

Information Security Policy

1. Purpose

This policy establishes the principles, controls, and responsibilities necessary to protect information assets, customer data, and gaming operations in compliance with Curaçao's LOK regulatory framework. It ensures confidentiality, integrity, and availability of data while supporting responsible gaming and regulatory transparency.

This policy works alongside the Know Your Customer Policy, in which the company ensures that we comply within the licenses regulatory framework, prevents identity fraud, supports responsible gambling, and meets Anti-money Laundering (AML) and Counter-Terrorism Financing (CTF) obligations.

Please also refer to the company's Terms and Conditions and Anti-Money Laundering Policies.

2. Scope

The policy applies to all employees, contractors, systems, and third-party service providers handling:

- Player personal data
- Financial transactions
- Gaming platform operations
- Regulatory reporting information

3. Governance & Compliance

Regulatory Alignment: All practices comply with Curaçao Gaming Authority (CGA) requirements under the LOK framework.

Audit & Reporting: Regular internal audits and annual external audits are mandatory. Reports must be submitted to the CGA.

Legal Obligations: Compliance with applicable data protection laws.

4. Customer Access

4.1 Customer Log-in

After opening your account your Account ID and password should remain secret. All transactions where your Account ID and password have been entered correctly will be regarded as valid.

Should your log-in details become known to a third party please contact our customer services department immediately.

4.2 Customer Preferences

A customer may 'opt out' of receiving any promotional communications from Cyprus Sporting Clubs either by choosing to opt out where the option is presented to you, or via email communications from us.

Please contact our Customer Services should you wish to:

- Confirm the accuracy of Personal Information held about you by Cyprus Sporting Clubs
- Would like to update or amend your Personal Information
- Have any queries or complaints regarding the use of your Personal Information

5. Information Use

5.1 Collection of Player Data

Cyprus Sporting Clubs collects personally identifiable information, such as your e-mail address, name, home or work address or telephone number. Cyprus Sporting Clubs also collects anonymous demographic information, which is not unique to you, such as your postcode, age, gender, preferences, interests and favourites.

There is also information about your computer hardware and software that is automatically collected by Cyprus Sporting Clubs. This information can include: your IP address, browser type, domain names, access times and referring web site addresses. This information is used by Cyprus Sporting Clubs for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Cyprus Sporting Clubs web site.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through Cyprus Sporting Clubs public message boards, this information may be collected and used by others. Note: Cyprus Sporting Clubs does not read any of your private online communications.

Cyprus Sporting Clubs encourages you to review the privacy statements of web sites you choose to link to from Cyprus Sporting Clubs so that you can understand how those web sites collect, use and share your information. Cyprus Sporting Clubs is not responsible for the privacy statements or other content on web sites outside of the Cyprus Sporting Clubs and Cyprus Sporting Clubs family of web sites.

5.2 Use of Player Data

Cyprus Sporting Clubs collects and uses your personal information to operate the Cyprus Sporting Clubs web site and deliver the services you have requested. Cyprus Sporting Clubs also uses your personally identifiable information to inform you of other products or services available from Cyprus Sporting Clubs and its affiliates. Cyprus Sporting Clubs may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

Cyprus Sporting Clubs does not sell, rent or lease its customer lists to third parties. Cyprus Sporting Clubs may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, Cyprus Sporting Clubs may share data with trusted partners to help us

perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to Cyprus Sporting Clubs, and they are required to maintain the confidentiality of your information.

Cyprus Sporting Clubs does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

Cyprus Sporting Clubs keeps track of the web sites and pages our customers visit within Cyprus Sporting Clubs, in order to determine what Cyprus Sporting Clubs services are the most popular. This data is used to deliver customised content and advertising within Cyprus Sporting Clubs to customers whose behaviour indicates that they are interested in a particular subject area.

Cyprus Sporting Clubs web sites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Cyprus Sporting Clubs or the site; (b) protect and defend the rights or property of Cyprus Sporting Clubs; and, (c) act under exigent circumstances to protect the personal safety of users of Cyprus Sporting Clubs, or the public.

5.3 Security of Player Data

Cyprus Sporting Clubs secures your personal information from unauthorised access, use or disclosure. Cyprus Sporting Clubs secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. When personal information (such as a credit card number) is transmitted to other web sites, it is protected through the use of encryption, such as the secure socket layer (ssl) protocol.

5.4 Data Retention

Cyprus Sporting Clubs stores data only as long as required by law and licence conditions.

5.5 Data Backup

Cyprus Sporting Clubs completes daily encrypted backups, with data stored in geographically diverse locations.

6. Use of Cookies

The Cyprus Sporting Clubs web site use “cookies” to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalise Cyprus Sporting Clubs pages, or register with Cyprus Sporting

Clubs site or services, a cookie helps Cyprus Sporting Clubs to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Cyprus Sporting Clubs web site, the information you previously provided can be retrieved, so you can easily use the Cyprus Sporting Clubs features that you customised.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Cyprus Sporting Clubs services or web sites you visit.

7. Child Protection

Placing bets by anyone of restricted age is prohibited. The right to void any transactions with minors is retained. We reserve the right to request proof of age documentation from any client at any time.

8. Third-Party Management

Third-party vendors contracted with Cyprus Sporting Clubs must agree to data protection and privacy agreements and adhere to all relevant information security protocols as required by law and licence conditions.

However, we cannot ensure the protection of any images or information that you provide to the third-party online sites that link from our company's website or any information gathered by a third-party provider to our affiliates, as these sites are owned and managed independently from us. Any information gathered by such third parties is not managed via our Privacy Policy or Information Security Policy, but by the Privacy Policy, if any, of the third party. We assume no liability for the practices, actions or policies of such third parties.

Information gathered by Cyprus Sporting Clubs may be processed in any country in which we or our affiliates, suppliers, subsidiaries or agents maintain facilities. By using the service, you consent to any transfer of information outside of your country.

9. Consent to Privacy Policy and Information Security Policy

By clicking 'yes' during the Registration Process, or by your continuing use of the company's services, you agree to the contents of this Policy.

10. Policy Amendments

Cyprus Sporting Clubs will occasionally update this policy statement to reflect company and customer feedback. Cyprus Sporting Clubs encourages you to periodically review this statement to be informed of how Cyprus Sporting Clubs is protecting your information.

11. Contact Us

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