Protecting your privacy is vital to Exchaste Broker Service("the Company"). This policy (together with Our Terms and Conditions) describes how Exchaste Broker Service collects and uses Your personal information. It also describes Your rights and the choices available to You regarding Our use of Your personal information and how You can access and update it. Please get in touch with our Data Protection Officer if You have any questions or complaints about Our privacy policies or practices.

Personal information relates to an identified or identifiable user and can include name and surname, residential address, and copies of passports. Where Exchaste Broker Service collects and determines the means of processing your personal information, it will act as a data controller. Exchaste Broker Service adheres to and complies with the General Data Protection Regulation and other relevant European and national regulations, legal notices, and similar instruments that may be in force from time to time.

# **AML Policy**

#### What is AML

Exchaste has a KYC procedure to ensure that we have all of our customers' information. KYC subject businesses to AML/CFT regulation to manage their anti-money laundering (AML) and 'Know Your Customer (KYC) obligations more efficiently. The Company only allows withdrawals to the wallet where the deposit was made. Furthermore, the account holder's name must be the same as the registration name. Customers are only permitted to have one account on our platforms, and transactions from one customer's account to another are not allowed.

### Information we may collect about you

### What you give us

We will store information about you if you fill out an online form or contact us via email or online chat. This will include but is not limited to the personal information you provide when registering to use our services, depositing and withdrawing funds, or reporting service problems.

You must ensure you provide to us is accurate and up to date. Our legal obligations which include, but are not limited to, gaming and anti-money laundering regulations are as follows:

• Contact information such as name, surname, date of birth, residential address, email address, phone number;

- Official documents, including passport or identity card which includes a photograph of You;
- Limits on responsible gaming; and
- Correspondence information, including a record of Your email and live chat interactions with Our Customer Support Team.

# What we automatically collect:

The Company may also process anonymized behavioral data and provide it to third-party research organizations to prevent gambling-related issues. Furthermore, The Company may obtain the following technical information from You:

- Username, Internet Protocol (IP) address, browser type, demographic and geolocation data from Your device and hardware, referring/exit pages, and operating system;
- Device ID, software installed, browser cookies, and in-game data;
- Financial and billing information such as credit card number, credit card holder's name and surname, credit card expiry date, billing address, bank name, and bank account number; and
- Name, surname, email address and other information related to Your subscription to Our Mailing List.

The Company may also collect, process, and retain Your personal information if the Company believes that it has a legitimate interest in doing so to pursue Our commercial and business objectives, and if such processing does not infringe on Your right to privacy, which includes situations such as:

- When You receive marketing updates, newsletters, and bonus information from the Company,
- When the Company updates and maintains the Service, as well as for troubleshooting,
- When the Company prevents and investigates fraud and other forms of misbehavior.
- When You require any additional information about the process of automatically collecting unrestricted information, which also includes the complete URL clickstream to and from our website and mobile applications.

If you are a US customer or are located in the US, the Company will collect movement data and GPS location data from your device.

#### What we receive from other sources

The Company may receive information about You from third parties with whom it collaborates from time to time including advertising networks, analytics providers, and search information providers.

#### Cookies

The Company employs cookies to ensure that the site functions correctly and to enhance Your user experience. The Company may use cookies to track Your preferences, activity, and the website from which You were routed. Cookies are also used to collect aggregate usage and volume statistics that do not contain personal information.

# How we use the data we collect, including the legal justification for doing so

The Company shares your personal information with companies that help Us deliver the Services You have requested and with companies that help Us with Our business activities: card and payment processing, customer service, marketing, data storage providers, and business intelligence. All of these companies have contractual relationships with the Company, which ensures that Your personal information which is shared, is strictly processed as needed to provide these services to Us.

The Company collects and uses your personal information and other information collected from or about you by the Company (or others on its behalf) for the following legal purposes, such as complying with a subpoena or similar legal process:

- To fulfill Our legal and regulatory obligations and responsibilities to the relevant licensing and regulatory authorities, as well as all other duties and responsibilities owed under other applicable legislation and to other applicable regulators in other jurisdictions;
- When The Company believes, in good faith, that disclosure is required to protect Our rights, protect Your or others' safety, investigate fraud, or respond to a government request;
- If The Company enters into a merger, acquisition, or sale of all or a portion of its
  assets, which You will be notified via email and/or a prominent notice on Our Service
  of any change in ownership or uses of Your personal information, as well as any
  choices You may have regarding Your personal information.

- When The Company works with third-party organizations to identify cases of matchfixing; and;
- To any other third party with Your prior permission.

As required by the Company to conduct our business and pursue our legitimate interests, in particular:

- The Company may utilize your usage data to give trade information to our liquidity partners to provide a better betting service. A unique anonymous identity that represents information about the counterparty and the markets available is included in the data we provide to our liquidity partners;
- The Company keeps track of how our websites and online services are used, and it utilizes your information to improve and protect our content, services, and websites, both online and offline;
- The Company uses the information to personalize our website, goods, and services for you;
- The Company keeps track of customers' accounts to prevent, investigate, and report fraud, terrorism, misrepresentation, security events, and other crimes per relevant laws;
- The Company uses the information you provide to investigate any complaints received from you or others about our website or our products or services; and the Company will use data in connection with legal claims, compliance, regulatory and investigative purposes as needed (including disclosure of such information in connection with legal process or litigation);

If you are a US customer or are geographically situated in the US, the Company ensures that you can only transact where state regulations allow so.

# Where you give us consent

- The Company will send you direct marketing about products and services offered by us, our affiliates, and carefully chosen partners;
- The Company places cookies and uses similar technologies per our Cookies Policy and the information supplied to you when those technologies are used; and
- When the Company asks for your consent on other occasions, the Company will use the data for the reason that the Company states at the time;
- For legal objectives, such as responding to requests from the government or law enforcement authorities conducting an investigation.
- For all of the data processing we do based on our legitimate interests outlined above, the Company has conducted balancing tests. You can get more information by contacting us at the phone number or email address listed later in this notice.

# Withdrawing consent or otherwise objecting to direct marketing

You can always withdraw your consent when the Company depends on it, even if we have other legal bases to process your data for other purposes, such as those listed above. Depending on our legitimate interests, the Company may send you direct marketing messages without your consent in specific situations. At any time, you have the ultimate right to opt out of direct marketing or our direct marketing analysis. You can either follow the directions in the email or contact us using the information provided below.

# Disclosure of personal information to third parties

As per company policy, we do not disclose any personal information to anyone other than those employees or third parties who need access to your data to provide you with a service. The Company is a data controller of your personal data under applicable data protection law. When Exchaste Broker Service provides certain corporate support services to the Company, it is also a data controller of your data. You can contact both the Company and Exchaste Broker Service using the information provided below. Exchaste will share your personal information with third-party vendors who will use it to serve advertisements based on your previous visits to the Exchaste website.

Exchaste may share personal data with government authorities, law enforcement officials, or relevant regulators if required for the purposes above, if mandated by law, or for the legal protection of our legitimate interests in compliance with applicable laws.

Exchaste may share personal data with sporting bodies. The Group has agreements to police the integrity and enforce the rules of a sport or to detect and prevent a crime.

Exchaste will also share personal data with third-party service providers who will process it on the Company's behalf for the purposes mentioned above, such as:

- Payment providers
- Identity verification agencies
- Credit rating agencies
- Fraud prevention agencies and services
- Digital marketing and content delivery agencies
- GPS data processing and validation services

If the Company is sold or integrated with another company, your information will be disclosed to our advisers and any prospective purchaser's adviser and passed on to the new owners.

In some cases, The Company is also required by law to verify Your identity through third-party service providers with whom The Company shares and obtains personal information. The Company has the authority to make decisions based on the information provided by these service providers. Exchaste may transfer personal information to third countries outside of the EU/EEA due to the above-mentioned data sharing.

#### Transfers of personal data outside the EU

The Company operates in multiple jurisdictions, some of which are located in Countries different from where You reside. The information that The Company collects from You or that You provide to Us may be transferred to and stored at a location outside Your country to process Your payment details and provide support services. The Company will take all reasonable measures to ensure that Your data is handled securely and following this Privacy Policy. By providing Us with Your personal information, You consent to The Company transferring, storing, and processing Your information outside of Your country, where The Company shares Your personal information with third parties outside the EU/EEA. The Company ensures that Our contractual relationship with such third party contains adequate safeguards regarding Your personal information. The Company only enters into contractual relationships with third parties who guarantee a comparable standard of data protection to EU/EEA countries.

If You communicate via social media platforms, the information You provide is linked to Your personal social media account. To exercise Your rights or request the removal of communications between You and Us on the platform in question, you must contact the social media platform directly.

#### Links to other websites

Our Service contains links to other websites whose services You may use, and their privacy policies may differ from those of Exchaste Broker Service. If You provide personal information to any of those sites, Your information will be subject to the privacy policies of those third parties. The Company advises You to read the privacy policies of any website you visit carefully. The Company accepts no responsibility or liability for such third parties' practises, actions, or policies.

### **Surveys or contests**

The Company may, from time to time, offer You the opportunity to participate in contests or surveys on Our website. When You participate, The Company will ask You to provide certain personally identifiable information. Participation in these surveys or contests is entirely voluntary, and as a result, You have the option of disclosing or not disclosing this information.

# Your legal rights

You have the right to request a copy of your personal data; to correct, delete, or restrict (suspend any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine-readable format, as well as to request that we share (port) this data to another controller.

You have the following rights concerning the personal information that The Company holds about You:

- The right to update incomplete personal information.
- The right to withdraw Your consent where The Company processes Your personal data based on Your consent, as well as the right to object to processing;
- The right to object to direct marketing, which can be done by opting out of direct
  marketing by either unsubscribing via email or by emailing us with a request to
  support@exchaste.com. You also have the right to object to any profiling to the
  extent that it relates to direct marketing.

While You do have the right to have Your data erased, The Company may not be able to remove it in some cases completely; additionally, you have the right to object to the processing of your personal data in certain circumstances (primarily where we do not need to process the data to meet contractual or other legal requirements, or where we are using the data for direct marketing). You have the right not to be subjected to decisions that are solely based on automated processing.

These rights may be limited, for example, if fulfilling your request would reveal personal information about another person, infringe the rights of a third party (including our rights), or if you ask us to delete information that we are required by law to keep or have compelling legitimate interests in keeping. The relevant exemptions are included in the GDPR and the applicable national or per-jurisdiction data protection legislation. When responding to any request you make, the Company will notify you of any relevant exemptions we rely on.

To exercise any of these rights or obtain additional information, such as a copy of a legitimate interest balancing test, please contact us using the information provided below. If you have unresolved concerns and are an EU or UK citizen, you have the right to file a complaint with an EU data protection authority in the country where you live, work, or believe a breach occurred. If you are a US citizen, you have the right to file a complaint with the Attorney General of your state.

# What is the best way to contact you?

We hope that we can answer any questions you may have about how we handle your data. You can contact us at support@exchaste.com.

# How long will you retain my information?

We process registration data for as long as you are an active user of our sites and for 6 years after that. Insofar as we process personal data for marketing purposes or with your consent, we process the data until you ask us to recruit and for a short period afterward (to implement your wishes). The Company also records that you have requested that we not send you direct marketing or process your data indefinitely so that we can comply with your request in the future.

### **Commitment to privacy**

The Company's Privacy Policy is subject to change at any time. We will notify you if there are any significant changes to how we process your personal data.