

KKPoker Information Security Policy

Privacy & Management of Personal Data

This Privacy and Management of Personal Data Policy ("Privacy Policy") applies when you use our Sites (described below). Please read this Privacy Policy, together with our Terms and Conditions, before using the Sites because it will tell you how we collect, store, use and disclose your personal information when providing the Sites to you.

The term "Company", "we", "us" and "our" in this Privacy Policy refers to Violet Fortune Tech Limited N.V. (a company incorporated in Curaçao with company number 158923, with its registered office at Dr. H. Fergusonweg 1, Curaçao). The term "User" or "you" in this Privacy Policy refers to you.

The term "Applicable Data Privacy Laws" means the National Ordinance Personal Data Protection (Landsverordening bescherming persoonsgegevens, National Gazette 2010, Consolidated text no. 84) and the General Data Protection Regulation 2016/679 of the European Union (all as amended from time to time).

A copy of our Data Protection Policy is available on request.

Introduction

For purposes of the Applicable Data Privacy Laws, KKPoker is the "controller" of your personal information, being the owner and operator of the website located at kkpoker.co.

This Privacy Policy applies whenever you use our "Sites", "KKPoker" and all of their "Services". "Sites" means kkpoker.co, the domain name and the subdomains linked to this domain, and/or other domains, websites and mobile gaming applications operated by the Company. "KKPoker" means the real-money gaming application operated by the Company. "Services" means all content included on the Sites, including information, data, software, photographs, graphs, videos, typefaces, graphics, and other material. It describes how we collect, store, use, and disclose your personal information when providing the Services to you, and your rights and choices concerning your information.

By using the Sites, you acknowledge that you have read this Privacy Policy and you consent to the practices described herein with respect to the Company's collection, use, store and disclosure of the information provided by you to us.

If you do not want KKPoker to collect, store, use, or share your information in the ways

described in this Privacy Policy, you may not use KKPoker's Services.

Our Legal Obligations

We commit to comply with the Applicable Data Privacy Laws and the terms of the Curacao eGaming gambling licence through which you access and use our Services when processing your personal information. Your personal information may also be processed or transferred by us to other members of our group of companies, our affiliates, our agents and third parties providing services to us in jurisdictions outside of Curacao. In this event, we will comply with the terms of the Applicable Data Privacy Laws which ensure that your personal data is only transferred to such jurisdictions which comply with the various adequacy requirements for data protection as set out in the Applicable Data Privacy Laws or as otherwise authorized under the Applicable Data Privacy Laws.

Your Agreement to the Privacy Policy

By using the Services, you agree to the terms of this Privacy Policy as may be amended by us from time to time, save that we will ask you separately, when you provide us with your details whether you consent to receiving promotional communications from: (a) us; and also (b) third party providers of goods and services with whom we may share your details.

For a list of third-party partners whose technology we have integrated on our Sites (or if you have any enquiries regarding our third-party partners' privacy practices or how they use your information and you would like to review our third-party partners' privacy policies and [Terms of Service](#)) please e mail us at info@kkpoker.net.

We may also engage third parties to place ads for our products and services on other websites. These third parties may use cookies, web beacons and other devices or technologies to collect information about your visits to websites and mobile applications. The data collected typically includes information such as your IP address, your web browser, web pages viewed, time spent on the web pages, links clicked and whether you have purchased an advertised product etc. These third parties may use the information collected to deliver advertising and/or content targeted to your interests. For more information about targeted advertising provided by these third parties, and how to opt out of having your information used in this way by these third parties, please e mail us at info@kkpoker.net.

We reserve the right to amend this Privacy Policy from time to time. Any amendment will come into effect immediately upon such change being notified on the Sites. We therefore encourage you to visit this Privacy Policy from time to time to make sure that you are aware of the current version and any changes that we may make. If you do not agree with the changes we make to

this Privacy Policy please stop using the Services.

What Information is Collected

Registration Details

As part of a KKPoker account opening process among the Sites and to allow us to provide our Services to you, we will ask you to provide us with certain personal information, including but not limited to your User name and password (the “Login Credentials”), name, date of birth, postal address, location and email address. The name you register with us must be your own name. In addition, it is important that you complete the account details with valid information, since it will be used in the course of validating financial transactions and for the other purposes described in this Privacy Policy. You must advise us of any relevant changes to your personal information as provided to us and we do not accept liability for any harm that you may suffer as a result of you failing to notify us of any changes to the personal information that you have provided to us.

Financial Information

As part of our Know Your Customer procedures, we will ask you to provide us with certain financial information, including but not limited to your proof of income, bank details etc.

Ongoing Data Capture

When you use the Services, we capture and store certain personal information including information of your activity on the Sites and information held on the devices you use to allow us to enhance the Services that we provide to you. We also use cookies and our cookie policy is explained below.

Purposes of Collecting Your Personal Information

We, members of our group of companies, our affiliates, our agents and third parties providing services to us or to you on our behalf will use your personal information for the purpose of conducting our business and providing the Services to you. Specifically, this includes the following purposes (but we also reserve the right to use your personal information for any other purposes that are reasonably ancillary to the business of providing you with online gambling services):

- (i) to confirm financial transactions;
- (ii) to analyse your credit and fraud risk and verify your credentials using third parties, including financial institutions, identification verification agencies and credit reference agencies;
- (iii) to assess your gambling activity for responsible gaming purposes;

- (iv) to verify whether you have registered with any mandatory self-exclusion bodies (as may be applicable), for responsible gaming reasons;
- (v) to provide the Services to you;
- (vi) identification, verification and vetting purposes;
- (vii) statistical analysis and research;
- (viii) research and development;
- (ix) marketing, market research, customer surveys and customer profiling;
- (x) data analysis;
- (xi) to comply with licensing and regulatory requirements;
- (xii) to carry out batch testing of documents prior to the deployment of tools sourced from or provided by third parties;
- (xiii) to combat against security risks and fraudulent activity; and
- (xiv) to confirm your geographic location.

Conditions for Processing Personal Information

We will process your personal information under a variety of conditions, each of which is prescribed by the Applicable Data Privacy Laws. Examples of conditions are listed below.

Consent

Our processing of your personal information will primarily be necessary for us to provide you with the Services. On occasion we may ask for your consent to processing personal information in a discrete manner, in this instance your personal information will be processed in accordance with such consent and you will be able to withdraw this consent in writing at any time. By way of example, your consent will be needed in order to send you marketing and promotional communications.

Please note that we will not share your data with companies outside of our group of companies, our affiliates, our agents and third parties providing services to us or to you on our behalf for them to use for their own marketing purposes.

Fulfilment of a Contract, Compliance with a Legal Obligation

It may also be necessary for us to process your personal information where it is necessary for the performance of a contract (such as the Terms of Service the KKPoker Affiliate Marketing Programme Terms and Conditions you register a KKPoker account) or in order for us to comply with our various legal and/or regulatory responsibilities, including, but not limited to, complying with the conditions of our gambling licence and complying with any anti-money laundering legislation.

Legitimate Interests

We may also process your personal information where we deem such processing to be in our (or a third party's) legitimate interests and provided always that such processing will not prejudice your interests, rights and freedoms. Examples of us processing in accordance with legitimate interests would include: (i) where we disclose your personal information to our group of companies following a restructure or for internal administrative purposes; (ii) where we identify certain companies that can offer you additional benefits to our Services or provide us with valuable information about your use of our Services; (iii) detection and retention of information pertaining to those with responsible gambling issues. Note that if you self-exclude yourself on any of our Sites for responsible gaming reasons, we will share information about your self-excluded status within our group of companies and our affiliates in order to help with the identification of individuals who may be at risk of problem gambling and may take suitable action where necessary; (iv) processing for the purposes of ensuring network and information security, including preventing unauthorised access to our electronic communications network; (v) safeguarding the integrity of our games; (vi) adhering to regulatory and statutory requirements etc.

Information Sharing, Disclosures and Recipients

Specific Disclosures

We may disclose your personal information as follows:

- (i) to any recipient if required to do so by law or by regulatory authority;
- (ii) to any regulatory body or licensing body or authority;
- (iii) to third parties for the purposes of settling or making payment in connection with our game;
- (iv) to third parties who provide services to us or on our behalf;
- (v) to third parties for marketing purposes, provided you have consented or not objected, as the case may be, as described in "Group Marketing" below;
- (vi) to any payment management or debt collection company engaged by us to handle payment and collection processes to and from our users;
- (vii) to any third party that purchases us or our business or any part of us or our business;
- (viii) to credit reference agencies;
- (ix) if we believe in good faith that such action is necessary:
 - (a) to comply with any law or comply with legal process served on us;
 - (b) to protect and defend our rights or property;
- (x) with your consent;
- (xi) for the purposes of disaster recovery; or
- (xii) as set out in "General Disclosures" below.

General Disclosures

In addition to the specific examples of disclosures listed above we may disclose your personal information to our employees, employees of our group of companies, our affiliates, our agents and to third party service providers who may use your personal information to provide services to us in respect of you being a user of our Services.

Combined Personal Data

We may combine your personal information collected from your use of the Services in accordance with this Privacy Policy with other information collected from your use of other services operated by any other company in our group of companies as well as all products which are related or ancillary thereto, including mobile and social networking services. We will treat this combined information in accordance with and for the purposes set out in this Privacy Policy.

Deposit and Withdrawal Processing

In the course of making a deposit and/or withdrawal, you will need to provide deposit and/or withdrawal method information (e.g. your credit card number, e-wallet account etc.). This information in conjunction with your other personal information might be used to clear or carry out financial transactions executed by you on our Sites. You must advise us immediately of any relevant changes to your personal information.

Confidentiality

We have undertaken substantial efforts to protect the confidentiality of the identity, preferences and other information we have collected about individual users and we will not knowingly allow access to this information to anyone outside of our group of companies, other than to users themselves or as described in this Privacy Policy. We have made a substantial investment in our server, database, backup, firewall and encryption technologies to protect the information that we collect and process.

You should also play your part in protecting your personal information. Your Login Credentials are confidential and you are obliged to keep your Login Credentials secret and confidential at all times and to use your best efforts to protect their secrecy and confidentiality.

Limits of Confidentiality

Legally Required Disclosures

Due to the legal, regulatory and security environment in which we operate, we may be required,

under certain circumstances, to disclose personally identifiable information about our users and we may not be permitted to inform you that we have done so. We will use reasonable endeavours to limit such disclosure to the following: (a) where we believe in good faith that we are required to do so in response to a subpoena, warrant or other legal process or obligation upon us; or (b) where reasonably necessary to identify, contact or bring legal action against persons or entities to preserve and/or enforce our rights. Further, we can, and you authorise us to, disclose your User identification, name, date of birth, postal address, location, email address, account activity, transactions, transfers to and communications with other users, plus details of financial instruments used to deposit and withdraw, to our third party agents or official government bodies as we, in our sole discretion, believe necessary or appropriate in connection with an investigation of money-laundering, fraud, intellectual property infringement, piracy or other unlawful activity or activity that may expose us to legal liability.

Group Marketing

We may use your name, email address and phone number for the purpose of providing you with news, promotions and other marketing offers from our group of companies, our affiliates, our agents and third parties providing services to us or to you on our behalf. If you no longer wish to receive these promotional communications, newsletters and marketing offers, you may opt-out of receiving them either when you register with us initially, or subsequently by following the 'opt-out' instructions included in each communication. You are also entitled at any time to notify us that you do not wish to receive any promotional communications from us and you may do this by emailing us at info@kkpoker.net.

Third Party Offers of Goods and Services

Where you have provided us with your consent to do so, we may also share your email address with third parties so that they may send you offers of their goods and services. You may request at any time not to receive such offers by emailing us at info@kkpoker.net. If you request not to receive these offers we will remove your details from our marketing distribution lists and from any future lists we may share with our marketing partners and affiliates. However, you will need to unsubscribe separately from marketing communications sent by partners and/or affiliates who have received your contact details from us prior to your request to be removed from these lists.

We will only use your name and details in publicity materials with your written consent.

Your Rights in Relation to Your Information

Right to Request Information About You

We aim to keep our information about you as accurate as possible. You can contact us at any time to review, change, obtain a copy of your information or have your details altered or corrected in accordance with your rights under the Applicable Data Privacy Laws. In this event we may require evidence of and be satisfied as to your identity before we take any requested action.

Additional Rights

You have the following rights in relation to your personal data however please note that some of these rights are not absolute and may be further qualified under the Applicable Data Privacy Laws:

- (i) right to know what information we hold about you by way of a data subject request;
- (ii) right to request modifications to your account details including the correction of errors and the updating of incomplete information;
- (iii) right of erasure which allows you to request us to stop all processing of your data and to request the deletion of your data relating to your KKPoker account;
- (iv) right to object where a request made by you to cease processing is rejected;
- (v) right to object to decisions being taken by automated means; and
- (vi) right to data portability which enables your personal data to be sent electronically to a third party upon your request.

To contact us so as to exercise your right in relation to your information, please email us at info@kkpoker.net. We may, in certain circumstances, levy a small charge to cover the cost of administration regarding any request made by you in this regard or deal with your query in accordance with the Applicable Data Privacy Laws.

Data Retention

We retain your personal information for as long as necessary for the purposes set out in this Privacy Policy which includes any period of historic retention that may be required for regulatory purposes. We do not collect any more personal information from our users than is necessary for our purposes and our data management policies include the deletion of any personal information we no longer require. Should you close (or if we shut down) your KKPoker account with us (but excluding where your account is self-excluded), we will retain your personal data for a period of 5 (five) years to allow us to meet our regulatory and legal obligations and defend ourselves against any claims. Personal information which is not needed for these purposes will be deleted after this period. Please note that information relating to self-excluded accounts will not be deleted and will be retained for much longer than the specified periods above in compliance with our regulatory obligations.

Cookies

Cookies and similar technologies are very small text documents or pieces of code that often contain a unique identification code. When you visit a website or use a mobile application, a computer asks your computer or mobile device for permission to save this file on your computer or mobile device and gain access to information. Information collected through cookies and similar technologies may include the date and time of the visit and how you use a particular website or mobile application.

Why Do We Use Cookies?

We use cookies to keep things running smoothly for each individual player. Cookies help us see how you use our Services so we can continue to improve them. Depending on your preference, our cookies also help us send messages and promotions related to the games you love.

What Type of cookies Do We Use?

- (i) Necessary Cookies
- These cookies are necessary for the Sites to function properly and cannot be switched off in our system.
- (ii) Performance Cookies
- These cookies are used to gather statistical information about the use of the Sites. We use these cookies for performance and website optimization.
- (iii) Functional Cookies
- These cookies enable more functionality for our Sites visitors. We also use these cookies to allow for personalization, such as live chats, videos, the use of social media etc.
- (iv) Advertising / Tracking cookies
- These cookies are set by external advertising partners and are used for profiling and tracking data across multiple websites. If you accept these cookies, we may show our advertisements on other websites based on your User profile and preferences.
- These cookies also save data about how many visitors have seen or clicked on our advertisements in order to optimize advertising campaigns.
- If you want to view your consents audit please email us at info@kkpoker.net.

Further Information

Please email us at info@kkpoker.net for further information on how we protect and use your personal information.



(SMES) Solutions for Management Employment Support N.V.
Managing Director
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