

CONFIDENTIAL

INFORMATION SECURITY POLICY

Rapture B.V., a Company with registered address at
Kaya Richard J. Beaujon Z/N Landhuis Joonchi II Curacao,
registration number 156074, domain name: zaza.com
(hereinafter referred to as “**Company**”)

**Gouloud Mercedes
Hammoud** obo Guardian
Corporation Curacao B.V.,
the Statutory Director

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KEY INFORMATION

Approving Official(s):	Gouloud Mercedes Hammoud obo Guardian Corporation Curacao B.V., the Statutory Director
Responsible Office:	Gouloud Mercedes Hammoud obo Guardian Corporation Curacao B.V., the Statutory Director
Effective Date:	17.06.2025
Next Review Date:	17.06.2026

1. GENERAL PROVISIONS AND POLICY STATEMENT

1.1. Rapture B.V. is firmly committed to safeguarding the personal privacy of its Players. The Company upholds a transparent approach to the collection and processing of personal data, ensuring that Players are fully informed about the purposes for which their data is gathered and how it is used.

1.2. This Information Security Policy (the “Policy”) sets out the principles governing the use, protection, and management of personal data, and outlines the rights and choices available to Players with regard to their information.

1.3. Any Player who does not agree with the terms of this Policy is advised to immediately cease using the Company’s services. By creating an account, placing wagers, or making financial transactions through the platform, the Player expressly acknowledges and accepts the Terms of Service and this Policy.

1.4. Players are free to discontinue their use of the website at any time. However, the Company may be legally required to retain certain personal data beyond account closure to comply with statutory obligations.

1.5. This Policy is subject to periodic revisions to reflect legal, technological, or operational changes. All updates will be published on the website, and Players are encouraged to review the Policy regularly to remain informed of any modifications.

2. DEFINITIONS AND ABBREVIATIONS

2.1. **Company** – refers to Rapture B.V., a legally registered entity under the laws of Curaçao (registration no. 156074), located at Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Curaçao.

2.2. **GCB** – Gaming Control Board of Curacao.

2.3. **GDPR** – General Data Protection Regulation.

2.4. **CGA** – Curacao Gaming Authority.

2.5. **XCG** – Caribbean Guilder, the currency of Curaçao.

2.6. **Gambling or Gambling Game** — refers to any online game made available on the Website in which a Player competes for a Prize. This includes: (i) games that incorporate both elements of chance and skill; (ii) games where chance can be overcome through exceptional skill; and (iii) games that are presented as involving an element of chance, regardless of whether they actually do—excluding sports.

2.7. **Customer** —refers to any individual who accesses or navigates the Website, reviews its terms, this Policy, and related documents, and expresses the intention to register on the Website in order to engage in Gambling and obtain Player status.

2.8. **Third Parties** — 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** — 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 ensures full compliance with the principles established under the General Data Protection Regulation (Regulation (EU) 2016/679) in its collection, processing, and management of personal data. These principles, which form the foundation of the Company's data protection framework, are as follows:

- **Lawfulness, Fairness, and Transparency:** All personal data is processed in a lawful, fair, and transparent manner. Data subjects are provided with clear information regarding the nature, purpose, and scope of data processing activities.
- **Purpose Limitation:** Personal data is collected for specified, explicit, and legitimate purposes. It is not further processed in any way that is incompatible with the original purpose for which it was obtained.
- **Accuracy:** The Company actively ensures that all personal data remains accurate and up to date. Mechanisms are in place for the prompt correction or deletion of data that is found to be inaccurate or incomplete.
- **Storage Limitation:** Personal data is retained only for as long as is strictly necessary to fulfill the purposes for which it was collected, unless a longer retention period is required by law or regulation.
- **Integrity and Confidentiality:** The Company applies robust technical and organizational safeguards to protect personal data from unauthorized access, unlawful processing, accidental loss, destruction, or damage, ensuring confidentiality and data integrity at all stages of processing.

4. PERSONALLY IDENTIFIABLE INFORMATION

4.1. In order to fully access and utilize the services available on the Company's Website, Players are required to provide specific personal information. This data is essential for enabling access to core features, ensuring secure transactions, and delivering a personalized user experience.

4.2. The Company collects personal data in the following circumstances:

- Upon registration of a Player account on the Website;
- During a Player's interaction with the Website and its services;
- When personal information is voluntarily shared in publicly accessible sections of the Website;
- When a Player contacts the Customer Support team.

4.3. The personal data collected by the Company may include, but is not limited to, the following:

- Username;
- First name and surname;
- Date of birth;
- Email address;
- Residential address;
- Telephone number;
- Billing address;

- Government-issued identification documents;
- Proof of address documentation;
- Transaction history and activity records;
- Website usage preferences and behavior;
- Any other data voluntarily submitted by the Player during use of the platform;
- Payment information, including credit or debit card details and other payment credentials.

4.4. Players are solely responsible for ensuring that all submitted personal data is accurate, complete, and up to date. The Company disclaims liability for consequences resulting from inaccurate or falsified information provided by the Player.

4.5. The Company is legally obligated to collect certain personal information to verify the Player’s legal age for participation in gambling activities and to fulfill billing and payment processing requirements in accordance with GCB regulatory expectations.

4.6. Players retain the right to request the correction or updating of their personal data at any time by contacting the Company’s Support Team through designated channels.

4.7. All collected personal data is used strictly for internal operational purposes. Disclosure to third parties will only occur under specific, predefined circumstances as outlined in this Policy, and always in compliance with applicable data protection legislation and regulatory guidance provided by the GCB.

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

5.1. The Company processes Players’ personal data strictly for legitimate business purposes that support the delivery, security, and enhancement of its services. These purposes include:

- **Service Provision and Contractual Execution:** To facilitate access to the Company’s services, manage Player accounts, process payments and withdrawals, and fulfill obligations outlined in the Terms of Service.
- **Regulatory and Compliance Obligations:** To meet internal policies and external regulatory requirements, including those related to fraud prevention, responsible gaming, and identity verification.
- **Website Optimization and Operational Efficiency:** To monitor system performance, diagnose technical issues, improve platform functionality, and enhance the overall user experience.
- **Marketing Communications:** To provide Players with updates on promotions, offers, and new features—only when explicit consent has been granted by the Player to receive such communications.

6. TRAFFIC ANALYSIS AND NON-PERSONALLY IDENTIFIABLE INFORMATION

6.1. To support continuous improvement, system integrity, and a user-centric design approach, the Company collects and analyzes technical and behavioral data that does not personally identify individual users. This analysis helps ensure the Website remains functional, efficient, and responsive to Player needs.

6.2. Data collected may include, but is not limited to, device type, operating system, browser version, language preferences, IP address, time and date of access, visited URLs, navigation paths, clickstream activity, session duration, load times, and software crash logs.

6.3. This data is automatically gathered using cookies, web beacons, log files, and other tracking technologies. It is stored in secure environments and used exclusively to monitor website traffic, detect anomalies, troubleshoot technical issues, and develop performance enhancements.

6.4. Importantly, this data is anonymized and aggregated. It is never combined with personally identifiable information in a manner that could allow for the identification of individual users. The Company employs data minimization practices to ensure only the information strictly necessary for operational purposes is retained.

6.5. Additionally, the Company may use analytics tools provided by trusted third-party service providers. These tools are selected based on their compliance with industry security and privacy standards. Data shared with these providers is anonymized and used solely for analytical purposes, such as evaluating the effectiveness of user interface features or optimizing server load distribution.

6.6. The Company regularly reviews the implementation of tracking technologies to ensure alignment with transparency standards and to provide Players with meaningful control over their data preferences, including the ability to manage or disable certain types of cookies through browser settings or consent management platforms.

7. SHARING THE PLAYER'S PERSONAL INFORMATION

7.1. The Company is committed to handling personal data with the highest level of confidentiality and care. However, in certain circumstances, it may be necessary to disclose such data to third parties. Any disclosure is conducted in accordance with applicable privacy standards and only when it is justified, proportionate, and legally permissible. Disclosure may occur in the following scenarios:

- **Compliance with Legal and Regulatory Obligations:** When required to comply with applicable laws, regulations, lawful requests by public authorities, or orders issued by courts or regulatory bodies.
- **Enforcement of Legal Agreements:** To protect the integrity of the platform by enforcing the Company's Terms of Service, Privacy Policy, or any other contractual agreements with the Player.
- **Operational Support through Third-Party Providers:** When engaging external service providers (such as payment processors, ID verification vendors, cloud hosting providers, or AML monitoring platforms) who perform services on the Company's behalf. Such parties are subject to strict contractual obligations and data protection standards.
- **Fraud Detection and Risk Prevention:** To investigate, detect, and prevent fraudulent activity, unauthorized access, money laundering, and other prohibited behavior.
- **Responsible Gambling Initiatives:** For collaboration with research institutions or regulators aimed at studying gambling behavior and promoting Player protection through evidence-based policy development.
- **Protection of Legitimate Interests:** When necessary to safeguard the legal rights, intellectual property, assets, operational integrity, or physical safety of the Company, its Players, employees, or the general public.
- **Legal Authorization or Consent:** When disclosure is required or permitted under applicable laws, or when the Player has provided explicit consent for the data to be shared.

7.2. The Player acknowledges and agrees that personal data may be transferred and processed in jurisdictions outside of their country of residence, including to countries where the Company or its affiliated entities, partners, or service providers maintain data processing operations or infrastructure.

7.3. In cases of cross-border data transfers, the Company ensures that appropriate safeguards are implemented to maintain the confidentiality, integrity, and lawful processing of personal data. This includes the use of contractual clauses, data processing agreements, or other protective mechanisms designed to ensure that data subjects' rights are upheld, regardless of the data's geographic location.

7.4. The Company regularly audits its data sharing practices and the compliance posture of its third-party partners to ensure ongoing adherence to internal policies, industry standards, and international best practices in data protection.

8. PERSONAL DATA STORAGE TERMS

8.1. The Company retains personal data for the entire duration of the Player's active relationship with the platform. This includes the period during which the Player maintains a registered account and engages with the services provided by the Company.

8.2. Upon account closure—whether initiated by the Player or the Company—personal data is archived and securely stored for a period of five (5) years. This retention period is necessary to:

- Resolve potential disputes or complaints;
- Comply with financial reporting and anti-money laundering (AML) obligations;
- Fulfill statutory or contractual record-keeping requirements;
- Support regulatory inspections or audits if requested by competent authorities.

8.3. Once the retention period has expired and the data is no longer necessary for any lawful or operational purpose, the Company will ensure that the personal data is securely and irreversibly deleted or destroyed using appropriate technical and organizational measures.

8.4. The Company applies strict internal controls and access restrictions to archived personal data, ensuring that only authorized personnel with a legitimate need can access retained records. Periodic reviews of data inventories are conducted to ensure timely and lawful disposal of obsolete information.

8.5. If required, anonymized or aggregated data sets may be retained beyond the standard retention period for statistical analysis or business intelligence purposes, provided that such data cannot be traced back to any individual.

9. SECURITY

9.1. The Company is committed to maintaining the confidentiality, integrity, and availability of Players' personal data. To achieve this, the Company employs robust technical and organizational security measures designed to prevent unauthorized access, alteration, disclosure, or destruction of personal information.

9.2. All personal data is stored in secured environments, utilizing encrypted databases protected by SSL/TLS 1.2 or higher encryption protocols. Access to these databases is restricted and secured through password authentication, role-based access controls, and intrusion detection systems.

9.3. The Company conducts periodic risk assessments, vulnerability scans, and penetration tests to proactively identify and mitigate potential security threats. Data backups are performed regularly, and disaster recovery protocols are in place to ensure continuity of operations in the event of a system failure.

9.4. Affiliates, service providers, and partners that process personal data on behalf of the Company are contractually required to implement and maintain security measures that meet or exceed the Company's own standards. Prior to engagement, all third parties undergo due diligence assessments to verify compliance with information security requirements.

9.5. Staff members with access to personal data receive regular training in data protection, cybersecurity hygiene, and incident response procedures to ensure that security is embedded into daily operations.

9.6. In the event of a suspected or confirmed data breach, the Company follows a structured incident response plan. Affected parties will be notified in a timely manner, and relevant authorities will be informed in accordance with applicable regulations.

10. MARKETING

10.1. The Company adopts a consent-based approach to all marketing activities. Marketing communications—including promotional offers, service updates, and newsletters—are sent exclusively to Players who have actively opted in to receive such messages. Consent is obtained through clear and unambiguous mechanisms during registration or through account settings.

10.2. The Company does **not** sell, lease, or otherwise disclose Players' personal data to third parties for their independent marketing or commercial use. Any third-party marketing communications are delivered solely on behalf of the Company and under its direct control.

10.3. Players maintain full control over their marketing preferences. They may update, restrict, or revoke their consent at any time via their account settings or by contacting Customer Support. All requests to opt out are processed without undue delay and in accordance with applicable service-level commitments.

10.4. The Company ensures that all marketing content includes a clear and functional unsubscribe mechanism, allowing Players to withdraw from promotional communications with immediate effect.

10.5. Marketing strategies and communication channels are regularly reviewed to ensure compliance with ethical advertising standards and respect for Player privacy. Targeted messaging is conducted based on non-intrusive profiling techniques and only where permitted by consent.

11. COOKIES

- 11.1. The Company uses cookies to personalize the experience and ensure website functionality.
- 11.2. Cookies are small text files stored on a device, enabling recognition and functionality during visits.
- 11.3. Cookies may be first-party or third-party, the latter used for analytics and ad performance.

11.4. The types of cookies employed include:

- **Required Cookies:** These are essential for the operation of the Website and allow for basic functions such as page navigation, user authentication, and access to secure areas. The Website cannot function properly without them.
- **Functional Cookies:** These cookies enable the Website to remember choices made by the Player, such as language preferences and game selections, thereby enhancing usability and personalization.
- **Advertising Cookies:** These are used to measure the effectiveness of promotional content, track the delivery of ads, and in some cases, to deliver targeted advertising based on user behavior across websites.

12. DISCLAIMER

- 12.1. The services are provided on an 'as-is' and 'as-available' basis.
- 12.2. The Company disclaims liability for events outside its control and does not guarantee error-free data processing.
- 12.3. It is not liable for indirect or incidental damages related to data use or disclosure under this Policy.

13. CONTACT INFORMATION

- 13.1. For any questions regarding this policy, please contact: support@zaza.group or send a mail on the address: Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Willemstad, P.O. Box 6248, Curacao.

14. POLICY HISTORY

June 17, 2025	Policy update (Annual update)
December 01, 2024	Policy update (legal changes)
June 12, 2024	Policy update (legal changes)
May 28, 2024	Policy update (Annual update)
December 12, 2023	Policy update (legal changes)
May 20, 2023	Policy update (Annual update)
May 24, 2022	Initial Policy