

Venturegamez N.V.

Privacy Policy

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Privacy Policy

1. Purpose of the Policy

VENTUREGAMEZ N.V. is and will always do everything operationally possible to be sure that you will always have a safe gaming experience. Your rights will always be respected and your data processed only within the limits of the data protection and privacy regulations. The purpose of this policy is to remind you what your rights.

Also, VENTUREGAMEZ N.V. is committed to transparently processing your data within the legal frame, as such, this policy will provide you with all the information you need to have regarding processors of choice, data retention, data transfers, security, etc.

If you have questions regarding this policy or your rights as a data subject, please contact our Data Protection Officer directly on: dpo@venturegamez.com.

Please remember that using any games or services provided by VENTUREGAMEZ N.V. is forbidden to any data subjects that are under eighteen (18) years old. We will use the data and documents that you are providing to make sure that only adults players (18+) are registered and allowed to use our services.

2. Terms

This Policy is issued on behalf of VENTUREGAMEZ N.V., a company based at Kaya W.F.G. (Jombi) Mensing 24 Unit A, Curacao. The terms "Company", "we", "us", "website" or "our" in this Privacy Policy refer to VENTUREGAMEZ N.V. or the relevant company in the group responsible for processing your data.

All references to "Player", "end user", "you", "yours" and/or "your", in this Privacy Policy refers to any user which accesses and plays on VENTUREGAMEZ N.V.

Any reference to "Games" or "Game" in this Privacy Policy refers to the gaming products offered by VENTUREGAMEZ N.V.

"The data controller" is a person, company, or other body that determines the purpose and means of personal data processing (this can be determined alone or jointly with another person/company/body).

"Data processor" is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

"Personal Data" are any information which are related to an identified or identifiable natural person. "GDPR" or "Privacy Regulation" – General Data Protection Regulation (2016/679).

3. VENTUREGAMEZ N.V. – Processed information

On a case-to-case basis VENTUREGAMEZ N.V. will have the right to request, to be able to comply with legal obligations, personal information that the Player will need to provide. That information includes but is not limited to:

1. Upon registration:

- a. identity data – needed to maintain a business relationship that allows you to enjoy the services offered by VENTUREGAMEZ N.V. as well as allowing us to comply with our legal obligations (Date of Birth, Place of Birth, Residential Address); and
- b. contact data - needed to maintain a business relationship that allows you to enjoy the services offered by VENTUREGAMEZ N.V. as well as allowing us to comply with our legal obligations (Username, Phone Number and Email Address);

2. During your activity on VENTUREGAMEZ N.V.

- a. activity logs (your playing history, login activity, game sessions, total bets, total wins, IP address);
- b. account balance information (total, real and bonus balance, bonuses, reserved bets, maximum balance, deposits, withdrawals, average deposit and bonus, income);
- c. game analytics (free rounds, recently played games, favorite provider, most played, biggest win) ("Usage Data");
- d. Records of your email and chat communication with the VENTUREGAMEZ N.V. agents (for Quality Assurance purposes);

- e. Know Your Customer documents (include but are not limited to Bank statements, Valid ID, Utility bill, PEP status, Source of wealth or source of funds) – necessary for us to fulfill our legal obligations in terms of AML and Risk mitigation – More details on this can be found in the Terms & Conditions page;
- f. “limit data” – meaning we will save your preferences in regard to self-imposed limits (including but not limited to bet and loss limits, daily deposit limits, temporary or permanent self-exclusion, etc);
- g. technical data, that could include but is not limited to:
 - i. IP address (the address used to connect your computer to the internet) and device
 - ii. login information
 - iii. browser type and version
 - iv. time zone setting
 - v. browser plug-in types and versions
 - vi. operating system and platform
 - vii. Information about your visit including the URL
 - viii. Information received from cookies regarding your behavior on the website. (Note: This information is collected in line with our Cookie Policy (“Cookie Data”) and collected in accordance with your choices done in the cookie banner on our website);
- h. VENTUREGAMEZ N.V. will never process any kind of personal sensitive information - We will never request or process in any way sensitive data, including but not limited to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, health data, data concerning an individual's sex life or sexual orientation; and
- i. VENTUREGAMEZ N.V. might from time to time consult information that is publicly available using Google searches or similar tools, when required to use in order to comply with legal requirements.

4. Purposes of collecting and processing information

We are requested to obtain and process some of the data in order to comply with our legal obligations, such as Identity Data, Contact Data and Public Sources Data in order to be able to have and maintain a business contract with you.

This is needed for you to be able to create your account and play games and for us to be able to provide you with gaming services in line with our contract with you (see Terms and Conditions). This will allow us to perform our contractual obligations arising from the Terms and Conditions, including contacting you where contact is necessary to perform our obligations towards you, e.g. customer support matters.

We are requested to obtain and process some of the data in order to comply with our legal obligations under Anti-Money Laundering and gaming laws, like Financial Data, Identity Data, Contact Data and Bank Account Data; This obligation will also require us to process KYC data, including Public Sources Data, Bank Account Data, Technical Data, Usage Data, Account Data, Bank Account Data as well as laws to verify your identity and establish source of wealth, source of funds and politically exposed person status. Please note this data will also be used to prevent money laundering, fraud and collusion by analyzing and studying player behavior, communications, depositing and player patterns.

In order to be able to maintain a business contract with you and to be able to process your deposit/withdrawal of funds and payouts in relation to Games played on our website and in accordance with the Terms Conditions we will need to process: Identity Data, Contact Data, Technical Data, Account Data, Usage Data and Cookie Data.

Some data will be processed based on Legitimate interests as a legal basis for processing. We need to make sure that all end users are having a smooth experience on the website, as such we must prioritize administering, protecting and developing our business and the website, provision of administration and IT services, network security, to prevent fraud, including through troubleshooting, data analysis, testing, system maintenance, and support. For this we might process: Identity Data, Contact Data, Technical Data, Usage Data, Account Data, Cookie Data.

In order to better understand how the end users are enjoying our products and in order to develop and to grow our business and form our marketing strategy and to deliver relevant website content and advertisements to users, we might be processing from time to time Technical Data, Usage Data, Cookie Data based on our legitimate interest to see how customers use our products We will be using Google Analytics based on our legitimate interests to use data to improve our website, products and services, customer relationships and marketing strategy and to define types of customers for our products, to keep our website updated and relevant, and to develop our business, and that will be processing : Identity Data, Contact Data, Technical Data, Usage Data, Account Data, Cookie Data.

All marketing communication will be done on consent basis only, in order to make sure the information reaches you about marketing products or services which might be of interest to you, bonuses schemes and promotional offers and game updates. For this we might be processing if such consent is provided: Account Data, Usage Data and Identity Data.

If you chose to partake in our promotions, surveys or contests that we might use from time to time to help improve the use of our website, Games and customer experience, based on your consent we will process your Identity Data and Contact

Data.

In order to notify you about changes in our Terms and Conditions and Privacy policies so we can comply with our legal obligations, we will need to process: Account Data, Usage Data, Identity Data, Legitimate interests.

We are fully committed to constantly improving our product and such have a legitimate interest in developing our products, growing our business and improving customer relationships by providing game leader boards and promoting in-game player achievements; for this we might need to process: Account Data, Usage Data, Identity Data, Legitimate interests.

Our legitimate interests are to solicit input and feedback in order to study how our customers use our products in order to develop and improve our Games and services and customize your user experience and customer relationship complying with our legal obligations under anti-money laundering and gaming laws to verify your identity and establish source of wealth, source of funds and politically exposed person status.

For your protection and for our legal obligation to respect Responsible Gaming regulations, for the allowance of the setting of player limits and processing of data to ensure that player and website do not exceed set limits as well as for the allowance of the setting of self-exclusions and processing of data to ensure that player and website abide by such exclusions we will be processing Self-Exclusion Data, Identity Data, Contact Data, Technical Data, Usage Data, Account Data and Limit Data.

Please know that VENTUREGAMEZ N.V. will use the information provided also for legal and regulatory compliance purposes, including as necessary: to respond to governmental or regulatory entities requests; to comply with our legal obligations under current Anti-Money Laundering laws and Regulations and any applicable current local and international Tax laws; to identify misuse of our systems and any fraud or other illegal or unlawful activity or any other activity which is or may be contrary to our legal and regulatory compliance obligations.

VENTUREGAMEZ N.V. will also keep a copy of your gambling history and employ measures to detect and identify problem gaming using analytical tools and/or behaviour monitoring systems, and to take steps to prevent further harm as per our legal obligation. We will also use such data to initiate customer interaction where we have concerns that your behaviour may indicate problem gambling.

VENTUREGAMEZ N.V. will also use and study your Usage Data, Technical Data and Account Data to target marketing activities for people of the same age as you, if marketing consent is provided. This activity includes the processing of your age. We consider this to be in our legitimate interests to develop our products, form our marketing strategy, deliver website content and advertisement to users, to keep our website updated and relevant and overall to provide better customer experience for our players. You have a right to object to such processing (see section Rights and Data Subject Requests).

We will further process your IP address in order to confirm your location, in line with our verification requirements under anti-money laundering laws, and to ensure that you do not have multiple accounts on our website in line with our obligations under gaming laws.

Your personal data will be processed automatically with the aim of evaluating certain personal aspects (profiling). We use profiling for the purposes of complying with our anti-money laundering and funding of terrorism obligations. As a rule, VENTUREGAMEZ N.V. does not make any kind of decisions based solely on automated processing to establish and implement the business relationship, as there is always an element of human involvement in such decisions. If we use these procedures in individual cases, we will inform you of this separately, provided this is allowed by law.

Please know that VENTUREGAMEZ N.V. uses payment gateway providers, so no credit card or bank account information (other than the one you provide us for KYC verification purposes, and that VENTUREGAMEZ N.V. will process in order to comply with legal obligations) will be processed on our side.

5. Disclosing data subjects information

VENTUREGAMEZ N.V. will only disclose your personal data to the third parties set out below for the purposes and in the context listed above.

We shall only disclose your personal data to third parties where it is lawful to do so including where VENTUREGAMEZ N.V.:

- Needs to share the information in order to provide you with the service and the disclosure is necessary in the process or needs to share the information in order to obtain services from third parties in order to provide you with the service.
- Have a legal duty to do so e.g. assist with detecting and preventing fraud and crime or regulatory reporting or in relation to problem gaming;
- Have a legitimate interest for the purposes of litigation or asserting and defending our legal rights and interests or if we are required to disclose the information in response to legal process (for example, a court order, search warrant or subpoena);
- Have a legitimate business interest to do so for managing risk;
Have been instructed by you to do so;
- Believe that VENTUREGAMEZ N.V. and its content is being used in the commission of a crime, including to report such criminal activity or to exchange information with other companies and organizations for the purposes of fraud or money-laundering protection;
- Have a reasonable and good faith belief that there is an emergency that poses a threat to the health, life and/or safety of you, another person or the public generally; and
- In order to protect the rights or property of VENTUREGAMEZ N.V., including enforcing our Terms and Conditions.

Where you are disputing payments or losses charged to your account, we shall disclose your KYC Data, Bank Account Data, Usage, and Account Data to your bank to settle the dispute.

Relevant authorities, employees of VENTUREGAMEZ N.V., in particular, Customer support agents and other employees with relevant roles, shall also have access to your personal data for the purpose of executing their duties and providing you with assistance and service.

VENTUREGAMEZ N.V. might disclose your personal data to third parties which include:

- Regulators and other authorities as may be required by law or by courts of law;
- Law enforcement, government, courts, dispute resolution bodies, regulators and any party appointed or requested by regulators to carry out investigations or audits of our activities; and
- external service providers and third-party vendors. We shall only disclose the personal data which is necessary for such third parties to deliver the required service; and
- from time to time, other third-party tools that allow us to be compliant with our AML regulations with data minimization applied.

VENTUREGAMEZ N.V. will always make sure that the third-party data processors are taking all the necessary security measures in order to protect your personal data and that they are in full GDPR compliance; VENTUREGAMEZ N.V. will also make sure that the information provided to each data processor is proportional and in line to the purpose of processing.

6. Data transfers

VENTUREGAMEZ N.V. will only transfer your data to the European Union or to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

If processors from outside the EU countries are used, VENTUREGAMEZ N.V. will make sure that all data processors used are audited and found to be compliant to the European Data Protection standards.

7. Marketing

VENTUREGAMEZ N.V. will send you information about our services which may be of interest to you. If you have consented to receive marketing but change your mind and decide you want to stop receiving the information and withdraw your consent, you have the right to opt-out at any time from receiving such marketing material.

You may opt out at any time as set out below:

- Contact our Customer Support and say that you would like to opt out Tick the 'opt-out' option on your profile;
- Press 'unsubscribe' on any marketing material received; and
- Withdrawing your consent will not lead to any detriment to you or the relationship with VENTUREGAMEZ N.V., and you can choose to opt-in or out anytime.

8. Security

VENTUREGAMEZ N.V. is committed to ensuring that your information is secure. We have implemented measures and procedures to prevent unauthorized access or disclosure of your information. Likewise, we seek to keep confidential all the information you send to us.

This site uses Secure Sockets Layer (SSL) to ensure the secure transmission of your personal data. You should be able to see the padlock symbol in the status bar on the bottom right-hand corner of the browser window. The URL address will also start with https://, depicting a secure webpage. SSL applies encryption between two points, such as your PC and the connecting server.

In addition, we only allow access to your personal data to employees, agents, contractors, and other third parties on a need-to-know basis. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any personal data breach and will notify you and the relevant regulator of a breach where we are legally required to do so.

9. Data Retention

VENTUREGAMEZ N.V. is committed to respecting the purpose limitation, data minimization, and storage limitation principles as defined under the data privacy regulations. As such, all data will be maintained for the duration of your relationship with us.

Following the termination of the relationship, the following data will be retained in the following manner:

In order to comply with our legal obligations, we are forced to keep your Identity Data, Contact Data, Technical Data, Usage Data, Account Data, KYC Data, Public Sources Data, Self-Exclusion Data, and Financial Data for Five years. Personal data may be held longer where required for a legal investigation or litigation or where there is a reasonable suspicion that a player has been involved in criminal activity by virtue of his/her gaming activities. The five-year retention period for self-excluded players shall begin to run from the lapse of the self-exclusion period.

Your account data will be kept for nine years as required by the income tax laws to abide by our legal obligations.

Based on legal obligations as well as our commitment to protecting our users, the record of Player Interactions in relation to Problem Gaming can be kept indefinitely (in case of indefinite self-exclusions or confirmed problem gaming), however not less than five years, as required by gaming laws.

10. Data subject rights under GDPR

VENTUREGAMEZ N.V. will always keep your privacy rights in mind whenever working with personal data, and such, it is very important for us that you are familiar with them as a data subject.

Right to Transparent Information – We will always make sure to inform you in a clear manner on any personal data pertaining to you that may be processed by us. Such information is being provided to you in this Privacy Policy and through our use of Cookiebot tool. Any additional questions can be sent to dpo@venturegamez.com and our data privacy team will answer as soon as possible.

Right of Access to Information – you have the right to request confirmation from us whether personal data relating to you is being processed and if so to request access such personal data. Our data protection team will provide you with a full export.

Right to lodge a request – you can always contact our DPO on dpo@venturegamez.com. If you would only like to receive information on a specific category of data, please indicate such category.

Right to Rectification – you have the right to request from us the rectification, without delay, of any inaccurate personal data pertaining to you.

You may change your data in the following manner:

- Through your Profile: by accessing the 'Account Details page on the platform;
- By contacting customer support.

Please note that your username may not be changed, for security purposes

Right to Be Forgotten – you have the right to request from us the erasure of all personal data pertaining to you without delay, where the data has been processed with your consent as the basis for processing and/or where the processing is no longer lawful. Please note that some data cannot be erased because of our legal obligations under the legislation of AML and because of our strong commitment to Responsible Gaming and protection of the vulnerable. We can assure you however that the data we cannot erase will undergo encryption and access minimization purposes up to such date where erasure is legally possible.

Right to Restrict Processing – you have the right to request from us the restriction of processing if: processing is unlawful; you are contesting the accuracy of data; the data is no longer required by the controller but you require us to keep it in order to establish, exercise, or defend a legal claim; or if you have previously objected to the processing. Once data is restricted, we cannot process it in any way other than to store it unless: we have your consent; or if it is required for the establishment, exercise, or defense of legal claims; or if it is for the protection of the rights of other people; or if it is for reasons of important public interest.

Right to Data Portability – you have the right to receive from us personal data which you have provided to us and to transmit that data to another controller without hindrance from us. This right applies where the data is being processed with your consent, or for the performance of a contract, and when processing is carried out by automated means.

Right to Object – you have the right to object at any time to the processing of personal data pertaining to you where the processing is based: on our legitimate interest; or the performance of a task in the public interest/exercise of official authority; or on direct marketing (including profiling); or on processing for purposes of scientific/historical research and statistics.

You also have the right to object to profiling based on our legitimate interests or on the performance of a task in the public interest/exercise of official authority.

You can also always object to automated decision making, including profiling, and therefore to not be subject to a decision which is based solely on automated processing, including profiling, which produces legal effects or significantly affects you.

11. Data subject requirements

In order to protect the safety and security of your account and in order to be able to respect its legal obligations, VENTUREGAMEZ N.V. might need to request certain information from you to help us confirm your identity and ensure your right to access your personal data (or exercise any of your other rights). This is a security measure we are using to make sure your data is never shared with a third party without your approval.

VENTUREGAMEZ N.V. has a legal obligation to keep your personal data up to date, and for this reason you may be asked about changes and proof of changes to your personal data at various intervals. You may help us in this process by informing us whenever your data has changed. You always have the right to request us to change the data with the updated one and we will be happy to help you in this process.

Since we require your data for the purposes of accepting and carrying out a relationship with you and fulfilling our contractual

and legal obligations, should you choose not to provide VENTUREGAMEZ N.V. with such data, depending on the data you wish to not share, we might not be in a position to enter into a business relationship with you or stop the current business relationship.

Anti-money laundering obligations require us to verify your identity at certain intervals, for example, by means of your passport and to record your personal details. Since we need to be compliant with this law, we will ask you to provide us with the necessary up to date information and documents

Reference is made to the Terms and Conditions whereby you have undertaken to provide us with certain personal data, including documentation, and to inform us of any changes to such data. In these circumstances, the provision of personal data is a contractual requirement.

However, please be reminded that you will. Never be obliged to provide us with any data which we request on the basis of your consent, and your decision not to opt in or not to provide us with the consent will not influence the relation you have with VENTUREGAMEZ N.V.

12. Processing Data Through Consent

Please keep in mind that VENTUREGAMEZ N.V. is basing its data processing on a legal basis, legitimate interest and contractual obligation, so your consent is not needed for anything other than marketing purposes in order for the processing to take place.

We may, from time to time, request to process additional personal data on consent basis. You are not obliged to provide the consent or the additional data and deciding not to provide it will have no repercussions about the business relationship that you have with VENTUREGAMEZ N.V.. Once you have granted us consent to the processing of personal data for an identified specific purpose, the process becomes lawful based on such consent. You can withdraw your consent at any time. Withdrawal of consent does not affect the legality of data processed prior to withdrawal.

At the time of withdrawal of consent, we may determine that there is another legal ground allowing us to process your data; if this is the case, we shall inform you accordingly.

13. Privacy Policies of Linked Websites and Advertisers

VENTUREGAMEZ N.V. may refer you, from time to time, to links for other third-party Websites and advertisers. We are not responsible for the privacy practices or the content of such Websites. By clicking on those links, you may be directed to those Websites which are not under the control of VENTUREGAMEZ N.V.. and will need to comply with those respective third-party privacy policies. If you have any questions about how these other websites use your information, you should review their policies and contact the Data Controller for the information they are obligated to provide.

14. Surveys & Contests

Please note that for certain marketing campaigns we might collect information through surveys or for participation in any contest organized by us on the Site. Always remember that this information is processed on consent meaning that providing the information and participating is completely voluntary. If you choose not to participate and such not to disclose the necessary information, you will have no disadvantages in relation to VENTUREGAMEZ N.V.. You also have the right to change your mind at any time, and withdraw your consent once provided.

By agreeing to participate in the survey, you agree to provide us with any such required information.

Survey information will be used only for purposes of improving the use and customer satisfaction of the Site.

15. Miscellaneous

Changes to Privacy Policy - This policy was updated on 31.12.2024.

Please note that we might change this Privacy Policy from time to time, if any internal processes are changed or in order to better reflect legislative changes or third-party contractual changes. Any change will be applicable from the moment it is published on the website so please make sure you check from time to time.

If you have any questions in regards to this policy and/or regarding how your data is being processed by VENTUREGAMEZ N.V., please contact our Data Protection Department by sending an email to dpo@venturegamez.com and they will be happy to assist you.

Please keep in mind that you also always have the right to make a complaint with the Data Protection Authority or other supervisory authority of your habitual residence, place of work or place of alleged violation in case you feel your rights have been infringed.

Venturegamez N.V.

Cookie Policy

Last Updated: December 31st, 2024

Our website uses cookies to improve functionality and performance. This helps us provide you with a good experience when you browse our website and also allows us to improve our site.

What is a cookie?

Cookies are small text files automatically placed on your computer, smartphone, or other device you use to visit a website or an application, which enable the website or the application to recognise visitors. The information stored in a cookie may relate to your browsing habits or may contain a unique identification number to allow the website to remember you on return visits.

How may cookies be used?

Cookies can be helpful in a variety of ways such as allowing you to move between web pages efficiently, remembering your browsing preferences, measuring how you use the website so we can make sure it meets your needs, and in general improving your browsing experience. Cookies also help by ensuring that content and advertisements you see on a website are more relevant to your preferences. The cookies that we use can be split into the following categories:

- **Strictly necessary cookies:** These are cookies that are required for the operation of the website. They include, for example, cookies that enable you to log into parts of the website. ·
- **Analytical/performance cookies:** These cookies allow us to recognise and count the number of website visitors and to see how they move around within the website when they are using it. This helps us to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies:** These are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Third party cookies:** These are set on your device by other website whose services are used on our website. Cookies of this type are the sharing buttons that allow you to share content onto social networks. These cookies assist them in pinpointing the viewed pages, clicked links and ads and other actions you take on those webpages, and the site from which you came before arriving at their webpage. ·
- **Targeted Email Marketing:** These cookies record your visit to the website, the pages you have visited and the links you have followed. We may share this information with third parties (see our Privacy Policy for more information on how we use information we collect from you). Some of the marketing, may be tailored based on your past browsing, downloading and/or purchasing behaviour with Venturegamez N.V. Website. This information allows us to send you relevant marketing materials and avoid any content that might be of low interest to you.

If you wish to withdraw your consent to our use of cookies at any time, you will need to delete your cookies using your internet browser settings. In addition, your browser or device may offer settings that allow you to choose whether browser cookies are set.

For more information about these controls, visit your browser or device's help material. Certain parts of the website may not work properly if you have disabled browser cookie use.