

PRIVACY POLICY

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- **General Introduction**

- Joymatik N.V. (hereinafter also, the “Company”, “we”, or “our”) offers online gambling services via www.BetShah.com (the “Website”) and/ or downloadable applications and software. The Company is deeply committed to safeguard the privacy expectations of its users (hereinafter, also the “User(s)”, “you”, or “your”). Accordingly, we have put in place this Privacy Policy, which outlines our data protection practices, including how we collect, use, disclose and protect your Personal Data, as well as your rights with respect to your Personal Data.
- The website www.BetShah.com is owned and operated by Joymatik N.V., a company registered in accordance with Curaçao Law, registration No. 157399, Address: Abraham de Veerstraat 9, Willemstad, Curacao. Joymatik N.V. is licensed and regulated by the Curacao Gaming Authority and operates under License No. 365/JAZ issued to Gaming Services Provider, Authorized and Regulated by the Government of Curaçao.
- We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By visiting the Website, downloading/ using applications, or by creating an account through services offered by the Website, you announce and confirm that you have read, understood, and accepted this Privacy Policy.

- **What Information We Collect**

We collect two types of information from our Users:

- **Personal Data**

The first type of information which we collect is information that identifies or may identify an individual with reasonable effort (“Personal Data”). Personal Data which is being gathered may consist of the following:

- Name and surname
- Birthdate
- ID number
- Phone number

- Email address
 - IP address
 - Bank account information
 - Photo
- **Non-Personal Information**

The second type of information which we collect is in its nature non-identifiable information pertaining to a User(s), which may be gathered via the User's use of the services ("Non-Personal Information"). Non-Personal Information which is being collected consists of technical information and usage information. For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Data shall be deemed as Personal Data as long as such connection or linkage exists.

Types of Non-Personal Information we collect from or about you:

 - Log-in history and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.).
 - Gameplay information (e.g. game play information including, amongst other things, your deposits, bets, bonuses, game session duration, etc.).
 - Device and connection information (this includes information from the particular device you are using for security and fraud detection and prevention purposes).
 - Analytics information (this includes information about your use of the services. This information is collected for, amongst other things, troubleshooting errors and bugs, as well as for analytical research purposes about use and operation of the Services).
 - Anonymous information: We may anonymize or de-identify the information collected so that the information cannot, on its own, personally identify you. Our use and disclosure of such aggregated or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation and for any purpose, such as for advertising or marketing purposes.
- *We normally do not process special categories of personal data, unless such information is provided to us directly by you and on your own initiative, or such information is requested in order to comply with legislation requirements. In any such case we ensure that with respect to sensitive data transferred, we will apply restrictions and safeguards that fully take into consideration the nature of the data and the risks involved, such as for instance strict purpose limitation, access restrictions (including access only for staff having followed specialised training), keeping a record of access to the data, restrictions for onward transfers and additional security measures. The services offered by the Website are not designed to persons under the age of 18 (or such higher age as established by national legislation) with respect to the use of the services ("Legally of Age"). If*

you are not Legally of Age, you should not download or use the services nor provide any Personal Data to us.

- **Conditions for Processing Personal Data**

- Personal Data processing is carried out for the following purposes:

- **Consent**

We prioritize obtaining your prior consent before the actual start of data processing. In order to ensure that, we provide you with necessary tools to gain access to Personal Data processing information before you start using our services.

- **Complying with our contractual obligations**

We may, from time to time, be requested or have a need to transfer Personal Data to our third party providers to ensure timely and quality service delivery to you.

- **Legitimate interests**

In order to ensure safety of your experience using the services, quality and secure operation of the Website, we may need to process your Personal Data for legitimate purposes, including but not limited to:

- Fraud prevention
- Network and information security
- Indicating possible criminal acts or threats to public security

- **Complying with legislation requirements**

Data processing is necessary in order for us to comply with various legal and/or regulatory responsibilities, including, but not limited to, complying with the conditions of gambling licenses and complying with any AML/CTF legislation.

- **How We Use the Collected Data**

- **We use your Personal Data for the purposes listed below:**

- To set up your account and provide you access to it;
- To provide and operate the services;
- To communicate with you and to keep you informed of our latest updates to our services and special offers;
- To conduct statistical and analytical research in order to improve and customize the services;
- For customer relationship management purposes;
- To support and troubleshoot the services and to respond to your queries;
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of the services;
- To investigate violations of our policies and T&Cs;
- To investigate and resolve disputes in connection with your use of the services;
- To assist us with meeting our regulatory obligations or as required by law (such as gambling regulations, AML/CTF legislation requirements).

- **Where you have not consented (or have withdrawn your consent) to the processing of your Personal Data by us, we may continue to process your Personal Data:**
 - where processing is required for the performance of the contract between you and us;
 - where processing is necessary for compliance with a legal obligation to which We are subject; and/or
 - where processing is necessary for the purposes of a legitimate interest of the Company (including for security reasons or for marketing purposes).
- **During the course of providing you with services via Website or applications, we may need to transfer your Personal Data to the following entities:**
 - Our third party providers
This may include software and hosting providers, banks and payment processors, etc. In order to ensure the safety and confidentiality of the data transferred to such third party contractors we have entered into a binding instrument ensuring at least the same level of data protection as under these Privacy Policy.
 - Government authorities, such as regulators, police, court We may be requested to provide certain information of our users to ensure compliance of our services with applicable legislation requirements, to to prevent fraud and any illegal activities.
 - Sport bodies
We may be required to provide information to sport bodies if there are suspects of match-fixing or breach of sports regulations
- **Please note that the Website may contain links to and from the third party websites. The Company does not take any responsibility with respect to the privacy regulations of any such websites. We encourage you to carefully read the respective policies before submitting your personal data to any third party.**
- **Retention of Personal Data**
If you have registered an account through the Website, the Company will retain your Personal Data during the period your account is active and for additional period of at least five years, as strictly necessary to enable the Company to meet its legal obligations under applicable laws or regulations, such as the applicable gambling regulations, AML/CTF regulations, Company's contractual obligations.
- **Your Rights**
You may contact us at any time by email: info@BetShah.com, and request:
 - To be informed of and have access to Personal Data;
 - To erase Personal Data;
 - To change or update any Personal Data;
 - To restrict or cease further use of Personal Data;
 - To object to the processing of Personal Data;
 - To withdraw your consent to our processing activities;

- To not be subject to a decision based solely on automated processing;
 - To transfer Personal Data.
- Please note that these rights are not absolute and requests are subject to the respective legal requirements, based on which We may refuse in approving your request.

- **How We Keep Your Data Secured**

We take great care in implementing and maintaining the security of the services and your data. We have put in place appropriate physical and technological safeguards to help prevent unauthorized access to maintain data security, and to correctly use the data we collect online. We also ensure ongoing training of our personnel to ensure the confidentiality of Personal Data and its lawful processing on all levels. All safeguards undertaken by the Company vary based on the sensitivity of the data that we collect and store. Although we take reasonable steps to safeguard the data, we cannot be responsible for the acts of those who gain unauthorized access or abuse the services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

- **Changes to the Privacy Policy**

The Company reserves the right to amend, modify and change the Privacy Policy from time to time. It is then your responsibility to make sure that you are aware of the current version of the Privacy Policy. Each login to your account on the Website constitutes your consent to the most up-to-date version of the Privacy Policy. If we materially change the Privacy Policy, we will take steps to inform you of the change. We may do this through email, SMS, notices on our websites or other means (or a combination of these means) in line with the permission you have given us to contact you.