

Privacy Policy

In this policy MonRae Management (**Company** or **we**) informs you about how we collect, use and disclose personal data from and about you and your engagement with our products and services, all our and our associated mobile sites, apps, social media pages and widgets (**Company Services**) including through social media platforms and associated research tools (**Research Tools**).

You can find a brief summary of this Privacy Policy in the chart below. For further details with regard to the data processing carried out by the Company please go to the corresponding paragraphs.

Effective Date: 1/3/2021

Summary:

	Issue	Information
1.	What and who this Privacy Policy covers?	<p>MonRae Management Limited registered at 35 Durham Rise, London, SE18 7TD ("MRM") whose website you are engaging with (Company or we) are the data controller of the personal data we collect from and about you through the Company Services and Research Tools.</p> <p>This Privacy Policy applies to all users, including both those who use or engage with the Company Services without being registered or having subscribed and those who have registered with or subscribed to a Company Service.</p> <p>For further information, please go to paragraph 1.</p>
2.	What kind of personal data do we collect about you?	<p>We might collect data from and about you.</p> <p>In particular, the Company may collect (1) registration data, (2) public data and posts, (3) data that you have permitted social media to share with the Company and (4) activity data.</p> <p>However, we do not collect either financial information from a payment service provider or sensitive data relating to you.</p> <p>For further information, please go to paragraph 2</p>
3.	How do we use your personal data?	<p>The main reason why we collect data about you is to provide you with Company Services, to analyse the Company Services and to allow you to interact with those services.</p> <p>In addition, with your prior consent, we can send you offers, promotions and marketing communications, also based on your personal preferences and habits.</p>

		For further information, please go to paragraph 3.
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4.	On what basis do we use your personal data?	<p>Your personal data is mainly collected in order to provide you with Company Services.</p> <p>Your personal data is also necessarily collected to comply with legal obligations or to pursue the legitimate interests of the Company.</p> <p>If you don't provide the data we may not be able to offer you the Company Services.</p> <p>When your personal data is collected for marketing purposes, you have the option not to provide the Company with your personal data.</p> <p>For further information, please go to paragraph 4.</p>
5.	How do we process your personal data?	<p>The security of your data is a priority for us. We have implemented adequate administrative, technical and physical measures designed to safeguard your personal data against loss, theft and unauthorised use, disclosure or modification.</p> <p>For further information, please go to paragraph 5.</p>
6.	Who can access your personal data?	<p>We might share your personal data with: (i) service providers; (ii) our affiliated companies; and (iii) national authorities, when allowed by the applicable laws.</p> <p>For further information, please go to paragraph 6.</p>
7.	Is your personal data transferred abroad?	<p>Your personal data might be transferred to other countries within or outside the European Economic Area. We always make sure that appropriate and suitable safeguards compliant with applicable laws are in place to protect your personal data.</p> <p>For further information, please go to paragraph 7.</p>
8.	What are your rights with regard to your personal data?	<p>You have a number of rights with regard to your personal data and these include the right to access, complete, update, amend and delete your personal data.</p> <p>For further information, please go to paragraph 8.</p>

9.	Retention period applying to your personal data	The personal data we collect is retained for only for the period necessary to fulfill the purposes for which that data is collected. For further information, please go to paragraph 9.
10.	Updates to this Privacy Policy	We may modify or update this Privacy Policy at any time in order to comply with applicable law. We will notify you of any changes. Please look at the Effective Date at the top of this Privacy Policy to see when this Privacy Policy was last revised.
11.	How can I contact you with regard to the processing of my personal data?	You can contact us at the following email address hello@monraemanagement.com

1. WHAT AND WHO THIS PRIVACY POLICY COVERS

The Company is the data controller of the personal data (e.g. information that identifies a specific person, such as full name or email address) we collect from and about you through the Company Services and Research Tools that is processed in compliance with the terms of this Privacy Policy.

This Privacy Policy and our Cookie Policy applies to all users, including both those who use or engage with the Company Services without being registered with or subscribing to a Company Service and those who have registered with or subscribed to a Company Service.

The Company Services are for a general audience, are not targeted at children, and do not knowingly collect personal data from children under 16 years of age.

2. WHAT KIND OF PERSONAL DATA DO WE COLLECT ABOUT YOU?

The Company collects the following types of data from and about you:

1. **Registration data** is the information you submit to register for a Company Service (if made available by the Company), for example to create an account, post comments, receive a newsletter, or enter a contest. This data may include, for example, name, surname, email address, gender, country, postcode and age.
2. **Public data and posts** are comments or content that you post on the Company Services and publicly on other social media platforms and the personal data about you that accompanies those posts or content, which may include a name, user name, comments, likes, status, profile information and picture. Public information and posts are always public, which means they are available to everyone and may be displayed in search results on external search engines.
3. **Data from social media.** If you access or log-in to a Company Service through a social media service or connect a Company Service to a social media service, the data we collect may also include your user ID and/or user name associated with that social media service, any information or content you have permitted the social media service to share with us, such as your profile picture, email address or friends lists, and any personal data you have made public in connection with that social media service. When you access the Company Services through social media services or when you connect a Company Service to social media services, you are authorizing the Company to collect, store, and use such personal data and content in accordance with this Privacy Policy.
4. **Activity data.** When you access and interact with the Company Services, we may collect certain information about those visits. For example, in order to permit your connection to the Company

Services, our servers receive and record information about your computer, device and browser, including potentially your IP address, browser type, and other software or hardware information. If you access the Company Services from a mobile or other device, we may collect a unique device identifier assigned to that device, geolocation data, or other transactional information for that device. Cookies and other tracking technologies (such as browser cookies, pixels, beacons, and Adobe Flash technology commonly called **Flash cookies**) may also be collected. These technologies may be used to collect and store information about your usage of the Company Services, such as pages you have visited, the video and other content you have viewed, search queries you have run and advertisements you have seen.

5. **Information from Other Sources.** We may supplement the information we collect with information from other sources, such as publicly available information about your online and offline activity from social media services and commercially available sources. This may include information about the content of your social media posts (where they relate to our talent products) and other demographic information such as your age range and general location.
6. **Information from you.** If you supply us with your contact information or any other information as part of any customer support we provide you with or if you make a complaint or enquiry or provide other feedback to the Company we will collect that too.

We do not collect:

1. Financial information from a payment service provider: in some cases, we may use an unaffiliated payment service to allow you to purchase a product or make payments (**Payment Service**). If you wish to purchase a product or make a payment using a Payment Service, you will be directed to a Payment Service webpage. Any information that you provide to a Payment Service will be subject to the applicable Payment Service's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, any Payment Service's use of information collected through any Payment Service.
2. Sensitive Information: We ask that you do not send us, and you do not disclose, any sensitive personal data (such as national insurance numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) on or through the Company Services or otherwise.

Linked Services

Finally, Company Services may also be linked to sites, including social media sites, operated by unaffiliated companies, and may carry advertisements or offer content, functionality, games, newsletters, contests or applications developed and maintained by unaffiliated companies. The Company is not responsible for the privacy practices of unaffiliated companies, and once you leave the Company Services or click an advertisement you should check the applicable Privacy Policy of the other service.

3. HOW DO WE USE YOUR PERSONAL DATA?

We use the personal data we collect from and about you to:

- a) Provide the **Company Services and features** to you;
- b) **Measure, analyze and improve** those Company Services and features, products and services;
- c) **Improve your experience** with both online and off-line Company Services by delivering content you may find relevant and interesting;
- d) Allow you to **comment on content, and participate** in online games, contests, or rewards programmes;
- e) Provide you with **customer support** and to respond to inquiries;
- f) **Protect the rights of the Company and others.** For example, there may be instances when the Company may use your personal data, including situations where the Company has a good faith belief that processing is necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of the Company, our Company Affiliates or their employees, agents, contractors, licensors and suppliers (including enforcement of our agreements and our terms of use); (ii) protect the safety, privacy, and security of users of the Company Services or members of the public; (iii) protect the Company, as well as other third parties

involved, such as Company suppliers, against fraud or for risk management purposes,

- g) **Comply with applicable laws or legal process and/or respond to requests from public and government authorities;**
- h) **Complete a corporate transaction**, such as a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Company business, assets or stock (including in connection with any bankruptcy or similar proceedings). For example, if the Company is involved in a merger or transfer of all or a material part of its business, the Company may disclose and transfer your personal data to the party or parties involved in the transaction as part of that transaction;
- i) **Allow social sharing functionality;** if you log in with or connect to a social media service account with the Company Services, we may share your user name, picture, and likes, as well as your activities and comments with other Company Services users and with your friends associated with your social media service. We may also share the same personal data with the social media service provider; with your prior consent (via email, SMS, telephone, chat and social media)
- j) **Offers, promotions and other marketing communications** regarding the Company Services, other programmes/services/products of the Company and/or Company Affiliates and/or third parties operating in the gaming and gambling sector (where you are aged 18 or over and reside within a territory where it is lawful to send you information about that sector) including group companies and co-branded services or features, such as contests or other promotions arranged together with a third party or Company Affiliate that may be hosted on the Company Services or on the Company Affiliate or third party's service;
- k) With your prior consent, send to you **marketing communications** customized to your interests and needs by means of the channels of communication set out under letter j) above.

We may use anonymised information or information that no longer identifies you personally, even indirectly (e.g. statistics) for any purpose or share it with third parties.

4. ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

The processing of your personal data for the purposes of:

- **Paragraph 3, letters from a) to f) of this Privacy Policy** is necessary for the provision of the requested services and therefore it is mandatory since otherwise the services could not be provided;
- **Paragraph 3, letter g) of this Privacy Policy** is requested under applicable laws and therefore it is also mandatory; and
- **Paragraph 3, letters b) and h) of this Privacy Policy** (where not mandatory as referred to above) is performed based on the legitimate interest of the Company to perform the relevant economic activities, which is adequately balanced with your interest since the data processing is within the limits strictly necessary for economic activities. This data processing activity is not mandatory and you can object at any time as described in Paragraph 11 of this Privacy Policy.

The processing of your personal data for the other purposes of:

- **Paragraph 3, letter i)**, is discretionary, but, without your consent, it is impossible to connect a social media service account with the Company Service so that you will have to log in to the Company Service using a different mechanism;
- **Paragraph 3, letters j) and k)**, is discretionary, but, without your consent, it is impossible for the Company and/or third parties to provide you with our generic marketing communications and those related to third parties services/products based on your interests and needs and to provide co branded services.

You can revoke your consent to the processing of your personal data for the purposes of Paragraph 3, letters i) to k) at any time by sending a communication to the email address described in Paragraph of 11 below.

5. HOW DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data through both electronic and manual means. It is protected by adequate security measures, taking into account the state of art, the costs of implementation and the nature, scope, context and purpose of processing as well as the risk to the rights and freedoms of individuals. In particular, we use appropriate administrative, technical, personnel and physical measures to safeguard personal data of yours in

the Company's possession against loss, theft and unauthorised use, disclosure or modification.

6. WHO CAN HAVE ACCESS TO YOUR PERSONAL DATA?

We may share your personal data for the purposes set out in Paragraph 3 to the following categories of recipients located within the European Union or outside of the European Union in compliance with and within the limits of the provisions of Paragraph 7:

- a) **Third party service providers** entrusted with processing activities and duly appointed as processors when required by applicable laws e.g. cloud service providers, other entities of the group, providers of services instrumental to or supporting the Company Service including for companies that provide IT services, experts, consultants, lawyers and companies resulting from possible mergers, demergers, or other transformations;
- b) **Company Affiliates** in their capacity as data controllers or data processors;
- c) **Business partners** After your prior consent, the Company may share your personal data with business partners operating in the sectors named within that specific consent to permit them to send you marketing communications; and
- d) **Competent authorities** in order to comply with applicable laws and regulations.

The Company may use a third party to send you marketing emails (if you have opted in to receive them). In those circumstances that third party is our data processor and we have procedures in place with that third party to ensure your personal information is protected.

7. IS YOUR PERSONAL DATA TRANSFERRED ABROAD?

Your personal data may be transferred to other countries (including countries other than where you are based that have a different data protection regime than the one existing in the country where you are based). If you are located in the European Economic Area (**EEA**), this may include countries outside of the EEA and in particular the United States. You can find the list of member states by clicking on the following link: https://europa.eu/european-union/about-eu/countries/member-countries_en. We have adopted appropriate safeguards to protect your personal data regardless of where it resides. Further information can be provided by filing a request to the Company as in Paragraph 11 of this Privacy Notice.

8. WHAT ARE YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA?

You have the right to:

- a) Obtain confirmation as to whether or not your personal data exists and to be informed of its content and source, verify its accuracy and request its rectification, update or amendment;
- b) Request the deletion, anonymization or restriction of the processing of your personal data processed in breach of applicable law;
- c) Object to or request the limiting of the processing, in all cases, of your personal data for legitimate reasons;
- d) Receive an electronic copy of your personal data, if you would like to port the personal data, which you have provided to us, to yourself or to a different provider (**data portability**), when the personal data is processed by automatic means and the processing is either (i) based upon your consent or (ii) necessary for the provision of the Company Service; and
- e) Lodge a complaint with the relevant data protection regulatory authority.

You may send your request to the address indicated under Paragraph 11. In your request, please include your email address, name, address, and telephone number and specify clearly which information you would like to access, change, update, suppress, or delete.

Remember that even after you cancel your registration (if applicable) or if you ask us to delete your personal data, copies of that information from your registration may remain viewable in some circumstances where, for example, you have shared information with social media or other services or, for example, when retention of

copies is necessary to comply with legal obligation or legal defence. Because of the nature of caching technology, your registration may not be instantly inaccessible to others. We may also retain backups of your personal data on our servers for some time after cancellation or your request for deletion, to comply with applicable law.

here your personal data is used for marketing purposes you may revoke your consent for:

- **Receiving electronic communications from us.** If you no longer want to receive future marketing related emails from us you may opt-out of receiving them by following the unsubscribe instructions in our communications. You may also send a request to the address at Paragraph 11 of this Privacy Policy. If you do opt out of receiving further marketing communications the Company may continue to send you administrative communications related to the provision of the Company Services.
- **Our sharing of your personal information with Company Affiliates or business partners for their marketing purposes.** If you would prefer that we do not share your personal information in the future with Company Affiliates and/or business partners for their direct marketing purposes, you may opt-out of this sharing by sending a request to the address at Paragraph 11 of the Privacy Policy.

9. RETENTION RIGHTS

e will retain your data only for the period necessary to fulfill the purposes for which the data was collected. The following retention periods will apply to the processing of your personal data:

- **Data collected for the purposes under Paragraph 3, letter from a) to h) of this Privacy Policy** are retained during the provision of the Company Service, plus the duration of the statute of limitation period under applicable laws, following termination of the Company Service;
- **Data collected for the purposes as per Paragraph 3, letter i) of this Privacy Policy** are retained for the time necessary to maintain access to the Company Service through a social network ; and • **Data collected for the purpose as per Paragraph 3, letters j) and k) are** retained for as long as is necessary to send you the marketing communications you've opted in to receive.

At the end of the retention period your personal data will be either cancelled, anonymised or aggregated.

10. UPDATE TO THIS PRIVACY POLICY

The Company may modify or update this Privacy Policy for any reason. Please look at the Effective Date at the top of this Privacy Policy to see when it was last revised. If we make material changes to this Privacy Policy that change the nature of processing or expand our rights to use the personal data we have already collected from you, we will notify you and provide you with a choice about our future use of that personal data, as may be required by applicable law.

11. CONTACT US

If you have questions about this Privacy Policy please contact us at the following email address hello@monraemanagement.com