

## Privacy Notice – OPAP Play

### Introduction

Our company, with name “OPAP S.A.”, having its seat at 112 Athinon Ave., Athens (hereinafter “OPAP S.A.”), is, according to the applicable legislation, responsible for processing your personal data within the framework of the provision of games of chance services through VLT game machines.

The protection of your personal data is very important to us. Our team makes every possible effort to protect your personal data at all times, by using top-notch technologies and conducting constant controls.

The present Privacy Notice aims at informing you on the type of personal data that we collect about you, on the way and the purposes for which we collect your data, on the third parties with which we share such the data, as well as on your rights, in order for OPAP S.A. to comply with the applicable Greek Law on Data Protection, L. 4624/2019, as well as with EU Regulation 2016/679 “on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC” (GDPR).

### Categories of personal data that we process

The collection and processing of your personal data is carried out by the responsible, authorized employees/associates of OPAP S.A. and relates to the information you voluntarily disclose to us when submitting the application for issuing the Individual Player Card or later, always in accordance with applicable laws and regulations.

In the same context, OPAP S.A. collects data relating to your playing behavior, including, but not limited to, the stores you visit, the game machines you choose, the games you are participating in, the amount of money you play, the time (days and hours) you play, in accordance with the specific provisions set out in the Regulation.

OPAP S.A. can record and archive, in accordance with the requirements of Art. 4 par. 3 N. 3471/2006, all your telephone conversations and other electronic communications with the OPAP Customer Service Department if you wish to ask for clarifications regarding your electronic account or to make complaints, and in any case you will be informed of the above recording at the beginning of your telephone conversation with the Company.

Please note that the collection and processing of the above data is necessary for the fulfillment of the purpose of the Accession Agreement and the operation of the Customer's relationship with OPAP S.A. and therefore any refusal or objection to the processing gives OPAP the right to cancel the Individual Player Card.

In addition, OPAP S.A. in compliance with its obligations arising from the legislation on combating the risk of money laundering from illegal activities, as well as limiting the risk of fraud, processes your personal data, such as identification data (information and documents), contact details, taxation data, identification data of any existing online gaming account, identification data of the means of payment used, winning certificates and data/documents obtained in the context of their

issuance, as well as details of your transactions on the games offered by the Company (e.g. timestamp, type, location, frequency, OPAP store/account code, amount).

### **Why we collect personal data**

The above information and the personal data collected by OPAP S.A. will be stored in OPAP S.A.'s databases and servers, always in accordance with the provisions of the applicable legislation and in particular those provisions on the protection of the confidentiality of communications and the protection of the individual with regard to the processing of personal data. The legal basis, as well as the purposes of processing are the following:

- i. Processing necessary for the performance of the terms of our contractual relationship and for the provision of the OPAP S.A. Games of Chance services to you. Within this context, we process your data for the following purposes:
  - a) To create, operate and manage each Player's Account, in accordance with the terms of the Agreement of Accession.
  - b) To process transactions, including payments.
  - c) To communicate with the account holders for the announcement of significant changes to the services and the Terms of Use.
  
- ii. Necessary processing for compliance with our legal obligations. Within this context, we process your data for the following purposes:
  - d) For OPAP S.A. to comply with the applicable legislative and regulatory framework and, in particular, with the provisions regulating the VLT machines gaming market.
  - e) To conduct the necessary security controls, both by capturing images from the CCTV circuits installed in PLAY stores and by identity verification and age confirmation of the Customers, through the control of their identification documents and through the use of their contact details, so as to ascertain that they indeed belong to you.
  - f) To mitigate the risks of money laundering and fraud, in accordance with the specific provisions of the relevant regulatory framework. In particular, through the processing of personal data referred to in the previous section and the application of appropriately adapted control mechanisms, OPAP aims to identify unusual and/or suspicious activities and to take the necessary management actions as soon as possible.
  - g) To comply with the obligations of OPAP in relation to ensuring Responsible Gaming, which have been established in the context of protecting society from addiction and of public interest. Compliance with these obligations concerns in particular the use of all available evidence to prevent the participation of minors and persons under 21 years of age, as well as the protection against excessive participation in games through the analysis of gaming activity and the provision of information to the Player. With regard to compliance with the obligation to protect players from excessive participation in the games, and in particular to timely intervene and inform them of the risks of participating in the games, we process your playing behavior and the information you provide when you communicate with us, using automated means and artificial intelligence applications, in order to create a player profile. Based on each player's profile, appropriate communication and measures to protect players from excessive participation in the games are determined.
  
- iii. Necessary processing for the purposes of our legal interests, namely:

- h) For the improvement of the services provided especially by recognizing the Player when he/she calls the call center, so that he/she is given priority in terms of service, and so that the agent attending to him/her has the details of his/her electronic account readily available.
- i) For the provision of evidence as to the transactions effected, by processing recorded oral or written (in soft or hard copy) communication.
- j) Specifically, the mobile telephone number provided by the Player will be also used for his/her immediate information in case of detection of transactions of his/her Individual Player Card that raise reasonable suspicions of non-authorized use or of fraud, without this meaning that OPAP S.A. undertakes the obligation to detect any eventual non-authorized use or suspicious transaction.

iv. Processing based on your specific consent.

If you wish, by marking in the relevant fields at the end of the Declaration, you may give your consent to the Company to process your personal data for the following purposes:

- k) For the implementation of compliance programs according to the commercial communication rules issued by the Hellenic Gaming Commission (HGC), the Company may process your personal data entered into the Central Information System and, in particular, information relating to your playing behavior.
- l) In order to make commercial communications, the Company may process your personal data that it receives outside of the Central Information System.

In any case, you hold the right to revoke the aforementioned specific consent to the processing of your personal data for the particular purposes at any given moment. In this case, OPAP S.A. will stop any processing that is based on your consent, without this affecting the lawfulness of the processing that was based on your consent prior to its withdrawal or of the processing described under points i to iii.

## Recipients

The processing of your personal data, within the context of the provision of Games of Chance services, is carried out by the competent employees of OPAP S.A. who are duly authorized to this end. Recipients of your personal data are also third parties (external partners such as IT providers, gaming systems, customer service, advertising services, messaging, etc.), to the extent that this is necessary for your optimum service and for the provision of our services. In this case, OPAP S.A. undertakes that its partners are under the control and act only following its orders, that they have been specifically authorized for this purpose and that they are fully bound by secrecy and by the obligations set forth in the legislation on the collection and processing of the aforementioned data.

Finally, we shall inform you that our company may disclose your data to the competent administrative authorities, insofar as this is imposed by the applicable legislative and regulatory framework, following relevant request or when it ought to submit a report with the said data, without giving you any special prior notice.

To the above recipients belong our partners who are located outside the European Union and in particular in the USA and Great Britain. Therefore, some of your data is transferred internationally. We have therefore taken increased due diligence measures, such as data minimisation,

anonymisation and encryption techniques, and the signing of strict standard contractual clauses. In particular, an adequacy decision has been issued by the European Commission for the UK while standard contractual clauses are being signed for the US.

### **Retention Period**

Your personal data will be kept for ten (10) years as of their registration and, in any case, for five (5) years as of the end of the customer relationship.

### **Your Rights**

In accordance with applicable legislation and in the context of using OPAP Store app, you have and you can exercise the following rights:

- right to access your personal data, as well as the information related to their processing;
- right to correct inaccurate or incomplete personal data of yours;
- right to erasure;
- right to restrict the processing of your personal data, when explicitly provisioned by the legislation;
- right to data portability in a structured, commonly used and machine-readable format (e.g. USB);
- right to have your data (directly) transmitted to a different controller;
- right to object to the processing of your personal data, which is founded on our legitimate interest; as well as
- the right to withdraw any consent you may have given at any time and at no cost.

You can exercise any of the abovementioned rights by submitting a request to OPAP S.A. in writing or by electronic means. You can expect a reply to such a request within one (1) month following its receipt by OPAP and in any case, within three (3) months, if the complexity of your request or in general the number of requests received, so requires.

Finally, you shall promptly notify OPAP S.A. of any eventual change to the information that you provided upon registering and opening your account.

### **Disclaimer**

Our services are not addressed to persons below twenty one (21) years of age. Any person who provides his/her details to us through any of our services warrants that he/she is above twenty one (21) years of age. We do not take on any obligation or liability for the practices, actions or policies that are beyond our control.

The present Privacy Notice may be amended. We will make sure to inform you on any amendment but, in any case, we invite you to visit our Website regularly, where the updated Privacy Notice will be posted.

## Our Commitments

We commit to maintain your data updated and accurate, to store and delete them securely, to not collect and maintain data that are not necessary for us, to protect your data against loss, misuse, unauthorized access or disclosure, and in general, to reassure that all adequate technical and organizational measures for their protection, are in place.

## Contact Information

For any request relevant to the processing of your data, as well as in case you ascertain that we have not observed the principles stipulated in the present Privacy Notice, we kindly ask you to address, the soonest possible, OPAP Group's Data Protection Officer, using the following contact details: Website: [www.opap.gr/gdpr](http://www.opap.gr/gdpr) | Address: 112 Athinon Ave., 10442, Athens | Telephone: +30 210 5798888 | E-mail: [dpo@opap.gr](mailto:dpo@opap.gr)

In case you deem we did not sufficiently address your request and the protection of your personal data is affected in any way, you may submit a complaint via the [special online portal](#) to the Hellenic Data Protection Authority (Athens, 1-3, Kifissias Ave., P.C. 115 23, tel: +30 210 6475600).| Detailed instructions on the submission of complaints are provided on the Authority's [webpage](#).