

# **Privacy Policy**

## **ESTORIL SOL DIGITAL**

ESTORIL SOL DIGITAL acknowledges the importance of protecting your personal information and data. That is why we do everything in our power to protect the privacy of all the visitors and players of our website. Here you will find information relating to the processing of your personal data, without prejudice to your other rights provided by applicable law.

You will also find information on the use of cookies or invisible pixels.

### **1 – Collection of personal data**

It is possible to visit our website, to read about our services or to find out our latest novelties without having to provide us any personal information.

The effective use of our services requires registration, and it is therefore mandatory, under the legal terms, that the user provides some personal data, which will be subject of verification and validation through an application used by the Regulation and Games Inspection.

In case of necessity and in compliance with the legal rules, namely the one established in Decree-Law 66/2015, of April 29, ESTORIL SOL DIGITAL reserves the right to ask, at any time, to receive legal documents relating to the identity of the player as well as the payment methods used by this player.

These documents can, among other things, be: a photo of the original of the identity card (Citizen Card, Identity Card, Passport, etc.), domiciliation or bank documents.

ESTORIL SOL DIGITAL also reserves the right to verify the received documents by means of an external source.

The collection and treatment of your personal data (such as your name, date of birth, address, email address and telephone number) is done by ESTORIL SOL DIGITAL, which is responsible for the processing.

The collection and treatment are based on:

1. Compliance with a legal obligation, contained in Decree-Law 66/2015, of April 29 and Law no. 83/2017, of August 18, and the realization of public interest underlying those standards, where the following data are collected:

- Full name;
  - Address of residence;
  - Place and date of birth;
  - Nationality;
  - Profession;
  - Civil identification number or passport number;
  - Tax Identification Number;
  - E-mail address;
  - Payment account identifier elements;
  - Credit card number;
  - Telephone (landline or mobile);
  - URL or IP address;
  - Games played and their results;
  - Any other information provided on a voluntary basis.
2. Customer management for retention purposes and marketing campaigns, according to the consent of the data subject, where the following data are collected:
- Last and First Name;
  - Address of residence;
  - Place and date of birth;
  - Civil identification number or passport number;
  - Tax Identification Number;
  - E-mail address;
  - Telephone (landline or mobile);
  - URL or IP address.

The collection and treatment is done in a confidential manner and is compliant with the Portuguese and European legal norms, namely Law 67/98, of October 26, and the Directive 95/46/CE, of 24 October 1995, Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002, Directive 2009/136/EC of the European Parliament and of the Council, November 25, 2009 and Regulation (EU) 2016/679 of April 27, 2016, or others that may arrive in the future.

## **2 – Purpose of the collection of personal data**

By providing us with your personal data, you give us your explicit permission to treat this information for the purposes indicated below:

- To offer you games and bets on our website and making sure you meet the legal requirements;

- To ensure the proper management of the clients and Player accounts;
- To allow for sending, claiming and verifying invoices;
- To be shared with sub-contracted suppliers of the platform or games, for the purpose of processing deposits, bets, bonuses and withdrawals.
- To, if necessary, collect information on the players from the gaming regulator, Serviço de Regulação e Inspeção de Jogos, in order to obtain approval for their participation in games of chance and bets;
- To carry out informative or promotional proceedings with regard to the services of ESTORIL SOL DIGITAL;
- To receive informative or promotional letters on the services or products of ESTORIL SOL DIGITAL, on paper or via email. In case you do not wish to receive such information you can express this desire from any message you receive;
- To respond to any questions you send us;
- To administer or otherwise fulfil our obligations with regard to any agreement you have with us;
- To anticipate and resolve problems concerning any service provided and, in general, ensure the technical administration of our website;
- To conduct market studies, assemble statistical data and conduct trend analyses for financial, management, marketing and reporting purposes.

In addition to this, in the direct marketing emails or newsletters you can be sent, there will always be a link which you can click to unsubscribe and no longer receive promotional information from our part.

By creating a player account, you accept, among other things, that ESTORIL SOL DIGITAL reproduces your user name on its website, as well as that of its partners, when you win a tournament, winnings, a prize and/or a bet.

### **3 – Contact details of the organization responsible for the processing of the personal data**

The entity responsible for the collection and processing of personal data is the ESTORIL SOL DIGITAL Online Gaming Products and Services S.A, with headquarters at Rua Melo e Sousa 535, Bloco 2, A, 2765-253 Estoril (Portugal).

The responsible entity can be contacted through the e-mail address [dpo@estorilsoldigital.com](mailto:dpo@estorilsoldigital.com).

#### **4 – Transmission of your personal data – Third party service providers**

Your collected personal data will be processed confidentially by the personnel of ESTORIL SOL DIGITAL. Moreover, ESTORIL SOL DIGITAL can transfer certain of your personal data to third parties, but only in the following cases:

- We collaborate with service providers, representatives and subcontractors to ensure support for the internal operations of our website and to help us with the management of the various functions, programs and offers available on the site. These third parties and their employees can also come in contact with your personal data when they provide us with their services. All of these third parties are obligated to constantly apply the same level of security to your personal data as ESTORIL SOL DIGITAL does and, if necessary, they are bound by an agreement which requires them to maintain the confidentiality and security of your personal data and to only process these data according to the specific instructions of ESTORIL SOL DIGITAL.
- With your consent, your data can be communicated to third-party companies and trading partners of ESTORIL SOL DIGITAL, for promotional purposes (including direct marketing) for the development and the sale of the products and services of these third-party companies.
- We may disclose your personal data in order to respond to any inquiries from duly authorized government and police authorities, or to comply with any law or regulation.
- Finally, we may disclose your personal information to respond to complaints, to protect the security, the property or the rights of ESTORIL SOL DIGITAL, its employees or the public in general and to prevent security threats, fraud or other malicious activities.

In case your data would be transmitted to a third party situated outside the European Union, ESTORIL SOL DIGITAL commits to the fact that the country of destination offers a similar level of protection with regard to the protection of personal data or the third party who is responsible for the processing commits to signing a contract containing the contractual clauses provided by the European Commission.

#### **5 – Your rights concerning your personal data**

#### A) Right of information

All your questions regarding the registration and treatment of your personal data can be directed by electronic message to the address of Estoril Sol Digital for [dpo@estorilsoldigital.com](mailto:dpo@estorilsoldigital.com).

If you wish to submit a complaint to the Portuguese Control Authority, you may do so at the following address:

Comissão Nacional de Proteção de Dados

Rua de São Bento n.º 148-3º

1200-821 Lisboa

Tel: +351 213928400 Fax: +351 213976832

E-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)

#### B) Right to access, rectification, portability, erasure and opposition

The Player has the right to, at any time and without charge, have access to his/her personal data collected, namely, to know which are and are not subject to treatment and for what purposes.

The Player has the right to, request his/her data to be rectified because they are outdated or incomplete. May also request the data to be erased, or limited use, without prejudice to the legal obligations that in this regard are incumbent upon the entity responsible for the treatment. The Player can also request his/her personal data to be delivered in a structured format in common use.

In order to exercise any of the aforementioned rights, the Player may send an e-mail request and without prejudice, in case there any doubts about the authenticity of the request, may be asked to send the respective requests by mail with proof of identity. The request must, in all circumstances, be formulated in writing, dated and signed, and be addressed to ESTORIL SOL DIGITAL, responsible for the aforementioned treatment.

If a request is submitted, the Player will be given a reply within one month at the latest, and this time limit may be extended if necessary. A reply may be refused, or a fee shall be required to pay the costs incurred if the request is manifestly unfounded or repetitive.

The Player may, at no cost associated, object to the processing of their personal data for direct marketing purposes. To do this, you can send a written request to the organization responsible for processing, and the contact details are given above.

## **6 – Security and confidentiality**

ESTORIL SOL DIGITAL takes the appropriate technical and organizational measures necessary to protect your personal data from abuse, destruction, loss or any other action that can compromise the safe and confidential preservation of your personal data.

ESTORIL SOL DIGITAL applies strict and extensive security measures to prevent unauthorized access to your personal data or any abuse of these data.

## **7 – Third-party websites**

The site can contain links to third-party websites or advertisements by third-party advertisers which collect your personal data. ESTORIL SOL DIGITAL can, in no way, be held responsible for the collection and processing of your personal data by these third parties.

## **8 – Conservation of the personal data**

All the personal data you provide us during your registration on our website, in order to enjoy our services, will be saved in the files of ESTORIL SOL DIGITAL Online Gaming Products and Services S.A. in Portugal. ESTORIL SOL DIGITAL sees to the adequate, relevant and non-excessive collection of the personal data, taking into account the purpose of processing as indicated in this declaration. Your personal data will be kept for the period of time that your registration on the site will continue, plus the period necessary for ESTORIL SOL DIGITAL to defend its rights in a judicial process, unless retention of such data is required by applicable law.

## **9 – Cookies**

ESTORIL SOL DIGITAL uses a series of cookies on its website. We invite you to read our cookie policy [HERE](#).

## **10 – Collection of non-personal information**

ESTORIL SOL DIGITAL may automatically collect non-personal information about you, such as the type of browser you use or the website containing the link you used

to go to our website. We may also assemble information you submitted to the site (e.g.: your age and the city you live in) in statistics.

The Player cannot be identified by means of the before mentioned information and this is solely used to help us provide an efficient service on this website. We can, from time to time, provide this non-personal information to third parties or assemble it in statistics in order to use it in relation to this website.

## **11 – Law applicable to these conditions for the protection of private data**

Unless otherwise provided by mandatory law, Portuguese law applies to these conditions for the protection of private data. In case of dispute, the courts of Portugal are the authority.

## **12 – Modifications**

ESTORIL SOL DIGITAL reserves the right to modify these conditions for the protection of private data at any time, but always in compliance with the applicable laws and regulations. In case of modifications related to the manner in which your personal data are used, we will post these modifications on this page. Please verify our Privacy Policy regularly in order to be up to date about any changes and the manner in which your information can be used.

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Note: In case of any differences between the Portuguese and any other translated versions of this declaration, the Portuguese version takes priority.