

Policy for the protection and processing of personal data, use of cookies

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1. General Provisions

1.1. This Policy for the protection and processing of personal data, the use of cookies (hereinafter referred to as the Policy) defines the general principles and procedure for the collection, processing, and protection of personal data:

- visitors of the Website of the Virtual gambling establishment " Winline " (hereinafter referred to as Visitors),
- applicants for vacant positions in the limited liability company " AlMakh ",
- applicants (persons who have submitted oral or written requests; *and*
- processing of data using cookies using the functionality of Internet services on the official Website of the limited liability company " AlMakh " [www . winline . by](http://www.winline.by) .

1.2. The purpose of the Policy is the proper provision of services to the Site Visitors, ensuring their rights and compliance with the legislation of the Republic of Belarus when processing personal data, communicating with Visitors, sending messages and notifications, carrying out activities to promote services, analyzing the work and effectiveness of advertising and marketing activities.

1.3. The policy has been developed in accordance with the Law of the Republic of Belarus dated 07.05.2021 No. 99-Z "On the Protection of Personal Data" (hereinafter referred to as **the Law on the Protection of Personal Data**), the Decree of the President of the Republic of Belarus dated 10.01.2005 No. 9 "On Approval of the Regulation on the Implementation of Activities in the Sphere of Gambling Business" (hereinafter referred to as **Regulation No. 9**), the Decree of the President of the Republic of Belarus dated 07.08.2018 No. 305 "On Improving the Legal Regulation of the Gambling Business" (hereinafter referred to as **Decree No. 305**), the Resolution of the Council of Ministers of the Republic of Belarus dated 01.03.2019 No. 139 "On Measures to Implement the Decree of the President of the Republic of Belarus dated August 7, 2018 No. 305" (together with the Regulation on the Procedure for Implementing Activities in the Sphere of Gambling Business for the Contents of Virtual gambling establishment, the Regulation on the requirements for virtual gambling establishments and the procedure for conducting an examination of a virtual gambling establishment for compliance with such requirements) (hereinafter referred to as **Resolution No. 139**); the Law of the Republic of Belarus dated 30.06.2014 No. 165-Z "On measures to prevent the legalization of proceeds from crime, the financing of terrorist activities and the financing of the proliferation of weapons of mass destruction" (hereinafter referred to as **Law No. 165-Z**) and other regulatory legal acts (hereinafter referred to as **legislation**) determining the procedure for working with personal data and the requirements for ensuring their security.

1.4. The Policy uses terms and definitions in the meanings established by the Law on the Protection of Personal Data, as well as the following definitions:

Automated means of processing personal data are means of processing personal data based on automated algorithms for processing personal data without human participation.

Virtual gambling establishment " Winline " (hereinafter referred to as VIZ " Winline ") is an information system consisting of the Website [www . winline . by](http://www.winline.by) , which allows, using the global computer network Internet, to organize and (or) conduct gambling, to participate in gambling, as well as software and hardware that ensure the collection, processing, storage, transmission, protection of information, audiovisual images and other results, the production of calculations related to the organization and (or) conduct of gambling using the global computer network Internet.

Counterparty – a party (legal entity, individual entrepreneur) to a civil law contract concluded with the Company.

Confidentiality of personal data is the obligation of persons who have gained access to personal data not to disclose it to third parties and not to distribute personal data without obtaining the consent of the subject of personal data, unless this is expressly provided for by law.

Depersonalization of personal data is a method of processing the personal data of a Visitor, as a result of which it is not possible to identify the Visitor without the use of additional information.

Processing of personal data is at least one of the following actions: collection, storage, modification, systematization, use, distribution , provision, blocking, depersonalization, deletion, as well as any other action or combination thereof performed with personal data.

Company – limited liability company “ AlMakh ”, which carries out activities on organizing and conducting gambling through the Virtual gambling establishment “ [Winline](http://www.winline.by) ” on the Website [www . winline.by](http://www.winline.by) .

Publicly available personal data – personal data distributed by the subject of personal data himself or with his consent or distributed in accordance with the requirements of legislative acts.

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Personal data – any information related to a Visitor and allowing him/her to be identified directly or indirectly, access to which the Company has received in the course of its business activities.

The VIZ " Winline " platform is a computer program "Virtual gambling establishment " Winline ", as well as a set of software and technical means that ensure the interaction of a virtual gambling establishment with a special computer cash system and a participant in a gambling game with the gaming programs and services of a virtual gambling establishment.

A visitor to a virtual gambling establishment, a subject of personal data (hereinafter referred to as the Visitor) – individuals who have provided the gambling organizer (Company) with data for registration, including personal data, and copies of documents proving their identity in electronic form, allowing these individuals to be identified, and who have been admitted by them to conclude a risk-based agreement on winning.

Provision of personal data – actions aimed at familiarization with the personal data of a certain person or group of persons.

Dissemination of personal data – actions aimed at familiarizing an indefinite number of persons with personal data.

Website – the Company's website on the Internet at www.winline.by.

Collection of personal data – any actions aimed at obtaining personal data, including through audio recording, photography and video filming.

Agreement - free, unambiguous, informed expression of will by the Visitor, by which he/she permits the processing of his/her personal data. The Visitor's consent may be obtained in writing, in the form of an electronic document or in another electronic form. In another electronic form, the consent of the personal data subject may be obtained by: indicating (selecting) certain information (code) by the personal data subject after receiving a SMS message, a message to the e-mail address; placing a corresponding mark on the Internet resource by the personal data subject; other methods that make it possible to establish the fact of obtaining the consent of the personal data subject.

Deletion of personal data – actions as a result of which it becomes impossible to restore personal data in information resources (systems) containing personal data, and (or) as a result

A cookie is a small piece of text sent to a browser from a website visited by a person. A cookie helps a website remember information about the Visitor, such as the language the Visitor prefers to view the website in, which will be useful the next time the same website is visited. Cookies make browsing a website much more convenient.

1.5. The organizational structure for the protection of personal data shall include the Director of the Company, employees or third parties (counterparties) performing functions for the technical protection of information, as well as employees of the Company directly performing actions to process personal data. All employees of the Company ensure the confidentiality of personal data obtained in the performance of their official duties. The rights, duties, responsibilities and assessment of the work of these persons shall be determined in accordance with the local legal acts of the Company.

1.6. The Policy applies to all processes, including any actions related to the processing of personal data, carried out both using automated means of processing personal data of the Company, including the Website and mobile applications, and without their use, including by engaging counterparties.

2. Procedure for processing personal data

2.1. We process personal data for the period, for the purposes, in the composition and to the extent described below.

<i>Purpose of processing</i>	<i>List of personal data</i>	<i>Shelf life</i>
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- Visitors of VIZ " Winline "**

Registration of a visitor to VIZ " Winline " together with registration of a game account for participation in gambling	Phone number; unique; email address. login and password	5 years from the date of the gambling or from the date of registration in VIZ, if the visitor has never participated in gambling
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<p>Identification, verification of the visitor of VIZ " Winline " and authentication of the player <i>(if necessary), creation and use of a personal account on the site</i></p>	<p>Surname, name, patronymic (if any); citizenship; date and place of birth; place of residence and (or) place of stay; personal data contained in the identity document and (or) other document on the basis of which identification is carried out, registration of the gaming account, information on the presence of the visitor of VIZ " Winline " in the List of individuals restricted in visiting gambling establishments, virtual gambling establishments and participation in gambling;; balance of the gaming account; date and time of each replenishment of the gaming account; betting history; betting result (bets); other information related to participation in gambling.</p>	<p>5 years from the date of the gambling or from the date of registration in VIZ, if the visitor has never participated in gambling</p>
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Control (registration) of actions of the participant of the gambling game VIZ " Winline "	Surname, name, patronymic (if any); citizenship; date and place of birth; place of residence and (or) place of stay; personal data contained in an identity document; unique identifier of the game account; IP address; browser type; history of access to VIZ " Winline "; other information about the device used when visiting VIZ " Winline "	5 years from the date of the gambling
Checking the presence of a visitor of VIZ " Winline " in the List of individuals restricted in visiting gambling establishments, virtual gambling establishments and participation in gambling	Last name, first name, patronymic (if any); date of birth; unique game account identifier	5 years from the date of gambling
Transfer of winnings (return of unplayed bets) upon application of a gambling participant	Surname, first name, patronymic (if any) of the gambling participant; personal data contained in the identity document of the gambling participant; unique identifier of the gaming account; bank details; amount to be transferred	5 years from the date of the gambling
Direction of marketing and other advertising mailings	Phone number; last name, first name, patronymic (if any)	3 years from the date of subscription to the newsletter or until the moment of unsubscribing from receiving the newsletter (depending on which event occurs earlier)

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- ***Applicants***

Consideration of a written or oral application <i>from an individual applicant</i>	Surname, first name, patronymic (if any); address of place of residence (place of stay); data contained in the document certifying the identity of the applicant, personal signature - if the applicant submits a written application; telephone number; information included in the application by the applicant; information contained in the documents confirming the authority of the representative - if the application is submitted by the applicant's representative	5 years; proposals for improving the activities of AlMakh LLC – 10 years of EPC
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Consideration of a written or oral request from an applicant submitting an application <i>on behalf of a legal entity</i>	Surname, first name, patronymic (if any) (in full or initials of the manager or person authorized to sign applications in accordance with the established procedure); personal signature of the manager or person authorized to sign applications in accordance with the established procedure - when the applicant submits a written application; other information included in the application by the applicant; information contained in documents confirming the authority of the representative - when the application is submitted by the applicant's representative	5 years; proposals for improving the activities of AlMakh LLC – 10 years of EPC
Implementation of administrative procedures	In accordance with the list of administrative procedures carried out by government agencies and other organizations upon applications from citizens, approved by Decree of the President of the Republic of Belarus dated 26.03.2010 No. 200	5 years

• ***Applicants for vacant positions***

Review of the applicant's resume, interview with the applicant	Last name, first name, patronymic (if any); telephone number; email address; place of residence; year of birth; information about education and work experience; publicly available personal data (for example, posted on the social network LinkedIn); other data provided by the candidate, including in accompanying correspondence	Upon hiring - 1 month from the date of formalization of employment relations; documents of persons not hired - 1 year
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2.2. The Company does not collect or process personal data that is not required to achieve the purposes listed in paragraph 2.1 of the Policy.

2.3. Visitors of VIZ " Winline " confirm their consent, if necessary, by performing actions aimed at registration on the Company's website www.winline.by and by checking the box .

's Cookie Policy

3.1. The Company uses (1) technical and (2) marketing cookies . The Company processes personal data using marketing cookies on the basis of consent to the processing of personal data (Article 5 of the Law on the Protection of Personal Data). The processing of technical cookies does not require the consent of the subjects of personal data.

3.2. If the Visitor disables support for cookies used by the Company, this may affect the ability to view and use the pages of the Site/mobile application.

3.3. The Company may use various services, including [Facebook API Conversions \(Ads Manager, Events Manager\)](#) , [Google Analytics](#) , [Yandex.Metrics](#) , which analyze the content of cookies and help the Company evaluate the activity of Visitors.

3.4. The Company and the services specified in paragraph 3.3 may transfer the data obtained from the analysis of cookie files to third parties, including for the purpose of providing the Visitor with targeted advertising (aimed at him and based on the analysis of his preferences). By continuing to browse the pages of the Site / saving the application on the device and without changing the settings, the Visitor agrees to the transfer of the above data to third parties and the receipt of targeted advertising. The Company does not control the analytical services and does not influence this process in any way.

3.5. The Visitor understands that the equipment and software used by him/her to visit the Site/mobile application may have the function of prohibiting operations with cookies (for any sites or for certain sites), as well as deleting previously received cookies . Most Internet browsers are initially set to automatically accept cookies . The Visitor can independently change the settings in such a way as to block cookies or receive warnings when files of this type are sent to the device .

3.6. The Visitor may use various devices to view and access the Site/mobile application (e.g. computer, tablet, smartphone, etc.). The Visitor must ensure that each browser on each device used is configured in accordance with the Visitor's position regarding the handling of cookies s .

3.7. The Company does everything possible to ensure that the use of the Site/mobile application is as convenient and safe as possible for Visitors.

3.8. Detailed information about cookies can be found on the following website:
<http://www.cookiecentral.com/faq/>

4. Site Security

4.1. All information transmitted by Visitors to the Site/mobile applications and received by them is encrypted by Secure Socket Layer (SSL) using a 256-bit key.

4.2. The Company recognizes and records the IP addresses of Visitors to ensure the security of Visitors and protection from unauthorized access.

5. Principles of personal data processing

5.1. The principle of legality, fairness and proportionality. Personal data in the Company are processed lawfully, fairly and are proportionate to the stated purposes of such processing.

5.2. Purpose limitation principle . Personal data are collected by the Company for specific, explicit and legitimate purposes and are not further processed in ways that are incompatible with these purposes.

5.3. Data minimization principle. The collection of personal data is limited to the extent necessary for the stated purposes of processing.

5.4. The principle of accuracy . Within the limits of its functional capabilities, the Company maintains the accuracy and relevance of the personal data collected. The Company takes reasonable measures to promptly delete or correct those personal data whose collection does not correspond to the stated purposes of processing, and (or) those personal data that are no longer accurate and relevant.

5.5. Principle of storage limitation . The Company stores personal data in a form that allows the identification of the Visitor for the period necessary to achieve the stated purposes of processing.

5.6. The principle of integrity and confidentiality. The Company processes personal data in ways that ensure the security of personal data and their protection from unauthorized and illegal processing, loss, damage, deletion, as well as using appropriate technical and organizational security measures.

5.7. The principle of transparency. The subject of personal data in cases stipulated by the Law on the Protection of Personal Data is provided with relevant information concerning the processing of his personal data. For example, by posting this Policy on the Company's website.

5.8. Availability of a legal basis. The processing of personal data by the Company is carried out with the consent of the subject of personal data, except for cases stipulated by the Law on the Protection of Personal Data and other legislative acts.

5.9. Accountability principle . The Company processes personal data in ways that ensure the possibility of confirming compliance with the principles specified in paragraphs 5.1.-5.9. of the Policy.

6. Terms of personal data processing

6.1. The processing of personal data is carried out to achieve the functions, powers and duties assigned to the Company.

6.2. The Company does not disclose or distribute personal data without the consent of the Visitor, unless otherwise provided by law.

6.3. In case of depersonalization of the Visitor's personal data, the Company may use them for any other purposes.

6.4. Conclusion of any type of agreement, including accession to a public agreement of the Company, is carried out at the initiative of the subject of personal data. The Company concludes with subjects of personal data, among other things, employment agreements (contracts), civil contracts, as well as a risk-based agreement with participants in a game of chance. Before concluding an agreement, the processing of personal data is carried out at the stage of pre-contractual work during the selection of personnel, when considering incoming requests from citizens, performing an administrative procedure, and other grounds stipulated by law.

6.5. The Visitor's personal data is stored on the servers of our partners, which is necessary to ensure the operation of VIZ " Winline ".

6.6. Visitors are responsible, to the extent possible, for the accuracy of the credentials provided, the security of passwords and other information required for authorization, and their protection from access by third parties.

6.7. If the Visitor's personal data is transferred to contractors or at the request of government agencies, the storage period will be determined in accordance with the privacy policy of such contractor or government agency.

6.8. The Company takes all measures provided for by the legislation of the Republic of Belarus to ensure the protection of the personal data of Visitors.

7. Transfer and disclosure of personal data

7.1 The following counterparties may have access to the Visitor's personal data:

a. Limited Liability Company "Belarusian Cloud Technologies" (hereinafter referred to as beCloud):

- address: 220030, Belarus, Minsk, K. Marx street, 29, room 2;
- beCloud personal data processing policy : <https://becloud.by/about-company/privacy-policy/>
- beCloud may have access to personal data that is transferred by the Company, since the Company uses beCloud services to carry out the work of VIZ " Winline ".

b. Republican Unitary Enterprise "National Center for Electronic Services" (hereinafter – RUE NCES):

- Address: 220004, Minsk , Rakovskaya str., 14.
- personal data processing policy of RUE NCEU: https://nces.by/wp-content/uploads/politika_obrabotki_pd.pdf
- RUE "NCEU" may have access to personal data when the Company uses their virtual database.

with Limited Liability Company " Bamboo Group By" (hereinafter referred to as LLC " Bamboo Group By"):

- Address: 220114, Minsk , Francis Skoryny St., 15B-2, second floor, administrative office No. 12
- personal data processing policy of Bamboo Group By LLC: <https://mobilemarketing.by/privacy>
- LLC " Bamboo Group By" may have access to personal data that is transferred to receive informational and advertising mailings via SMS .

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7.2. Personal data of visitors to VIZ " Winline " may be processed with the participation of third parties: UP "A1" (Minsk, Internatsionalnaya St., 36-2) and SOOO "Mobile TeleSystems " (Minsk, Nezavisimosti Ave., 95-4).

7.3. Also, other mobile operators, banks and non-bank credit and financial institutions, payment systems and providers, advertising platforms, organizations that send notifications and SMS messages, any other third parties with whom the Company interacts to improve the quality of services provided and ensure the operation of the Virtual Gambling Establishment on the basis of civil law contracts may have access to the Visitor's personal data.

7.4. Provision of the Visitor's personal data may be mandatory in accordance with the law, including civil procedure, criminal procedure, or at the request of state bodies of the Republic of Belarus. Provision of the Visitor's personal data will also be carried out if it is necessary for the purposes of national security, protection of the rights and legitimate interests of the Company or for other socially important purposes.

8. Rights of personal data subjects

8.1. The subjects of personal data specified in paragraph 2.1 of this Policy have the following rights:

- receive information about the processing of personal data;
- demand that changes and/or additions be made to your personal data if the personal data is incomplete, outdated or inaccurate;
- receive information about the provision of your personal data to third parties (but not more than once per calendar year free of charge);
- appeal the actions (inactions) and decisions of the Company related to the processing of personal data;
- receive information regarding the processing of personal data by the Company;
- revoke consent to receive messages, including marketing and advertising mailings (except for information sent to the personal account of the gambling participant);
- demand the termination of the processing of personal data and their deletion, while the Company has the right to refuse the Visitor's demands to terminate the processing of his personal data and (or) their deletion on the grounds provided for by the legislation regulating activities in the field of gambling and AML/CFT.

8.2. To exercise the rights specified in paragraph 8.1, any other rights provided for by the legislation of the Republic of Belarus, it is necessary to send a corresponding application in writing or in the form of an electronic document. The right to revoke consent to the processing of personal data can also be exercised in another form (for example, a request to revoke consent by phone call). The application must contain the following information: the applicant's surname, first name, patronymic (if any) , game account number in VIZ " Winline ", address of the place of registration, date of birth, details of the identity document, the essence of the requirement, personal signature.

The Company reserves the right to verify the identity of the applicant (to conduct re-identification) before exercising any rights under his application.

9. Final Provision

9.1. This Policy may be supplemented and/or amended at any time. It is the Visitor's responsibility to familiarize themselves with the new terms of the Policy.

9.2 If any provision of the Policy is invalid or unenforceable, the other provisions shall remain valid and enforceable to the fullest extent permitted by applicable law.

9.3. The applicable law to this Policy is the law of the Republic of Belarus.