmaster may also process Personal Data from third party databases.

Processing of such Personal Data is required by the Gambling Act for us to be able to provide our Service to You. Control of the Customers' age and identity are necessary to fulfil our legal obligations. It may also be necessary for Us to be able to fulfil and execute our agreements and is therefore in our legitimate interest.

Betmaster will also review and analyse data from any established User profile and each Customer gambling behaviour to enable the implementation of responsible gambling measures when self-excluding Customers, to not send commercial messages directly to self-excluded Customers and to handle Personal Data / information received from the national self-exclusion scheme.

Processing in accordance with the above is necessary for the performance of the Services provided by Betmaster, for compliance with legal obligations and is also necessary for the purposes of the legitimate interest pursued by Betmaster.

6.3. Personal Data Processed for Payment Services

6.3.1. Data Processed for Deposits Made with Debit Cards and Withdrawals

If Customer deposits funds into the Account by debit card or wishes to withdraw funds from the Account, the following Personal Data is required solely for data processing purposes:

- first name and last name of cardholder;
- card number;
- expiry date of the card;
- CVC code (only for deposits), which is deleted immediately after the processing operation.

Additionally, the following Personal Data will be processed for internal records:

- first name and last name of the cardholder;
- expiry date of the card;
- card number (excluding digits 9 to 12).

Some payment service providers may request additional Personal Data that is necessary for use of their services. This Personal Data may include:

- billing address;
- email address;
- phone number;
- internal User ID.

6.3.2. Data Processed for Withdrawals Made Through a Bank Account

For withdrawals from the Account into the Customer's bank account, particularly the following Personal Data has to be processed:

- name and surname of the bank account holder;

- IBAN of the bank account holder.

6.4. Personal Data Processed Throughout the Use of Betmaster Services

When Customer utilizes Betmaster Services, Betmaster processes the time and date of entering and exiting the personal account of the Customer, the record of bets made, payments transferred to the personal account, refunds made and the winnings collected.

6.5. Additional Personal Data Processed When Using Betmaster Services

Betmaster processes information that is collected by cookies, log files, clear gifs, and/or by third parties' support in order to create User profiles. A profile contains information on individual Users including preferences concerning the activities of the User. This information is related to the Users' personal and identifiable data and used to provide and improve our Services to the benefit of the User. Profiles are also used to design each User's experience on the Betmaster Website individually and to provide specific marketing information. Betmaster processes information to prevent cheating, fraud and other criminal activities. The processing of data for these purposes is necessary for Betmaster to comply with legal obligations.

6.6. Any Other Personal Data Directly Provided by You During Your Interaction with Us.

Betmaster applies the principle of minimization to limit the amount of Personal Data that is processed by Betmaster. However, if You provide any other Personal Data / information during Your communication with Betmaster via e-mail or Intercom (on-site customer support service platform), that Personal Data / information will be processed for the applicable retention period.

7. Purposes and Legal Basis for Personal Data Processing

7.1. Betmaster may process Your Personal Data to fulfill its obligations under the General Terms and Conditions and to comply with its legal obligations, for the following purposes:

- Administration and development of the Website and the Services;
- Enabling processing of payments at the Website;
- Enhancement of user experience, including the provision of personalized Services and improvement of the Website and the Services;
- Development of new products, utilities and offerings;
- Detection, investigation and prevention of fraudulent transactions and other illegal activities and protection of Your rights and rights of the Company;
- Collection, processing and performing statistical and other research and analysis of information for enhancement of the Website and the Services;
- Verifying compliance with the General Terms and Conditions.

7.2. Betmaster may process Your Personal Data only with Your lawful Consent for the following purposes:

- For the purposes of commercial communication, marketing and advertising of our Services or third-party Services via SMS, telephone, e-mail, internet, fax, mail, social media and / or any other appropriate communication channels.
- For personified market research and/or analysis purposes to better understand Your needs, preferences, interests, experiences and / or habits as a consumer.

7.3. You have the right to withdraw Your Consent at any time in writing to dpo@betmaster.ee. Withdrawal of Your Consent does not affect the lawfulness of the treatment of Your data prior to its revocation.

8. Recipients of Your Personal Data

8.1. For the execution of the purposes mentioned in this Privacy Notice, We may provide access or transmit Your Personal Data to the following recipients:

8.1.1. Sharing of Personal Data Within the Betmaster Group

Personal Data may be transferred or disclosed to any company within the Betmaster Group. Betmaster Group means BM Baltics Ltd and its related companies.

8.1.2. Sharing of Personal Data with Service Providers

Betmaster may share Personal Data with other third party service providers, when You request a service, which Betmaster offers partly or fully through the third party provider, such as casino games, virtual sports or eSports. For these products provided via the game provider websites' additional provisions may apply. The service providers includes:

- Our internet and data hosting providers for hosting purposes;
- Third-party providers for the smooth operation of Website and Our information and communication systems; and
- Third-party consultants to provide data analysis Services and Know-Your-Customer procedures.

Betmaster also makes use of trusted third parties to process Users' Personal Data including but not limited to payment services, information technology, statistics and reporting, customer support, sales, marketing related services. Pursuant to applicable data protection regulations including the General Data Protection Regulation these third parties are contractually bound to Betmaster and obliged to treat Users' data securely and confidentially. Their use of the said data is restricted to the extent required to fulfill the respective task. Betmaster only transfers data to states outside the EU/European Economic Area ('EEA') provided that the recipient guarantees a standard of data protection comparable to that in place in the EU/EEA.

8.1.3. Sharing of Personal Data for KYC, the Prevention of Fraud and Money Laundering

Betmaster may transmit Your Personal Data with third-party consultants to provide data analysis services and Know-Your-Customer procedures, in order to complete Your identity verification, to carry out security checks, to assess Users' compliance with our General Terms and Conditions and legal obligations including the prevention of money laundering, the financing of terrorism and the protection of minors, User Personal Data may be compared against third party databases.

8.1.3.1. Sharing of Personal Data with **Sumsub**, a company responsible for Know-Your-Customer procedure, including user verification, AML screening and liveness check. Sumsub (Sumsub LTD, with company registration number: HE 405087) has its head office in Cyprus at Agiou Andreou 153, Limassol 3036, Cyprus and is in full compliance with the GDPR.

When registering with Betmaster, We will require You to complete a verification procedure through Sumsub. During this verification procedure Sumsub will process the following Personal Data:

- Full name (including middle name, if applicable);
- Date of birth;
- Full address;
- Identification document issued by a governmental authority;
- Facial features captured during a 'liveness check' for identity verification purposes.

For clarity purposes, We share a minimal amount of Personal Data with Sumsub who then verify the provided Personal Data across their verification list to ensure that no high-risk individual is able to register with Betmaster without Betmaster's knowledge. Sumsub performs the 'liveness check' and retains the images captured during this process, as well as photos of identification documents, on their secure systems. Betmaster does not receive or store the actual photos taken during the 'liveness check' or the original image files of Your identification documents from Sumsub. Instead, Sumsub digitizes the relevant information from Your identification documents (such as document number, expiry date, and other textual data) and provides this information to Betmaster in a text format. Sumsub also provides Betmaster with the outcome of the 'liveness check' (e.g., pass/fail), but not the biometric data or images themselves. Betmaster applies its own retention periods to the Personal Data provided by Sumsub in text format. For the applicable retention periods, see Section 9. Sumsub applies, by analogy, identical retention periods, however, in some instances, Sumsub may retain Personal Data for different periods of time. Information on Sumsub's retention periods can be found [here](#).

8.1.4. Sharing of Personal Data with Regulatory and Enforcement Authorities

If we are under a duty to disclose or share Your Personal Data to comply with our legal obligations, Betmaster may transfer Your Personal Data to regulatory and enforcement authorities within the EU/EEA.

8.1.5. Sharing of Personal Data for Other Purposes

It may be necessary to share Personal Data for additional business purposes, such as to process transactions, maintain accounts, and report to credit bureaus. However, Betmaster will only disclose Personal Data if securely kept and processed by the partners on the basis of non-disclosure agreement and the same level of data protection provided under this Privacy Notice.

8.1.6. Sharing of Personal Data for the Purpose of User Communication via Online Chat

Betmaster uses Intercom R&D Unlimited Company, an Irish company with office at 124 St Stephen's Green, Dublin 2, DC02 C628, Republic of Ireland (company registration number: 538158). Intercom enables Live Chat and similar functionalities on the Website. For more information on how Intercom deals with Personal Data see Intercom's [Data Processing Addendum](#) and [Privacy Notice](#). Intercom is in full compliance with the GDPR. We use Intercom for the purpose of providing our Users with the best possible consulting and support experience on the Website. For reasons arising from Your particular situation, You have the right at any time to object to this processing of Your Personal Data. If You object to the processing, request a copy of Your data, correct, or delete it, please contact Us at dpo@betmaster.ee.

8.1.7. Sharing of Personal Data for the Purpose of Use of Google Place Autocomplete Data API

Betmaster uses Google LLC, a company registered at 1600 Amphitheatre Parkway, Mountain View, California 94043, USA to enhance Your registration experience by enabling the use of the autocomplete function for inputting of the address during registration, as provided by Google LLC. By using this feature, certain Personal Data will be processed by Google LLC. For more details on how Google handles Your Personal Data, please refer to [Google's Privacy Policy](#). Use of this autocomplete service is also subject to Google's [Terms and Conditions](#) (for Google Maps API).

- 8.2. The processing of Your Personal Data by our data Processors is done under a contract compelling data Processors to the same level of data protection provided under this Privacy Notice.
- 8.3. Betmaster will only transfer Your Personal Data to any third parties outside of the EU/EEA provided the recipient guarantees a standard of data protection comparable to European standards. We will take all reasonable steps possible to ensure that Your data is treated as securely as it is within the European Union and in accordance with this Privacy Notice and applicable legislation.
- 8.4. In the event that We are required by a court or other administrative authority, pursuant to an investigation relating to unlawful activities such as money laundering and in any other case that We are legally bound to do so, the Company may transfer Your Personal Data to public authorities to the extent specified by law.

9. Retention of Your Personal Data

- 9.1. Your Personal Data is retained until the purposes of the processing have been fulfilled or until the obligations arising from the legislation have been fulfilled.
- 9.2. In accordance with the legislation, Betmaster must retain registration, identification, AML and gaming data for at least 5 years after Your last login. Generally, after 5 years, Your Personal Data will be deleted, but the non-personalised data will remain.
- 9.3. Furthermore, Betmaster may retain Your Personal Data after the expiration of the five-year period from the last login if Betmaster has found that it has a legitimate interest in retaining all or part of Your Personal Data. In this case Betmaster will not retain the relevant Personal Data for longer than Betmaster needs to fulfill its legitimate purposes.
- 9.4. For more information about data retention terms in relation to specific Personal Data, please contact Us at dpo@betmaster.ee

10. Personal Data Security and Confidentiality

- 10.1. All data will be processed in an automated manner. Betmaster takes all adequate technical and organizational measures to protect Users' data from access by unauthorized persons and to prevent accidental or unlawful processing, disclosure, destruction, loss, alteration or damage. In particular payment information will always be encrypted when data is being processed.

10.2. The processing of Your Personal Data by Betmaster is conducted in a manner that ensures confidentiality and security, taking into account the latest developments, implementation costs and the nature, scope, context and purposes of the processing, as well as the risks for Your rights and freedoms, which are applicable in each circumstance.

10.3. Only authorized employees or service providers of Betmaster have access to Your Personal Data. Betmaster monitors the trustworthiness and reliability of all of its employees and service providers. At regular intervals, all employees are given training on the applicable security and data protection standards.

11. Your Rights

11.1. You have the right:

- To request access to Your Personal Data and information related to their processing and obtain a copy thereof.
- To request for the correction of any inaccuracies or any missing Personal Data of Yours.
- To withdraw Your Consent to the processing of Your Personal Data at any time where the processing is based on Your Consent to use or process such data.
- To request for the erasure of Your Personal Data.
- To request for the transfer of Your Personal Data to another Data Controller or directly to You in a structured, commonly used and machine-readable format.
- To request for the restriction of the processing of Your Personal Data in cases explicitly provided for by law.
- To object to the processing of Your Personal Data in cases explicitly provided for by law.
- To object to a decision taken solely on the basis of automated processing, including profiling, which has impact on You or significantly affects You.

11.2. Any requests related to Your Personal Data or to Your rights mentioned above must be addressed in writing to dpo@betmaster.ee

12. Profiling and Automated Decision-making

Profiling and automated decision-making is utilized by Betmaster in order to decide if an Account may be opened, subject to reaching the relevant legal age to use the Services provided by Betmaster and having no gambling restrictions (games of chance and/or toto).

13. Filing a Complaint

If You feel that Your rights are infringed, You have the right to file a complaint with the Maltese Office of the Information and Data Protection Commissioner at the following website <https://idpc.org.mt/file-a-complaint/>

14. Your Obligations

14.1. By using our Website and by providing Your Personal Data, You acknowledge that You are required to provide Your actual, accurate and complete data as requested by the Company. Furthermore, You must inform Us of any changes to Your information so as to ensure it is kept up-to-date and accurate.

14.2. Website and any products or Services available on Website are not intended to solicit information of any kind from persons under 18 years of age. By using our Website and by providing Your Personal Data, You confirm that You are at least 18 years old.

14.3. If You are found to be in breach of Your obligations or if We have reasonable suspicion that the information You provide is false or incomplete or in any way contrary to applicable law or this Privacy Notice, We retain the right to reject Your application for registration or to suspend or terminate Your Account immediately without notice. In this case, You have no right to any compensation due to the rejection of Your application, or the suspension or termination of Your Account.

15. Cookies

15.1. Our Website uses cookies. For more information please review our Cookie Notice available on our Website.

16. Amendments to this Privacy Notice

16.1. This Privacy Notice is subject to change from time to time. Any changes thereof shall come in force and effect from the instance they appear online on the Website. Although any substantial modifications to this Privacy Notice will be communicated to You, it is recommended to review this Privacy Notice and potential amendments regularly.