GLOBAL POKER PRIVACY POLICY

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At VGW, we are committed to maintaining transparency and protecting the privacy of our players.

VGW operates the Global Poker website and any subdomains, subpages, successor sites or any application accessible via our website (the "**Website**").

This Privacy Policy ("**Privacy Policy**") explains how VGW collects, uses, maintains and shares information collected from the Website.

We are committed to complying with obligations under all applicable United States data privacy laws, including, but not limited to, the *California Consumer Privacy Act* (including the *California Privacy Rights Act*), the *Colorado Privacy Act,* the *Connecticut Data Privacy Act*, the *Delaware Personal Data Privacy Act*, the *Florida Digital Bill of Rights*, the *Illinois Biometric Information Privacy Act*, the *Indiana Consumer Data Protection Act*, the *Iowa Consumer Data Protection Act*, the *Kentucky Consumer Data Protection Act,* the *Maryland Online Data Privacy Act,* the *Minnesota Consumer Data Privacy Act,* the *Montana Consumer Data Privacy Act*, the *Nebraska Data Privacy Act,* the *New Hampshire Privacy Act,* the *New Jersey Data Protection Act,* the *Oregon Consumer Privacy Act,* the *Rhode Island Data Transparency and Privacy Protection Act,* the *Tennessee Information Protection Act,* the *Texas Capture of Use of Biometric Identifier Act,* the *Texas Data Privacy and Security Act,* the *Utah Consumer Privacy Act,* the *Virginia Consumer Data Protection Act* and the *Washington WASH. REV. Code §19.375.010*.

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1 DEFINITIONS

Aggregate Information means information about groups or categories of players, which do not identify and cannot reasonably be used to identify an individual player.

Anonymous Information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as Personal Information.

Artificial Intelligence (AI) refers to systems and intelligence tools (including machine learning or otherwise automated tools) that can learn from data and experiences and can help computers complete tasks that normally require human intelligence. AI systems can do things like understand languages, recognise images, make decisions, and even predict future outcomes.

Behavioral Advertising means advertisements that may be sent to you based on your data through the use of technologies such as cookies to gather information about your activities on our Website and other websites.

Personal Information means any information about you, whether it is true or not, that can reasonably be used to identify you, or otherwise make you identifiable.

VGW (including "**VGW Holdings Pty Ltd**", "**VGW Group**", "**We**", "**Us**" or "**Our**") means VGW Holdings Pty Ltd and any applicable subsidiaries, including VGW Malta Holding Limited, VGW Malta Limited, VGW GP Limited, VGW Games Limited, VGW Corporation Pty Ltd, VGW Treasury Malta Limited, VGW Administration Malta Limited, VGW Corporate Services Australia Pty Ltd, VGW Technology Australia Pty Ltd, VGW US, Inc., VGW Luckyland Inc., VGW Holdings US Inc., Beematch Limited, Beefour Limited, Beells Limited and VGW Canada Inc., that forms the VGW Group and may collect, use, maintain and disclose information collected from the Website as applies to this Privacy Policy.

2 DATA CONTROLLER

2.1 The business responsible for managing data collected through your use of the Website (including any data you may provide through the Website when you purchase a product or service or take part in a promotion or competition) is VGW GP Limited having its registered address at Trident Park, Notabile Gardens, No 6 – Level 3, Central Business District, Mdina Road, Zone 2 Birkirkara CBD2010 Malta.

3 TYPE OF INFORMATION WE COLLECT

3.1 We collect three types of information (as defined in section 1, **Definitions**):

- Personal Information
- Anonymous Information
- Aggregated Information

The types of Information we may process depend on the business context and the purposes for which it was collected. Any other information that we receive and identify as your Personal Information will be treated as Personal Information by VGW.

3.2 It may include:

Contact Details, such as your first name and surname, email address, residential address, and mobile or other phone numbers.

Personal Information, such as gender, age, photographs of you (including selfie images, images from an ID document such as passport or drivers' license), information such as your name, gender, country and date of birth derived from your government identifiers such as your passport, drivers' license and social security number, age range and a unique personal identifier derived from your username, email address, mobile or other phone number(s), advertising identifier and/or residential address. Additionally, we may collect account login details, including your username, password and pictures associated with your profile.

Transaction Information you provide when you make a purchase, request a redemption or otherwise use the Website, such as your postal address, phone number and payment or redemption information including banking and financial details, credit card details and bank account statements (we do not store your full card details).

Geolocation Information, which may include general location information (your city, state and country) and, with your explicit consent, precise geolocation information (as may apply under your relevant state privacy law).

Usage Data, which may include activity, technical and device information about your use of the Website, such as the content you view, the time and duration of your visit on our Website, how often you use our services, how you first heard about our Website, your preferences and information about your interaction with the content offered through our Website, your hardware model, device type, other unique device identifiers, operating system version, browser type and IP address.

Sensitive Personal Information, which may include biometric information collected by our third party service providers (see section 6) including facial image data (such as selfie images, facial recognition data, photo or scan of face on an ID document), numeric facial features, keystroke data, precise geolocation information (as may apply under your relevant state privacy law).

Information we obtain from a third party, such as a site or platform provider (including Facebook and Google), about your use of or interest in our services.

3.3 Aggregated Information

We may use information we collect about you in an aggregated form so it cannot identify you. We may use aggregated data to analyze how you interact with our products and services, to monitor and analyze usage and activity trends (including Usage Data), website performance and analytical and statistical purposes. We may also receive information from a third party (such as Facebook) about your use of our services.

4 HOW WE COLLECT YOUR INFORMATION

4.1 Information you provide to us directly

This includes information collected when you visit our website, register, purchase products, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Website. We collect information from you by telephone, video or in correspondence (including email, live chat, mail, text message or social media). All telephone or video calls between you and VGW Group representatives may be recorded for training, quality control and compliance purposes and by continuing with any such call you consent to it being recorded.

4.2 Information we collect as you use our services

We also collect information about your use of our products and services through a variety of technologies that are present when you visit our websites, including the Website, or use our applications on third party sites or platforms (whether or not you are logged in or registered) including cookies, flash cookies, application programming interfaces ("**API**"), pixels and tags (further information in set out in section 5, **Personal Information Collected via Technology**). Analytics tools are also used by us to collect information, including when you visit our Website or use our applications or services on third party sites or platforms.

4.3 Information we receive from third party service providers

Finally, we also use trusted sources to update or supplement the information you have provided, or we have collected, including in order to verify or validate information (for example, postal address, documentation and names).

5 PERSONAL INFORMATION COLLECTED VIA TECHNOLOGY

5.1 We and our service providers use industry standard identifiers, such as cookies or other similar technologies, to provide an enhanced experience.

5.2 These technologies allow us to record certain pieces of information whenever you visit or interact with the Website. Information may include, in part, browser type, operating system, device type, an estimate of your geographic location associated with your IP address, the location of your mobile device, the page served, the time, referring URLs and other information normally transmitted in HTTP requests.

5.3 This statistical data provides us with information about your use of the services, such as general engagement with a page, the type of content on that page and how long you stay on that page. Usage Data is generally non-identifying but if VGW associates it with you as a specific and identifiable person, VGW will treat it as Personal Information (including in relation to any unique identifiers).

5.4 The following are examples of these types of technologies:

a) **APIs.** APIs work by allowing different types of software to communicate with each other. They make life a lot easier for programmers and provide a better experience for end users.

b) **Cookies.** These are small text files placed in your device browsers to store your preferences. Cookies help us to better understand your behavior including for security and fraud prevention purposes, they tell us which websites you have visited and facilitate advertisements and web searches. When you first access our Website you will be given the option to enable or disable cookies through our cookie banner. You can revisit your choice at any time by going to the cookie tool bar in your browser. Most browsers allow you to block and delete cookies. However, if you do that, certain features of the service may not be available or work properly if all cookies are disabled.

c) **Event tagging.** Event tagging (including Facebook App Events) allows us to track actions that occur on the Website such as application installs and purchase events. By tracking these events we can view analytics, measure ad performance, and build audiences for ad targeting.

d) **Mobile device identifiers.** When you download or access our products via a mobile device, we and our service providers may receive information about your geolocation (based on your IP address) and your mobile device including device identifiers, advertising identifiers, hardware type, your operating system and your in-game activity. We may share the advertising identifier associated with your mobile device or tablet (such as the Apple IDFA and Google Advertising ID) with advertisers. VGW, our service providers and data processors may use this information to provide you with tailored advertising and other content. When you download or access our games through your mobile device, we may ask permission to track your activity. If you initially consent to tracking, you may later disable that permission in your device settings or withdraw your consent.

e) **Pixel tags/web beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Website that collects information about your engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on or forwarded.

5.5 Do-not-track signals and similar mechanisms

Our Website does not currently respond to Do Not Track Signals which are settings some browsers and devices use to indicate a preference not to be tracked across websites or apps. VGW is committed to protecting your privacy rights and complying with data protection laws. Our Website may request your consent before tracking your activity across other apps and websites for advertising or analytics. If you decline, we will not track your activity outside of our Website for those purposes. For further information regarding these technologies, and how to exercise your rights, please refer to our Cookie Notice. You can manage how your data is collected and used by adjusting your privacy settings on your device.

6 HOW WE USE COLLECTED INFORMATION

6.1 We use the information collected for the following purposes:

To provide and manage the services you request	This includes, for example, processing your registration, setting up and looking after your account, including checks made to guard against fraud.
To improve our services	Information you provide helps us respond to your player service requests more efficiently; we may use feedback you provide to improve our products and services.
To process payments	We may use the information you provide when placing an order to service that order (including to satisfy our player due diligence requirements and to establish the source of funds where necessary).
To personalize user experience	We may use information which has been aggregated to understand how our users as a group use the services and resources provided on our Website. We may also send promotional push notifications or alerts to your mobile device, with your consent. You can deactivate these messages at any time by changing the notification settings on your mobile device.
To contact you about our services including marketing	We may contact you by email, live chat, telephone, text message, mail or social media for communications related to your use of our services and products, including in connection with your accounts, offers and information about our products and services, promotions and competitions you choose to enter, online surveys, new features that you are entitled to access, and other important information. Please see section 8, **Your Privacy Rights**, for your opt-out rights.
To send important notices to you	From time to time, we may send important notices to you, such as communications about purchases you have made, or legal notices regarding the changes to our terms and conditions or other policies. This information is important to your interactions with us and you acknowledge that you may not opt-out of receiving these communications.
To comply with our legal and regulatory obligations	We may use information we collect about you to assess your social gameplay activity for responsible social gameplay purposes, taxation purposes, to comply with fraud and anti-money laundering laws (including to establish the source of funds where a transaction is involved) or to comply with any other legal or regulatory obligations (including the detection, investigation and prevention of activity that violates our Terms and Conditions or that may be illegal).
To detect and monitor fraudulent activity	We may use Transactional Information shared from Worldpay and Nuvei to detect and prevent fraudulent activity and to ensure the safety and integrity of your transactions and our services. We may use Sensitive Personal Information shared by you or from our third-party service providers (including SumSub, Jumio, Darwinium and GeoComply) for precise geolocation information, identity

	verification, AML and anti-fraud compliance and to verify human participation in our Alternative Method of Entry. With your explicit consent, biometric information and precise geolocation information collected through our third party service providers are used to verify your identity and location for legal and fraud prevention purposes.
To offer alternative dispute resolution services	We may provide information we collect about you to our service provider for the specific purpose of resolving any disputes that have not been satisfactorily resolved through our internal processes.
To provide Behavioral Advertising and Marketing	We may use information collected through cookies and similar technologies to show you ads that are more relevant to your interests, based on your activity on our Website. This may include advertising our own services or those of other apps and websites within the VGW Group. If you wish to opt-out of Behavioral Advertising, click here.
To conduct market research and analysis	We may use information we collect about you to analyze how you interact with our products and services, to monitor and analyze usage (including Usage Data) and activity trends, and for other research, analytical and statistical purposes.

Marketing and Behavioral Advertising

6.2 Certain types of your Personal Information may be collected when you use our Website and services, such as your email, your IP address of your device, your advertising identifier or any unique identifier attributed to you or your device, or cookies stored on your device, which may be combined with other information provide Behavioral Advertising and marketing content. This information may also be used by our advertising partners and social media platforms to combine it with other information they have about you obtained through other sources or through your relationship with them. For more information on who we share your Personal Information with for marketing and Behavioral Advertising, please refer to section 7, **HOW WE SHARE INFORMATION**.

Sensitive Personal Information

Biometric Information

6.3 Our third party service providers may collect biometric identifiers and biometric information such as your facial image data (through a selfie, photo or scan of your face on an ID and facial recognition data) and keystroke data to assist us in verifying your identity for AML and anti-fraud compliance purposes. We use facial recognition technology provided by third-party service providers (including, but not limited to, Jumio Corporation and Sumsub) that determines whether the photo you take matches the photo in your identification document. The verification results are shared with us. These third-party service providers store, process and retain your biometric information according to their privacy policies and only retain it for the minimum time required by law. For more information on how our service providers process your information and your privacy rights, please refer to the links below:

a) Jumio's Privacy Center (biometric identifiers and biometric information).

b) SumSub's Privacy Page (biometric identifiers and biometric information).

c) Darwinium Privacy Policy (keystroke data).

Precise Geolocation Information

6.4 We may collect your precise geolocation information (as may apply under your relevant state privacy law) to assist us in verifying your location for compliance with laws, fraud prevention and to verify you are not located in an excluded territory according to our Terms and Conditions. We use

GeoComply to collect your precise geolocation on our behalf. GeoComply collects your precise geolocation information using GPS coordinates, Wi-Fi networks, IP addresses, and mobile or other device signals when you interact with our Website. This information is collected each time you log in to the Website, during your game play session and interactions with our Website. This information is retained for as long as necessary to fulfil our requirements for compliance with laws. For more information on the collection, storing, retention and processing of your precise geolocation information, please refer to GeoComply's Privacy Statement.

Automated Decision Making and Profiling

6.5 We may use automated systems to analyze your data for purposes such as fraud prevention, eligibility verification or personalization of content and advertisements. Where these processes could affect your access to certain services, we apply appropriate human review. Decisions with meaningful impact such as profiling are reviewed by trained personnel to help ensure fairness, accuracy and compliance with applicable privacy laws. You have the right to request human review, or object, where applicable by law.

Artificial Intelligence and Machine Learning

6.6 We may use Artificial Intelligence and Machine Learning technologies to enhance and personalize various aspects of your experience with our products and services. AI technologies may be used to assist in processes such as:

a) Personalized content recommendations.
b) Enhancing player support.
c) Optimizing website performance.
d) Fraud prevention and security.

6.7 Before implementing any Artificial Intelligence or Machine Learning technology, we follow a process that includes reviews to identify and address potential risks related to data security, regulatory compliance and privacy.

7 HOW WE SHARE INFORMATION

7.1 We share your Personal Information with companies in the VGW Group, our service providers and third parties who process your data on our behalf. The following categories of data may be shared:

a) Name and contact information.

b) Demographic data.

c) Subscription and licensing data.

d) Identifiers (including Player ID, mobile device identifier, IP address, advertising identifier and other unique identifiers).

e) Aggregated data (such as geolocation, time playing in the Website, registration method, and game play).

f) Purchase and redemption activity (such as card details, purchase amount, redemption information, date, player ID and geolocation).

7.2 We may also share aggregated information not linked to any personally identifiable information regarding visitors to and users of our Website for the purposes outlined below.

Sharing With Third Parties

7.3 When sharing your Personal Information with a third party, we will take reasonable steps to ensure your information is protected to the same standards as we protect our own. Data shared with third parties for legitimate purposes are protected by external agreements.

7.4 We only share information with third parties in limited circumstances including the following:

a) when you allow us to share your information with third parties.

b) when providing you with products and services and notifying you about important changes or developments to the features and operation of those products and services.

c) with our service providers who help us offer our services, such as companies that assist us with things like technology, storing and combining data, processing payments and redemptions, or providing relevant marketing and advertising for our products and services. Where service providers use Personal Information for their own purposes, where permitted by law, such service providers will act as the business who determines, individually or jointly with others, the purposes and means of processing that data.

d) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, when ordered to do so by any regulatory body and/or under any legal provision contained in the governing law of a particular jurisdiction.

e) when instructing and authorizing the financial institution with which a user's account is held to disclose any information as may be requested by a regulator in respect of the user's account.

f) to enforce our terms and conditions set out on our Website, to protect our rights and property and the rights and property of our players and third parties, to detect fraud or other illegal activities, and to comply with law or legal processes.

g) when performing web analytics to analyze traffic and player activity.

h) to perform customer due diligence including ID verification.

i) for marketing and Behavioral Advertising.

Behavioral Advertising

7.5 We may partner with a third-party service provider to:

a) display advertising on our Website or any application accessible via our Website.

b) manage our advertising on other websites (for example, using custom audiences on Facebook) to help us provide more relevant advertisements.

7.6 This information may also be used by our advertising partners and social media platforms to combine it with other information they have about you obtained through other sources or through your relationship with them.

7.7 If you do not want to receive Behavioral Advertising, you may opt-out by adjusting the ad tracking settings on your device (such as turning on "Limit Ad Tracking") and resetting the advertising identifier (like an IDFA) from your device's settings. If you wish to opt-out of Behavioral Advertising, click here. For more information on the advertising choice mechanisms, visit the NAI's Mobile Choices Page here.

7.8 Please note that when you opt-out of receiving Behavioral Advertising you will continue to receive generic advertisements and marketing content from us or our third-party partners including other products and services within the VGW Group. This means that the advertisements you do see should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third parties opt-out options or programs, or any use of cookies or other tracking technologies.

7.9 We share your Personal Information with the third parties set out below, as well as Prizeout (redemptions provider), Amplitude (marketing analytics) and Braze (push notifications).

Google

7.10 We use Google's services that will process your Personal Information as set out below:

a) Google Maps: We make available an API provided by Google Maps in order to allow you to have access to an address auto-complete function on our Website. The use of Google Maps for this purpose by you is subject to the then current Google Maps/Google Earth Additional Terms of Service and Google Privacy Policy.

b) Google Account Sign-In: We make available an API provided by Google to allow you to use your Google Account to sign into the Website. You can manage this connection at any time via your Google Account. More information can be found here.

c) Google Analytics: We use Google Analytics to collect data (cookies, IP addresses, pixels and tags) to understand how you use our Website so we can improve its functionality and

performance, as well as for marketing and internal business purposes. With your consent, Google Analytics will process and collect this data. You can find out more about Google's use of information by visiting here.

You can opt out of Google's collection and processing of data by going to here. Please review Google's Privacy Policy for more information on how Google processes your Personal Information.

Google Sign-In

7.11 We make available an API service provided by Google (i.e. Google Sign-In) to allow you to use your Google Account to register and login to the Website. Google Sign-In is a secure and convenient login option that safeguards your personal information. Google Sign-In uses secure protocols to verify your identity without sharing your actual password with us. Your login credentials are then securely transmitted and stored by Google in accordance with their respective Privacy Policy for registration and identification purposes only.

7.12 If you register to the Website using Google Sign-In, the following Personal Information will be shared with us; first and last name, profile picture and email address. We use this data solely for the purpose of facilitating your account creation, login and providing personalized features within our Website. We will not share this information with any third parties without your express consent.

7.13 You can manage your permissions and revoke access at any time through your respective Google Account settings or here. You also have the option to create an account with VGW using an email address and password if you prefer not to use Google Sign-In.

Neustar

7.14 We use Neustar Information Services, Inc. (**Neustar**) to assist in processing your Personal Information for marketing analytics purposes and to better understand your interactions with our advertising.

7.15 With your consent, we will share your Personal Information (such as first name, last name, email address, IP address, unique identifiers, unique device identifiers, and residential address) with Neustar to be processed in accordance with this Privacy Policy. Neustar then returns to us an online identification code that is associated with your Personal Information, and we may use this information in online and cross-Product advertising across our products and services. This information may also be shared with our advertising third-party service providers to enable behavioral advertising.

7.16 Please refer to section 6 for information on how you can opt-out. You can also opt-out of Neustar's processing of your Personal Information in connection with marketing and analytics services, such as interest-based and targeted advertising, by visiting here. Further, Neustar's Privacy Choice Portal provides you with more information on exercising any other privacy rights you may have.

7.17 You can find out more about Neustar's use of Personal Information by visiting Neustar's Privacy Policy.

Other Third Parties

7.18 We may also share generic aggregated demographic information not linked to any personal identification information regarding visitors to and users of our Website with our service providers, affiliates and advertisers for the purposes outlined above.

7.19 **Transfer of data**

The VGW Group operates in several international jurisdictions and Personal Information we collect may be transferred to, and stored and processed by, affiliates within the VGW Group or service providers in these international jurisdictions, including the European Union, the United States, Canada, Australia and the Philippines, or any other country in which we or our service providers maintain facilities. We will ensure that transfers of Personal Information to any country or organization are subject to appropriate safeguards.

8 YOUR PRIVACY RIGHTS

8.1 We appreciate that by law and subject to certain conditions you have a number of rights concerning the Personal Information we hold about you. Further information and advice about your rights can be obtained from the data protection regulator in your country or state.

8.2 Your rights may include, but are not limited to, the following:

The right to access	You have the right to access your Personal Information we process, and certain other information (similar to that provided in this Privacy Policy).
The right to rectification or correction	You are entitled to have your Personal Information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold about you.
The right to be informed	You have the right to know how we collect and use your information and your rights regarding your Personal Information.
The right to object/opt-out to processing	You have the right to object to certain types of processing of your Personal Information where such processing is based on consent or legitimate interest, including for marketing and Behavioral Advertising.
The right to delete	You have the right to request the deletion or removal of your Personal Information subject to certain exceptions.
The right to data portability	With certain exceptions, you have the right to obtain and reuse your information in an easily understandable format.
The right to opt-out of sharing	You have the right to opt out of the sharing of your Personal Information to a third party for Behavioral Advertising. If you wish to opt-out of Behavioral Advertising, click here.
Rights related to automated decision making	You have the right to know when your information is used in automated decision making, including any profiling, and the right to request human review of the decision or challenge the outcome.
The right to complain to a supervisory authority	You also have the right to complain to the supervisory authority in your US state (such as state's Attorney General) about VGW's processing of your Personal Information. Please complete the Global Poker Privacy Request Form here or alternatively, email dataprivacy@vgw.co.

8.3 **Additional Rights**

In addition to the rights in the table above, you may have additional rights based on your state, including, but not limited to:

a) not be discriminated against for exercising any of the above rights.
b) limit use of your Sensitive Personal Information if we use such Personal Information to infer characteristics about you. In some states, we may be required to obtain your consent before collecting your Sensitive Personal Information.

Under some US state privacy laws, consumers have the right to opt out of the sharing or sale of their Personal Information with third parties for Behavioral Advertising and marketing. Please refer to section 6, **HOW WE USE COLLECTED INFORMATION**, above for more details. If you want to stop receiving promotional communications from us, you can click on the "unsubscribe" link in any promotional email received from us.

8.4 **How to Exercise Your Rights**

You can exercise any of these rights by completing the Global Poker Privacy Request Form here or alternatively, email dataprivacy@vgw.co. We will not discriminate against you (e.g., through denying products and services or providing a different level or quality of goods or services) for exercising any of the rights afforded to you. You may opt-out of receiving commercial messages from us by following the instructions contained in those messages or by contacting Customer Support. In the event of your objection to processing for the purpose of direct advertising, we will no longer process your Personal Information for these purposes. Once we receive your request, we may request additional information to verify your identity. In some jurisdictions you are able to use an authorized agent to exercise your rights; we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to exercise those rights on your behalf.

8.5 **Cookies**

You can change your preferences with regards to cookies and other trackers at any time by clicking on the Your Privacy Choices link at the bottom of our Website. Our websites support the Global Privacy Control ("**GPC**"). GPC is a browser-based opt-out preference signal that can communicate your privacy preferences to the websites you visit. Because the GPC is browser-based, note that your choices will only apply to online data that is associated with your browser, and you should enable the signal separately for each browser on each device from which you would like to be opted out. Our websites do not support "do-not-track" signals, as there is no industry standard concerning what, if anything, websites should do when they receive such signals. For further information regarding these technologies, and how to exercise your rights, please refer to our Cookie Notice.

9 HOW WE PROTECT YOUR INFORMATION

9.1 We use physical, electronic and operational safeguards to protect the information we gather. We follow appropriate practices for collecting, storing, and handling data, along with security measures to prevent unauthorized access, changes, exposure, or loss of your Personal Information. We regularly review and update our security measures to stay current with technology advancements.

9.2 If we believe that a notifiable data breach has occurred, we will comply with the legislative requirements to notify you of the data breach and any steps taken by VGW to contain and investigate the data breach.

10 HOW LONG WILL WE RETAIN YOUR INFORMATION

10.1 We will retain the categories of Personal Information listed in section 3 above for various periods of time to reasonably fulfill the purposes specified in this Privacy Policy which will be determined based on (1) the length of time we need to retain the information to achieve the business or commercial purpose for which it was obtained; (2) any legal, accounting, reporting or regulatory requirements applicable to such information; (3) internal operational needs; and (4) any need for the information based on any actual or anticipated investigation, dispute or litigation.

10.2 We will take reasonable steps to destroy or permanently de-identify any Personal Information where:

a) we no longer need the Personal Information for any purpose for which the Personal Information was collected.

b) we are not required by law, a regulator or a court/tribunal order, to retain the Personal Information.

11 MINORS

Protecting the privacy of children is especially important to VGW. You must be at least 21 years old to play Global Poker, in accordance with our Terms and Conditions. For that reason, we never knowingly collect or maintain information from individuals under the age of 21, and no part of our Website is structured to attract children. VGW's services or products, including Global Poker, are only offered to individuals over the age of 21. If you become aware that a minor has provided us with their Personal Information, please contact dataprivacy@vgw.co. Should we learn that we have collected Personal Information from a minor under the age of 21, we will delete that information as quick as possible.

12 CHANGES TO THIS PRIVACY POLICY

12.1 This Privacy Policy may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of material changes and, where required by law, will obtain your consent. Notice may consist of posting such changes on our Website or by other means in accordance with applicable laws.

12.2 Any changes to the Privacy Policy will become effective when the updated policy is posted on our Website.

12.3 We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the Personal Information we collect.

12.4 This Privacy Policy supersedes and replaces any and all Privacy Policies previously in effect.

13 CONTACTING US

If you have specific questions regarding your Personal Information, how we process or use it, or to exercise your rights, please contact our Privacy Team directly by email at dataprivacy@vgw.co or alternatively please complete the Global Poker Request Form here.