

Privacy policy V.1

WHO WE ARE

SA Sports Group America N.V (also referred to in this document as "we" or "us") is processing personal data in accordance with European Regulation 2016/679 (General Data Protection Regulation) and the Council of 27 April 2016, as well as Federal Law No. 13,709 of 14 August 2018 (Personal Data Protection Act). This Privacy Policy is issued on behalf of the SA Sports Group America NV, which includes the URL www.betesporte.com .

The data controller for the www.betesporte.com URL is SA Sports Group America N.V, Abraham de Veerstraat 9,P. O. Box 3421, Curaçao. Our Data Protection Officer (**DPO**) can be contacted at contato@betesporte.com .

If you have questions about this Privacy Policy, please contact our DPO. We understand that the privacy and security of our Clients' personal information is extremely important. This policy defines what we do with our Clients' information and what we will do to keep it safe. It also explains where and how we collect Clients' personal information, as well as Clients' rights to any personal information we have.

PRIVACY NOTICE AND CLIENTS' DUTY TO INFORM US OF CHANGES

This is the first version of our Privacy Policy.

It's important that the personal data we have about the Client is accurate and current. It is a Clients' duty to keep us informed if the personal data changes during the relationship with us.

1. HOW WE USE YOUR PERSONAL DATA

We will use the Client's personal data only when the law authorizes us to do so, most often in the following circumstances:

- If we need to execute the contract that we are going to enter or that we have already concluded with the Client.
- If it's necessary for our legitimate interests (or those of a third party) and the Interests of the Client and fundamental rights do not nullify those interests.
- If it's necessary to comply with a legal or regulatory obligation.
- We don't normally rely on consent as a legal basis for processing Client's personal data. However, the Client has the right to withdraw his consent for marketing purposes at any time, and in this case must contact us via contato@betesporte.com.

By providing personal information and registering on our website, or by logging in when accessing our Website, the Client expressly consent our processing and disclosure of personal information as defined in this Privacy Policy, or as provided in accordance with the Terms and Conditions.

THIRD-PARTY CONNECTIONS

This site may include links to third-party websites, plug-ins, and applications. Clicking or activating these links may allow third parties to collect or share data about the Client. We do not control these third-party websites and we are not responsible for their privacy statements. When leaving our website, we advise the Client to read the privacy notice of each website that visits.

2. THE DATA WE COLLECT ABOUT THE CLIENT

Personal data (or personal information) refers to any information about a person from whom that person may be identified. They do not include data where the identity has been deleted (anonymous data).

We may collect, use, store and transfer different types of personal data about the Client that we group in as follows:

A. Identity data includes first name, single name, surname, username or similar identifier, date of birth and gender.

B. Contact details include billing address, mailing address, email address and phone numbers.

C. Financial data includes bank account and payment card details.

D. Transaction data includes details about payments made or received by the Client and other details about products and services you have purchased from us.

E. Technical data includes IP address (internet protocol), PC tag, login data, browser type and version, time zone and locale setting, browser plug-in types and versions, operating system and platform, and other technologies on the devices used to access this site.

F. Profile data includes your username and password, purchases or orders made by the Client, interests, preferences, mailing feedback and survey responses.

G. Usage data includes information about how the Client use our website, products, and services.

H. Marketing and communications data includes the Client's preferences for receiving marketing messages from us and third parties and the communication preferences.

We also collect, use, and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data can be obtained from personal data but are not considered personal data in accordance with the law, since this data does not reveal, directly or indirectly, the identity.

On rare occasions, we may collect Client's health data when the Client forward specific medical reports to us. Outside this scenario, we do not collect any special categories of personal data about the Client (these include data about race or ethnicity, religious or philosophical beliefs, sexual life, sexual orientation, political opinions, union membership, information about genetic and biometric data). For the avoidance of doubt, data on requests for self-exclusion are not considered to be health data.

IF THE CLIENT DO NOT PROVIDE US WITH PERSONAL DATA

In cases where we must collect personal data in accordance with the law, or under a contract we have with the Client and if the Client do not provide us with data when requested, we may not be able to perform the contract we have or provide the Client with the requested service.

Please note that the information transmitted to us by the Client via e-mail is not encrypted and is transmitted at the Client's own risk.

3. THE PURPOSE FOR WHICH WE COLLECT THE CLIENT'S PERSONAL DATA

We define below, in table format, a description of how we plan to use Clients' personal data and the legal bases on which we rely to do so. We also identify what our legitimate interests are when appropriate. The Client can obtain the information on the equilibrium criterion based on legitimate interest upon request by contacting the DPO by e-mail: contato@betesporte.com.

Please note that we may process the Client's personal data for more than one legitimate reason depending on your specific purpose. The Client may contact us if he needs data about the legal reason we rely on for processing personal data, when more than one reason has been defined in the table below.

Purpose/Activity	Data type	Legitimate basis for processing, including the basis of legitimate interest
To register as a new Client to provide you with our sports betting services.	(a) Identity (b) Contact	Execution of a contract with the Client.
(a) Processing and monitoring of user bets. (b) Processing of payments made by card and online. (c) Processing, authorization and/or identification of payment processing. (d) Debt collection.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and communications	(a) Execution of a contract with the Client. (b) Necessary for our legitimate interests (recover debts due to us and meet client payments). (c) comply with our legal and regulatory obligations.
To manage our relationship with the Client, which will include: (a) Notify you of changes to our terms or our Privacy Policy. (b) Ask you to leave a comment or respond to an inquiry.	(a) Identity (b) Contact (c) Profile (d) Marketing and communications	(a) Execution of a contract with the Client. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (keep our records up to date and study how clients use our products/services).
Allow the Client to participate in a sweepstakes, hobby or respond to a survey.	(a) Identity (b) Contact (c) Profile (d) Use (e) Marketing and communications	(a) Execution of a contract with the Client. (b) Necessary for our legitimate interests (study how clients use our products/services, develop them, and grow our business).
Manage and ensure the security of our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and data hosting).	(a) Identity (b) Contact (c) Technicians	(a) Necessary for our legitimate interests (to manage our company, provide administration and it services, network security, to prevent fraud and in the context of a corporate reorganization or group restructuring exercise). (b) Necessary to comply with a legal and regulatory obligation.
To provide the Client with relevant content on the website and advertisements, and measure or understand the effectiveness of the advertisements we display.	(a) Identity (b) Contact (c) Profile (d) Use (e) Marketing and communications (f) Technicians	Necessary for our legitimate interests (study how clients use our products/services, develop them, grow our business, and underpin our marketing strategy).
To use data analytics to improve our website, products/services, marketing, client relationships and experiences.	(a) Technicians (b) Use	Necessary for our legitimate interests (define the types of clients for our products and services, keep our website up to date and relevant, develop our business and base our marketing strategy).
To make suggestions and recommendations about goods or services that may be of interest to the client.	(a) Identity (b) Contact (c) Technicians (d) Use (e) Profile	Necessary for our legitimate interests (develop our products/services and grow our business).

To prevent the Client to use our services when he has disclosed to have a gambling problem proven by medical evidence, such as a medical certificate.	(a) Health	Necessary to protect the Client's vital interests (Art. 9(2) c) of the GDPR).
---	------------	---

4.COM WHO CAN SHARE CUSTOMER INFORMATION

a. For the purposes of controlling and/or detecting fraud and money laundering, SA Sports Group America N.V has the right to transfer Client's personal data to third parties, including, among others, external suppliers such as the police, financial integrity units, banks, address identification and verification system providers, payment service providers and financial institutions; however we will only do so in cases where we are assured that they are complying with the same standards regarding data processing and security. We encourage our Clients to read the privacy policies of our external suppliers.

b. In addition, we reserve the right to disclose the Client's personal data to relevant third parties, such as other SA Sports Group companies, our regulatory authorities, financial integrity units, especially where SA Sports has reasonable grounds to suspect irregularities involving the Client's account.

c. Your data will also be shared for regular operational purposes with entities such as cloud services, data centers, payment services, banks, ID verification tools, Client communication tools, game providers, etc.

d. We have the right to share the information we have about the user, which includes personal data and/or betting history with sports bodies, to investigate issues of fraud, money laundering or sports integrity and to comply with our regulatory obligations.

e. We will take all reasonable steps to ensure that the personal data is treated securely and processed with care and protection and in accordance with appropriate applicable legal requirements.

5. HOW LONG WILL WE KEEP CLIENT'S INFORMATION

To comply with our legal, financial, and regulatory requirements, we will retain user's information for the minimum period required to comply with those requirements. Once the minimum period has passed to maintain Client's data and if we don't have no other legitimate reason to retain Client's data, those data will be made anonymous.

The retention period will be implemented in accordance with the applicable requirements (never less than at least 10 years).

In the event of a request for data to be deleted and such request qualifies for deletion in accordance with our guidelines, the personal data will be made anonymous. Once they are anonymous, they are no longer recognized as personal data.

If there is no activity in the account (as defined in our Terms and Conditions) and we have kept Client data for the minimum period required to comply with our legal and regulatory requirements, the Client's account will be terminated and made anonymous.

Accounts in which a fraud, gambling addiction notification and/or permanent self-exclusion has occurred will not be made anonymous so that we can continue to monitor these Clients while we comply with our legal and regulatory requirements.

6. KEEP THE USER INFORMED ABOUT OUR PRODUCTS AND SERVICES

We would like to send offers, hobbies, and exclusive content through our various marketing channels. Client data will not be sold or given to third parties who are not SA Sports affiliates for marketing purposes without prior approval.

The Client could change the settings for marketing preferences by logging into the SA Sports account and going to the Preferences page, where the marketing preference could be changed.

7. HOW WE PROTECT YOUR INFORMATION

a. SA Sports ensures that Client's personal data will be:

- Processed in accordance with the rights of the Client;
- Processed in a fair and lawful manner;
- Obtained only for the above purposes;
- Adequate, relevant, and not excessive for this purpose;
- Kept safe;
- Kept only for as long as necessary for the purposes for which they are intended.

b. SA Sports will take all reasonable steps to ensure that the user information is kept safe and secure. In this context, we maintain appropriate technical and organizational measures to protect data from unauthorized or unlawful processing.

8. CLIENT'S RIGHTS

Subject to certain limitations on certain rights, the Client have the following rights in relation to his information. The Client can exercise any of these rights by contato@betesporte.com indicating the right he wish to exercise along with the reason for the request, if applicable.

Right of access: the Client have the right to have access to his personal data and additional information.

Right of rectification: the Client have the right to request that inaccurate personal information be rectified or completed if it is incomplete.

Right of deletion: the Client have the right to request the deletion of his information in cases where there is no longer a valid reason for us to continue processing it. The Client must withdraw the balance from his account before sending us the order. The rules decreed in section 8 of our Terms and Conditions regarding withdrawal of funds apply. The Client also have the right to ask us to delete or remove personal data in cases where the Client have successfully exercised the right to object to processing (see below), in cases where we may have unlawfully processed the information or in cases where we are required to erase the personal data to comply with local law. It should be noted that this right is not absolute and may be subject to our compelling reasons for maintaining such information, such as our compliance with legal and regulatory obligations. The Client can refer to the "How long we will keep Client's information" section above. If we are not able to fulfill this request, we will notify the Client.

Right to restrict processing: this allows the Client to ask us to suspend the processing of the personal data in the following situations: (a) if Client want us to determine the accuracy of the data; (b) in cases where our use of the data is unlawful (i.e. where it does not fall within a legal reason for processing as outlined in accordance with section 3, or where the information has been obtained unlawfully by a third party), but does not want us to delete it; (c) in cases where we need to keep the data even if we no longer need it, as required by it to establish, exercise or defend legal proceedings; or (d) if the Client has objected to our use of his data, but we need to confirm that we have primary legitimate reasons for using it. Please note that this right is not absolute.

Right to data portability: the Client have the right to request the personal data that have provided to us. You can make a data portability request by contacting contato@betesporte.com.

Right of objection: the Client have the right to object to our processing of your data. It should be noted that this right is not absolute and may be subject to our compelling reasons for maintaining such information, such as our compliance with legal and regulatory obligations. If Client wants to be eliminated from direct marketing, must contact contato@betesporte.com and indicate that no longer want to receive marketing materials.

It should be noted that the ability to provide our services depends on the processing of certain information; therefore, exercising certain rights may result in a loss of the service or part thereof.

NORMALLY NO FEE IS CHARGED

The Client will not have to pay any fee to access personal data (or to exercise any other rights). However, we may charge a reasonable fee in case of a request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

WHAT WE MAY NEED FROM THE CLIENT

We may ask the Client for specific information to help us confirm identity and to guarantee the right to access personal data (or to exercise any other of Client's rights). This is a security measure to ensure that personal data is not disclosed to anyone who does not have the right to receive it. If the Client haven't provided us with all verification information when registered, this information may be requested to complete the profile. We may also contact Client to ask for further information regarding the request to speed up our response. The Client must keep the password confidential.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally, it may take more than a month if the request is particularly complex or in case of several requests. In this case, we will notify the Client and keep him updated.

It's Client's responsibility to keep personal information up to date and accurate.

The Client has the right to lodge a complaint with a supervisory authority at the place of his habitual residence, place of work or place of the alleged infringement. However, we would like to have the opportunity to address your concerns before the local authority's approach; therefore, please contact us first.

9. COOKIE POLICY

SA Sports websites (including mobile-optimized ones) and mobile applications use cookies and similar technologies to manage login, provide personalized web pages, and tailor content to reflect Client's specific needs and interests. Once the Client "Accept" our cookie banner, agrees to the use of cookies and similar technologies for the purposes described herein.

WHAT IS A WEB COOKIE?

Cookies are text files that contain a small amount of information that is downloaded to the user's device when they visit a website. They are generally used by most websites to improve the online user experience and to ensure that content and functions are provided and used more effectively.

Cookies perform several different functions. For example, some cookies are temporarily transferred to your device during the time you browse a particular website; these cookies allow you to navigate pages more efficiently or enable websites to remember the preferences you have selected. Other cookies may be used to help websites remember you as a visitor returning to the page or to ensure that the online ads you receive are more relevant to your specific needs and interests.

User can change the browser settings to block some or all cookies. To do this, simply follow the instructions presented by the browser provider. The Client should be aware that if blocks cookies from the SA Sports website, some, or all the functions of the site may not function as intended. If user want more information about cookies, must consult "other information".

The types of cookies SA Sports uses are:

- Performance cookies
- Functionality cookies
- Targeting cookies
- Essential cookies

Essential cookies are cookies necessary for the correct functioning of a website; they allow user to browse our website and perform specific functions such as accessing secure areas, making bets, making deposits, and managing the account. Without these cookies, it would not be possible to provide our specific online services and functions.

We use essential cookies to:

- Keep the selections in the betting slip as the Client browses the site;
- Identify to the Client as being logged in to the www.betesporte.com .

Cookies that we set as essential cookies will not be used to:

- *Collect information that could be used to advertise products or services to the Client;*
- *Remember the preferences or username beyond your current visit.*

Some examples of essential cookies that SA Sports defines:

BackURL	This cookie is used for browsing purposes.
Custid	This cookie is used to authenticate the Client ID.
BrowserSessionId	This cookie is used in concurrent logins to verify that the user's current session is the most recent.
UserAccess	This cookie defines users' access to the site.

PERFORMANCE COOKIES

These cookies collect information about how visitors use a website; for example, which pages they visit most often and whether they get error messages from internet pages. These cookies do not collect information that identifies a visitor. All information that these cookies collect is aggregated and therefore anonymized. They are used only to improve the performance of a website.

We use performance cookies to:

- Provide statistics on how our website is used;
- See how effective our promotions are;
- Collect statistical data on the markets in which clients are betting;
- Help us improve the site by measuring any errors that may occur;
- Test different designs from our website;
- Identify the browser or device used to end the site.

Cookies that we set as performance cookies will not be used to:

- Collect information that could be used to advertise products or services to the client on other websites;
- Remember your preferences or username beyond your current visit;
- Save personal information such as email address or name;
- Direct promotions to the client on any other site;
- Allow third parties to use cookies for any purpose other than those indicated above.

Example of performance cookies that SA Sports defines:

ADRUM	This cookie is used to monitor the end-user experience.
Webmetrics/RUM	This cookie is used to track data analysis.

We use third-party cookies (such as Google Analytics and Silverpop Web Analytics) to gather information about client interactions with the site so that we can develop and improve client journey and provide you with an optimized service (to exclude performance cookies, see below).

The Client should be aware that deleting our performance cookies will not prevent him from using our website; however, will limit us and will not allow us to learn from his experience and may limit our ability to make good decisions to improve our site. However, if the Client would like to opt out of using the internet analytics data that SA Sports uses, please use the link below:

GoogleAnalytics

<http://tools.google.com/dlpage/gaoptout>

FUNCTIONALITY COOKIES

These cookies allow the site to remember choices that Client have made, such as username, language, or the region in which the Client is located, and to display personalized and improved features. For example, a website may be able to provide you with local weather reports by using cookies to save information about the region you are in. These cookies can also be used to remember changes you've made to the size of text, fonts, and other parts of the web pages you can customize. They can also be used to provide services you've requested, such as watching a video or commenting on a blog. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.

We use functionality cookies to:

- Remember the settings that Client applied, such as layout, preferences, colors and show/hide features;
- Remember that Client have seen certain content;
- Provide proactive live chat sessions to support the Client.

Cookies that we set as functionality cookies will not be used to:

- Target ads on other sites;
- Allow third parties to use cookies for any purpose other than those indicated above.

Examples of functionality cookies that SA Sports defines:

UserPrefsCookie	This cookie saves information about some of the settings related to the user's profile, such as the default probability format, default language, view, and time zone.
HomePageVisitedTime	This cookie is designed to let the site know if to redirect you to a page for already registered Clients.
DestUrl	This cookie is used to send the Client directly to the page of a specific league to see possible bets without having logged in.

TARGETING COOKIES

These cookies are used to provide content, such as advertisements, that are more relevant to you and your interests. They can also be used to limit the number of times you see an ad or measure the effectiveness of the ad campaign. They tend to be created by external advertising agencies with SA Sport's permission and may share information about websites you have visited with other organizations, such as advertisers.

We use targeting cookies to:

- See which pages interest a Client and provide this information to our email tool so that we send Clients only information that is relevant to them.
- Offer promotions to Clients who have registered an account with us, whether that account has funds or not.
- Provide cross-product promotions to Clients based on the markets they viewed or the value of the bets they placed.
- Provide information to suggested third parties about your visit so they can show you ads you might be interested in.

Some of the target cookies SA Sports uses:

Sidi	This cookie is used to collect data about visitor activity during a session on the site.
Vidi	This cookie is used to identify the visitor.

MANAGE YOUR COOKIES

We recommend that you do not change your cookie settings, as this may limit your user experience and website performance.

If you really want to change the setting of cookies, you can do so through your browser. Different Internet browsers may use different ways of controlling cookies; then you'll need to use the help section of your browser to find out how you can do it, or you can visit one of the following browser sites directly.

- [Firefox](#)
- [Google Chrome](#)
- [Microsoft Internet Explorer \(IE\)](#)
- [Safari](#)

MORE INFORMATION

You can find more information about cookies in https://en.wikipedia.org/wiki/HTTP_cookie. To view a video about cookies, visit <https://policies.google.com/technologies/cookies>.

10. CHANGES TO INFORMATION

All changes to our Privacy Policy will be posted on this page and will take effect after the publication of the revised Privacy Policy. If this Privacy Policy is subject to material or material changes, we will make reasonable efforts to inform you by email, notice on the website or other agreed communication channels. If we plan to use personal data for a new purpose, we update our Privacy Policy and communicate the changes to the people concerned before we start any new processing.

KYC POLICY

The SA Sports Group is required by law to take steps to help ensure that the game is fair and open, is not linked to crime and does not cause harm. Similarly, for banks, part of this includes collecting Client information for verification of age, identity, and funds.

Why should we need more information about the Client?

We ask because we operate under a license provided by the Curacao Gaming Commission and one of our license requirements is to proactively participate in the due diligence and ongoing.

This process helps us ensure that we know and provide a great Client experience, as well as ensuring compliance with our obligations regarding KYC verifications.

Sometimes it may be necessary, as part of this process, to ask Clients to confirm their identity and the origin of the funds used to bet or play. If we request the Client to provide the documentation of the source of funds, it is important that the Client provides evidence that identifies the actual source(s) of funds used to bet or gamble and that it matches and can prove the betting activity.

This information may be in the form of:

- Proof of salary: salary / remuneration of the director / dividends / pension;
- A bank statement/savings account that clearly shows consistent incoming values from an identifiable source;
- A fiduciary deed that clearly shows a consistent right to funds;
- Proof dated to a prize / payment made to the Client;
- Another clear evidence that would support "accessibility" in relation to your business with us.

What checks does the Client need to make? What information do we request?

We may only ask you to provide an ID, such as passport, driver's license, or another government-recognized document.

However, in some cases, could be necessary to request more basic information, which may include conversations about account activity and discussions about the source of account funding and specific areas of responsible gaming. In some cases, we may request documentation to support what has been discussed.

How will this information be used?

The information and documentation the Client provide to us is used for our own internal purposes and does not share it with other companies. As always, the data will be treated with complete confidence, by specially trained teams aligned with ours.

What if the Client does not provide the information/documentation?

If we are unable to speak to the Client or if the Client is unable to provide us with the necessary information or documentation, we may take steps to restrict the account until we can obtain it. Unfortunately, other businesses may not be accepted if the requested information is not provided.

Where can the Client learn more about the requirements?

We will be happy to provide all the necessary additional information, just contact a member of our team for help.