

## Privacy Policy

Circle Three Ltd and the CircleBet group ("CircleBet", "we", "us" and "our") respect and protect the privacy of visitors to our website and mobile phone application and related services. To ensure transparency and compliance with the regulations from the General Data Protection Regulation (GDPR), this Privacy Policy describes our information handling practices when you access content we own or operate, including websites, mobile phone applications and or interacting with representatives and related services by CircleBet (referred to collectively hereinafter as "Services").

Please take a moment to read this Privacy Policy carefully. If you have any questions about this Privacy Notice, please contact [compliance@circle.bet](mailto:compliance@circle.bet).

### Your personal data

Our Privacy Policy covers all personal information that you voluntarily submit to us and that we obtain from our partners relating to our activity when interacting with our service. This Privacy Policy does not apply to anonymised data, as it cannot be used to identify you.

### Personal information collected

CircleBet collects personal information to provide you with our Services. When we require certain personal information from users it is both because we need the information to provide you with our Services and because we are required by law or controlling body to collect this information. Any personal information you provide to us that is not required is voluntary. You are free to choose whether to provide us with the types of personal information requested, but we may not be able to serve you as effectively without it.

For example, when registering to use the CircleBet service we collect personal information which is required under the law to open an account, add a payment method, or execute a transaction. We also collect personal information when you use and how you use our Services, subscribe to marketing communications, request support or complete surveys. We use this information to provide a more personalised service and to ensure that we are compliant of laws and regulations which CircleBet are obliged to follow to operate its Services.

We collect the following types of personal information:

**Personal Identification Information:** Full name, date of birth, nationality, utility bills, photographs, home address, phone number and/or email.

**Formal Identification Information:** Passport details, driver's license details, national identity card details, and/or photograph identification cards.

**Transaction Information:** Information about the transactions conducted including deposit, withdrawal and wagers, time, date, frequency, method and amount.

**Online Identifiers:** Geo location/tracking details, OS, browser name and version, and/or personal IP addresses.

**Usage Data:** Interaction with users of the Service, Circle association, ticket and wager interaction, survey responses, information provided to our support team, chat posts and user ID.

## What information we save and why

CircleBet's primary reason for collecting personal information is to provide our users with a secure, efficient and customised experience. In general, we use personal information to create, develop, operate, deliver, and improve our Services, content and advertising, and for loss prevention and anti-fraud purposes. This means that the legal basis for processing your personal data generally is the fulfilment of our contract with you or based on CircleBet's legitimate interests.

Parts of our Services are subject to laws and regulations requiring CircleBet to collect and use your personal identification information, formal identification information, transaction information, online identifiers, and/or usage data in certain ways. CircleBet must for example identify and verify customers using our Services to comply with anti-money laundering and terrorist financing laws. In addition, we may use third parties to verify your identity by comparing the personal information you provided against third-party databases and public records. The consequences of not processing your personal information for such purposes is the termination of your account as we cannot perform the Services in accordance with legal and regulatory requirements.

We may use Personal information in the following ways:

*Personal Identification Information:* The information is collected to ensure that only eligible users access the Service and to identify fraudulent activity. The combination of data collected, such as nationality, age, address and e-mail are therefore used as indicia to grant the right to individual users to access the Service.

*Formal Identification Information:* CircleBet collects this type of information to comply with legal requirements including the Anti-Money Laundering regulation. This information is used to authenticate the Personal Identification Information initially provided by the user, and hence cross referenced.

*Transaction Information:* This information is recorded to provide users an overview of her transaction related activities conducted using the Service. CircleBet is accessing the information for account- and ledger reconciliation, taxation purposes, compliance with Anti-Money Laundering regulation and in events of economic conflict of interest.

*Online Identifiers:* To certify users from countries with legislation prohibiting users from engaging with CircleBet location information is collected.

*Usage Data:* Data is collected to improve and personalize the experience on a user level. Monitoring the chat forum is a regulatory requirement to enforce terms of the Service as stipulated by the regulator.

## Third party access

The CircleBet system is maintained in a cloud environment where all data is stored and managed using the Microsoft Azure cloud service located within EU. Data is seamlessly exchanged and finally stored using secure and approved manner with this third-party company.

In addition, a dedicated third-party data replication- and back-up service is engaged, to ensure continuous updated version of the system and database used to run CircleBet. The application of such third-party service is a regulatory requirement which we are obliged to follow.

CircleBet may be required to transfer your personal information if such requirement is issued by support from legislation or a regulatory body. This may also apply if suspicious activity and behaviour is identified and such sharing of personal information is to prevent misconduct.

CircleBet will never sell your data to a third-party, nor will your data be transferred, traded, exchanged to a third party for marketing purposes, without your specific consent. We will not forward or share your personal information to a third-party for any reason, without your specific consent.

All third-party access to your personal data are located within EU.

### Retention period

CircleBet will store your personal information for as long as there is a justifiable purpose of doing so, with a minimum of the period during when you hold an Account with CircleBet. After which we will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including to satisfying any legal, accounting, taxation or reporting obligations or to resolve disputes.

Content that you post on or using our Service such as customer support comments, chat posts, and other content may be kept indefinitely after you close your account for audit and crime prevention purposes.

Information collected via technical means such as cookies, webpage counters and other analytics tools is kept for a period of up to one year from expiry of the cookie.

### Security measures

CircleBet understand how important your privacy is, which is why we works to ensure appropriate physical and technical security when you transfer data to us when using our Service. This includes entitlement restriction and access control to protect the security and confidentiality of personal information about all our data and activity. Data stored in our systems are at all time encrypted. In addition, masking of data is applied, meaning a process is in place to changing certain data elements of stored data so that the structure remains similar while the information itself is changed to protect sensitive information. Data masking ensures that sensitive customer information is unavailable beyond the permitted production environment. Transmission of data to our webservice is done using standard security technology for establishing an encrypted link between a web server and a browser.

### Your rights

You have a right of access to the personal information that we hold about you and to some related information. You can also require any inaccurate personal information to be corrected or deleted. You are entitled to, at no additional cost, review, correct, or amend your personal information, or to

delete that information where it is inaccurate. You can also request justification to the storage of specific data and from where it has been obtained.

If you close your Account with CircleBet, we will mark your account as "Closed," but will keep your account information for the period described in the Retention Period section. This is necessary to prevent fraud, as well as for accounting and taxation purposes. However, if you close your account, your personal information will not be used by us for any further purposes, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

You have the right to object to our use of your personal information for direct marketing purposes and a limited right to object to our processing of some or all of your personal information in other circumstances. You have the right to opt-out of direct marketing efforts at any time in the profile settings.

There are exceptions to your right to personal information. Access to information may for example be rejected in the event where denial of access is required or authorized by law, if granting access would have a negative impact on other's privacy, to protect CircleBet's rights and properties; and where the request is frivolous or vexatious.

#### Circle Three Ltd, a part of CircleBet

The legal entity Circle Three Ltd is a part of the CircleBet group. All and any gaming related activities in the CircleBet group is operated from Circle Three Ltd. The information as collected will also be available to other legal entities within the CircleBet group which has a direct ownership relationship.

For any questions or requests with regards to this Privacy Policy or relating to handling of personal information should contact Circle Three Ltd as per below:

Circle Three Ltd, ATTN: Data Protection Officer, 23, Office 2, Triq Giuseppe Calleja, Swatar, Msida MSD2270, Malta. E-mail: [compliance@circle.bet](mailto:compliance@circle.bet)

#### Changes to this Privacy Policy

CircleBet will occasionally amend and update the Privacy Policy to ensure compliance and appropriateness. The most recent and current version will always be available from any of our Services. You can expect to be informed when updates are made. We will ask for your consent to such updates if the changes are considered material.

#### Version:

Current version number 1.0

Dated 11<sup>th</sup> June 2018