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

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1. General provisions

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

- visitors to the Virtual Gambling Establishment "Winline" website (hereinafter referred to as Visitors),
- applicants for vacant positions at the limited liability company AlMah,
- applicants (persons who have submitted verbal or written requests);
- processing data using cookies with the functionality of Internet services on the official website of the limited liability company "AlMah" www.winline.by.

1.2. The purpose of the Policy is to provide appropriate services to Visitors to the Website, to ensure their rights and compliance with the legislation of the Republic of Belarus when processing personal data, communicating with Visitors, sending messages and notifications, promoting services, and 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 No. 99-Z of May 7, 2021, "On the Protection of Personal Data" (hereinafter referred to as **the Law on the Protection of Personal Data**), Decree of the President of the Republic of Belarus No. 9 of January 10, 2005 "On Approval of the Regulations on the Implementation of Activities in the Field of Gambling Business" (hereinafter referred to as **the Regulations No. 9**), Decree of the President of the Republic of Belarus No. 305 of 07.08.2018 "On Improving the Legal Regulation of the Gambling Business" (hereinafter referred to as **Decree No. 305**), Resolution of the Council of Ministers of the Republic of Belarus No. 139 of March 1, 2019 "On Measures to Implement Decree of the President of the Republic of Belarus No. 305 of August 7, 2018" (together with the Regulations on the procedure for carrying out activities in the field of gambling business for the maintenance of virtual gambling establishments, the Regulations on the requirements for virtual gambling establishments and the procedure for conducting an examination of virtual gambling establishments for compliance with such requirements) (hereinafter referred to as **Resolution No. 139**); Law of the Republic of Belarus No. 165-Z of June 30, 2014, "On Measures to Prevent the Legalization of Proceeds from Crime, the Financing of Terrorism, 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**) defining the procedure for working with personal data and requirements for ensuring its 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 – means of processing personal data based on automated algorithms for processing personal data without human involvement.

The virtual **gambling establishment "Winline" (hereinafter referred to as VIZ "Winline")** is an information system consisting of the website www.winline.by, which allows users to organize and/or conduct gambling, participate in gambling, and use software and technical means to collect, process, store, transfer, and protection of information, audiovisual images, and other results, as well as the performance 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 – 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 the consent of the subject of the personal data, unless expressly provided for by law.

Anonymization of personal data – a method of processing the Visitor's personal data, as a result of which it is not possible to identify the Visitor without using additional information.

Processing of personal data – 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 of actions performed with personal data.

Company – AlMah Limited Liability Company, which organizes and conducts gambling through the Virtual Gambling Establishment
"Winline" on the Website www.winline.by.

Publicly available personal data – personal data distributed by the subject of personal data themselves or with their consent, or distributed in accordance with the requirements of legislative acts.

Personal data is any information relating to a Visitor that allows them to be identified directly or indirectly, to which the Company has gained access in the course of its business activities.

The VIZ "Winline" platform is a computer program called "Virtual Gambling Establishment."
"Winline," as well as a set of software and technical means ensuring the interaction of a virtual gambling establishment with a special computer cash register system and a gambling participant 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 a Visitor) – individuals who have provided the gambling organizer (the Company) for registration, including personal data and copies of documents proving their identity in electronic form, allowing these individuals to be identified and admitted to conclude a risk-based agreement on winnings.

Provision of personal data – actions aimed at familiarizing oneself with the personal data of a specific person or group of persons.

Distribution of personal data – actions aimed at familiarizing an indefinite group 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 recording.

Consent – a free, unambiguous, informed expression of the Visitor's will, by which he or she authorizes the processing of his or 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: the personal data subject indicating (selecting) certain information (code) after receiving a CMC message, a message to an email address; the personal data subject making a corresponding mark on the Internet resource; other methods that allow establishing the fact of obtaining the consent of the personal data subject.

Deletion of personal data – actions that make it impossible to restore personal data in information resources (systems) containing personal data and/or that result in the destruction of physical media containing personal data;

A cookie is a small piece of text sent to a browser from a website that a person has visited. Cookies help websites remember information about visitors, such as their preferred language for viewing the website, which is useful when they visit the same website again. Cookies make browsing websites much more convenient.

1.5. The organizational structure for the protection of personal data includes the director of the Company, employees or third parties (contractors) performing technical information protection functions, as well as employees of the Company who directly perform actions related to the processing of personal data. All Company employees ensure the confidentiality of personal data obtained in the performance of their official duties. The rights, obligations, responsibilities, and performance evaluation of these persons are determined in accordance with the Company's local legal acts.

1.6. The policy applies to all processes, including any actions involving the processing of personal data, carried out both with and without the use of the Company's automated personal data processing tools, including the Website and mobile applications, including through the involvement of counterparties.

2. Personal data processing procedure

2.1. We only process personal data that is necessary to achieve the stated purposes and do not allow its excessive processing. Personal data is processed for the period, for the purposes, in the composition and to the extent described below.

- ***Visitors to VIZ "Vinline"***

Purpose of processing	*List of personal data*	*Legal basis for processing*	*Storage period*
Registration of a visitor to VIZ Vinline together with the registration of a gaming account for participation in gambling	Phone number ; unique; Address e-mail Login and password	**Paragraph 20 of Article 6 of the Law on Personal Data Protection** *(clauses 17, 24, subclause 27.2 of clause 27 Regulation No. 9; paragraphs 8, 14 Part 1 of Article 6, Article 8 of Law No. 165-Z, Clauses 10, 12 of Regulation No. 139)*	5 years from the date of gambling or from the moment of registration in the VIZ, if the visitor has never participated in gambling *(subparagraph 27.3 of paragraph 27 of Regulation No. 9)*
Identification and verification of VIZ visitors "Winline" and player authentication *(if necessary), creation and use of a personal account on the website*	Last name, first name, patronymic (if available); citizenship; date and place of birth; place of residence and/or place of stay; personal data contained in the document identity, and/or other document on the basis of which identification, registration of the gaming account, information about the presence of a VIZ "Winline" in the List of Individuals persons restricted from visiting gambling establishments, virtual gambling establishments, and participation in gambling; game account balance; date and time of each game account replenishment; betting history; betting results (wagers); other information related to participation in gambling.	**Paragraph 20 of Article 6 of the Law on Personal Data Protection** *(clauses 17, 24, subclause 26.6 of clause 26, subparagraphs 27.2, 27.3, 27.10 of paragraph 27 Regulation No. 9; paragraphs 8, 14 Part 1 of Article 6, Article 8 of Law No. 165-Z, , item 10 of Regulation No. 139)*	5 years from the date of gambling or from the moment of registration in the VIZ, if the visitor has never participated in gambling *(subparagraph 27.3 of paragraph 27 of Regulation No. 9)*

Control (registration) of the actions of a participant in gambling game VIZ "Winline"	Surname, first name, patronymic (if available); citizenship; date and place of birth; place of residence and/or place of stay; personal data contained in the document identifying identity; unique gaming account identifier; IP address; browser type; access history access to VIZ ; other information about the device used when visiting VIZ "Winline"	**Paragraph 20 of Article 6 of the Personal Data Protection Act** *(17, 24, subparagraph 27.3, clauses 27.9, 27.11, clause 27 Regulation No. 9; clause 10 of Regulation No. 139)*	5 years from the date of gambling *(subparagraph 27.3, paragraph 27 of Regulation No. 9)*
Verification of the presence of a visitor VIZ "Winline" in the List of individuals pers ons restricted from visiting gambling establishments, virtual gambling establishments, and participating in gambling	Surname, first name, patronymic (if any); date of birth; unique gaming account identifier	**Paragraph 20 of Article 6 and paragraph 17 of Section 2 of the Law on the Protection of Personal Data** *(subparagraphs 27.3, 27.11 paragraph 27, Regulation No. 9;)*	5 years from the date of the gambling activity *(subparagraph 27.3 of paragraph 27 of Regulation No. 9)*
Replenishment of the gaming account, transfer of winnings (return of unplayed bets) at the request of the participant in the gambling game	Surname, first name, patronymic (if any) of the participant in the gambling game; personal data contained in the document identifying gambling participant gambling game; unique gaming account identifier; bank details; amount to be transferred	**para. 20 of Art. 6 of the Law on Personal Data Protection** *(subparagraph 26.4, 28 Regulation No. 9;)*	3 years after the tax authorities compliance with tax legislation (but not less than 5 years from the date of the last financial transaction: acceptance of bets, payment of winnings, etc. using a gaming account). If the tax authorities have not conducted an audit of compliance with tax legislation was not conducted — 10 years from the date the last financial transaction.

Sending reference, service, marketing a nd advertising information	Phone number ; surname, first name, patronymic (if any)	based on the consent of the personal data subject — Part 1, Clause 3, Article 4 of **the Law on Personal Data Protection**.	3 years from the date of subscription to the mailing list or until the moment of unsubscribing from the mailing list (whichever occurs first)
Contact via chat on the website and in the VIZ app "Winline"	Other data sent by a gambling participant when communicating in chat with a customer service representative	**Paragraph 20 of Article 6 and Paragraph 17 of Clause 2 of Article 8 of the Law on the Protection of Personal Data**	1 year from the date of transmission of information in the chat

- ***Applicants***

Consideration of a written or oral appeal from *an applicant who is a natural person*	Surname, first name, patronymic (if available); address of residence (place of stay); data contained in the document certifying the identity , personal signature – when submitting a written application; telephone number ; information included in the application by the applicant; information contained in documents confirming the representative's authority, – when submitting the application by the applicant's representative the applicant	**para. 20 of Art. 6, para. 17 of Art. 8(2) of the Law on Personal Data Protection**	5 years; suggestions for improving the activities of AlMak LLC – 10 years EPC

Consideration of a written or oral appeal by the applicant submitting an appeal *from a legal entity*	Surname, first name, patronymic (if any) (in full or initials of the head or person authorized to sign the application in accordance with the established procedure the application); personal signature of the head or person, authorized in the established order to sign appeals – when the applicant submits a written appeal; other information included in the application by the applicant; information contained in documents confirming the representative's authority, – when submitting an application by a representative of the applicant	**para. 20 of Art. 6, para. 17 of Art. 8 of the Law on Personal Data Protection** Article 12 of the Law of the Republic of Belarus of July 18, 2011 No. 300-Z "On Appeals by Citizens and Legal Entities"	5 years; proposals for improving the activities of AlMak LLC – 10 years EPC
Implementation administrative procedures	In accordance the list administrative procedures carried out by state bodies and other organizations in response to citizens' applications, approved by Decree of the President of the Republic of Belarus dated March 26, 2010, No. 200	**paragraph 20 of Article 6, paragraph 16 of Article 8 of the Law on the Protection of Personal Data** *(Articles 14 and 15 of the Law of the Republic of Belarus dated October 28, 2008 No. 433-Z "On the Fundamentals of Administrative Procedures")*	5 years

- ***Applicants for vacant positions***

Review of the applicant's resume, conducting an interview with the applicant	Last name, first name, patronymic (if any); phone number; address e-mail mail; place of residence; year of birth; information about education and work experience; publicly available personal data (for example, posted on social network	**Article 5 of the Personal Data Protection Act** (consent) – when sending a resume by email *or* **paragraph 16 of Article 6 of the Law on Personal Data Protection** – when sending a resume in writing or as an electronic document	Upon hiring – 1 month from the date of establishing employment relationship; documents of persons not hired – 1 year

	LinkedIn); other data provided by the candidate, including in accompanying correspondence	*and* **paragraph 19 of Article 6 of the Law on the Protection of Personal Data** – when processing previously disclosed personal data	

2.2. The Company does not collect or process personal data that is not required to achieve the purposes listed in clause 2.1 of the Policy.
2.3. Visitors to the VIZ "Vinline" website confirm their consent, if necessary, by taking actions aimed at registering on the Company's website www.winline.by and by ticking the checkbox.

3. The Company's policy regarding cookies

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 Personal Data Protection Act). The processing of technical cookies does not require the consent of personal data subjects.
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 Website/mobile application.
3.3. The Company may use various services, including Facebook API Conversions (Ads Manager, Events Manager), Google Analytics, Yandex.Metrica, which analyze the content of cookies and help the Company evaluate Visitor activity.
3.4. The Company and the services specified in clause 3.3 may transfer the data obtained during the analysis of cookies to third parties, including for the purpose of providing Visitors with targeted advertising (tailored to them and based on an analysis of their preferences). By continuing to browse the pages of the Site/keeping the application on the device and not changing the settings, the Visitor agrees to the transfer of the above data to third parties and to receiving targeted advertising. The Company does not control analytical services and has no influence on this process.
3.5. The Visitor is aware that the equipment and software used by them to visit the Website/mobile application may have a function to prohibit operations with cookies (for any websites or for specific websites), as well as to delete previously received cookies. Most Internet browsers are initially set to automatically accept cookies. Visitors can change their settings to block cookies or receive warnings when files of this type are sent to their device.
3.6. Visitors may use different devices to view and access the Website/mobile application (e.g., computer, tablet, smartphone, etc.). Visitors should ensure that each browser on each device they use is configured in accordance with their preferences regarding cookies.
3.7. The Company makes every effort to ensure that the use of the Website/mobile application is as convenient and secure as possible for Visitors.
3.8. Detailed information about cookies can be found at http://www.cookiecentral.com/faq/

4. Website Security

4.1. All information transmitted by Visitors to the Website/mobile applications and received by them is encrypted using Secure Socket Layer (SSL) with a 256-bit key.
4.2. The Company recognizes and records Visitors' IP addresses to ensure the safety of Visitors and protect against unauthorized access.

5. Principles of personal data processing

5.1. *Principle of legality, fairness, and proportionality.* Personal data in the Company is processed on legal grounds, in a fair manner, and is proportionate to the stated purposes of such processing.

5.2. *Principle of purpose limitation*. Personal data is collected by the Company for specific, explicit, and legitimate purposes and is not further processed in a manner incompatible with those purposes.

5.3. *Principle of data minimization.* The collection of personal data is limited to what is necessary for the stated purposes of processing.

5.4. *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 personal data that is not collected in accordance with the stated purposes of processing and/or personal data that is no longer accurate and relevant.

5.5. *Principle of storage limitation*. Personal data is stored by the Company in a form that allows the Visitor to be identified for the period necessary to achieve the stated processing purposes.

5.6. *Principle of integrity and confidentiality.* Personal data is processed by the Company in ways that ensure the security of personal data and its protection from unauthorized and unlawful processing, loss, damage, deletion, and using appropriate technical and organizational protection measures.

5.7. *Principle of transparency.* In cases provided for by the Personal Data Protection Act, the subject of personal data is provided with relevant information regarding the processing of their personal data. For example, by posting this Policy on the Company's website.

5.8. *Legal basis.* The Company processes personal data with the consent of the data subject, except in cases provided for by the Personal Data Protection Act and other legislative acts.

5.9. *Accountability principle*. Personal data is processed by the Company in ways that ensure compliance with the principles set forth in clauses 5.1.-
5.9. of the Policy.

6. Conditions for the processing of personal data

6.1. Personal data is processed in order to fulfill 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 required by law.

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

6.4. The conclusion of any type of contract, including accession to a public contract of the Company, is carried out at the initiative of the subject of personal data. The Company concludes with subjects of personal data, including employment contracts (contracts), civil law contracts, as well as risk-based agreements with participants in gambling. Prior to the conclusion of a contract, personal data is processed at the pre-contractual stage during the selection of personnel, when considering applications received from citizens, performing administrative procedures, and other grounds provided for by law.

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

6.6. Visitors are responsible, to the extent possible, for the accuracy of the account details provided, the security of passwords and other information necessary 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 state authorities, the period of storage will be determined in accordance with the privacy policy of such contractor or state authority.

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

7. Transfer and disclosure of personal data

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

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

- address: 220030, Belarus, Minsk, K. Marx St., 29, room 2;
- processing policy processing personal processing beCloud: https://becloud.by/about-company/privacy-policy/
- beCloud may have access to personal data transmitted by the Company, as the Company uses beCloud's services to operate VIZ "Vinline".

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

- Address: 14 Rakovskaya St., Minsk, 220004.
- processing processing Personal Data RUE NCEU: https://nces.by/wp-content/uploads/politika_obrabotki_pd.pdf
- RUE "NCEU" may have access to personal data when using the Company's virtual database.

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

- Address: 220114, Minsk, ul. Franciška Skorina, 15B-2, second floor, administrative office No. 12
- processing policy processing personal Data LLC Bamboo Group Bai: https://mobilemarketing.by/privacy
- Bamboo Group Bai LLC may have access to personal data that is transferred for the purpose of receiving informational and promotional SMS messages.

7.2. The personal data of visitors to VIZ Vinline 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. Other mobile operators, banks, non-bank credit and financial organizations, payment systems and providers, advertising platforms, organizations that send notifications and SMS messages, and any other organizations may also have access to the personal data of visitors. banks and non-bank credit and financial organizations, payment systems and providers, advertising platforms, organizations that send notifications and SMS messages, and 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.

7.4. The provision of the Visitor's personal data may be mandatory in accordance with the law, including civil procedural, criminal procedural, or at the request of state authorities of the Republic of Belarus. The provision of the Visitor's personal data will also be carried out if it is necessary for national security purposes, to protect 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 clause 2.1 of this Policy have the following rights:

- to receive information about the processing of personal data;
- to request changes and/or additions to their personal data if the personal data is incomplete, outdated, or inaccurate;
- to receive information about the provision of their personal data to third parties (but not more than once per calendar year free of charge);
- to appeal against the actions (inaction) and decisions of the Company related to the processing of personal data;
- receive information regarding the processing of personal data by the Company;
- withdraw consent to receive messages, including marketing and advertising mailings (except for information sent to the personal account of a gambling participant);

- demand the cessation of the processing of personal data and its deletion, while the Company has the right to refuse the Visitor's request to cease the processing of his personal data and (or) its 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 clause 8.1, as well as 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 withdraw consent to the processing of personal data can also be exercised in another form (for example, by requesting withdrawal of consent by telephone). The application must contain the following information: the applicant's surname, first name, patronymic (if any), VIZ "Winline" gaming account number, registration address, date of birth, identity document details, the essence of the request, and a personal signature.
The company reserves the right to verify the identity of the applicant (to conduct re-identification) before exercising any rights under their 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.