

Data Protection Policy Affiliates
(20th December 2021)

INTRODUCTION

The protection and security of the personal data of our Affiliates and users is an essential concern for the company Equinox (subsidiary of Betclik Everest Group).

When collecting and processing your personal data as part of your affiliation contract, Equinox acts as data controller and undertakes to comply, in all circumstances, with all legal and regulatory requirements in force, in particular those relating to General Regulation (EU) 2016/679 on Data Protection (GDPR), as well as the Data Protection Act of January 6, 1978, Directive 2002/58 / EC of the European Parliament and of the Council of July 12, 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector, any amendment, consolidated text or re-edition ("Texts applicable to personal data protection").

This Policy also informs you of all the means at your disposal to control the use of the services and exercise your rights relating thereto. By registering on the Site or using the Site, you declare that you have read and understood this Data Protection Policy.

For any questions about this Policy, you can contact our Data Protection Officer (DPO) at the following address: privacy.team@betclikgroup.com

1. What personal data is collected ?

When you register, we may collect the following data :

- Personal information
 - Username
 - Password

- Contact details
 - Email address
 - Name
 - Surname
 - Phone number
 - Skype username
 - Postal address
 - ZIP Code
 - Country

- Banking details

- Name
- Address
- IBAN
- Swift/BSB/Routing

- Additional data
- URL address used for affiliation,
- Navigation data.

We may also be required to collect any identification documentation concerning the Affiliate, natural person or legal person, at any time, in order to carry out checks concerning the Affiliate's Site and / or any information concerning the Affiliate.

2. On what basis do we collect your personal data ?

- **Compliance with our contractual obligations:** We will use your data to fulfill our obligations arising from the Contract between you and us, and to provide you with the information and services you request from us. We will also use your data to inform you of changes to our services and / or products and the evolution of our contractual relationship.

- **Compliance with our legal obligations:** As a regulated operator, we are required to comply with the directives applicable to online betting operators as well as with the legislation against money laundering and fraud, financing terrorism, corruption and tax evasion.

- **Legitimate interests:** We will also use your data in certain cases on the basis of our legitimate interests, mainly to protect against fraud and ensure the physical and IT security of our company; ensure the management of any dispute arising between us or with third parties.

3. For what purposes do we collect your personal data ?

Your personal data are only used for the purposes for which you have communicated them, namely:

- Affiliate account management and provision of the Services;
- Communication management with the Affiliate;
- Analysis and improvement of the offer;
- Fight against fraud, money laundering and terrorist financing;
- Respond to a legal or regulatory request, a court decision or as part of a legal procedure;
- Management of commissioning plans and payments.

4. Recipients of your personal data

Equinox is the sole recipient of your personal data. They are, however, likely to be transmitted to companies of the Betclic Everest Group and to subcontractors, ensuring that they are used only for the purposes indicated in this data protection policy.

Your data may also be communicated to the various service providers of Equinox such as, for example, payment providers and this, exclusively for the needs of its activity and in order to allow it to fulfill legal and regulatory obligations, in particular concerning the fight against fraud and money laundering.

Your data may also be transmitted to:

- Affiliate platform;
- IT service providers;
- Auditors;
- Any competent authority.

We strictly ensure that our subcontractors comply with the GDPR as well as the rules that we contractually impose on them in terms of data security.

Some of our subcontractors may be located outside the European Union. In this case, we ensure that the transfers are framed by adequate legal guarantees. We are committed to ensuring that our subcontractors comply with the required security and confidentiality obligations.

5. Security of your personal data

Equinox implements measures to protect your personal data through technical and organizational security measures.

In the event of unauthorized use of your credentials, you must immediately notify Equinox or the Group.

6. Retention of your personal data

We only keep your personal data for the periods corresponding to the pursuit of the purposes for which they were collected, in particular in order to provide you with the services associated with your affiliation contract and to comply with our legal obligations, in particular in terms of online gambling and anti-money laundering, or to assert one of our rights.

7. Your personal data rights

- The right to be informed about the collection and use of your personal data: You have the right to demand clear, transparent, and easily understandable information about how we use your personal data and about your rights.
- The right to access to your personal data: You have the right to obtain from Betclic a copy of your personal data.

- The right to data portability: The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. This right only applies when the lawful basis for processing this information is consent or contract, or when the information is processed by automated means.
- The right to rectify and complete your personal data: You have the right to have inaccurate personal data rectified or completed if it is incomplete, without due delay, subject to the regulations applicable to online gambling operators. For more information, you can refer to our Terms and Conditions.
- The right to object to the processing of your personal data: You have the right to object to the processing of your personal data after you have registered with us.
- The right to have your personal data erased : You can ask Betclic to erase your personal data, if the retention of your personal data is no longer necessary for the purposes for which it was collected.

As an Affiliate, you can contact our Data Protection Officer (DPO) at the following email address: privacy.team@betclicgroup.com.

Please note that you can lodge a complaint with the French Supervisory Authority (CNIL <https://www.cnil.fr/>).

8. Cookies and other trackers

8.1 What is a cookie ?

A cookie is a small data file placed on the hard drive of your terminal (computer, smartphone, tablet, etc.) via our browser, when you access an online service. A cookie allows its issuer to identify the terminal in which it has been placed and to keep in memory certain information relating to your activity, for a limited period, to improve and personalize your experience on the site.

8.2 Cookies on the website ?

Necessary cookies :

These cookies allow you to use the main functionalities of our website and access to secured areas of the website. Without these cookies, our website cannot run normally. These cookies also ensure security of the website for its users.

Analytics cookies :

These cookies collect information which is used in aggregate form to help us understand how the website is used.

Cookies provider : Google Analytics

URL : <https://support.google.com/analytics/answer/6004245>

No advertising cookies, social networks or pixels are used when you browse the site.

8.3 How to manage your cookies from our cookies management ?

You have the right to decide whether to accept or refuse cookies. You can exercise your cookie preferences by clicking on the "Cookie management" link on this site.

8.4 How to manage your cookies from your internet browser ?

You can also configure your browser so that cookies are in your terminal or, on the contrary, that they are rejected, either systematically or according to their transmitter. It is also possible to configure your browser software so that the acceptance or rejection of cookies is offered to you from time to time, before a cookie is likely to be saved in your terminal.

To express or reconsider your choices regarding cookies, refer to the help menu or to the dedicated section of your browser.

9. Amendments

Equinox may modify this policy. You will be informed by a visible notice on your next connection.