

PRIVACY NOTICE

1. General Information

- 1.1. We, BM Solutions Ltd (Betfree' 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 Betfree 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.
- 1.3. In collecting and processing Your Personal Data, Betfree complies with the Laws of Malta and will process Your Personal Data in accordance with EU General Data Protection Regulation (the 'GDPR').
- 1.4. 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 Solutions Ltd**, a Maltese Company with registration number C95857 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 Betfree uses Your Personal Data please contact our Data Protection Officer through the following email address: support@betfree.io
- 3.2. Any notice, demand, request or other communication which You address to Betfree 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 Betfree upon Your registration and acceptance of the 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 Betfree 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 Solutions Ltd, available on the Internet via address: www.Betfree.io

4.12. **User** – any person who registers an Account or accesses and browses the Website ('You', 'Your').

5. Principles of 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 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 Personal Data Collected

Betfree collects and process the following Personal Data

6.1. Data Collected when visiting the Website

During the visit of the website www.Betfree.io our system automatically collects 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 player.

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

6.2. Data Collected upon Registration

- first name and last name
- gender
- complete mailing address
- date of birth
- verifiable email address
- mobile phone number
- username and password
- scanned copy of a valid passport or ID card

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.

6.3. Data collected for Payment Services

If Customer deposits funds into the Betfree account by credit card, the processing of particularly the following additional personal data is required:

- first name and last name of cardholder
- name of credit card company
- credit card number
- expiry date of credit card, CVC code and password

For a withdrawals or transfer of winnings into the Customer bank account, particularly the following personal data has to be collected:

- name and surname of account holder
- name of bank
- IBAN
- SWIFT code

6.4. Additional Data collected when using Betfree Services

Betfree processes information that is collected by cookies, log files, clear gifs, and/or by third parties' support in order to create player profiles. A profile contains information on individual players including preferences concerning the activities of the player. This information is related to the players' personal and identifiable data and used to provide and improve our services to the benefit of the player. Profiles are also used to design each player's experience on the Betfree website individually and to provide specific marketing information.

6.5. Any other Personal Data directly provided by You during Your interaction with Us.

7. Purposes and Legal Basis for Data Processing

7.1. Betfree may process Your Personal Data to fulfill its obligations under the 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 Terms of Use of the Website.

7.2. Betfree 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 support@Betfree.io. 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 Betfree Group

Personal data may be transferred or disclosed to any company within the Betfree Group. Betfree Group means BM Solutions Ltd and its related companies.

- 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.

8.1.2. Sharing of personal data with Service Providers

Betfree may share personal data with other third party service providers, when players request a service, which Betfree 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.

Betfree makes also use of trusted third parties to process players' 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 Betfree and obliged to treat players' data securely and confidentially. Their use of the said data is restricted to the extent required to fulfil the respective task. Betfree only transfers data to states outside the EU/European Economic Area provided that the recipient guarantees a standard of data protection comparable to that in place in Europe.

8.1.3. Sharing of personal data for KYC, the Prevention of Fraud and Money Laundering

Betfree 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 players' compliance with our Terms and Conditions and legal obligations including the prevention of money laundering, the financing of terrorism and the protection of minors, player data may be matched against third party databases.

8.1.4. Sharing of 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, Betfree 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, report to credit bureaus. However, Betfree 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.

- 8.2. 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. Betfree 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. We retain Your Personal Data for as long as is necessary to fulfill the relevant purposes of processing explained in this Notice, in accordance with the Data Minimisation and Storage Limitation principles.
- 9.2. Furthermore, Betfree may retain Your Personal Data after the expiration of the relevant processing purposes for the following reasons:
 - In case We have a legal obligation to retain Your Personal Data under a relevant statutory provision.
 - Based on Our legitimate interest to defend the Company against any potential legal claims, before any competent court or public authority.
- 9.3. After the period of retention, Your Personal Data is erased from Our databases and systems.
- 9.4. For more information about data retention terms in relation to specific Personal Data, please contact Us at support@Betfree.io

10. Data Security and Confidentiality

- 10.1. All data will be processed in an automated manner. Betfree takes all adequate technical and organizational measures to protect players' 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 Betfree 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 Betfree have access to Your Personal Data. Betfree 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 You 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 to the above Section 9.1 must be addressed in writing to support@Betfree.io

12. Filing a Complaint

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

13. Your Obligations

14. 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.

14.1. 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 or any other age of legal majority existing in the jurisdiction of the User. By using Our Website and by providing Your Personal Data, You confirm that you are at least 18 years old.

14.2. 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.

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