

Sovereignty SRL

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Privacy Policy

## Version Control

Prepared By	Reviewed/Approved By	Revision Number	Approval Date
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# 1 Introduction

This Privacy Policy (“Policy”) governs the manner in which the company gathers, uses, maintains and discloses information collected from users (“User”) of the website (“Site”). This Policy applies to the Site and all products and services offered by the Company.

## 1.1 Who Are We

References in this Privacy Policy to “Lottos1, Azplay and/or Azbillions” “we,” “us” or “our” relate to Sovereignty SRL a company incorporated in Costa Rica, with the registered number 4062001331226 for Gaming products. We control the way your Personal Data is collected and the purposes for which your Personal Data is used by us acting as the “data controller” for the purposes of applicable data protection legislation.

## 2 Why We Collect Your Personal Data

Your Personal Data isn’t just protected by the quality, commitment and high standards of Sovereignty SRL, it is also protected by law. The law states that we can only process your Personal Data when there is a genuine reason to do so and must be one of the following:

- To fulfil any contract that we have with you.
- We have a legal obligation.
- Where you have consented to the processing.
- When it is in our legitimate interest.
- When it is in the public interest; and/or,
- When it is in your vital interests.

## 3 Legitimate Interests

When we have a business or commercial reason to process your Personal Data this is referred to as a 'legitimate interest'. Your Personal Data is still protected, and we must not process it in a way that would be unfair to you or your interests.

If we do use legitimate interests as a reason to process your Personal Data, we will tell you that we are doing so, what our legitimate interests are and provide you with a method to raise any questions or objections you may have. However, compelling grounds for processing such information may over-ride your right to object.

## 4 Data Retention

Whenever your data is kept by us, we will ensure that it is appropriately protected and only used for acceptable purposes.

We will keep your data for the period that you are a customer.

If you are no longer a customer, we will keep your data for the minimum length of time required to comply with the purposes set out in this policy and relevant legal or regulatory obligations. Your Personal Data may be kept longer if we cannot delete it for technical reason.

## 5 Why We Process Your Personal Data

What We Do	How it is Justified	Our Legitimate Interests
<ul style="list-style-type: none"><li>• Manage customer relationships</li><li>• Develop new products and services for our customers and to grow our business</li><li>• Create, develop and send marketing</li><li>• Learn from how our customers use our products and services</li><li>• To provide support for our products and services</li></ul>	<ul style="list-style-type: none"><li>• Your consent</li><li>• Fulfilling contracts</li><li>• Our legitimate interests</li><li>• Legal obligations</li></ul>	<ul style="list-style-type: none"><li>• Maintaining our records</li><li>• Letting you know about relevant products and services</li><li>• Developing or improving products and services and determining who may be interested in them</li><li>• Obtaining your consent when needed</li><li>• Being efficient about how we fulfil our legal duties and contractual duties</li></ul>

What We Do	How it is Justified	Our Legitimate Interests
<ul style="list-style-type: none"> <li>• Develop and manage our brand(s)</li> <li>• Develop and manage our products and services</li> <li>• If applicable, manage our relationship with and the performance of other companies that provide services to us and our customers.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Developing or improving products and services</li> <li>• Being efficient about how we fulfil our legal duties and contractual duties</li> <li>• Conducting brand image and reputation protection activities to support and grow our business</li> </ul>
<ul style="list-style-type: none"> <li>• Deliver quality products and services to you</li> <li>• Create and manage customer accounts, payments and withdrawals</li> <li>• Responding to any customer complaints</li> <li>• Prevent and detect improper use of our systems</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal duties and contractual duties</li> <li>• Complying with laws and regulations that apply to us</li> </ul>
<ul style="list-style-type: none"> <li>• Prevention of crime</li> <li>• Detect, investigate and report crime</li> <li>• Managing risk for us and our customers</li> <li>• Complying with any laws and regulations applicable to us</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Developing and improving how we deal with crime and attempted crime</li> <li>• Protecting our customers and ourselves from the impact of crime</li> <li>• Complying with laws and regulations that apply to us</li> <li>• Being efficient about how we fulfil our legal and contractual duties</li> </ul>

## 6 Information Collected

The information and data about you which we may collect, use and process includes the following:

- Information that you provide to us by filling in forms on the Site or any other information you submit to us via the Site or email.
- Records of correspondence, whether via the Site, email, telephone or other means.
- Your responses to surveys or customer research that we carry out.
- Details of the transactions you carry out with us, whether via the Site, telephone or other means; and,
- Details of your visits to the Site including, but not limited to, traffic data, location data, weblogs and other communication data.

## 7 Unauthorised and Unnecessary Disclosure

In order to prevent unauthorised and unnecessary disclosure of your Personal Data, we will implement the following controls:

- Access Controls: Unauthorised persons shall be prevented from gaining physical access to premises, buildings or rooms, where data processing systems are located which process personal data. We will also ensure that measures are implemented to specify and document the authorised individuals permitted to access personal data.
- System Access Controls: We will ensure that all systems processing personal data (this includes remote access) are password protected, with dedicated user IDs for authentication against systems user management for every individual that has access.
- Data Access Controls: We will restrict access to files and programs based on a 'need to know basis' and implement controls to prevent the use and/or installation of unauthorised hardware and/or software. This will also include the establishment of rules for the safe and permanent destruction of data that is no longer required.
- Organisational Requirements: We will take technical and organisational measures to avoid the accidental mixing of personal data. We will ensure this by designating a Data Protection Officer, ("DPO") in addition to training staff on data privacy and data security.

## 8 Cookie Policy

To find out more about how we use cookies please see the T&Cs.

## 9 Personal Data That We Share

We may share your Personal Data within the group and with organizations such as:

- Law enforcement agencies, regulators and other authorities.
- Gaming governing bodies.
- Organisations that introduce you to us.
- Third parties you ask us (or permit us) to share your data with; and/or,
- Third parties necessary to provide products or services which you have requested

## 10 Your rights over your Personal Data

We will assist you if you choose to exercise any of your rights over your Personal Data, including:

- Withdrawing your previously granted consent; however, this will not invalidate any previously consented processing.
- Lodging a complaint with any relevant Data Protection Authority.

- Access to your Personal Data that we hold or process.
- Correction of any Personal Data that is incorrect or out of date.
- Erasure of any Personal Data that we process.
- Restrict processing of your Personal Data in certain circumstances.
- Asking us to provide you or another company you nominate with certain aspects of your Personal Data, often referred to as 'the right to portability';
- The ability to object to any processing data where we are doing it for our legitimate interests; and,
- The ability to contest a decision made entirely by automated processing, to express your point of view and to request that a human review the decision.

For more information on these rights, you can contact [Help@Sovereignty.ltd](mailto:Help@Sovereignty.ltd)

## 11 Contacting Us

If you have any concerns or would like more detail about how we process your Personal Data, you can contact us using [Help@Sovereignty.ltd](mailto:Help@Sovereignty.ltd)

## 12 Changes to our Privacy Policy

We may update this Policy from time to time, so please review it frequently.

If any material changes are made to this Policy, we will use reasonable endeavours to inform you in advance by email, notice on the Site or other agreed communications channels.