

Privacy policy

We know that you care how information about you is used and it's important to us that you feel comfortable and trust us with your information when you use our website _____ and its related services (collectively "Website"). Our Privacy Policy ("Privacy Policy") helps explain our information practices, including the information we process to support our Website, e.g. what information we collect and how this affects you, what steps we take to protect your privacy etc. Please take a few minutes to read this Privacy Policy, so that you understand what information we collect, what we do with it and why.

Scope and Consent

We collect personal information from you and any devices you use when you use our Website, register for an account with us, provide us information on a web form, update or add information to your account, or when you otherwise correspond with us.

Some of this personal information, such as a way to identify you, is necessary to enter into a binding legal agreement with us, participate in the games or make payments on the Website.

By visiting, registering with us or logging on with us on the Website and providing us with personal information, you should accept and consent to collecting, processing and disclosing your personal information for the purposes set out in this Privacy Policy. If you do not agree with the terms of our Privacy Policy, please do not provide any personal information to us, do not use or register on the Website.

We may at our sole discretion change, modify, add or remove this Privacy Policy at any time and without prior notice to you to reflect changes in our information practices or relevant laws. Any changes to Privacy Policy will become effective upon posting of the changed Privacy Policy on our Website.

If we make substantial or material changes, we will provide you with additional notice (such as using a pop-up notice on our Website or sending you an email confirmation). If you object to any changes, you may close your account. We encourage you to review the Privacy Policy whenever you access our Website to stay informed about our information practices and the ways you can help protect your privacy.

By using our Website, you should also agree to our Terms and Conditions. Please make sure you read and agree with our Terms and Conditions if you want to use our Website.

Any personal information provided to or gathered by us is controlled by this Website that is owned and operated by Abudantia B.V., a company registered under the laws of Curacao under registration number 126608, having its registered address at: Groot Kwartierweg 10, Livestrong Building, Curacao ("Company"), which holds an e-gaming sublicense # 8048/JAZ2014-034 issued by Antillephone N.V. with Gaming License # 8048/JAZ.

Personal Information We Collect

The personal information and data that we collect and process about you include the following:

- (a) information and documents provided to us upon registration of the player account (such as name, surname, e-mail address, phone number, residential address and date of birth) and in the course of KYC & due diligence procedures;
- (b) information about the games you participate in via our Website;
- (c) details of the transactions you carry out with us via the Website;
- (d) details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data;
- (e) records of your correspondence with us, whether via the Website, live-chat, e-mail or other means of communication;
- (f) information provided in customer surveys or other forms of customer research;

(g) any other information that you submit to us via the Website or e-mail.

We reserve the right to record all calls, internet communications and details of transactions you carry out through the Website.

How We Use Your Personal information

We use the personal information we collect from you for a scope of different business purposes and according to different legal grounds of processing.

We may collect and process your personal information for the purposes of:

- (a) registering you on the Website, creating your user account, fulfil verification requirements, creating your profile and to enable you an access and use of the Website;
- (b) allowing you to participate in the games available on the Website;
- (c) processing your payments;
- (d) providing customer service, giving you information about your account, responding to your requests;
- (e) improving our services by using log information and usage information to better understand network behavior and trends, detect potential outages and technical issues;
- (f) providing you with ancillary services, for marketing purposes;
- (g) preventing, detecting and investigating fraud, security breaches, potentially prohibited or illegal activities, as well as for enforcement of law and our Terms and Conditions;
- (h) conducting risk assessment activity including but not limited to anti-money laundering and player protection obligations as may be required by applicable EU or regional legislation;
- (i) protecting the vital interests of the data subject and also for the overall “public interest”;
- (g) the legitimate interest pursued by the Company or by a third party;
- (k) carrying out operations necessary to enable the foregoing.

We may also use your personal data to inform you of changes on the Website, new services available and promotions that you may find interesting. If you do not wish to receive such direct marketing material, you may opt-out of such communications by following the instructions contained therein.

We may use and publish your user name and/or first name and/or first letter of last name and/or region for promotional purposes. You may withdraw your consent for this by contacting _____.

Retention of Your Personal Information

We may keep your personal information for no longer than necessary for the purposes for which the personal information is processed.

The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal or contractual rights. When data is no longer required to be kept, it will be destroyed.

How Do We Protect Your Personal Information

We are committed to protecting your personal information and respecting your privacy. We will ensure that your personal information is processed following the principles of lawfulness, fairness and transparency, purpose limitation, data minimization, accuracy, storage limitation, availability, integrity and confidentiality, and not excessive for the purposes specified in this Privacy Policy.

We commit to protect your personal data in accordance with best business practices and applicable laws. We assure you that your personal information is kept by us in a secure manner. We maintain appropriate technical and organisational measures to prevent your data from being processed in an unauthorised or unlawful way.

We employ security protocols to ensure that all transactions including deposits and withdrawals are carried out in a totally secure manner.

How We Might Share Your Personal information

We may share your personal information with our employees, affiliates or third party providers under certain contracts. This disclosure may be required for us to provide you access to our Website, to comply with our legal obligations, to enforce our Terms and Conditions, to facilitate our marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our Website. We attempt to minimize the amount of personal information we disclose to what is directly relevant and necessary to accomplish the specified purpose. We do not sell, rent, or otherwise disclose your personal information to third parties for their marketing and advertising purposes without your consent.

The employees who have access to, or are associated with the processing of your personal information, are obliged to respect the confidential nature of your information pursuant to applicable data protection and privacy laws.

The following categories of staff of the Company will have access to your Personal information:

- (a) Key Official;
- (b) Money Laundering Reporting Officer;
- (c) Director of Operations;
- (d) customer support agents;
- (e) customer retention team members;
- (f) VIP player manager(s).

We may disclose your information to our affiliates, service providers, and other third parties under contract who help us with providing you and others our services on our behalf or other services provided by third parties via our Website. They are required to provide sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing of your personal data will meet the legal requirements and ensure the protection of your rights.

You agree that your personal data will only be disclosed to and/or processed by third parties in the following cases:

- (a) to detect, investigate and control fraud, money laundering and terrorism funding activities (this includes but is not limited to third-party suppliers such as ID and address verification system providers, payment service providers and financial institutions, licensing bodies and other competent authorities);
- (b) to comply with our legal and regulatory duties and responsibilities to the relevant licensing and regulatory authorities as well as all duties and responsibilities owed under any other applicable legislation;
- (c) if we need to share data with our payment processors to facilitate transactions;
- (d) when we feel that disclosure is necessary to protect our or your safety, or the safety of others;
- (e) if it concerns a credit reference agency (a credit reference agency may also keep a record of such information);
- (f) where we are required to do so by law;
- (g) to any other third party with your prior consent to do so.

In order to provide you with efficient services, we and our service providers may be required to transfer your personal data from one country to another. Some of the data processors engaged to process your personal information may not be based on European Economic Area (EEA) and data protection laws applicable to them may not be as protective as EU law. By agreeing to this Privacy Policy, you acknowledge and agree to our (and our service providers) processing of your personal information outside the EEA. We will take all reasonable efforts to ensure that your personal data is treated securely and is processed with appropriate care and protection.

How You Can Access, Control and Correct Your Personal Information

For personal data that we have about you, you can:

- a) access your personal data that have been collected and held by us. We will provide this, free of charge in electronic format, subject to you evidencing your ID to avoid a security breach;

b) request a correction and/or erasure of incorrect and/or inappropriate data. It is your responsibility to maintain your personal information accurate and up to date;

c) ask us not to process your personal data for marketing purposes. This will not affect your ability to play on the Website, however, will limit the bonus and special offer notifications you receive;

d) delete data, object to, limit or restrict use of data, refuse or withdraw your consent to provide us with any personal information at any time. However, once you make that request, you may not be able to use our Website. Consent can be withdrawn at any time by sending a request to _____ or deleting your account.

Please note that we may retain your personal data even after you have deleted your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse.

Your personal information is essential to us not only for the purpose of providing our services but also to comply with fraud and anti-money laundering regulations.

e) request the removal of your personal data from our systems, whereby we will isolate your data in a secure, separate system which will be kept only for legal and anti-money laundering purposes for the necessary amount of time. All non-essential data will be deleted and upon the lapse of the required period of time, all data held will be deleted.

We will respond to any request to provide, correct, restrict or erase data within 4 weeks of receiving written requests to the support email _____.

How We Use Cookies & Similar Tools

We may use cookies and similar technologies on our Websites to collect additional website usage data and to operate our services. Cookies are small files containing information that is downloaded to your device when you visit our Website. We use them in order to offer you an optimal and personalised customer experience, track visitors and improve our services. You may refuse to accept cookies by activating an appropriate setting on your Internet browser. However, if you select this setting you may be unable to access certain parts of our Website. You can learn more about how we use cookies and similar technologies in our cookie policy.

Other Important Privacy Information

Our Website may contain links to and from the third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or the content of the websites. Before you submit any personal data to these websites, please carefully check their privacy policies.

All capitalised terms used in this Privacy Policy shall have the same meaning as set forth in the Terms and Conditions of the Website unless otherwise stated.

If you still have questions about our Privacy Policy, please feel free to send us an email to _____.