

privacy policy

MOZZARTBET MALTA LIMITED

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Introduction

MOZZARTBET MALTA LIMITED (hereinafter referred to as the "Company") provides basic information regarding the processing of personal data to visitors, user, respondent, employees and job candidates on the website and at the time of collection of personal data. The content of the notices to which the providers, the user, the respondent, the employee and the job candidate provide the relevant information are defined in Article 13 of the General Data Protection Regulation ("Regulation") or in Article 14, if the personal data is not collected directly from the user, respondent, employee and job candidate.

Records of processing activities define the purposes of processing and methods of collection of personal data, as well as the legal basis for processing personal data and other elements under Article 30 of the Regulation, and this document has been prepared according to this information.

The attached annexes are an integral part of the document:

- 1. privacy policy**
- 2. Automatic response to questions or requests related to the processing of personal data**
- 3. Automatic response to the submission of requests for jobs out for competition**

Extract of the attached Appendices

Below is an excerpt from the attached annexes for ease of reference for the user, respondent, employee and job candidate visiting the site. These extracts help to understand the rights of the user, the respondent, the employee and the candidate for employment and how the Company will manage the personal data and collected information kept, processed, transferred and disclosed in relation to the Regulation.

Excerpt from Privacy Policy

This policy is easily accessible to the visitor, user, respondent, employee and job candidate on the company website www.mozzartbet.ro.

This policy includes all processing of personal data in relation to the user, respondent, employee and job candidate of the service (website visitors, online players) and other persons whose data is processed by the Company. Thus, a single document covers all situations - places of collection and purposes of data processing.

The Policy link must be visible and easily accessible on www.mozzartbet.ro, but also every time data is entered through the web form (registration and online chat).

Extract regarding the automatic response to questions or requests related to the processing of personal data

The Company provides access points for the User, Respondent, Employee and Job Candidate who wish to submit a request or application. The rights of the user, the respondent, the employees and the candidate for employment are guaranteed by the Regulation (Articles 15-22). Submission of a request or request will be made available to the User, Respondent, Employee and Job Candidate via email or customer service (if applicable).

The email address for sending a request or request is support@mozzartbet.com .

Before submitting a request or an application, the user, respondent, employee and candidate for employment must check the consent box on the Company's website, whereby he consents to his personal data being collected, used, stored, transferred and disclosed by to the Company.

Upon submission of a request or request, the user, respondent, employee and candidate for employment will receive an automatic response [see annex 2], confirming receipt, notifying the same that the request or request will be processed without delay.

In this way, the user, the respondent, the employee and the job candidate are informed about the response deadline and have the assurance that their application or request has been received.

Excerpt regarding the automatic response to the submission of requests for available jobs

Data about the potential job candidate is collected through a job form available on the Company's website. The Company will store all information received and use it to carry out the selection process. The company reserves the right to keep the information received for up to two years from receipt or as required by law.

Before submitting his personal data, the candidate is required to tick the consent box on the website, whereby he consents to his personal data being collected, used, stored, transferred and disclosed by the Company.

In order for this procedure to be completely transparent, the candidate is informed by an automatic response [see annex 3] about the retention period of personal data and his rights during processing.

If an application for available jobs is sent by post, the Company will notify the candidate of said information and forward him to the Data Protection Policy link.

The candidate has the right to request the deletion of his personal data before the expiration of two years.

Appendix 1

PRIVACY POLICY

MOZZARTBET MALTA LIMITED, registration number C 83980, with registered office at Office 2D, Soho St. Julians, Punchbowl Centre, St. Elia Zammit, St. Julians, STJ3154, Malta (hereinafter referred to as the "Company"), strives to comply with the applicable General Data Protection Regulation (GDPR) laws in the countries in which the Company operates.

This policy covers the basic principles by which the Company collects, uses, retains, transfers and discloses the personal data of users, respondents, employees and candidates for employment and presents the responsibilities of the Company during the processing of personal data.

The Company ensures that any personal data of data subjects that is transferred outside the EU and EEA countries or an international organisation, that the legal regime is considered to provide an "adequate" level of personal data protection, as is stipulated by the European Commission or has adequate safeguards protected by binding agreements or corporate rules or fulfills any of the conditions in Article 49.

This policy applies to the Company and its subsidiary companies, directly or indirectly controlled in the European Economic Area (EEA) or processing the personal data of data subjects in the EEA.

The company guarantees that all Personal Data of users of its services and visitors to the website www.mozzartbet.ro (hereinafter referred to as "users") and employees, are processed in accordance with the applicable regulations governing the protection of personal data (GDPR).

Personal data is processed only when there is a legal basis for such an act:

1. legal obligation,

We need to process your Personal Data to the extent necessary to comply with our various legal and/or regulatory obligations, including, but not limited to, complying with the conditions of our gaming license and authorization and complying with anti-money laundering (AML) and customer identity verification (KYC) legislation.

2. the contractual relationship,

3. user consent,

4. for the protection of the vital interests of the data subject or

5. the legitimate interest of the Company.

Our processing of your Personal Data, based on one or more of the legal grounds described above, will be necessary, in particular, to participate in the online games of chance organized and operated by the Company.

Definitions

The following terms " **Operator**" , " **Authorized person**" , " **Data subject**" , " **Personal data**" , " **Activity/Processing activities**" , " **Anonymization**" , " **Pseudonymization**" , " **Cross-border processing of personal data**" , " **Supervisory authority**" used in this document will have the same meaning as in the GDPR.

Basic principles regarding the processing of personal data

The company will comply with Article 5(2) of the GDPR which states that "the operator shall be responsible for and must be able to demonstrate compliance with the principles."

Personal data must:

1. Be processed fairly and legally;
2. To be obtained only for specific, legal purposes;
3. Be adequate, relevant and not excessive;
4. Be accurate and up-to-date;
5. Not to be stored for longer than necessary;
6. To be protected in appropriate ways;

And the Company must:

7. To be responsible;
8. To disclose information;
9. To transfer personal data outside the European Economic Area (EEA) only in accordance with the GDPR;
10. To process data in accordance with the rights of data subjects.

Legality, fairness and transparency

The company processes personal data related to data subjects in a legal, fair and transparent manner.

Purpose limitation

The Company collects personal data for specific, explicit and legitimate purposes and will not further process personal data in a manner incompatible with these purposes.

Data minimization

The Company will keep personal data adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. The Company will apply the anonymization or pseudonymization of personal data, when possible, in order to reduce the risks for the data subjects.

Accuracy of personal data

The Company strives to keep personal data accurate and, if necessary, kept up to date. The Company will take reasonable steps to ensure that personal data is accurate, having regard to the purposes for which it is processed, and any inaccurate personal data will be deleted or rectified without undue delay.

Storage of personal data

The company guarantees the storage of personal data no longer than is necessary and only for the purposes for which the personal data is processed.

Privacy

Taking into account the state of technology and other security measures available, the cost of implementation and the likelihood and severity of risks to personal data, the Company endeavors to use appropriate technical or organizational measures to process personal data in a manner that ensures adequate security of personal data, including protection against destruction, loss, alteration, unauthorized access or accidental or unlawful disclosure.

Responsibility

The company will be responsible for and will be able to demonstrate compliance with the principles stated above.

Disclosure of Information

If the Company uses a third-party supplier or business partner to process Personal Data on its behalf, the Company will ensure that this authorized person will provide security measures appropriate to the associated risks to protect the Personal Data.

The company strives for the supplier or business partner to provide the same level of data protection. The Company will ensure that the supplier or business partner processes the Personal Data only to fulfill its contractual obligations to the Company or according to the instructions of the Company and not for any other purposes.

When the Company processes Personal Data jointly with an independent third party, the Company will explicitly specify its and the third party's responsibilities in the relevant contract or any other legally binding document, such as the Provider Data Processing Agreement.

Cross-border transfer of personal data

The Company will ensure that, before transferring personal data outside the European Economic Area (EEA), appropriate safeguards are used, as provided for in special data protection regulations.

Our partner, Mozart doo Beograd, with which the company cooperates, is located in the Republic of Serbia, which is not part of the EEA. The transfer of data to Mozart doo Beograd is governed by the Standard Contractual Clauses of 7 December 2022, which include the requirement that certain safeguards are applicable to ensure a level of data protection equivalent to the level of data protection at EU level, in accordance with the mechanisms approved by the EU Commission. The purpose of these standard contractual clauses is to ensure compliance with the requirements of 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, including transfer of personal data to a third country. If you would like to obtain a copy of these Standard Contractual Clauses, please email dpo@mozzartbet.com.

Access rights of data subjects

The company acting as a data controller shall provide data subjects with a reasonable access mechanism to enable them to access their personal data. The data subject will be authorized to update, correct, delete or transmit his personal data, if applicable or in accordance with legal requirements.

Data portability

Individuals have the right to receive, upon request, a copy of the personal data they have provided to the Company in a structured, commonly used and machine-readable format and to transmit this data to another operator, free of charge . The Company endeavors to ensure that such requests are processed within one month, provided that they are not excessive and do not affect the rights to personal data of others.

The right to be forgotten

Upon request, data subjects have the right to have their personal data deleted by the Company. The company acting as operator will take all necessary actions (including technical measures) to inform authorized third parties to comply with the request.

Fair Processing Instructions

Personal data will only be processed when this is explicitly authorized by the Company. It is up to the Company to decide whether to carry out a Data Protection Impact Assessment for each data processing activity in accordance with the Data Protection Impact Assessment Instructions.

Notices to data subjects

At the time of collection or before the collection of personal data for any kind of processing activities, including but not limited to the sale of products, services or marketing activities, the Company will inform the data subjects of the following:

- the types of personal data collected;
- processing purposes and processing methods;
- the rights of data subjects regarding their personal data;
- storage period, including possible international data transfers;
- whether the data will be disclosed to third parties; and
- the security measures that the Company adopts to protect personal data.

This information is provided through a Privacy Notice.

If personal data is shared with third parties, the Company will ensure that the data subjects have been notified of this through a Privacy Notice.

Where personal data is transferred to a third country in accordance with the Cross-Border Data Transfer Policy, the Privacy Notice should reflect this and clearly state where and to which entity the personal data is transferred.

Consent of the data subject

The Company will ensure that, each time Personal Data is processed, this processing is carried out based on the Data Subject's consent or other legal grounds. The Company will retain proof of this consent.

The Company will provide Data Subjects with various options to provide their consent and must inform and ensure that their consent (unless processing is continued on the basis of another lawful basis for processing) can be withdrawn at any time. The withdrawal of consent will not affect the legality of the processing carried out on the basis of it before it was withdrawn.

Storage of personal data

If you have registered a game account, we will retain your personal data for as long as your account is active. After this period, the required period of retention of your data may vary from a few months to 10 (ten) years in order to fulfill our legal obligations under applicable laws or regulations, such as applicable gambling regulations, KYC and AML regulations.

In addition, the Company may retain your personal data for longer periods, provided that retention of such data is strictly necessary for reasons of responsible gaming, for the resolution or handling of complaints regarding potential disputes, and where the Company directs to do so by the applicable supervisory authority. After this period, the Company ensures that your personal data will be irreversibly destroyed. Any Personal Data held by the Company for marketing and service update notifications will be retained by us until you notify us that you no longer wish to receive this information.

Deletion of personal data

When the Company receives requests to delete personal data records from Data Subjects, the Company will ensure that these requests are dealt with within a reasonable time. The Company keeps records, including a log, of these requests.

The Company will also endeavor to have adequate deletion mechanisms to ensure that there will be no leakage of personal data outside the organisation.

Security

The Company will maintain the accuracy, confidentiality and relevance of personal data based on the purpose of the processing. The Company will ensure that appropriate security

mechanisms are in place designed to protect Personal Data, to prevent theft, misuse or abuse of Personal Data and to prevent breaches of the security of Personal Data.

The Company will be responsible for the requirements of this section and that any current and future methods of collection, retention, transfer, disclosure and disposal comply with relevant legislation, best practices and industry standards.

Responsibilities of the Company

The Company will ensure the appropriate processing of Personal Data by all its employees and by all those who have access to and process the data on behalf of the Company.

Personal data collected

Use of the web page: www.mozzartbet.ro

The company collects information from visitors and users of the website www.mozzartbet.ro in order to better understand the needs of users and to improve its products and services.

The following data is collected for the purposes stated above:

- Time and date of page visit
- Pages visited
- Internet browser type and version
- IP address of the visitor.

Cookies

The company uses cookies to provide visitors and/or users with full functionality and high quality content. Cookies are small text files loaded on visitors' computers for the purpose of tracking the use of certain pages. If the cookie acceptance option is disabled on the visitor's and/or user's computer, the visitor and/or user can still use the pages, but the functionality of the service will be partially restricted. You can find out more about the cookies we use on our website by visiting our Cookie Policy.

User registration

While registering a user who wishes to participate in online gambling, the Company collects the following information:

- Username
- Email address (to which further instructions regarding account opening will be provided).
- Name and surname
- Date of birth
- Residence, place and postal address

- Personal identification number
- Cell Phone Number)
- IBAN.

User support

The company will provide support to its users through an online chat with an agent. Username and email address are required to sign up for online chat. The data collected in this way is processed exclusively for the purpose of providing assistance to users.

The company operates a recorded call system. When data subjects call the following number 0730 033 392, the call will be automatically recorded for quality assurance purposes. The person concerned is informed about the recording of the calls.

The Company may retain records of calls, online chat conversations and/or emails providing support to users for internal and external audits, training and investigation, including by law enforcement authorities. Data so stored will be deleted after one (1) year if it is no longer necessary for crime prevention, investigation, detection and reporting of crimes for the purpose of protecting the business and other legal interests, as well as for the protection of employees.

Marketing

The Company, subject to consent, may notify users of new Company benefits. The user can always decide to opt out of receiving the above notifications and can cancel the service by sending an email to support@mozzartbet.com.

Recipients of personal data

The company will ensure that the transmission of users' personal data to third parties is carried out only as a legal obligation or as a justified requirement of the competent public authority.

When personal data is transmitted to third parties or trusted partners (proxies) for the purpose of providing user support, information system maintenance or similar needs, the Company will ensure that these third parties or trusted partners will comply mandatory data protection measures.

If personal data is provided to third parties, the names of the parties and the purpose for which these persons may use the data shall be specified in particular. A specific option to express consent for the transfer of data to third parties will be included.

The rights of data subjects

Depending on the purpose and legal basis of the processing of personal data, the user has the following rights in accordance with the applicable regulations on the protection of personal data:

- Access to personal data
- Rectification of personal data
- Deletion of personal data

- Portability of personal data
- Restriction of personal data processing
- The right to object to the processing of data for marketing purposes

If you wish to make a complaint about how we have managed your personal data, please contact the Data Protection Officer at dpo@mozzartbet.com.

Response to Personal Data Breach Incidents

When the Company becomes aware of a suspected or actual personal data security breach, the Company will conduct an internal investigation and take appropriate corrective action in a timely manner. If there is any risk to the rights and freedoms of data subjects, the Company will notify the relevant Supervisory Authorities without undue delay and, where possible, within 72 hours.

Audit and accountability

The Audit Department or other relevant department is responsible for auditing how Company departments implement these policies.

Any employee who violates this Policy will be subject to disciplinary action, and the employee may also be subject to civil or criminal liability if their conduct violates laws or regulations.

Governing Law

This Policy is intended to comply with the laws and regulations of the place of establishment and the country in which Mozzartbet Malta Limited operates. In the event of a conflict between this Policy and applicable laws and regulations, the latter shall prevail.

Contact regarding the protection of personal data

The company has appointed a Data Protection Officer (DPO). Requests, complaints or questions regarding the processing and protection of personal data can be sent to the e-mail address support@mozzartbet.com or by calling the phone number 0730 033 392 .

In accordance with the applicable legal regulations on the protection of personal data, each request/inquiry will be resolved without undue delay and at the latest within 30 days of receipt.

When you contact us or post such requests, we will use reasonable efforts to confirm your identity and prevent unauthorized processing of personal data.

Data subjects have the right to file a complaint with a national data protection authority (for Romania, information on the national data protection authority can be found at <https://www.dataprotection.ro>) .

Changes to this Policy

As the Company evolves, this Policy may need to be updated to keep pace with changes to the Site, software, services, business and applicable laws. However, the Company will always maintain its commitment to respecting the confidentiality of Personal Data. The Company will ensure that it posts on the website any other revisions to this Policy together with their effective date, in an easily accessible area of the website.

Validity

This document is updated accordingly to provide you with optimal privacy protection .

The last update took place on 01.03.2023 and will enter into force from the date of its publication on the website after the approval of the competent authority.

Contact of the Data Protection Officer:

Email: dpo@mozzartbet.com

Office 2D, Soho St. Julians, Punchbowl Centre, St. Elia Zammit, St. Julians, STJ3154, Malta

Mozzartbet Malta Limited,

By representative

Appendix 2

Automatic response to questions or requests related to the processing of personal data

Dear Sir / Dear Madam,

We have received your request / request.

We, within MOZZARTBET MALTA LIMITED, systematically promote awareness of the importance of personal data protection to visitors, users, respondents, employees and job candidates and contractual partners and strive for a transparent and honest relationship with our customers.

In accordance with the applicable legal regulations on the protection of personal data (General Data Protection Regulation 2016/679), your request will be dealt with as soon as possible and at the latest within 30 days of receipt.

Regards,

MOZZARTBET MALTA LIMITED

Office 2D, Soho St. Julians, Punchbowl Centre, St. Elia Zammit, St. Julians, STJ3154, Malta

www.mozzartbet.ro

Appendix 3

Automatic response to the submission of applications for competitive jobs.

Dear Sir / Dear Madam,

Thank you for your inquiry and your interest in MOZZARTBET MALTA LIMITED.

We will review your application and contact you if it meets our needs and the vacancy.

Your personal data will be processed exclusively for the purpose of selection during a recruitment procedure and will be kept for the next two years or as required by law, after which it will be deleted.

If you do not want your personal data to be kept for the specified period, you can request the deletion of your personal data at any time. Please consult www.mozzartbet.ro for more information on the Data Protection Policy of MOZZARTBET MALTA LIMITED.

Regards,

MOZZARTBET MALTA LIMITED

Office 2D, Soho St. Julians, Punchbowl Centre, St. Elia Zammit, St. Julians, STJ3154, Malta

www.mozzartbet.ro