

Agreegain Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, (“Our Sites”) or uses our Services. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

This Privacy Policy is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services.

You may contact us if you have additional questions or require more information about our privacy policy or ways to exercise any of your privacy related rights.

Data Controller Details

Agreegain Limited
Isle of Man Business Park, Douglas,
Isle of Man, IM2 2QZ

WHO WE ARE AND WHAT WE DO

Agreegain is a technology company, operating primarily in the igaming industry, offering software via a software-as-a-service (SaaS) model to Business-to-Customer (B2C) operators.

DEFINITIONS

In this policy the following terms shall have the following meanings:

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, identification number, location data, an online identifier;

Processing, processes, process: either any activity that involves the use of Personal Data or as the Data Protection Legislation may otherwise define processing, processes or process. It includes 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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller and Processor: as defined in the Data Protection Legislation.

Data Protection Legislation: means EU Data Protection Laws and, to the extent applicable, the data protection or privacy laws of any other country;

"EU Data Protection Laws" means EU Directive 95/46/EC, as transposed into domestic legislation of each Member State and as amended, replaced or superseded from time to time, including by the GDPR and laws implementing or supplementing the GDPR;

"GDPR" means EU General Data Protection Regulation 2016/679;

"Cookie" means a small text file placed on your device by our site when you visit our site or use certain features of our services;

INFORMATION WE COLLECT

We collect and process your personal details for a range of legitimate purposes as defined by the data protection legislation. These include:

Information collected from the website contact form:

- Identification data: first name, last name, or similar identifiers.
- Contact Information: email and mobile phone number provided by you on a voluntary basis.
- Message data: any information you provide in the relevant field of the contact form.
- Cookie data
- Marketing and Communications Data: your preferences regarding receiving marketing materials from us and our third parties, your communication preferences, and any correspondence we had with you.

We do not collect any special categories of sensitive data, which may include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership.

The information we collect from users will depend on their particular interaction with a website. For example, the information we collect from users who solely navigate the website will differ from users who create an account profile or transact for services through the website. Different portions of this privacy policy may apply to users at different times. When you register for an account we may ask for your contact information, such as Name and Surname, Company information, Address, email address and telephone number. The personal information that you are asked to provide and the reasons why we collect it will be described in our service agreement.

DESCRIPTION OF PROCESSING

We use information we collect in various ways including:

- Improve personalised and expand their website
- Understand and analyse how you use a website
- Develop new products, services and features
- Provide you with information products or services that you request from us or which we feel may interest you where you have consented to be contacted for such purposes
- To improve the functionality of our site and/or diagnose problems with our servers

- To comply with any regulatory or legal obligation.
- Marketing purposes

HOW AND WHERE DO WE STORE OR TRANSFER YOUR PERSONAL DATA?

We will store and process your data following industry best practice and security. Some of that processing takes place at our offices in Malta and Greece as well as our hosting providers in Amsterdam or Google Cloud. In general we undertake measures in order to process data within the EU and the EEA. Agreegain may need to transfer your data to third countries deemed by the European Union as having adequate safeguards for protecting personal data.

When your personal data is shared with a third party, we will take the necessary steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law. We ensure that our contracts with those third parties contain the appropriate GDPR model clauses and that all our third parties are also compliant with the GDPR, such that your data is protected away from our organisation, as it does within it.

In some limited circumstances, we may be legally required to share certain personal data, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

The data we collect through our services may be processed by one or more of the following:

- Trusted service providers such as technology, support, marketing, and sales service providers or CRM tools
- Parents or Subsidiary companies of Agreegain
- Software companies engaged by Agreegain in order to optimise and facilitate the recruiting process.
- Individuals within the marketing and sales team at Agreegain in order to be provided with relevant marketing communications you may have subscribed for or consented to as applicable.

TECHNICAL MEASURES IN ORDER TO PROTECT YOUR DATA

The security of your personal data is essential to us, and to protect your data, we take several technical security measures, including but not limited to:

- access control procedures to limit access to your personal data to those employees, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- implementing technical security measures, such as the use of firewalls with strong access control sets, encryption of sensitive information, secure coding, secure password enforcement, and endpoint protection;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data)

including notifying you and/or the Supervisory Authority where we are legally required to do so;

- penetration testing and vulnerability assessments

Agreegain has implemented an Information Security Management System based on the ISO27001 standard and maintains appropriate administrative, technical and physical security measures to protect your Personal Data.

OVERSEAS TRANSFER OF YOUR INFORMATION

By using our site or entering into a contract with us for the provision of services, we may need to transfer data (including your personal data) to other companies in our company group. If any data is transferred outside of the EEA, we will ensure a protection of your data to the standard required within the EEA and we will take all reasonable steps to ensure that adequate measures are in place to keep your personal data as secure as it is within the EEA and in accordance with this Privacy Policy.

DATA RETENTION

Agreegain retains your personal data, as necessary, for the duration of the relevant business relationship. We may also retain personal data for longer than the duration of the business relationship should we retain it to protect ourselves against legal claims, use it for analysis or historical record keeping or comply with our information management policies and schedules.

YOUR RIGHTS

We take reasonable steps that are designed to keep your personal data accurate, complete, and up-to-date for the purposes for which it is collected and used. We also have implemented measures that are designed to help ensure that our processing of your personal data complies with this Privacy Notice and applicable law.

In accordance with applicable law, you may have one or more of the following rights:

- a right to request a copy of the personal data that we hold about you and details of how we use that information;
- a right to amend or rectify your personal data if any of the information held about you is incorrect or out of date;
- a right to portability of your personal data;
- a right to request erasure of your personal data;
- a right to demand that we cease the processing of your personal data or that we restrict the processing of your personal data;
- a right to withdraw your consent to the processing of your personal data, to the extent our processing relies on your consent as the lawful basis for processing. This right may not apply if there are other legal justifications to continue processing or we need to retain certain personal data where required or permitted under applicable law; and/or
- a right to provide us with instructions as to the processing of your personal data in case of death.

In addition, and where granted by applicable law, you may have the right to lodge a complaint with a competent data protection authority.

If you would like to make a request to access, review, correct, delete or port the personal data we have collected about you, to assert a right with regard to your personal data, or to discuss how we process your personal data, please contact us at :

dataprotection@altenar.com

If you are unable to access this form for any reason, you may contact us using the information at the end of this Privacy Notice.

AMENDMENTS TO THIS PRIVACY POLICY

This Privacy Policy enters into force beginning the date of its issuance. In case it is necessary to comply with new requirements composed by applicable laws or technical requirements we reserve the right to amend the current Privacy Policy. The most up-to-date version of this privacy policy will be published on the website, and any changes will take effect upon being posted on the website or as designated by us.