

STATEMENT ON DATA PROTECTION MEASURES

CONTENT:

1. INTRODUCTION
2. GENERAL DATA
3. MESURES OF PERSONAL DATA PROTECTION
4. CREDIT CARD PURCHASE SECURITY PAYMENT
5. HELP CONTACT

SECURITY MEASURES OF PROTECTION OF PERSONAL DATA

1. INTRODUCTION

Hattrick-PSK Ltd considers the protection of its customer's privacy and the personal information to be its primary obligation. Hattrick-PSK Ltd treats the personal data with all due care and in accordance with applicable legislation and regulations. Hattrick-PSK Ltd protects the personal data to the greatest possible extent in accordance with the technical level of the available resources.

The Hattrick-PSK Ltd applies strict rules to determine which employees, departments or other subjects are authorized to access the personal data and which data may be processed. Hattrick-PSK Ltd constantly improves the methods by means of which Hattrick-PSK Ltd provides protection for customers and data about them and with regards to this.

Hattrick-PSK Ltd., collects information from visitors at several places on the website. All information collected is used for the purpose of improving services that Hattrick-PSK Ltd. offers its players, especially for the purpose of participating in games of chance through interactive sale channels of on-line gaming. In case of change of any safeguards or procedures prescribed herein, the players shall be informed in an appropriate manner.

The personal data which is processed by Hattrick-PSK Ltd comes from different sources. Hattrick-PSK Ltd mainly process data automatically directly provided by its customers (e.g. when applying for products and services) or which is created by means of customer's activity (e.g. when using Websites, mobile devices apps etc.).

Besides, Hattrick-PSK Ltd also uses other information from public sources (e.g. social networks, public registers) or from collaborating third parties (e.g. fraud prevention agencies, payment service providers).

2. GENERAL DATA

Hattrick-PSK Ltd only processes that data which is necessary to enable it to provide professional and user-friendly services and to enable it to adhere to its legal obligations and protect Hattrick-PSK Ltd justified interests.

Hattrick-PSK Ltd cannot, however, provides a requested betting or gaming service if the client does not supply the personal information necessary to do so.

Hattrick-PSK Ltd process the following categories of personal data:

- Identification information
- Contact information
- Betting and Gaming data
- Financial data
- Records of phone calls
- Other data

2.1. DATA COLLECTED DURING REGISTRATION

When registering customer wishing to take part in games of chance through interactive channels of on-line games, the following data is collected:

- The username player chooses
- The password player shall use when accessing the website
- E-mail address of player,
- Name and surname of player
- Player's date of birth
- Place of residence and postal code
- Player's telephone (mobile) number
- Identification Number -PIN
- Player's account number (IBAN)
- Citizenship
- Type of ID document
- State issuer of ID document
- Number of ID document
- Name of the issuer of ID document

For Politically exposed player or their family members or associates, following data is collected:

- Data about political exposure of the player

- Data about public office held by the player
- Data about source of income used in business relationship

2.2. OTHER DATA COLLECTED THROUGH ON- LINE MEASURES

The following data shall be collected from every website visitor:

- The time and date of the website visit
- Pages that a visitor is viewing
- The type of Internet browser
- IP address

3. PERSONAL DATA PROTECTION MEASURES

Hattrick-PSK Ltd commits itself to customers and any other persons providing them with personal data to ensure the confidentiality and security of personal data in accordance with the applicable legal provisions in this field.

In order to ensure the proper use and integrity of the collected personal data, as well as prevent unauthorized or random access, processing, deletion, distortion or other use thereof, Hattrick-PSK Ltd implements different internal policies, while adopting all the necessary organization, technical, physical, electronic and procedural safety measures, as well as technological standards in accordance with the applicable Laws and Regulations.

At Fortuna group level, there were implemented numerous IT security procedures aimed to (i) provide a minimum security baseline for all devices, users and systems (“Minimum information security standards”); (ii) detect and remediate vulnerabilities in a timely manners (“Vulnerability management”); (iii) to implement security management systems in order to protect information and to effectively minimize security risks (“Information security”); (iv) to ensure that only authorized users are able to access information and to prevent unauthorized access (“Access control”); (v) to ensure that after an incident, normal services operations are restored as quickly as possible and minimize any impact of the incident (“Incident management”).

Hattrick-PSK Ltd has internal procedures, rules and security measures in place which are in line with all standards applied on the market.

Hattrick-PSK Ltd retains 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.

Hattrick-PSK Ltd process personal data transparently, fairly, correctly and in accordance with the law. Hattrick-PSK Ltd also implemented processes related to

Data Subject rights management, which includes: right to access to personal data, right to have the personal data rectified or erased, right to restrict the processing, right to data portability and right to lodge a complaint against Hattrick-PSK Ltd, as a controller, with the Data Protection Authority.

Hattrick-PSK Ltd informs its customers about Personal Data processing and DS Rights in freely accessible Privacy policy:

- a) In the footer Hattrick-PSK Ltd web sites where all important information is available (About us, Terms & Conditions, Responsible gaming, Contact information, Privacy policy)
- b) Within registration page
Privacy policy is incorporated into registration page.
- c) Within customer account
Customer can reach Privacy policy within his/her customer account, in special section dedicated for consent management.

4. CREDIT CARD PURCHASE SECURITY MEASURES

Confidentiality of your information is protected and secured by using SSL encryption.

Pages for web payment are secured by using Secure Socket Layer (SSL) protocol with 128-bit data encryption. SSL encryption is a data coding procedure for prevention of unauthorized access during data transfer. This enables a secure data transfer and prevents unauthorized data access during communication between user and card processor and vice versa. Financial institutions exchange data by using their virtual private network (VPN) which is also protected from unauthorized access and are certified by PCI DSS Level 1 certified payment service provider. Full card details are not stored by Hattrick PSK d.o.o. and are not available to unauthorized personnel. In some cases, we can process masked card number and cardholder name.

5. HELP CONTACT

Each registered player has the opportunity to learn more about the protection of personal data by sending a written request to the following address:

Hattrick-PSK d.o.o.
Sv. Leopolda Mandića 14
21204 Dugopolje



Hattrick - PSK d.o.o. | Sv. Leopolda Mandića 14 | 21 204 Dugopolje
OIB 92265244213 | tel +385 21 863-520, +385 1 2399-200
fax +385 21 863-513, +385 1 2399-228
e-mail psk.uprava@feg.eu | web www.psk.hr

Any questions about the protection of personal data can be directed by the player to our customer service at any time, to the e-mail address podrska@psk.hr.

Also, players have the opportunity to contact our personal data protection officer at dpo@hattrick.hr.

Details regarding requests relating to the processing of personal data or the exercise of player rights are available to players in the Privacy Policy.