

KYC Policies, Privacy & Management of Personal Data

Abbreviations used in this document

- **AML/CFT:** Anti-money laundering/combating funding of terrorism
- **KYC:** Know Your Customer
- **CDD:** Customer due diligence
- **EDD:** Enhanced customer due diligence
- **N/A:** Not applicable

Purpose

We make sure that your Personal Data is processed lawfully. We only process your personal data for one of the following reasons as presented below;

- To establish a business relationship/contract with you (upon registration)
- We have a legal obligation
- Where you have consented to the processing
- When it is in our legitimate interest
- When it is in the public interest

Types of the information we collect

This section is dedicated to helping you understand what data we collect and store about you. These data are categorised and presented below:

Registration data

- Customer Name
 - First name
 - Last Name
- Customer Birthdate
- Gender
- Username
- Password

- Password confirmation
- Contact details
 - Email Address
 - Mobile number
 - Permanent residential address
 - Street and street number
 - City
 - Country
 - Postal code

Customer Verification data

- Identity
 - Passport
 - National Identity card
 - Driving License
 - Residence card
- Residence Address reference
- Payment methods
 - E.g Bank statement

Transaction data

- Deposit/Withdrawal method
- Transaction date
- Id of the person performing the transaction
- Destination of funds
- Volume of transactions

Connection data

- IP address

Gambling Activity

- Game type
- Game preference/Selection (e.g bet-slip)
- Time
- Amount

Please note that, once your account is opened it is given a unique number so that it can be identified within our platform. This account id is associated with your activity, preferences and generally all the actions you take within the site, including payments. This is required for the

proper operation of our business. For example, we need to know who is the person placing a bet, so that we can settle bets and transactions. This implies that all your actions within our site can be essentially linked back to your personal data, in case it is required by a legal Authority.

Usage of the information we collect

Purposes of using personal data	Personal data involved	Legal justification for processing your data	Reasoning
Customer Registration	Registration data, Connection data	Establishing business relationship/contract, AML/CFT	The details are required for you to register to our site. Minors are not allowed to register. Our service is restricted for registration or usage from certain countries. The details we ask you to provide, originate from establishing business relationships with natural persons in a non-face to face manner.
Identity and Contact Details Verification	Registration data, Customer verification data, Connection data	AML/CFT, KYC, CDD, EDD	We are obliged by law to verify the accuracy of the data you provide, so that we can be sure about the identity of the account holder.
Transactions Management	Account identifiers, Transaction data, Connection data	AML/CFT, EDD	We are obliged by law to record your transactions.
Monitoring gambling behavior and transactions for crime prevention	Account identifiers, Connection data, Gambling activity, Transaction data	AML/CFT	We are obliged by law to monitor your transactions and gambling behavior.
Monitoring and evaluating gambling	Registration data (only contact details),	N/A	You have to provide your consent in order

activity for personalised offers, bonuses ** Grouped with bonuses and offers during registration	Gambling activity, Account identifiers		to be subject to such an operation.
Product updates, Newsletters and Promotions	Registration data (only contact details), Account identifiers	N/A	You have to provide your consent in order to be subject to such an operation.
Bonuses and offers	Registration data (only contact details), Account identifiers	N/A	You have to provide your consent in order to be subject to such an operation.
Report to regulatory or law enforcement authorities	Registration data, Customer Verification data, Account identifiers, Transaction data, Connection data, Gambling Activity	Legal obligation upon request from such Authority.	We are obliged by law to fulfill such request and provide d

If you choose not to provide your personal information, it may restrict us from meeting our legal obligations, fulfilling a contract, or performing services required to run your account. This means that we are unable to provide you with our products and services.

Disclosure of personal information

We will not disclose, rent or sell your personal information to any third parties in ways other than the ones described in this privacy policy document. In case it is required, we may disclose your information for one of the following reasons and only.

1. If we are required to disclose your personal data to meet any legal or regulatory obligation.
2. In order to enforce our terms and conditions or protect our rights.
3. In order to investigate and prosecute unlawful activities, such as fraud and money laundering, in cooperation with law enforcement agencies or government authorities. We reserve the right to perform such action, at our sole discretion in case we believe it is necessary and appropriate. The authorities to which we may disclose your personal information are:
 - a. Gambling Authorities in the countries of our operation
 - b. Anti-Money Laundering / Counter Terrorism Financing (AML/CTF) regulators
 - c. Law enforcement bodies in the countries of our operation

- d. Other companies or organizations, namely banks and credit institutions that are directly affected by illegal activities.

How long we keep your data

We only retain personal data for as long as it is necessary for the purpose they were originally obtained, in alignment with the Data Minimisation and Storage Limitation principles. As long as you are our customer your data is stored. If you are no longer our customer, your personal data are still retained for a period of time. We are obliged by law (AML/CFT) to retain such data for a period of at least 5 years from the time we ended our business relationship with the customer. We align the retention of your information with potential differentiations arising from the exercising of your data privacy rights.

Your data privacy rights

At any point, while we maintain or process your data you can exercise the following rights by submitting relevant requests via email at {office@trigonongroup.com}.

- 1) Right to know how your personal data are being processed
 - a) This document is created to directly address this right
- 2) Right to access - obtain a copy of the personal data stored about you
- 3) Right of rectification - ask for any incorrect, incomplete or inaccurate personal data to be corrected
- 4) Right to erasure - you have the right to be forgotten and request your data to be erased, if there is no legal basis against performing such an action
- 5) Right to restrict processing - restrict the processing of your personal data in specific cases if certain conditions apply
- 6) Right to data portability - ask for a copy of your data in a machine readable format to send it to another organization
- 7) Right to object - object to the processing of your personal data for marketing purposes or on specific grounds
- 8) Right to withdraw consent - withdraw the consent you have provided earlier, at any time.
- 9) Right to request that decisions from automated processing that concern you or affect you in any way are also processed by natural persons. You can also contest these decisions, if any.
 - a) Note that, **we do not apply** any automated processing to draw decisions about you as a natural person or your personal data.

Please note that fulfillment of certain requests might be a time costly process. We reserve the right to grant your request but get the appropriate time needed, in accordance to the regulation, to fulfill your request. We will assess your request and reply within no later than one month for the outcome of your request. In case we reject your request, you will be provided with the full justification and reasons behind such a decision. You have the right to lodge a complaint directly to the supervisory authority and the Data Protection Officer. Note that, we reserve the right to reject requests that are unreasonably repetitive.

Changes to our Privacy Policy

This privacy policy is subject to changes, and might be updated from time to time. Please review it frequently. If material changes are made to this policy, we will inform you either by email or through our website based on the agreed communication channels. Such changes will be presented to you in advance (before becoming effective), providing you with the appropriate amount of time to review them and understand them. We will not enforce material changes to this policy without your express consent. If you decline to accept the privacy policy after it has been updated, we may not be able to provide you with our products and services.

Know Your Customer (KYC)

Additional Notes

When you play casino games developed by casino providers, such as Evolution Gaming, their privacy policies also apply.

Cookies

To find out how we use cookies please see our cookies policy.

Contacting us

If you have any concerns, or would like more detail about how we process your Personal Data, you can contact us using office@trigonongroup.com.