

Genbby Privacy policy

Our Commitment to Our Players' Privacy. We are the owner and operator of the websites located at www.Genbby.com. We are committed to maintaining the confidentiality of the personal information collected by us, utilising 'best in class' information security technology and procedures with standards of data protection and the requirements of our regulatory authorities.

Purpose of this Privacy Policy. The purpose of this Privacy Policy is to enable you to understand how we collect, store, use and safeguard your personal information and to explain your rights in relation to that information and its use.

Our Legal Obligations. We will comply with the terms of applicable data protection regulations for the relevant licence through which you access and use our Service (as such regulations may be amended from time to time) (collectively, "**Applicable Law**"), when processing your personal information. Your personal information may be also processed or transferred by us to other members of our companies, our affiliates, our agents and third parties providing services to us, in jurisdictions outside of the Republic of Panama. In this event we will comply with the terms of Applicable Law which ensure that personal data is only transferred to such jurisdictions which comply with the various 'adequacy' requirements for data protection set out in Applicable Law.

What do the Capitalised Terms Mean? Unless we give them a specific meaning in this Privacy Policy, capitalised terms shall have the meaning given to them which takes precedence over any conflicting provision of this Privacy Policy.

- [Your Agreement to the Privacy Policy](#)
- [What information is collected and for what purpose](#)
- [Conditions for Processing Personal Information](#)
- [Information Sharing, Disclosures and Recipients](#)
- [Deposit and withdrawal processing](#)
- [Confidentiality](#)
- [Limits of Confidentiality](#)
- [Your Rights in Relation to Your Information](#)
- [Cookies](#)
- [Further Information](#)

Your Agreement to the Privacy Policy

1. **Agreement:** By using the Service, you (“**User**” or “**you**”) agree to the terms of this Privacy Policy as may be amended by us from time to time, save that we will ask you separately, when you provide us with your details whether you consent to receiving promotional communications from: (a) us; and also (b) third party providers of goods and services with whom we may share your details. **Amendments:** We reserve the right to amend this Privacy Policy from time to time. Any amendment will come into effect immediately upon such change being notified on the Sites. We therefore encourage you to visit this Privacy Policy from time to time to make sure that you are aware of the current version and any changes that we may make.

What information is collected and for what purpose

1. **Registration Details:** As part of a User’s Account opening process across the Sites and to allow us to provide our Service to you, we will ask you to provide us with certain personal information, including but not limited to your name, date of birth, postal address, telephone number, email address and password as well as certification that you are at least 18 years old or older in jurisdictions in which the minimum age for use of the Service is greater than 18. The name you register with us must be your own name. In addition, it is important that you complete the account details with valid information, since it will be used in the course of validating financial transactions and for the other purposes described in this Privacy Policy. You must advise us of any relevant changes to your personal information as provided to us and we do not accept liability for any harm that you may suffer as a result of you failing to notify us of any changes to the personal information that you have provided to us. If you wish to use the Service via a Device (as defined in Clause 16 below), you will be required to consent to the use of location-based services by us (or through third parties acting on our behalf) or other operating software information that can be derived from your Device, to detect your geographic location. If you do not permit your location to be known, we will not be able to provide the Service to you using your Device. **Ongoing Data Capture:** In addition, when you use the Service, we capture and store certain personal information including information on your activity on the Sites and information held on the Device(s) you use to allow us to enhance the Service that we provide to you. We also use ‘cookies’ and our ‘cookie’ policy is explained below. **Data Retention:** We retain your personal information for as long as necessary for the purposes set out in this Privacy Policy which includes any period of historic retention that may be required for regulatory

purposes. We do not collect any more personal information from our users than is necessary for our purposes and our data management policies include the deletion of any personal information we no longer require. Should you close (or if we shut down) your Account with us, we will retain your personal data for a period of 6 (six) years to allow us to meet our regulatory and legal obligations and defend ourselves against any claims. Personal information which is not needed for these purposes will be deleted after this period.

Purposes: We as Genbby Inc, our affiliates and third parties providing services to us or to you on our behalf will use your personal information for the purpose of conducting our business and providing the Service to you. Specifically, this includes the following purposes but we also reserve the right to use your personal information for any other purposes that are reasonably ancillary to the business of providing you with our online services:

- to confirm financial transactions;
- to analyse your credit and fraud risk and verify your credentials using third parties, including financial institutions, identification verification agencies and credit reference agencies;
- to assess your gaming activity for responsible gaming purposes;
- to verify whether you have registered with any mandatory self-exclusion bodies (as may be applicable), for responsible gaming reasons;
- to provide the Service to you;
- identification, verification and vetting purposes;
- statistical analysis and research;
- research and development;
- marketing, market research, customer surveys and customer profiling;
- data analysis;
- to comply with licensing and regulatory requirements;
- to carry out batch testing of documents prior to the deployment of tools sourced from or provided by third parties;
- to combat against security risks and fraudulent activity; and
- to confirm your geographic location.

Conditions for Processing Personal Information

1. **Conditions:** We will process your personal information for a variety of reasons, each of which is prescribed by relevant data protection laws.

2. **Consent:** Our processing of your personal information will primarily be necessary for us to provide you with the Service. On occasion we may ask for your consent to processing personal information in a discrete manner, in this instance your personal information will be processed in accordance with such consent and you will be able to withdraw this consent in writing at any time. By way of example, your consent will be needed in order to send you marketing and promotional communications.
3. **Fulfilment of a contract, compliance with a legal obligation**

It may also be necessary for us to process your personal information where it is necessary for the performance of a contract (such as the [End User Licence Agreement](#) when you open a Account) or in order for us to comply with our various legal and/or regulatory responsibilities, including, but not limited to, complying with the conditions of our licences and complying with any anti-money laundering legislation.

4. **Legitimate interests**

Finally, we may also process your personal information where we deem such processing to be in our (or a third party's) legitimate interests and provided always that such processing will not prejudice your interests, rights and freedoms. Examples of us processing in accordance with legitimate interests would include: (i) where we disclose your personal information to companies in our Group following a restructure or for internal administrative purposes; (ii) where we identify certain companies that can offer you additional benefits to our Service or provide us with valuable information about your use of our Service; (iii) detection and retention of information pertaining to those with issues; (iv) processing for the purposes of ensuring network and information security, including preventing unauthorised access to our electronic communications network; (v) safeguarding the integrity of sports by combating suspicious betting patterns as well as reporting and sharing information related to such patterns; (vi) adhering to regulatory and statutory requirements; (vii) devising a tailored reward scheme for players.

Information Sharing, Disclosures and Recipients

Specific Disclosures. We may disclose your personal information as follows:

- to any recipient if required to do so by law or by regulatory authority;
- to any regulatory body or licensing body or authority;
- to third parties for the purposes of settling or making payment in connection with any wager;
- to third parties who provide services to us or on our behalf;
- to third parties for marketing purposes, provided you have consented or not objected, as the case may be, as described in Clause 11 below;
- to any payment management or debt collection company engaged by us to handle payment and collection processes to and from our users;
- to any third party that purchases us or our business or any part of us or our business;
- to credit reference agencies;
- if we believe in good faith that such action is necessary:
 - i. to comply with any law or comply with legal process served on us;
 - ii. to protect and defend our rights or property;
- with your consent;
- for the purposes of disaster recovery; or
- as set out in Clause 5 below.

General Disclosures: In addition to the specific examples of disclosures listed above we may disclose your personal information to our employees, our agents and to third party services providers who use your personal information to provide services to us in respect of you being a user of our Service.

Combined Personal Data: We may combine your personal information collected from your use of the Service in accordance with this Privacy Policy with other information collected from your use of other services operated by any other company in our corporate group as well as all products which are related or ancillary thereto, including mobile and social networking services. We will treat this combined information in accordance with, and will use it for the purposes set out in, this Privacy Policy.

Credit References: Where you fail to reimburse us for any chargebacks, denial or reversal of deposits you make, we may give details of your accounts and how you manage them to Credit Reference Agencies (**CRA**). The CRA will record the outstanding debt. This information may be supplied to other organisations and records will remain on the CRA file for 6 years after the date of the chargeback, denial or reversal of payment. The information will be used by the CRA to prevent

crime, fraud, money laundering, verifying your identity if you, your partner, other members of your household, your business or financial associates apply for other credit facilities, monitoring the operation of accounts you may hold, making decisions for credit, credit related or other facilities, tracing your whereabouts, recovering debts that you owe, statistical analysis and system testing.

Deposit and Withdrawal Processing

In the course of making a deposit, you will need to provide deposit method information (example: your credit card number). This information in conjunction with your other personal information might be used to clear or carry out financial transactions executed by you on our Sites. You must advise us immediately of any relevant changes to your personal information.

Confidentiality

What Do We Do? We have undertaken substantial efforts to protect the confidentiality of the identity, preferences and other information we have collected about individual Users and we will not knowingly allow access to this information to anyone outside of our Group, other than to User themselves or as described in this Privacy Policy. We have made a substantial investment in our server, database, backup, firewall and encryption technologies to protect the information that we collect and process. These technologies are deployed as part of state of the art security architecture.

What Can You Do? You should also play your part in protecting your personal information. Your Login Credentials are confidential and you are obliged to keep your Login Credentials secret and confidential at all times and to use your best efforts to protect their secrecy and confidentiality.

Limits of Confidentiality

1. **Legally Required Disclosures.** Due to the legal, regulatory and security environment in which we operate, we may be required, under certain circumstances, to disclose personally identifiable information about our Users and we may not be permitted to inform you that we have done so. We will use

reasonable endeavours to limit such disclosure to the following: (a) where we believe in good faith that we are required to do so in response to a subpoena, warrant or other legal process or obligation upon us; or (b) where reasonably necessary to identify, contact or bring legal action against persons or entities to preserve and/or enforce our rights. Further, we can, and you authorise us to, disclose your User identification, name, date of birth, street address, city, county, post code, country, phone number, email, account activity, transactions, transfers to and communications with other Users, plus details of financial instruments used to deposit and withdraw, to our third party agents or official government bodies as we, in our sole discretion, believe necessary or appropriate in connection with an investigation of money-laundering, fraud, intellectual property infringement, piracy or other unlawful activity or activity that may expose us to legal liability.

- 2. Group Marketing.** We may use your email address and phone number for the purpose of providing you with news, promotions and other marketing offers from us. If you no longer wish to receive these promotional communications, newsletters and marketing offers, you may opt-out of receiving them either when you register with us initially, or subsequently by following the 'opt-out' instructions included in each communication. You are also, in addition, entitled at any time to notify us that you do not wish to receive any promotional communications from us and you may do this by emailing [Support](#).
- 3. Third Party Offers of Goods and Services.** Where you have provided us with your consent to do so, we may also share your email address and phone number with third parties so that they may send you offers of their goods and services. You may request at any time not to receive such offers by sending a blank message with the word 'Remove' in the subject area to [Support](#). If you request not to receive these offers we will remove your details from our marketing distribution lists and from any future lists we may share with our marketing partners. However, you will need to unsubscribe separately from marketing communications sent by partners who have received your contact details from us prior to your request to be removed from these lists.
- 4. Publicity.** We will only use your name and details in publicity materials with your written consent.

Your Rights in Relation to Your Information

- 1. Right to request information about you.** We aim to keep our information about you as accurate as possible. You can contact us at any time to review, change, obtain a copy of your information or have your details altered or

corrected in accordance with your rights under Applicable Law. In this event we may require evidence of and be satisfied as to your identity before we take any requested action. To contact us so as to exercise any of your rights as set out in this Clause 14, please email [Support](#). We may, in certain circumstances, levy a small charge to cover the cost of administration regarding any request made by you in this regard or deal with your query in accordance with Applicable Law.

2. **Additional Rights.** You have the following rights in relation to your personal data:
 1. a right to object to processing that is likely to cause or is causing damage or distress;
 2. a right to object to decisions being taken by automated means;
 3. a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed; and
 4. a right to claim compensation for damages caused by a breach of Applicable Law.

If you are unsure about your rights or are concerned about how your personal information may be processed you should contact the Republic of Panama Data Protection Authority (see Clause 17). If you contact us in relation to your rights we will do our best to accommodate your request or objection. Please note, however, that not all rights are absolute.

Cookies

1. Cookies are text-only strings of information that are downloaded to your personal desktop, laptop computer or mobile device (each a “**Device**”) when you visit a website. They are then sent back to the originating website on each subsequent visit, or to another website that recognises those cookies. Please see: www.allaboutcookies.org for information about what cookies are and what they do.

Cookies are very useful and are used for many different purposes. These include allowing you to navigate between pages efficiently, remembering your preferences, and generally improving user experience. Sometimes cookies are used to help ensure that adverts you see online are relevant to you and your interests. We use cookies in order to track referrals to our Sites, to remember your preferences, and to generate anonymised statistical data, which we use to improve the user experience on our Sites. We also use cookies to measure the effectiveness of our advertising campaigns, to limit the number of times you see an advertisement, to remember that

you have visited a website, and to provide advertisements that are more relevant to your interests.

Detailed information about cookies and how we use them on the Sites may be found in our [Cookie Policy](#), which also describes how you can turn off cookies or control which cookies are set on your Device (see in particular the section headed “How to manage your cookie settings”).

Privacy Policy last revised: January 21, 2018