

# Privacy Policy

## Scope

This Privacy Policy (hereafter referred to as the “policy”) explains how Paloma Media and its direct and indirect subsidiaries (collectively, “Paloma Media”, “us”, “we”, “our”) handles your personal data.

This Privacy Policy applies to the personal data collected from registered users (“Player(s)”) who have an account on our website and visitors to our website.

## Who We Are

The operator of this website is the Data Controller of your personal data. We are the data controller of your personal data because in the context of our business relationship with you, we decide how and why it is processed in the ways explained in this policy. Together with our joint controller, we maintain the ownership and security of the personal data you provide to us.

If you have any questions about this policy, including any requests about exercising your privacy and data protection rights, you can contact our Data Protection Officer by sending an email.

## What Personal Data Do We Collect?

### Data you provide to us directly

We may collect the following personal data from you depending on how you interact with our services;

**Registration Data:** To create an account on our website, you need to provide us with your personal data, including your email address, date of birth, country, phone number, gender, full name, social security number, zip code, username. Upon registering, we will automatically receive your IP address and location data.

**Due Diligence Data:** We collect your identity card number/driving license/passport number, proof of address, social security number, source of wealth/funds, bank ID, and financial statement/details to comply with our due diligence and Know Your Customer (KYC) obligations, for age and identity verification purposes for Anti-Money Laundering purposes and/or to comply with our license or other legal requirements.

**Financial Information:** We may collect your financial information, including Bank ID, CPR number, CPF number, IBAN, and payment system details, to facilitate withdrawals and deposits to your account. Additionally, this information may be used for Know Your Customer (KYC) and Anti-Money Laundering (AML) compliance purposes.

### Personal Data We Collect Automatically

**Device Information:** We receive information about the device and software you use to access our services, including Internet protocol (IP) address, operating system version, and device identifiers.

**Logs and Usage Information:** To help us understand how you use our services, and to help us improve them, we automatically receive information about your interactions with our services. Our servers automatically log usage data when you interact with our website. This information includes records of your activities like viewing content, clicking ads, performing searches, and sharing our services on social media on our website, date and time of your sessions, the pages you view, links to/from any page, and time spent in a session. We gather some of the data through cookies and similar technologies.

**Location Information:** We may collect or infer your general location information when you use our Services.

### **Personal Data That We Receive From Others**

We may collect your personal data from other sources to provide and personalize our services to you and/or to comply with legal obligations. We may gather data from:

- Publicly available sources such as public and government databases, internet, social media platforms, online and printed media, and so on.
- Commercially available databases and third-party entities, including financial and credit institutions, fraud prevention agencies, and public authorities. These sources help us in verifying your information and investigating suspicious activities, especially for fraud prevention and anti-money laundering purposes.
- Inferences. We may infer additional personal data based on the personal data described above. For example, we may infer your interests and game preferences based on the web pages you view and the games you play.

Personal data you have made public, such as information available on social media platforms, linked accounts (e.g., Facebook or Google), and other publicly accessible digital platforms.

## **Why Do We Collect Your Data?**

We use the Personal data we collect to:

- Provide you with our services
- Respond to your questions or requests Test, research, troubleshoot and analyze data to develop and improve our products and services
- Prevent, detect, and manage risk against harmful behavior, fraud and illegal activities
- Send you marketing content, newsletters and personalize our marketing to you
- Resolve disputes that may arise, including investigations by law enforcement or regulatory bodies
- Fulfill regulatory and legal obligations

Maintain the security and functionality of the service, including ensuring technical availability of the website, protecting our systems and intellectual property from security threats and unauthorized access.

## **What Are Our Lawful Basis for Processing Your Personal data?**

In compliance with the GDPR and other applicable data protection laws, we process your personal data when we have a legal basis to do so. For some processing, more than one lawful basis may be relevant. Here are some lawful basis that we rely on;

### **Conclusion and Performance of a Contract**

We process personal data in order to fulfill or enter into a contract with you. For example, to create and support your account with us, to communicate with you to fulfill our obligations under the Terms and Conditions, and so on.

### **Legal Obligation**

Processing your personal data may be necessary to comply with legal obligations. Some of the processing activities we may engage in to comply with legal obligations include:

- Verifying your age and identity as part of our KYC and AML obligations
- Determining your location and applicable legal requirements using your IP data
- Managing risks, including preventing problem gambling and promoting responsible gambling
- Ensuring network and information security complying with legal processes like search warrants, subpoenas, or court orders preventing crimes related to money laundering, terrorist financing, fraud, or computer claims
- Regular reporting activities to meet economic, financial, technical, and legal requirements
- Dealing with requests from you to exercise your rights under data protection laws

### **Legitimate Interest**

When necessary, we may process your personal data to safeguard our legitimate interest, a third party, or a commercial reason provided your rights, freedoms, or interests do not outweigh those interests. Examples of such processing activities include:

- Initiating legal claims and preparing our defense in litigation/administrative procedures
- Undertaking IT and system security procedures to prevent potential crime, asset security, intellectual property protection and ensure technical availability and proper functioning of our website and applications
- Managing our business relationship and to enhance our products and services

- Engaging in analytics, data aggregation, and research for service development/ improvement and/or marketing purposes
- Customer segmentation to manage risks, identify potential harmful behaviors, and ensure responsible gaming
- Analyzing your gaming behaviors using machine learning algorithms to recommend games and features you might enjoy
- Detecting and preventing activities that compromise the integrity of our services, such as fraud, use of unauthorized software or tools, abnormal patterns, or cheating

## **Consent**

With your consent, we may engage in the following activities:

- Send direct marketing messages via email, SMS, phone calls, website or app notifications
- Customize offers and promotions based on your gaming history and preferences
- Use data about your online behavior to display targeted advertisements that might interest you
- Personalize and assess the effectiveness of our marketing to better align with your interests and preferences
- Administer your participation in competitions, tournaments, rewards, loyalty schemes, and promotional events

## **How We Share Your Personal Data**

We may share your personal data with the following categories of recipients:

- Internally with authorized employees, brands within the same entity/operator, contractors, agents, joint controllers, affiliates, and subsidiary companies within our business group or linked to our parent company.
- Payment providers and financial institutions. For the use of our services, withdrawals and deposits, we offer a variety of trusted third party payment providers. We may share the following personal data with them: first name, last name, date of birth, email, address, zip, city, country, phone number, and alias. We may also share Your KYC documents with the payment providers in order for them to be able to comply with their legal and AML obligations.
- Third-party service providers, as necessary to deliver, manage, and improve our services including but not limited to customer support service providers, email delivery, sms and voice call providers, technology providers, and cloud hosting service providers.
- Marketing partners.
- Fraud prevention agencies.
- Third parties in the event of/connection to a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, transfer, divestiture, or sale of all or a portion of our business or assets.
- Game providers.

- Data aggregators or analytics providers for the purpose of conducting market research, data analysis, and improving service offerings.
- Law enforcement agencies, regulatory and licensing authorities.

If you choose to submit a complaint, review, or query concerning our services to a third-party platform (such as a casino review site, gambling forum, or dispute resolution body), we may be required to respond directly to such platforms in order to clarify, investigate, or resolve the matter you have raised. In doing so, we may disclose personal data strictly limited to what is necessary to identify your account and respond appropriately. Such disclosures are made based on our legitimate interest in protecting our business reputation and resolving external disputes in a transparent and accountable manner. We do not initiate such disclosures unless a submission or public allegation has been made by you or on your behalf, and any data shared will be restricted to what is proportionate and necessary to provide context and factual clarity.

## **How Long We Keep Your Data**

We will retain your personal data only for the duration that you maintain an account with us and to fulfill the purposes outlined in this privacy policy.

Additionally, we may keep your data for a longer period as required by applicable legal obligations, such as anti-money laundering (AML) regulations or other regulatory requirements.

Once your account is closed and there is no longer a legal or business need to retain your data, your personal data will be either deleted or anonymized so that it can no longer be associated with you.

## **Your Rights**

You have certain rights regarding the personal data we hold about you. They include:

- Right to request access to the personal data we hold about you and obtain information about how we process it. (Subject to KYC verification)
- Right to rectify or correct any inaccurate or incomplete personal data about you. (Subject to KYC verification)
- Right to erase, delete, or remove your personal data when there is no compelling legal or business reason for its continued processing.
- Right to restrict the processing of your personal data in certain circumstances.
- Right to request the transfer of your personal data to another party in a structured, commonly-used, and machine-readable format.
- Right to object to the processing of your personal data, particularly if we are processing it on grounds of legitimate interests or for direct marketing purposes.
- Right to withdraw your consent at any time, without affecting the lawfulness of previous processing based on your consent.

- Right to lodge a complaint with a supervisory authority. To exercise your rights, kindly contact our Customer Support at [service@thunderpick.io](mailto:service@thunderpick.io)

## **Cookies and other Tracking Technologies**

We use cookies, tags, pixels, web beacons and other similar technologies to enhance your experience on our website and applications. Upon your first visit to our website or applications, we will ask for your consent to use non-essential cookies. Strictly necessary cookies which are necessary for the operation of the website, do not require your consent. For more information on the specific cookies we use, their purposes, and how to manage your preferences, please refer to our Cookie Policy.

## **Data Security**

We prioritize the security of your personal data and implement robust measures to protect it from unauthorized access, loss, theft, and misuse. Our security strategy includes a combination of administrative, technical, and physical safeguards designed to protect your data against unauthorized disclosure, alteration, and destruction. Even though we use advanced security measures to protect your data, no system is completely safe from security breaches. The Internet, by its nature, cannot ensure complete security of data transmission or storage. While we strive to protect your personal information, we cannot guarantee its absolute security. However, we will continuously assess and improve our security practices to enhance the protection of your data.

## **Transfer Of Data Outside Your Jurisdiction**

We may process your personal data in countries outside of your jurisdiction. When we transfer your personal data to our affiliates or third parties, we make sure that appropriate safeguards have been put in place before such transfer to ensure your personal data is afforded a high standard of protection. This includes transferring personal data only to countries recognized as providing adequate protection, employing Standard Contractual Clauses, or implementing other legally recognized safeguards.

## **Change in Ownership or Control**

In the event of a sale, merger, or any other change in ownership or control of our company, your personal data may be disclosed as part of the transaction or during the preparation for such an event. The new owner or controlling entity will be permitted to use your personal data, but only in accordance with the terms outlined in this Privacy Policy, unless you provide explicit consent for different use.

## **How To Contact Us**

If you have any questions about this privacy policy or our data collection practices, kindly contact us by sending an email to [service@thunderpick.io](mailto:service@thunderpick.io)

## **Updates To This Policy**

We may need to update, modify, or amend our Privacy Policy as our technology evolves and as required by law. It is your responsibility to review the amended Privacy Policy from time to time. The Privacy Policy will apply from the effective date provided on our website.