

Privacy, Personal Data Protection and Processing and Cookie Policy

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1. General provisions

1.1. This Privacy, Personal Data Protection and Processing and Cookie Policy (“the Policy”) defines the general principles and procedure for the collection, processing, storage and protection of personal data of visitors of the Winline Online Gambling Establishment Platform, and data processing using cookies when using the features of the internet services on the official website of the limited liability company AlMakh (“the Company”), www.winline.by.

1.2. The aim of the Policy is to properly provide services to Visitors to the website, to ensure that their rights are respected and to ensure compliance with the legislation of the Republic of Belarus when processing personal data, when communicating with Visitors, when sending messages and notifications, when promoting services, and when analysing the performance and effectiveness of advertising and marketing activities.

1.3. The Policy has been developed in accordance with the Law of the Republic of Belarus "On Personal Data Protection" (hereinafter – the Law on Personal Data Protection), the Law of the Republic of Belarus "On Information, Informatization and Information Protection", the Decree of the President of the Republic of Belarus "On approval of the Regulations on the implementation of activities in the field of gambling" (hereinafter – Regulation No. 9) and other regulatory legal acts (hereinafter referred to as legislation) defining the procedure for working with personal data and requirements for ensuring their security.

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

Automated personal data processing tools: tools for processing personal data using automated algorithms without human involvement;

Virtual gambling establishment "Winline" (hereinafter – VGE "Winline") is an information system consisting of a website winline.by, which allows using the global computer network Internet to organize and (or) conduct gambling, take part in gambling, as well as software and hardware that ensure the collection, processing, storage, transfer, the 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) under a civil contract concluded with the Company;

Confidentiality of personal data is the obligation of persons who have access to personal data not to disclose them 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.

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.

The Company is a limited liability Company "AlMah", which carries out activities for the organization and conduct of gambling through the Virtual gambling establishment "Winline" on the website www.winline.by.

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

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

The VGE platform "Winline" is a computer program "Virtual Gambling establishment "Winline", as well as a set of software and hardware tools that ensure the interaction of a virtual gambling establishment with a special computer cash register system and a gambling participant with gaming programs and services of a virtual gambling establishment.

The visitor of a virtual gambling establishment, the subject of personal data (hereinafter referred to as the visitor) – individuals who have provided the Gambling Organizer with data for

registration, including personal data, and copies of their identity documents in electronic form, allowing them to identify these individuals, and allowed them to conclude a risk-based winning agreement.

Provision of personal data: actions with the aim of familiarisation with the personal data of a specific individual or group of individuals.

Dissemination of personal data: actions with the aim of familiarisation with the personal data of a non-specific group of individuals.

Website: the Company's website, at the address www.winline.by

Collection of personal data: any actions with the aim of receiving personal data, including by means of audio, photo or video recordings.

Consent is a free, unambiguous, informed expression of the Visitor's will, through which he authorizes the processing of his personal data. The Visitor's consent can 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 can be obtained by: specifying (selecting) certain information (code) by the personal data subject after receiving a CMC message, a message to the email address; the subject of personal data affixing the appropriate mark on the Internet resource; other ways to establish the fact of obtaining the consent of the subject of personal data.

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 transmitted to the browser from a site visited by a person. The cookie helps the site to remember information about the Visitor, for example, in which language the Visitor prefers to view the site, which will be useful the next time you visit the same site. Thanks to cookies, browsing the site becomes 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 functions for the technical protection of information, as well as employees of the Company directly performing actions for the processing of 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 evaluation of the work of these persons are determined in accordance with the local legal acts of the Company.

1.6. The Policy applies to all processes, including any actions for the processing of personal data carried out both using automated means of processing personal data of the Company, including the www.winline.by and mobile applications, and without their use, including by attracting contractors.

2. Purposes of personal data processing and categories of personal data subjects

2.1. The processing of personal data is carried out on the basis of paragraph 20 of Article 6 of the Law on the Protection of Personal Data in order to comply with the requirements of the Decree of the President of the Republic of Belarus "On approval of the Regulations on the implementation of activities in the field of gambling", the Law of the Republic of Belarus "On measures to prevent the legalization of proceeds from crime, the financing of terrorist activities and the financing of the proliferation of weapons mass destruction", the Labor Code of the Republic of Belarus and others.

2.2. The processing of personal data is carried out to achieve the following objectives:

- compliance with the requirements of legislation regulating activities in the field of gambling and Prevention of money laundering and financing of terrorist activities;
- verification of the fulfillment by visitors of the "Winline" VGE of the Rules for organizing and (or) conducting the online betting game of the "Winline" VGE;

- providing services to visitors of the "Winline" VGE;
- communication, advertising and marketing purposes;
- implementation of existing bonus offers;
- maintaining and monitoring the smooth operation of the site and applications, correcting technical errors, improving the quality of services;
- ensuring safety and eliminating possible damage during the provision of services;
- implementation of labor legislation, appeals of citizens and legal entities, accounting and reporting, civil legislation.

2.3. The processing of personal data is carried out in relation to the following categories of individuals:

- visitors of the "Winline" VGE – keeping records of persons who have provided their personal data and who wish to register and have passed identification, authentication in the Virtual Gambling Establishment "Winline" to participate in gambling in accordance with the Rules of organizing and (or) conducting the online betting game of the "Winline" VGE, participating in bonus programs, receiving marketing and other advertising mailing lists;
- persons who have applied with oral or written appeals – consideration and resolution of appeals in accordance with the requirements of legislation, implementation of administrative procedures;
- employees of the Company – fulfillment of obligations in accordance with the terms of employment contracts (contracts), labor legislation and other requirements;
- relatives of the Company's employees – providing the employee with benefits and guarantees provided for by labor legislation, labor protection, social security;
- applicants – making a decision on the possible replacement of open vacancies by persons who most meet the requirements of the Company;
- employees of contractors – fulfillment of contractual obligations in accordance with the terms of contracts and legal requirements.

2.4. Visitors of the Winline VGE confirm their consent by performing actions aimed at registration on the Company's website [www.winline .by](http://www.winline.by) by entering a code, after receiving an SMS message, going through the identification procedure, as well as then entering a login and password to log in to your personal account and place bets, top up your gaming account and withdraw funds (refund of non-winning bets). Applicants confirm their consent by sending their CV and (or) a response to a vacancy on specialized websites on the Internet.

2.5. The period during which personal data is stored is the period of use by each of the Visitors of the functionality of the Virtual Gambling Establishment "Winline", as well as the period established by the legislation of the Republic of Belarus and The Company's Cookie policy

3. The Company's Cookie Policy

3.1. The Company uses technical and marketing cookies, its own and third-party companies.

3.2. Visitors, in case of viewing the Website and (or) downloading the mobile application, accept the terms of this Policy, including with respect to cookies.

3.3. If a Visitor does not agree with the use of this type of files by the Company, then such a Visitor should set the settings of his browser accordingly or not visit the Site (not view its pages) / download the mobile application.

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

3.5. 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 to evaluate the activity of Visitors.

3.6. The Company and the services specified in clause 3.5 may transfer the data obtained during the analysis of cookies to third parties, including for providing targeted advertising (directed at

him and based on the analysis of his preferences) to the Visitor. 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 analytical services and does not influence this process in any way.

3.7. The Visitor is aware that the equipment and software used by him 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 configured to accept cookies automatically. The visitor can independently change the settings in such a way as to block cookies or receive warnings about when files of this type will be sent to the device.

3.8. The Visitor can use various devices to view and access the Website / mobile application (for example, a computer, tablet, smartphone, etc.). The Visitor must make sure that each browser on each device he uses is configured in accordance with the Visitor's position regarding working with cookies.

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

3.10. Detailed information about cookies can be found on the following website:
<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 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 safety of Visitors and protect against unauthorized access.

5. List of personal data processed by the Company

5.1 In accordance with the legislation of the Republic of Belarus, the Company is obliged to collect personal data about the Visitor during registration, identification and authentication on the website and its mobile applications. Such data, among other things, include the following: surname, proper name, patronymic (if any) Visitor; gender; full date of birth; place of birth; registration address; email address; phone number; photo of the Visitor; data of the identity document (series and number of the document, date of issue, validity period, issuing authority, identification number, citizenship); bank card details (e-wallet data) and other information necessary to complete the registration procedure and (or) use of the Company's Services.

5.2. In addition to the purposes of use specified in Section 2 of this Policy, the Company has the right, and the Visitor, when registering on the website and going through the identification procedure, agrees to transfer personal data to third parties of the Republic of Belarus and foreign countries, subject to the provisions of the order of the National Center for Personal Data Protection of the Republic of Belarus dated 15.11.2021 No. 14, to provide any of the Services of the Company; verification of the accuracy of information provided by the Visitor; provision of marketing services and provision of advertising and marketing materials; any other goals and actions that the Company deems necessary in the process of providing Services.

5.3. In addition to personal data, the Company collects:

- o Information concerning communication data (including IP address, browser type, login, password, unique device identifier, unique identifier of the installed operating system), during the use of the Company's website by the Visitor.

- o Information about the bonuses received and used.

- o Information about the Visitor's statements about self-restriction, as well as inclusion in the List of persons restricted in visiting gambling establishments, virtual gambling establishments and participation in gambling.
 - o The history of access to the Company's website, including the duration of betting sessions, location data, server logs and other site usage statistics.
 - o Pages and content visited and viewed by the Visitor, links, buttons and URLs that were used by him when visiting the Company's website.
 - o Information about placement (implementation) By the visitor of bets, replenishment of the account, withdrawal of funds (return of non-winning bets), performing other operations using the gaming account - these actions are constantly analyzed by the Company in order to improve the site and the Services provided.
 - o Any other information and documentation in order to comply with the requirements of the legislation of the Republic of Belarus. Recordings of telephone conversations and online chat messages used by the Visitor when contacting the support service for the purpose of placing bets or for consultation.
 - o Information and messages on the Company's social media platforms, such as chat channels, bulletin boards and profiles, as well as correspondence with administrators and other Visitors.
- 5.4. If the Visitor wishes to make changes (additions) to the previously submitted personal data, he must re-identify by providing an image of a new identity document or other information that needs to be supplemented.
- 5.5. The Company collects the following information in relation to other categories of personal data subjects:
- o In relation to employees (representatives) of contractors – full name, position, email address and phone number required to fulfill obligations under the contract.
 - o In relation to the Company's employees – full name, other data for concluding and fulfilling obligations under an employment contract, providing additional services.
 - o In relation to relatives of employees – full name, date of birth, contact details necessary to provide the employee with guarantees provided for by law and to inform about the accident.
 - o In relation to applicants – full name, phone number, email address, information about work experience, education.
 - o In relation to applicants – full name, address of residence, e-mail address, information contained in the application for consideration on the merits.
- 5.6. The Company does not collect or process personal data that is not required to achieve the goals listed in clause 2.2 of the Policy.

6. Principles of personal data processing

- 6.1. The principle of legality, fairness and transparency. Personal data in the Company is processed legally, in a fair manner and transparently for the Visitor.
- 6.2. The principle of goal limitation. Personal data is collected by the Company for certain, explicit and legitimate purposes and is not further processed in ways incompatible with these purposes.
- 6.3. The principle of data minimization. The collection of personal data is limited to the limits necessary for the stated purposes of processing.
- 6.4. The principle of accuracy. Within the limits of functionality, the Company maintains the reliability and relevance of the collected personal data. The Company takes reasonable measures for the timely deletion or correction of those personal data, the collection of which does not correspond to the stated purposes of processing, and (or) those personal data that are no longer reliable and relevant.

6.5. The principle of storage restriction. Personal data is stored by the Company in a form that allows the identification of the Visitor for the period necessary for the implementation of the stated processing purposes.

6.6. The principle of integrity and confidentiality. Personal data is processed by the Company in ways that allow ensuring the security of personal data and their protection from unauthorized and illegal processing, loss, damage, deletion, as well as using appropriate technical and organizational protection measures.

6.7. The principle of accountability. Personal data is processed by the Company in ways that provide an opportunity to confirm compliance with the principles specified in paragraphs 6.1.-6.6. of the Policy..

6. Conditions relating to processing of personal data

6.1. If the Visitor's personal data is pseudonymised, the Company may use it for any other purposes.

6.2. The Company does not use automated decision-making solutions (including profiling) when processing personal data. Automated decision-making solutions include those systems which, having processed the Visitor's personal data, can, without human involvement, make any decision regarding the Visitor that has potential legal consequences.

6.3. The Visitor's personal data is stored on the servers of our partners, whose services the Company uses to ensure it can provide its Services.

6.4. Visitors to Services are responsible for, as far as possible, the accuracy of the account data provided, for the safekeeping of their passwords and other login details and for protecting them from third-party access. Winline Online Gambling Establishment Privacy Policy 7

6.5. If a Visitor's personal data is transmitted to a third party, the length of time for which it is stored shall be defined in accordance with the third party's privacy policy. The Company must inform the third party of their obligation to delete a Visitor's personal data at the Visitor's request.

6.6. Any personal data collected and processed within the framework of this Policy is subject to the appropriate protection until:

- the Visitor provides the Company with their consent to divulge said data;
- the personal data is pseudonymised;
- the information is disclosed in accordance with the law.

6.7. The Company undertakes to carry out all the measures provided for by the legislation of the Republic of Belarus regarding the protection of the Visitor's personal data.

7. Terms of personal data processing

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

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

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

7.4. The conclusion of any type of contract, including joining the public contract of the Company, is carried out on the initiative of the subject of personal data. The Company enters into employment contracts (contracts) with personal data subjects, civil law contracts, as well as risk-based agreements with gambling participants. Prior to the conclusion of the contract, the processing of personal data is carried out at the stage of pre-contractual work during the selection of personnel, when considering received appeals from citizens, performing administrative procedures, and other grounds provided for by law.

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

7.6. Visitors are responsible, within their capabilities, for the accuracy of the credentials provided, the safety of passwords and other information necessary for authorization, and their protection from access by third parties.

7.7. If the Visitor's personal data is transferred to counterparties or at the request of government agencies, the time of their storage will be determined in accordance with the privacy policy of such counterparty or government agency.

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

8. Transfer and disclosure of personal data

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

- Limited Liability Company "Belarusian Cloud Technologies" (Belarus) (hereinafter – beCloud):
Address: 29 K. Marx str., Minsk, 220030, Belarus, pom. 2;

beCloud Privacy Policy;

beCloud may have access to personal data that is transmitted by the Company, since the Company uses beCloud services to carry out the work of Winline visas.

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

Address: 14 Rakovskaya str., Minsk, 220004.

www.nces.by

RUE "NCES" may have access to personal data when the Company uses their virtual database.

8.2. Personal data of visitors of the VGE "Winline" can be processed with the participation of third parties: Unitary Enterprise "A1" (Minsk, Internatsionalnaya str., 36-2) and Joint Limited Liability Company "Mobile TeleSystems" (Minsk, Nezavisimosti Ave., 95-4).

8.3. Other mobile operators, banks and non-bank credit and financial organizations, 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 Center may also have access to the Visitor's personal data. establishments based on civil law contracts.

8.3. The provision of personal data of the Visitor may be mandatory in accordance with the legislation, including civil procedure, criminal procedure, or at the request of state bodies of the Republic of Belarus. The personal data of the Visitor will also be provided if it is necessary for the purposes of national security, protection of the rights and legitimate interests of Society or for other socially important purposes.

9. Rights of personal data subjects

9.1. the subjects of personal data specified in clause 2.3 of this Policy have the following rights:

- receive information about the processing of personal data;
- require changes and/or additions 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 a calendar year for free);
- appeal against the actions (inaction) and decisions of the Company related to the processing of personal data;
- receive information concerning the processing of personal data by the Company;
- withdraw consent to receive messages, including marketing and advertising mailings (with the exception of information sent to the personal account of a gambling participant);

- to demand the termination of the processing of personal data and their deletion, while the Company has the right to refuse the Visitor to satisfy the requirements for the termination of 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 Prevention of money laundering and financing of terrorist activities;

9.2. In order to exercise the rights specified in clause 9.1, any other rights provided for by the legislation of the Republic of Belarus, it is necessary to send a corresponding application in writing to the location of the Company. The application must contain the following information: the surname, proper name, patronymic (if any) of the applicant, the number of the game account in the VGE "Winline", the address of the place of registration, date of birth, data of the identity document, the essence of the requirement, personal signature. A copy of the identity document must also be attached to the application.

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

10. Consent of Visitors to receive messages from the Company

10.1. The Visitor grants the Company the right to send him notifications and messages from the Company and third parties, including marketing and advertising, to the phone number and (or) email address provided during registration. The visitor confirms and is responsible for providing his own data, and not the data of third parties.

10.2 The Visitor grants the Company the right to make phone calls to the number specified during registration.

10.3. The Visitor grants the Company the right to contact him by any other available means according to the data provided by the Visitor, if such a need arises.

10.4. In order to refuse to receive notifications and messages specified in clause 10.1, the Visitor must submit a corresponding application in writing or electronically, attaching a copy of the identity document to it.

10.5. During the initial registration on the website, the visitor of the VGE "Winline" may consent to the processing of personal data with the participation of third parties.

11. Final provision

11.1. This Policy may be supplemented and/or amended at any time. Familiarization with the new terms of the Policy is the responsibility of the Visitor.

11.2. If any condition of the Policy is invalid or unenforceable, the other conditions remain valid and enforceable to the fullest extent permitted by applicable law.

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