

PRIVACY AND COOKIE POLICY

Last updated [21.11.2022]

INTRODUCTION

Thank you for choosing to be part of our community at BtoBet. BtoBet is a multinational group of companies, with offices around the globe ("BtoBet", "company", "we", "us", or "our"). BtoBet Limited is our leading data controller, located in Gibraltar. However, if you are applying for a specific position from a specific entity of the BtoBet Group, such entity shall be deemed your data controller and the respective local data protection laws shall apply.

We understand the importance of the privacy. Therefore, we are committed to ensuring the measures that protect your personal information when you visit us or have decided to share your data with us. The following information is designed to help visitors and applicants understand what information we collect from our career-site and how we handle and use the information after that. This Privacy and Cookies Policy ("The Policy") explains our practices, including your choices and rights, regarding the collection, use, and processing of certain information, including your personal information, by the BtoBet Group of companies.

If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at legal@btobet.com.

When you visit our career-website <https://career.btobet.com/> ("Site") and use our services, we consider that you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our site and our services.

This privacy policy applies to all information collected through our website, and/or any other third-party websites, services and partners (we refer to them collectively in this privacy policy as the "Sites").

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE USE YOUR INFORMATION?
3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?
4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
5. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?
6. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?
7. HOW LONG DO WE KEEP YOUR INFORMATION?
8. HOW DO WE KEEP YOUR INFORMATION SAFE?
9. DO WE COLLECT INFORMATION FROM MINORS?
10. WHAT ARE YOUR PRIVACY RIGHTS?
11. DO WE MAKE UPDATES TO THIS POLICY?
12. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us such as name, personal email, phone number, address, contact information and other similar contact data, information listed in your CV and security data.

We collect personal information that you voluntarily provide to us when expressing an interest in contacting us when applying for a possible career in BtoBet.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

In Short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our websites.

We may automatically collect certain information when you visit, use or navigate the Site. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. This information is primarily needed to maintain the security and operation of our Site, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find more information regarding the cookie policy below.

Information collected from other Sources

In Short: We may collect limited data from public databases, social media platforms, and other outside sources.

We may obtain information about you from other sources, such as public databases, social media platforms (such as Facebook, LinkedIn or other), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); search results and links, including paid listings (such as sponsored links).

HOW DO WE USE YOUR INFORMATION?

In Short: We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Site for the business purposes described below. We process your personal information for these purposes in reliance on our legitimate interests of a possible employment ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To send administrative information to you** [for Business Purposes, Legal Reasons and/or possibly Contractual]. We may use your personal information to send you a proposal, offer, service and/or new feature information and/or information about changes to our terms, conditions, and policies.
- **Fulfill and manage your orders** [for Contractual reasons]. We may use your information to fulfill and manage a possible contract if made between you and BtoBet.
- **Request Feedback** [for our Business Purposes and/or with your Consent]. We may use your information to request feedback and to contact you about your application or your use of our Site.
- **To enforce our terms, conditions and policies** [for Business Purposes, Legal Reasons and/or possibly Contractual].
- **To respond to legal requests and prevent harm** [for Legal Reasons]. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In Short: We only use your information for evaluating a possible career within BtoBet and your information is shared within our members on a need-to-know basis and by applying the minimally used information rule. We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We may only share and disclose your information in the following situations:

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- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
 - **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
 - **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
 - **Service Providers.** We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. These third parties may have access to, or process personal data or client data as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.
 - **With your Consent.** We may disclose your personal information for any other purpose with your consent.

DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

A cookie, also known as an HTTP cookie, web cookie, or browser cookie, is a piece of data stored by a website within a browser, and then subsequently sent back to the same website by the browser. Cookies were designed to be a reliable mechanism for websites to remember things that a browser had done there in the past, which can include having clicked particular buttons, logging in, or having read pages on that site previously.

Cookies are often designed to improve the usability of a website.

When applying through our career-site the following cookies are collected:

- `_ga` (standard Google Analytics cookie)
- `_gid` (standard Google Analytics cookie)

The Google Analytics JavaScript libraries use HTTP cookies to "remember" what a user has done on previous pages / interactions with the website.

The `_ga` and `_gid` cookies are used to distinguish users on the website. The `_ga` cookie has a default expiration time of 2 years and `_gid` cookie has a default expiration time of 24 hours.

- `on_waitlist_session` cookie,

This cookie is used only when an applicant on our site has fully submitted an application and to determine whether this applicant has applied through a referral or not.

The previous cookies are used only when accessing our career site. For more information when accessing our website www.btobet.com, please see the privacy policy therein.

IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

In Short: We may transfer, store, and process your information in countries other than your own.

Whenever in the course of sharing information we transfer personal information to countries outside of the European Economic Area and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Policy, and as permitted by GDPR and the applicable laws on data protection.

BtoBet is multinational group of companies. For the purposes explained in this Policy, your information may be transferred to BtoBet group companies (including service providers operating on their behalf) and other third parties in countries which might not have the same level of data protection laws as those in the country where you are located. Each of those BtoBet group companies (and their authorized data processors) will however comply with BtoBet internal policies and procedures or have same level of their own policies and procedures, relating to collection and processing of personal data which complies with the key data protection principles of fair handling of personal data and ensuring adequate level of protection of personal data according to GDPR and the applicable laws on data protection.

If you are applying for a specific position from a specific entity of the BtoBet Group, such entity shall be deemed your data controller and the respective local data protection laws shall apply.

WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

***In Short:** We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our websites.*

The Site may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Sites. You should review the policies of such third parties and contact them directly to respond to your questions.

HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements), or if consented by you when applying.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Site is at your own risk. You should only access the services within a secure environment.

DO WE COLLECT INFORMATION FROM MINORS?

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Site, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site. If we learn that personal information from users less than 18 years of age has been collected, we will promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at legal@btobet.com

WHAT ARE YOUR PRIVACY RIGHTS?

In Short: *[In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information.] You may review, change, or terminate your account at any time.*

[In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below (legal@btobet.com). We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority.

DO WE MAKE UPDATES TO THIS POLICY?

In Short: *Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, email us at legal@btobet.com or by post to:

1. BtoBet Limited
For: Data Protection
Address: Sovereign Place 117 Main Street,
Gibraltar