PRIVACY POLICY

1. General Information

- 1.1. This Privacy Policy by BM Solutions GB Ltd ('Betmaster' or 'Company' or 'We' or 'Us') relates to the provision of the Services of Betmaster provided via <u>www.betmaster.uk</u>, <u>www.betmaster.co.uk</u>, and any related software applications ("Site", "Website"), where Personal Data is processed relating to You ('You' or 'Customer' or 'User').
- 1.2. This Website is owned and operated by BM Solutions GB Ltd, a company registered in Malta with registration number C98650 having its registered address at The Edge Court, Office 2, Guze Duca Street, QORMI QRM 9088, MALTA and has Gambling Commission licences with licence no.000-065699-R-339929-001. Customers or Users who gamble in the UK are regulated in accordance with the UK Gambling Act (2005).
- 1.3. This Privacy Policy ('Privacy Policy') 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
- 1.4. In collecting and processing Your Personal Data, Betmaster complies with the Laws of the United Kingdom and will process Your Personal Data in accordance with The Data Protection Act 2018 (the 'DPA').
- 1.5. 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.
- 1.6. By visiting our Website and using our Services, You acknowledge reading and fully considering this Privacy Policy.

2. Data Controller

2.1. The **data controller** of Your Personal Data is **BM Solutions GB Ltd**, a Maltese Company with registration number C98650 having its registered address at The Edge Court, Office 2, Guze Duca Street, Hal Qormi QRM 9088, Malta.

3. Data Protection Officer

- 3.1. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Notice, including any requests to exercise rights please contact Us or the DPO using the details set out below.
- 3.2. For any privacy issues or for further information on how Betmaster uses Your Personal Data please contact our DPO through the following email address: <u>dpo@betmaster.co.uk</u>.
- 3.3. Any notice, demand, request or other communication which You address to Betmaster shall either be sent by certified mail, return receipt requested, or by email. All communication done by email 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. DPA means the Data Protection Act 2018, which is the UK's implementation of the General Data Protection Regulation (EU) 2016/679. The Act controls how personal information is used by organisations, businesses, or the government, ensuring the protection of natural persons with regard to the processing of Personal Data and the free movement of such data. It came into force on 25 May 2018, repealing the Data Protection Act 1998. The Act is subject to amendments and updates in accordance with legislative changes.
- 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, organisation, 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 Solutions GB Ltd, available on the Internet via address: <u>www.betmaster.uk</u> and <u>www.betmaster.co.uk</u>
- 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 Policy, 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 organisational 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. Data Processed when visiting the Website

During the visit of the Website 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 User.

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

6.2. Data Processed upon Registration

- first name and last name
- gender
- complete mailing address
- date of birth
- verifiable email address
- mobile phone number
- password

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 information that has been provided to Betmaster is no longer accurate or incomplete.

Betmaster may also collect information from third party databases.

Collection of such Personal Data is required by the Gambling Act (2005) for us to be able to provide our Services to the Customer. 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 <u>multi operator</u> and <u>national self-exclusion schemes</u>.

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. Data Processed for Payment Services

6.3.1. Data processed for deposits and withdrawals made with debit cards

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 information will be processed and stored 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 information that is necessary for use of their services. This information 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. Additional Data Processed when using Betmaster Services

Betmaster processes information that is processed 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 User's 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 collection of data for these purposes is necessary for Betmaster to comply with legal obligations.

6.5. 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 information during Your communication with Betmaster via e-mail or CRISP (on-site customer support service platform), that information will be processed for the applicable retention period.

7. Purposes and Legal Basis for Data Processing

7.1. Betmaster may process Your Personal Data to fulfil 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 personalised 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 <u>dpo@betmaster.co.uk</u>. 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 Policy, 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 Solutions GB 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 Users 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 provider 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 DPA, and the GDPR 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 fulfil the respective task. Betmaster 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 the EU/European Economic Area.

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 User's 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 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 (Sum and Substance Ltd, with company registration number: 09688671) has its head office in the United Kingdom at 30 St. Mary Axe, London, England, EC3A 8BF and is in full compliance with the DPA and other similar data protection acts such as the GDPR.

8.1.3.1.1. 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

8.1.3.2. Sharing of Personal Data with **GBG**, a company responsible for Know-Your-Customer procedure, including verification of political exposure, existence in sanctions lists and affordability check upon reaching established thresholds. GBG (GB Group Plc, with company registration number: 02415211) has its head office located in the United Kingdom at The Foundation, Herons Way, Chester Business Park, Chester United Kingdom, CH4 9GB and is in full compliance with the DPA and similar data protection acts such as the GDPR.

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

- Full name (including middle name, if applicable)
 - Date of birth
 - Full address

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, Betmaster may transfer Your Personal Data to regulatory and enforcement authorities within the UK.

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 Policy.

8.1.6. Sharing of Personal Data for the purpose of User communication via online chat

Betmaster uses Crisp IM SARL, a company registered at 2 Boulevard de Launay, 44100 Nantes, France (registration number: 833085806). CRISP enables Live Chat and similar functionalities on the Website. For more information on how CRISP deals with data see <u>https://crisp.chat/en/privacy/</u>. CRISP is in full compliance with the European Union's GDPR and is in compliance with the DPA.

We use CRISP for the purpose of providing our customers 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 <u>dpo@betmaster.co.uk</u>.

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 <u>Google's Privacy Policy</u>. Use of this autocomplete service is also subject to <u>Google's Terms and Conditions</u> (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 Policy.
- 8.3. Betmaster will only transfer Your Personal Data to any third parties outside of the UK and the EU/EEA provided the recipient guarantees a standard of data protection comparable to UK and the EU/EEA 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 Policy 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 fulfil the relevant purposes of processing explained in this Privacy Policy, in accordance with the Data Minimisation and Storage Limitation principles.
- 9.2. Furthermore, Betmaster 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 dpo@betmaster.co.uk.

10. Data Security and Confidentiality

10.1. All data will be processed in an automated manner. Betmaster takes all adequate technical and organisational measures to protect Users' data from access by unauthorised 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 authorised 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 in the above Section 11.1 must be addressed without undue delay in writing to <u>dpo@betmaster.co.uk</u>.

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.

13. Filing a Complaint

If You feel that Your rights are infringed, You have the right to file a complaint with the UK Information Commissioner's Office (ICO) at the following website <u>https://ico.org.uk/make-a-complaint/</u>

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 Policy, 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 Policy available on our Website.

16. Amendments to this Privacy Policy

16.1. This Privacy Policy 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 Policy will be communicated to You, it is recommended to review this Privacy Policy and potential amendments regularly.

Last Update: 17 April 2025