

PRIVACY POLICY

This Privacy Policy describes the way in which we deal with the information and data you share with us in order for us to allow you the optimal use of our gaming services provided through our website and a network of sales points.

We will process your personal data provided to us (whether via our website, the customer application form or any other means) or otherwise held by us in the manner and for the purposes set out in this Privacy Policy. Collection and processing of your personal data is conducted in accordance with the applicable data protection legislation, in particular, the Act on Protection of Personal Data or legislation that will amend or replace it in the future, e.g. the General Data Protection Regulation.

1. Who is the data controller?

The controller of your personal data is Hattrick-PSK LLC, having its registered seat at Svetog Leopolda Mandića Street No. 14, Postal Code 21204, Dugopolje, Croatia, Identification No.(OIB): 92265244213 ("**Hattrick-PSK**" or "**we**")

In case of any requests relating to processing of your personal data or in case of exercising your rights set out in the Clause 4 below, please send us an e-mail at podrska@psk.hr. You may also contact our data protection officer at dpo@hattrick.hr

2. What personal data do we collect about you? For what purpose and for how long do we collect it?

We process your personal data only to the extent determined by the particular services we provide to you or other purposes of processing, namely:

- **2.1** For the purpose of provision of gaming services, provided online, we process your personal data in the extent of: name, surname, residence address, place and postal number, identification number, date of birth, e-mail address, user name, user password, telephone/mobile number, bank account number, ID card number. A prior registration is required for such participation. In some cases, we can process masked card number and cardholder name. Additionally, one time verification of your card details might be needed for the purposes of usage of specific payment option available to our players. In some particular cases, we process above mentioned data in respect of provision of gaming services that we offer through a network of our sales points. Legal basis for such processing is performance of a contract (i.e. provision of the gaming services) to which you are a party. The personal data will be processed for the period of the duration of the contractual relationship.
- **2.2** For the purpose of compliance with obligations laid down by the special legislation that applies to us, particularly by the Act on Selected Measures Against

Legitimation of Proceeds of Crime and Financing of Terrorism, Act on Gambling, Accounting Act or Tax Code, we process your personal data in the extent of name, surname, residence address, date of birth, place of birth, identification number, citizenship, type and number of ID document, name and state of issuer, date and time of transaction, amount and currency in which transactions are carried out, transaction purpose in case of high incident risk. The processing is based on compliance with legal obligations to which we are subject. The personal data will be processed for a period specified by the particular legislation but no longer than 11 years.

- **2.3** For the purposes of promotion of our products and services, we may contact you by e-mail or telephone even without your prior consent. You may however refuse receiving this kind of marketing communications at any time (i.e. you may opt-out from the database). Details of your electronic contact will be processed for the period of the duration of the contractual relationship unless you opt-out from it.

For the purposes of Responsible gaming program, we may process your personal data in the extent of name, surname, address, contact information (e-mail, telephone number), information related to your betting/gaming activities, transactions, and betting history. The processing is based on legitimate interest.

- **2.4** For the purpose of distribution of commercial communications concerning our services, we may process your personal data in the extent of name, surname, address, contact information (e-mail, telephone number), sex, information related to your betting/gaming activities, interests and online data such as cookies and IP address., transaction and betting history, IP address, cookies, browsing data and behavior data. Such processing is based on the consent given during the registration process. Your personal data will be processed for the duration of the consent.
- **2.5** For the purpose of carrying out analysis of your behavior and preferences (i.e. profiling) which will help us to tailor our offers and advertising to your particular interests and needs, we may process your personal data in the extent of name, surname, address, contact information (e-mail, telephone number), sex, information related to your betting/gaming activities, interests and online data such as cookies and IP address., transaction and betting history, IP address, cookies, browsing data and behavior data. Such processing is based on the consent given during the registration process. Your personal data will be processed for the duration of the consent.

Hattrick-PSK can use automated systems and profiling in its processes, the aim of which is to provide the Customer with quality services. Hattrick-PSK may use these processes in particular to effectively manage the risks of participating in gambling or to evaluate the suitability of services based on the personal data provided. Hattrick-PSK does not make decisions based on profiling that would have legal or similar effects for the Customer.

- **2.6** For the purpose of ensuring functionality of registration form and the gaming portal, we may process your personal data in the extent of [technical cookies and related technical data]. Legal basis for such processing is performance of the contract (i.e. provision of the gaming services) to which you are a party. The personal data will be processed and stored for a period that is necessary for ensuring functionality of the website (i.e. in a matter of days or weeks, eventually for duration of contractual relationship, if necessary).
- **2.7** For the security purposes and purposes of protection of our assets, we may process video recordings from our sales points capturing your face. This processing is based on our legitimate interest and the personal data will be processed for the period necessary to fulfil this purpose, usually in a matter of days, weeks maximum.
- **2.8** In addition, we need to process and store your personal data in the extent of name, surname, residence address, personal identification number (OIB), date of birth, e-mail address, telephone/mobile number, user name, user password, IP address, contract number, bank account number for the purpose of potential claims in the future. This processing is based on our legitimate interest or of a third party. The personal data will be processed for the period necessary to fulfil this purpose, however, no longer than for the period of ten years from the commencement of the statutory limitation period in each particular case.

3. Who do we share your personal data with?

Your personal data may be disclosed to reliable third parties that provide us with administrative or technical support, i.e. to the data processors. We may also share your personal data with payment institutions if it is necessary for performance of services of gaming portal, with government authorities or law enforcement bodies if required by law, with external advisors and with other personnel who is subject to confidentiality obligation. Only limited number of our employees will have access to your personal data. The employees are obliged to keep your personal data and measures taken for their protection strictly confidential. They are entitled to handle personal data only upon our explicit instructions.

4. What are your rights in relation to the processing?

If you grant us your consent to the processing of your personal data, you do so entirely voluntarily and you have the right to revoke or restrict the consent at any time. If your personal data is processed for the purposes of direct marketing (including profiling) or on the basis of a legitimate interest, you also have the right to object to such processing at any time.

Under certain conditions and circumstances, your other rights include: right to access your personal data, right to have your personal data rectified or erased, right to restrict the processing, right to data portability and right to lodge a complaint against Hattrick- PSK, as a controller, with the Data Protection Authority.

5. For how long do we keep your personal data?

We retain your personal data for no longer than is necessary to fulfil the purpose of the processing in question, i.e. typically for the period of performance of the contractual relationship or for the period explicitly required by the applicable legislation. Where we process your personal data based on your consent, such personal data will only be processed for the duration of the consent which you may revoke or restrict at any time. If you do so, we will stop processing the personal data concerned for the purposes you consented to.

6. How do we implement the social media networks features?

Our website may include social media features, such as the Facebook or Twitter buttons. These features may collect certain information about visitors of our website, such as IP address or browsing history and may implement cookies to the browser of the visitors. Please note that processing of the collected data is governed by policies adopted by operators of the social media networks and, therefore, this Privacy Policy does not apply.

7. What if there are any changes to the processing?

Any changes we may make to this Privacy Policy in the future will be notified to you through the agreed communication channels. You are however advised to periodically review this Privacy Policy for any changes that might have been made.