

**PRIVACY & MANAGEMENT OF PERSONAL
DATA POLICY
MIRTH B.V.
(Reg. No. – 163936)**



**Jonathan Marshall Ruwel
Heymans** obo Kurason Trust
Curacao N.V., the Managing
Director

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KEY INFORMATION

Approving Official(s):	Jonathan Marshall Ruwel Heymans obo Kurason Trust Curacao N.V., the Managing Director
Responsible Office:	Jonathan Marshall Ruwel Heymans obo Kurason Trust Curacao N.V., the Managing Director
Effective Date:	22.05.2025
Next Review Date:	22.05.2026

1. GENERAL PROVISIONS AND POLICY STATEMENT

- 1.1. The Company values the privacy of each Player and is committed to safeguarding personal information. We are transparent about the reasons for collecting personal data and how it will be used.
- 1.2. This Privacy and Personal Data Management Policy (referred to as the Policy) outlines how personal information is handled, the options available to players, and their rights regarding privacy and data management.
- 1.3. If a Player disagrees with any part of this Policy, they should refrain from using the website's services. By registering an account, placing bets, or transferring funds, the Player explicitly agrees to the Terms of Service and this Policy.
- 1.4. The Player can choose to stop using the website at any time. However, the Company may still be legally obligated to retain certain personal data of the Player.
- 1.5. The Player should be aware that this Policy may be updated or modified. Any changes will be communicated by posting the revised version on the website. It is advisable to review this Policy periodically.

2. DEFINITIONS AND ABBREVIATIONS

- 2.1. **Company** – means Mirth B.V., a legal entity validly registered and existing under the laws of Curacao, identification number: 163936, address: Schottegatweg Oost 10 Unit A1K 10 Unit 1-9, Bon Bini Business Cente, Curacao.
- 2.2. **GCB** – means Gaming Control Board of Curacao.
- 2.3. **GDPR** – means General Data Protection Regulation.
- 2.4. **CGA** – means Curacao Gaming Authority.
- 2.5. **NAF** – means Netherlands Antillean guilder, the currency of Curaçao.
- 2.6. **Gambling or Gambling Game** — means any online game posted on the Website that means playing a game of chance for a Prize. Game of chance includes (i) a game that involves both an element of chance and an element of skill, (ii) a game that involves an element of chance that can be eliminated by superlative skill, (iii) a game that is presented as involving an element of chance but does not include a sport.
- 2.7. **Customer** — means an individual, who uses the Website and/or familiarizes himself with the provisions of the Website, these Policy and the provisions of other documents, and intends to register on the Website to participate in Gambling (acquire a Player status).
- 2.8. **Third Parties** — means any individuals and/or legal entities other than the User and/or the Player, in particular, but not exclusively: family members, spouses, friends, partners, counterparties, creditors, service providers, agents, etc.
- 2.9. **Website** — means the official websites of the Company, on which Customer may play the Gambling Games.
- 2.10. In this Policy singular include the plural, and the plural include singular in cases of a need for interpretation.

3. PRINCIPLES OF PERSONAL DATA COLLECTING

- 3.1. The Company uses principles established by the General Data Protection Regulation (Regulation (EU) 2016/679) in its work, among them:
 - 3.1.1. Lawfulness, fairness and transparency. Personal data is processed lawfully, fairly and transparently in relation to the data subject by the Company;
 - 3.1.2. Purpose limitation. Personal data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with such purposes;
 - 3.1.3. Accuracy. Personal data is accurate and, where necessary, kept up to date; every reasonable step is taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
 - 3.1.4. Storage limitation. Personal data are kept in a form which permits identification of data subjects no longer than is necessary for the purposes for which the personal data are processed;
 - 3.1.5. Integrity and confidentiality. Personal data are processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

4. PURPOSES OF DATA PROCESSING

- 4.1. We process your personal data for the following purposes:
 - 4.1.1. To provide services: Managing your account, processing bets, payments, and withdrawals.
 - 4.1.2. Customer support: Responding to inquiries, resolving issues.
 - 4.1.3. Legal compliance: Meeting legal obligations, preventing fraud, and ensuring security.
 - 4.1.4. Marketing: Sending promotional offers if you have consented.
 - 4.1.5. Improving services: Analyzing usage patterns to enhance our platform.

5. PERSONALLY IDENTIFIABLE INFORMATION

- 5.1. The Player must provide this information to the Company in order to use services of the website in full. This information is needed for the purpose of giving the Player access to certain parts of the website and related services.
- 5.2. The Company may collect the Player's personal information in the following cases:
 - 5.2.1. When the Player registers an account on the website;
 - 5.2.2. When the Player provides the Company with the personal information in the process of website usage;
 - 5.2.3. When the Player personally discloses the information in public areas of the website;
 - 5.2.4. When the Player provides the Support Team with his/her personal information.
- 5.3. Personal information may include:
 - 5.3.1. Username;
 - 5.3.2. First and surname;
 - 5.3.3. Date of birth;

- 5.3.4. Email address;
- 5.3.5. Address of residence;
- 5.3.6. Phone number;
- 5.3.7. Billing address;
- 5.3.8. Documents the proof of the Player's identity;
- 5.3.9. Proof of address documents;
- 5.3.10. Transaction history;
- 5.3.11. Website usage preferences;
- 5.3.12. Any other information the Player provides the Company with when using the website;
- 5.3.13. Credit/debit card details, or other payment information;
- 5.4. All data provided by the Player must be correct and valid. It is the sole responsibility of the Player to ensure the accuracy, completeness and correctness of the data provided to the Company.
- 5.5. One more purpose of collecting information by the Company is protection of minors. The Company ask the Player to provide it with necessary documents to proof the legality of Player's age to participate in gambling. Also, the Company may collect personal information for billing purposes.
- 5.6. The Player can amend his/her personal information by contacting the Support Team.
- 5.7. Personal information of every Player is kept only for internal use. Personal data may be passed to third parties only in cases that are mentioned in this Policy.

6. HOW AND WHY THE COMPANY USES PERSONAL INFORMATION OF PLAYERS

- 6.1. The Company uses personal information of Players for the following purposes:
 - 6.1.1. To provide Players with the Company's services
 - 6.1.2. To work in accordance with the legal or regulatory requirements
 - 6.1.3. To monitor the website performance; and
 - 6.1.4. To provide Players with marketing and promotional materials.

7. TRAFFIC ANALYSIS AND NON-PERSONALLY IDENTIFIABLE INFORMATION

- 7.1. The Company's aim is to make the website as user-friendly as possible and easy to find on the internet. The Company may collect data concerning your website usage. Such information does not have anything in common with the Player's identity. When the Player uses the website services, the Company's server keep an activity log unique to the Player that collects certain administrative and traffic information including source IP address, time of access, date of access, web page(s) visited, language use, software crash reports and type of browser used. Such information is collected only for the purpose of provision of qualitative services.

8. SHARING THE PLAYER'S PERSONAL INFORMATION

- 8.1. The Player's personal information may be disclosed in the following cases:

- 8.1.1. If the Company is obliged to disclose or share the Player's personal information for the purposes of legal or regulatory compliance;
- 8.1.2. To enforce or applying the terms of this notice or any other applicable agreements;
- 8.1.3. To assist the Company in providing the services that the Player uses, it includes third-party software providers attraction;
- 8.1.4. In case there was an attempt or case of cheating or fraud or game manipulation;
- 8.1.5. To make research on the prevention of gambling addiction;
- 8.1.6. For the purposes of protection of the rights, property or safety of the Company, other Players etc.;
- 8.1.7. In case the Company is legally authorized to do so.
- 8.2. The Player confirms that the personal data may be transferred to any country in which the Company or the affiliates, agents may maintain facilities.

9. PERSONAL DATA STORAGE TERMS

- 9.1. The Company stores the personal data of every Player for the entire duration of the relationship between the Parties in accordance with the Terms of Service on the Company's website.
- 9.2. After the termination of the relationship between the Parties, personal information is subject to storage for five years. This term is needed to resolve any possible disputes concerning the usage of the Company's services.
- 9.3. When the Company no longer need the Player's personal information, it shall be securely deleted or destroyed.

10. SECURITY

- 10.1. The Company acknowledges the importance of security, and the techniques needed to secure information. All personal information that the Company receives from the Player is encrypted and password protected in the database. Our Services support SSL Version TLS 1.2 with 256-bit encryption.
- 10.2. The Company also makes everything possible to ensure the subsidiaries, agents, affiliates and suppliers employ adequate and qualitative security measures.
- 10.3. We implement appropriate technical and organizational measures to safeguard your personal data against accidental or unlawful destruction, loss, alteration, unauthorized access, or disclosure.

11. MARKETING

- 11.1. In case the Player agrees to receive offers and promotions via email, SMS or online, the Company will do so. The Company does not share personal information with third parties for them to use for their own marketing.
- 11.2. The Player has the right to withdraw agreement or make amendments to marketing preferences at any time.

12. COOKIES

- 12.1. The Company may use cookies as a form of collecting information. This can be done through the web server with the sole purpose of maintaining the Player's privacy and security.
- 12.2. Cookies are text files containing small amounts of information which are downloaded to the Player's computer or mobile device when the Player visits a website and allows a website to recognize the Player's device. Cookies managed by the Company only are called “first-party cookies” whereas cookies from third parties are called “third-party cookies” as explained below.
- 12.3. Some cookies and other tracking and storage technologies that the Company uses are from third-party companies (third-party cookies), they are used to provide the Company with web analytics and intelligence about the website which may also be used to provide measurement services and target ads.
- 12.4. There are a few types of cookies that are used by the Company:
 - 12.4.1. Functional cookies. This type of cookies is used for the analysis of the website usage and the selections on the website that are used by the Player.
 - 12.4.2. Required cookies. This type of cookies is used for the proper work of navigation and basic functionality of the website.
 - 12.4.3. Advertising cookies: This type of cookies is used for the analysis of the Company's effectiveness of marketing content.

13. RETENTION

- 13.1. We retain your personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required by law. When no longer needed, data is securely deleted or anonymized.

14. DISCLAIMER

- 14.1. The Services operate ‘AS-IS’ and ‘AS-AVAILABLE’ without liability of any kind. The Company shall not be responsible for events beyond its direct control. The Company cannot guarantee that there will be no errors in performance regarding the privacy of Player's personal data. The Company shall not be liable for any indirect, incidental, consequential or punitive damages relating to the use or release of personal data that was mentioned in this Policy.

15. CLIENT’S RIGHTS

- 15.1. Under GDPR, you have the right to:
 - 15.1.1. Access your personal data.
 - 15.1.2. Request correction or rectification of inaccurate or incomplete data.
 - 15.1.3. Request the deletion of your data (“Right to be forgotten”).
 - 15.1.4. Restrict processing under certain circumstances.
 - 15.1.5. Data portability – receive your data in a structured, commonly used format.
 - 15.1.6. Withdraw consent at any time (where processing is based on consent).

15.1.7. Lodge a complaint with supervisory authority.

16. CONTACT INFORMATION

- 16.1. For any questions regarding this policy, please contact: support@auro777.win or send a mail on the address: Schottegatweg Oost 10 Unit A1K 10 Unit 1-9, Bon Bini Business Center, Curaçao.

17. POLICY HISTORY

May 22, 2025	Privacy & Management of Personal Data Policy update (annual update)
December 02, 2024	Privacy & Management of Personal Data Policy update (legal changes)
July 25, 2024	Privacy & Management of Personal Data Policy update (legal changes)
March 14, 2024	Privacy & Management of Personal Data Policy update (Annual update)
November 22, 2023	Privacy & Management of Personal Data Policy update (legal changes)
July 20, 2023	Privacy & Management of Personal Data Policy update (legal changes)
May 24, 2023	Initial Privacy & Management of Personal Data Policy