

DATA PROTECTION POLICY

1 GENERAL PROVISIONS

We are committed to protecting your privacy. This Data Protection Policy provides information about how Tipsport collects, stores and further processes personal data in connection with participation in odds betting, online technical and online live games, or other types of Games of chance (hereinafter referred to as “Games of chance”) and other Tipsport services operated at www.tipsport.cz, including its mobile platform and through its Branches.

In the provision of Games of chance, we are subject to legal obligations which imply an obligation or necessity to process personal data. The processing of personal data is also a necessary condition for the provision and functionality of our odds betting, online technical games, online live games, or other Games of chance, if they are operated and involve the processing of personal data by Tipsport. To a certain extent, the processing of personal data may also occur when simply visiting our website or mobile application. Our aim is to provide users with the most enjoyable betting and gaming experience possible and generally the best Tipsport customer service experience.

In this Data Protection Policy, we make available information about how we collect, process and protect your personal data (Sections 2 to 6 below) and about your rights and how to exercise them (Section 7 below).

Personal Data means any information relating to an identified or identifiable natural person, in particular Bettors in our Gambling Games described in the Game Plans set out in section 4.1.1 below, including former Bettors and Registrants.

Capitalised terms used in this Data Protection Policy are defined in Section 9 below.

You are advised to read this Data Protection Policy carefully prior to registering for any Game of Chance, Service or otherwise prior to using the Games of chance or Services.

2 DATA CONTROLLER

The controller of your personal data is **Tipsport.net a.s.**, with its registered office at Beroun - Centrum, Politických vězňů 156, Postal Code 266 01, registered in the Commercial Register of the Metropolitan Court in Prague, file No. B 12548, ID No.: 281 78 653.

Current contact details can be found at <https://www.tipsport.cz/napoveda/kategorie/541-identifikacni-a-kontaktni-udaje>

3 DATA PROTECTION OFFICER

The Data Controller has appointed a Data Protection Officer. Contact details of the Data Protection Officer:

E-mail: osobniudaje@tipsport.cz

4 GAMES OF CHANCE

In providing Games of chance, we process personal data for the period of time, for the purposes set out below and on the basis of the legal bases set out below:

4.1 REGISTRATION AND CREATION OF TIPSPORT USER ACCOUNT

4.1.1 Participation in the Games of chance is subject to Tipsport's legal obligations under the Gambling Act and the AML Act, which require the processing of your personal data. The Registration process, the opening of a Temporary User Account, User Account and other conditions are set out for each Game of Chance as follows:

- **Odds Betting, including Online Odds Betting.** Registration is a statutory condition for your participation in the Odds Betting in accordance with Sections 29 and 30 of the Gambling Act and Sections 76 to 78 of the Gambling Act and [Game Rules for Odds Betting](#). Registration and your identification in accordance with the provisions of Section 16 of the AML Act is carried out through our Branches or online at www.tipsport.cz within the scope of the options provided by the Web Application, including the possibility of using remote identification, whereby the creation of a Temporary User Account takes place after all registration conditions have been met;
- **Online Technical Games.** Registration is a statutory condition of your participation in the Online Technical Games in accordance with sections 44 to 45 of the Gambling Act and sections 76 to 78 of the Gambling Act and the s [Game Rules for Online Technical Games](#). Registration and your identification in accordance with the provisions of Section 16 of the AML Act is carried out through our Branches or online at www.tipsport.cz within the scope of the options provided by the Web Application, including the possibility of using remote identification, whereby the creation of a Temporary User Account takes place after all registration conditions have been met;
- **Online Live Games.** Registration is a statutory condition for your participation in Online Live Games in accordance with Sections 57 to 60 of the Gambling Act and Sections 76 to 78 of the Gambling Act and [Game Rules for Online Live Games](#). Registration and your identification in accordance with the provisions of Section 16 of the AML Act is carried out through our Branches or online at www.tipsport.cz within the scope of the options provided by the Web Application, including the possibility of using remote identification, whereby the creation of a Temporary User Account takes place after all registration conditions have been met;
- **Other Games of chance.** Tipsport may, from time to time, start to operate Games of chance other than those listed above. In such case, if the operation of such games involves the processing of personal data, in particular on the basis of compulsory registration, such processing will be carried out in accordance with and similar to this Data Protection Policy.

4.1.2 Purposes and duration of processing. The processing of your personal data is a necessary condition for your use of the Games of chance, and the processing of such data is carried out in order for us to fulfil our contractual obligations under the Game Rules referred to in clause 4.1.1 and to ensure the functionality of each Game of Chance in accordance with its published terms and conditions. We also process your personal data in order to ensure compliance with the terms and conditions of the Games of chance by all Bettors and to prevent any breach or circumvention of these terms and conditions or other abuse of the functionality of the Games of chance or fraud. We also process your personal data where necessary to comply with legal obligations to which we are subject. We describe the purposes of the processing at each stage of use of Games of chance:

- **Temporary User Account.** A Temporary User Account may be used to participate in Games of chance (in particular Online Odds Betting, Online Technical Games or Online Live Games) in

accordance with Section 80 of the Gambling Act and [Game Rules for Odds Betting](#), [Game Rules for Online Technical Games](#) or [Game Rules for Online Live Games](#).

In order to create a Temporary User Account, you must provide your identification information (first name(s), surname, or birth name, birth certificate number or date of birth, if no birth number was assigned, gender, nationality and place of birth), contact details (home/correspondence address, permanent or other similar residence address, email address, telephone number, or data mailbox identifier), information about the identity document you have provided and you must set up your Self-Restricting Measures.

If a Temporary User Account is created, your personal data is processed until the account balance is transferred to the regular User Account or until the expiry of a 30-day period (i.e. the duration of the Temporary User Account) and the subsequent payment of any unused deposits. If you have used your Temporary User Account to place Bets, your personal data will be processed in accordance with the Game Rules for Games of chance as described in clause 4.2 below.

- **Registration and Identification.** In order to complete the Registration and receive User Account credentials, it is necessary to verify your identity and age, to set up Self-Restricting Measures and to verify that you are not listed in the register of persons excluded from participation in gambling under section 16 of the Gambling Act.

The personal data required for the Registration includes your identification data (name(s), surname, or birth name, birth certificate number or date of birth, if no birth certificate number has been assigned, gender, nationality and place of birth), contact details (home/correspondence address, permanent or other similar residence address, email address, telephone number, or data mailbox identifier), details of the identity document provided and details of your Self-Restricting Measures.

Under Section 16 of the AML Act and the Gambling Act, we are required to verify your identification information from your Identity Document, if applicable, and to enter the type and number of the Identity Document, the country or authority that issued the Identity Document and the period of its validity in our internal database. We are also required to verify that the image on the Identity Document bears a likeness to you.

For this purpose, under Section 16 of the AML Act, we will process the aforementioned data, together with information about who made your first identification and when, and we will keep it for the duration of your Registration, for the duration of the contractual relationship between you and Tipsport or for 10 years from the date of your identification, whichever is longer;

We will also establish and record whether you are a politically exposed person or a person against whom the Czech Republic applies international sanctions under the International Sanctions Implementation Act in accordance with Section 8(3) of the AML Act. The identification data of a natural person according to the AML Act are all names and surnames, birth certificate number and, if not assigned, date of birth and gender, as well as place of birth, permanent or other residence and nationality. In addition to the above, we are also required by section 16(1) of the AML Act to keep information of the person that made your identification and when. The processing period for the afore-mentioned data under the AML Act is 10 years from the end of your Registration;

- **Monitoring of Bettors and Protection against Suspicious Trades.** Under the AML Act (in particular Section 18 et. seq. of the AML Act), we are obliged to monitor the conduct of Bettors and identify suspicious trades. In order to comply with these legal obligations and to ensure that your funds, the funds of other Bettors, our Games of chance are adequately protected against violation or circumvention of the Games of chance or other abuse of the Games of chance or against fraud, we verify, as part of the Registration process and based on your sworn declaration, the origin of the funds you use to participate in the Games of chance and that such funds are not generated by any illegal activity. When you continue using the Games of chance, we also monitor and verify your identification and contact details, identification documents and your use of the Games of chance as described in section 4.2.2 below. For the purpose of fulfilling our obligations under the AML Act, we are entitled to require you to provide documents or proof of other necessary facts, as appropriate, for the duration of the business relationship established by the Registration. Such procedure is necessary for the provision of Games of chance and for the conclusion of the Gambling Contract in accordance with the applicable legislation.

4.1.3 Scope of the processed data. For the purposes mentioned above, we process the personal data we collect from you via the Registration Form when you submit your Registration Application and the data you provide to us at the Branches or otherwise during your Registration process. This includes, in particular, the following data:

- Identification and contact details: details (name(s), surname or birth name, birth certificate number or date of birth, if no birth certificate number was assigned, gender, nationality and place of birth), contact details (home/correspondence address, permanent or other similar residence address, email address, telephone number or data mailbox identifier), details of the identity document provided and details of your Self-Restricting Measures.
- Details from the Identity Document: document number, issuing authority, expiration;
- User account registration data: username, user ID, password, etc.;
- Payment details: payment account number, IBAN, partially anonymised payment card number (only the first 6 digits and the last 4 digits) and similar details necessary to make and verify payments;
- Self-Restricting Measures chosen by you;

4.2 PROVISION OF GAMES OF CHANCE

4.2.1 If you create a Temporary User Account with us or if you have gone through the Registration process, we will continue to process the data you have provided to us as part of the Registration Application and the Registration itself, which is necessary for the provision of Games of chance on a continuous basis. When you use our Games of chance, we will collect other data about you relating to your use of the Games of chance, including data about your gaming activities and use of our other Services, and process this further to enable you to participate in our Games of chance under the published terms and conditions and to provide you with the best possible gaming and user experience.

4.2.2 **Purposes and duration of processing.** If you participate in Games of chance provided by us, we process your personal data for the following purposes:

- **Provision of Games of chance** – the performance of our contractual obligations to you in accordance with the Game Rules set out in clause 4.1.1 above. We need to know certain information about you in order to provide you with Games of chance, including related obligations.

When you use our Games of chance, in addition to the data we have collected about you from the Registration Application or the Registration process and which we are required to process under the Gambling Act and the AML Act, we also process data about your User Account, data about the games you played and your bets, including any accompanying data about such games and bets (the odds, your winnings and related data). Such data are kept for the duration of your User Account (for the purpose of fulfilling the contract and also to comply with legal obligations), and the mandatory data are kept also for the period of time as required by law – in particular the AML Act (i.e. in the cases described below up to 10 years from the execution of each transaction).

- **Protection against Fraud.** Under the Gambling Act, we are obliged to provide all Bettors with a level playing field and an equal opportunity to win. In order to provide such a level playing field and to ensure that your funds, the funds of other Bettors, our Games of chance and our information systems are adequately protected against violations or circumvention of the Games of chance or other abuse of the Games of chance provided or against fraud, we use the Web Application to automatically monitor and evaluate your use of the Services, including certain technical data associated with it (your IP address, the location of that IP address, the frequency of logins, etc.).

Furthermore, under the AML Act, we are obliged to monitor the behaviour of Bettors and identify suspicious trades. We are thus obliged to identify, for example, whether the Bettor is handling funds that are clearly not in line with his/her financial circumstances, whether he/she is knowingly making losing trades, whether the Bettor is placing low-risk Bets in low proportions to his/her deposits or whether he/she is unexpectedly requesting the withdrawal of unused funds. To comply with this legal obligation, we therefore monitor your individual Bets and the overall handling of funds when using the Gambling Facilities. The obligation to retain such data lasts for 10 calendar years from the execution of each Bet (transaction); the period starts on the first day of the next calendar year following the execution of such Bet.

If we identify suspicious transactions or suspicious behaviour that could compromise the integrity of our Games of chance or otherwise compromise our Games of chance or the information systems on which they are operated, we have the right to suspend use of or refuse to create your Temporary User Account or User Account, we may temporarily restrict the functionality of your User Account or prevent you from placing Bets, playing Games of chance or depositing or withdrawing funds. If we suspect abuse of your User Account, we may also temporarily limit the maximum amount you may wager or deposit in our Games of chance.

Such procedure is necessary to provide and ensure the integrity and functionality of our Games of Chance and to ensure a level playing field and equal opportunity to win in accordance with the Gambling Act. Tipsport is committed to protecting its Bettors and ensuring the functionality of its Games of chance. Due to the large number of Bettors using Games of chance in an online environment, such protection is the only way to ensure

sufficient and effective protection of our Gambling Games and information systems, as well as other Bettors.

In the event of suspected abuse of Games of chance or other fraud, we may also use your personal data to make a criminal complaint or to make other notifications under the applicable legislation. In such case, we are also entitled to disclose, to the extent necessary, your personal data to other members of the TIPSPORT group that operate Games of chance, within the scope of our legitimate interest, in particular for the purpose of preventing individuals who may attempt to abuse Games of chance or to engage in fraudulent conduct with respect to such conduct at Tipsport. The legal basis for such processing is our legitimate interest in protecting our Games of chance, our resources and information systems.

- **Tipkonto.** Our Game of Chance service includes the Tipkonto programme, the rules of which are set out in Section 9 of the [General Terms & Conditions](#) and [Tipkonto parameters](#). Tipkonto is part of our Gambling Services. In accordance with the Tipkonto parameters, you will receive a bonus for placed Bets in the form of Net Points.

The maintenance of your User Account thus involves the processing of data relating to your Bets for the purposes of the Tipkonto programme, including records of Net Points earned from Bets placed, benefits provided or redeemed under other bonus programmes. We process such data as part of the provision of Games of chance on the basis of our legitimate interest in providing benefits and rewards for the use of Games of chance and the Services. We retain the data for the duration of your User Account and the data relating to Bets placed for the period described below.

If you do not agree that we continue to record your Net Points and process data from your Bets and other bonus programmes within the Tipkonto, you can opt out of the Tipkonto via your User Account. Opting out is, in nature, an objection to the processing and if you opt out of the Tipkonto, you will lose the ability to continue to enjoy the Net Points and other benefits of the bonus programmes associated with the use of Net Points.

- **Records of Bets Received.** Under the Gambling Act and the AML Act, we are required to keep all information about bets received and winnings paid out (including your identification details obtained in the Registration process) in order to track the movement of Funds in your User Account. This obligation survives 10 years after each transaction you make on the Tipsport Services or 10 years after the termination of your User Account.

- **Customer Support Services.** The provision of Games of chance involves the provision of customer support services through which we communicate with you to facilitate the payment of winnings and the use of our services. Customer support is communicated via the call centre, email or chat on www.tipsport.cz, and we also process your personal data when we handle your requests and enquiries. We may also keep records of communications with you for as long as necessary to handle such requests. In order to properly identify you when communicating with customer support, you may be asked to provide additional proof of your identity in case of doubt, including proof of your identity at the Branch, so that your User Account and/or your rights associated with the use of the Games of chance and Services cannot be abused.

- **Establishment, Exercise and Defence of Legal Claims.** After the termination of the contractual relationship with you, i.e. after termination of the User Account, we may also

retain some of your personal data for the duration of the limitation periods, the retention of which is necessary for the protection of our rights and the possible defence of legal claims.

5 OTHER SERVICES AND OTHER OPERATIONS

In addition, we provide you with the following services, which also involve the processing of personal data, for the period of time set out below, for the purposes set out below and on the basis of the legal bases set out below:

5.1 COMMUNITY SERVICES

5.1.1 If you have an active User Account (or Temporary User Account), you can log in to the Tipsport Community Services. The Tipsport Community Services include the possibility for Bettors to place their Bets in the so-called Ticket Arena, to share their analysis of sporting events, to add posts to discussion forums or to create their own profile. The community services are interconnected and are operated integrally at www.tipsport.cz, www.tipsport.sk and www.chance.cz.

Your use of the Tipsport Community Services involves processing of your personal data to the extent necessary to use these services. To the extent that you choose in your profile and to the extent that you use the various functionalities of the Tipsport Community Services, your contributions, user content (posts, analyses or tickets) will be published at www.tipsport.cz, www.tipsport.sk and www.chance.cz.

Tipsport Community Services are provided as joint services by Tipsport, Tipsport SK and CHANCE as joint data controllers. CHANCE and Tipsport SK use the personal data of users of the community services to the same extent as Tipsport. Tipsport SK also publishes the data on www.tipsport.sk and CHANCE publishes the data on www.chance.cz. Tipsport similarly takes over the data of users of CHANCE community services operated on www.chance.cz and the data of users of Tipsport SK community services operated on www.tipsport.sk. More information on the processing by the joint controllers is provided in section 6.2 below.

The personal data of Tipsport Community Service participants may also be shared with other entities (social networks and media), as further described in the section Recipients of Personal Data in section 6.1. This involves mainly sharing analyses of sports or other events entered by Ticket Arena users.

5.1.2 **Purposes of processing.** We process your personal data primarily in order to enable your active use of the community services. In particular, we process personal data for the following specific purposes:

- Writing posts to discussion forums on the Community Services website of Tipsport, Tipsport SK and CHANCE;
- Publishing user sports analytics on the Community Services website of Tipsport, Tipsport SK and CHANCE;
- Publishing user betting slips in the Ticket Arena on the Community Services website of Tipsport, Tipsport SK and CHANCE;
- Maintaining a public user profile and publishing other data on that profile;
- Sharing data with Tipsport SK and CHANCE.

5.1.3 **Scope of data processed.** In the operation of the Community Services, we use, to the extent necessary, your gaming profile, which you can customize and set up individually within your User

Account, as well as any content you create and post or choose to use within the Ticket Arena or in the use of our other Services. This includes, in particular, the following data:

- Details about your User Account;
- Your posts to discussion forums;
- Your blogs and analytics of sports or other events;
- Your betting slips (Bets) that you explicitly wish to be made public;
- Information you choose to be made public as part of your use of our Services, including your location, if the Service offers such an option.

5.1.4 Duration of processing. We process your data related to the Tipsport Community Services for as long as you register for the service. In the event of termination of your registration from the Community Services and/or in the event of termination of your User Account or of the Temporary User Account, we will cease to process your data for the purposes of the Community Services no later than 30 days after the termination of that registration or User Account (or Temporary User Account).

5.2 COMPETITIONS

5.2.1 If you register for our competitions, we will process your data to enable your participation in and evaluation of such competitions, including the individual data on which a particular competition is based (e.g. your Bets, Winnings or other data processed in the context of your use of Games of chance or other Tipsport services on which the relevant competition may be based). The competitions in which you may participate as a Bettor are interconnected and are provided as one comprehensive service, subject to your express consent. Accordingly, if you register for our competitions, we will automatically enrol you into all competitions run by us until you opt out of such competitions and/or until you cancel your User Account (or Temporary User Account) or until you withdraw your consent to participate in Tipsport competitions.

The competitions are provided jointly by Tipsport, Tipsport SK and CHANCE as joint data controllers. CHANCE and Tipsport SK use the personal data of Bettors participating in the competitions to the same extent as Tipsport. Tipsport similarly takes over the data of users of CHANCE services operated on www.chance.cz and the data of users of Tipsport SK services operated on www.tipsport.sk. In order for us to share your personal data about Bets and other use of the Games of chance and Services with these companies, we require your explicit consent. For more information about processing by joint controllers, please see section 6.2 below.

Results and rankings of some competitions may be publicly available on www.tipsport.cz and also on www.tipsport.sk and www.chance.cz websites if the competition is organized in cooperation with Tipsport SK or CHANCE. For the purpose of publishing the results of competitions, your personal data is anonymised so that your identity is not apparent from the published information. All rankings and competition results are published anonymised.

5.2.2 Withdrawal of consent. You can withdraw your consent to participate in competitions organised by Tipsport at any time and we will stop processing your data. Withdrawal of consent is only effective in the future and therefore does not affect the lawfulness of previous processing based on this consent (prior to its withdrawal).

5.2.3 Scope of processed data. In order for you to participate in competitions, we need to process the following personal data to the extent that it is defined in the registration form upon registration

for the competition, as well as personal data the processing of which is necessary for the specific competition:

- Contact and identification details from your User Account (or Temporary User Account);
- If applicable, details about the use of the Games of chance associated with the specific competition, including your Bets, Winnings and other ways of the use of the Games of chance

5.2.4 Purpose and duration of processing. The purpose of processing your personal data is to enable you to participate in user competitions organized by us in accordance with the terms and conditions of such competitions, including contacting the winner and delivering the prize, if applicable. We process the data for this purpose until the end of the relevant competition and for a reasonable period of time, typically not exceeding 1 year after the end of the competition, in order to deliver any winnings or to deal with suggestions or submissions from competition participants or other persons.

5.2.5 The specific purpose of the processing, the scope of the data and the duration of the processing will always depend on the specific competition you are participating in and, if not obvious from the rules of the competition, may be further described in the rules of such competition. In case of any discrepancy between the rules of a specific competition and this section 5.2, the rules of the specific competition shall prevail.

5.3 MARKETING COMMUNICATION

5.3.1 We may also use your personal data to send you newsletters about our services and other commercial communications related to Tipsport products, or other communications related to the Games of chance, services and products we provide. This includes, but is not limited to, newsletters regarding our competitions and products that may be relevant to you based on your prior use of our Games of chance and Services. We may send you newsletters via your email address and/or by SMS to your telephone number. The legal basis for such processing is our legitimate interest in informing our Bettors about Tipsport news or delivering other commercial communications. If you object to such processing of your personal data, we will cease processing your data for this purpose without further delay.

5.3.2 Scope of processed data. In order to send you relevant marketing communications, we use the following personal data:

- first and last name;
- your correspondence address;
- email address;
- telephone number;
- information about your Bets and your overall use of Games of chance or our other Services.

5.3.3 Purpose and duration of processing. The purpose of processing your personal data is to send you marketing offers and other commercial communications based on our legitimate interest in offering you services that we consider relevant to your needs. We process data for this purpose until your Registration is closed.

5.4 CALL CENTER

5.4.1 If you [contact](#) us on our contact phone number, we will advise you at the beginning of the call that the call may be recorded. We keep recordings of calls for the purposes of dealing with your request relating to the provision of our services, in particular Games of chance. The call centre

services are provided pursuant to our contractual obligation to you and we process your personal data provided to the call centre in order to fulfil this contractual obligation.

5.4.2 Scope of processed data. We keep the recordings as a complete record of the call. We therefore process all the data you disclose to us in the call, including the following data:

- First name and last name, e-mail, telephone number;
- your user account details.

5.4.3 Purpose and duration of processing. The purpose of processing your personal data is primarily to handle your request. For this purpose, we keep recordings of conversations with you for the time necessary to handle your request, typically for a maximum of 1 month. In justified cases, we may keep such data longer, as long as necessary for such processing (e.g. to provide evidence of an infringement).

5.5 COOKIES AND OTHER DATA

When you use our websites, including mobile platforms, your personal data may be processed through cookies or other data stored on or extracted from your devices. This includes both necessary data that we are required to process based on our legal obligations, including our contractual obligations to you, in order to ensure the proper operation of the Games of chance and our Services or based on our legitimate interest, and also data that we use to obtain information about your use of the Games of chance and our Services and to target personalised advertising that is relevant to you and meets your interests or other marketing purposes. For more information on how we use cookies and other data, including how you can manage it, please visit <https://www.tipsport.cz/napoveda/kategorie/371-ochrana-dat>.

6 SHARING AND TRANSMISSION OF PERSONAL DATA (RECIPIENTS OF PERSONAL DATA)

6.1 Recipients of personal data

We may share the personal data we process in the ways described above with third parties who provide certain services related to the provision of Games of chance, administrative support, use of software resources, etc. Such parties are in the position of data processors. In particular, we may share your personal data with:

- other companies of the Tipsport group for the purpose of administrative support in the provision of services and the sharing of certain services (e.g. call centre or payment processing and authorization) and in the context of our legitimate interest. We provide data in particular to the following companies of the Tipsport group that provide certain processing activities:
 - CHANCE a.s., registered office at Beroun, Politických vězňů 156, post code 266 01, registered in the Commercial Register of the Metropolitan Court in Prague, File no. B 12550, ID no.: 281 78 815;
 - TIPSPORT a.s., registered office at Beroun, Politických vězňů 156, post code 266 01, registered in the Commercial Register of the Metropolitan Court in Prague, File no. B 673, ID no.: 186 00 824; and
 - TIPSPORT SK, a.s., registered office at J. Kalinčiaka 14, Žilina 010 01, Slovak Republic, registered in the Commercial Register of the District Court in Žilina, Section Sa, Entry 10502/L, ID no.: 36 436 861.
- We share data from community services - in particular data from the Ticket Arena and analytics of sports and other events are shared with social networks such as Facebook

(www.facebook.com) or Twitter (www.twitter.com), or with media such as Czech Television (www.ceskatelevize.cz) or TV Nova (www.tv.nova.cz);

- In exceptional cases, some of your personal data may be accessed by our IT system suppliers performing contractual obligations related to the provision of system support services;
- In exceptional cases, some of your personal data may be accessed by external auditors, tax advisors or legal counsels if this is necessary for the recovery of debts or posting receivables or to protect our legitimate interests;
- in line with the obligations arising from the Gambling Act, we send your identification details and data on the use of Games of chance, on a regular basis, to the Ministry of Finance of the Czech Republic or the Customs Administration of the Czech Republic. At the same time, if we are contacted by competent public authorities with a request to provide personal data, we will disclose your personal data to the relevant authority to the extent necessary, based on the obligations arising from the law or other legal regulations.

6.2 Joint controllers

We provide the community services (described in section 5.1 above) and some competitions (described in section 5.2 above) jointly and severally with CHANCE and Tipsport SK, who are therefore joint controllers with us in relation to all personal data processed in relation to such services. The processing of personal data by CHANCE is described in its Data Protection Policy available on the website www.chance.cz. Tipsport SK's processing of personal data is described in its Data Protection Policy available on its website www.tipsport.sk.

Each community services user and/or competition participant is entitled to exercise his/her rights against the company with which he/she has established his/her User Account and thus registered for such community services. You may exercise your rights against Tipsport as described in section 8 below or by contacting our Tipsport customer support.

6.3 Guarantees

We have entered into data processing agreements with the data processors referred to in the preceding paragraph that guarantee at least the same level of protection for your personal data as this Data Protection Policy.

7 DATA SECURITY

We have put in place and maintain the necessary reasonable technical and organisational measures, internal controls and information security processes in accordance with best business practice appropriate to the potential risk to you as a data subject. We also take into account the state of technological developments to protect your personal data from accidental loss, destruction, alteration, unauthorised disclosure or access. Such measures include a methodology for the secure development of our applications and services, network traffic security both in internal and external networks and access, and strong authentication of each employee or contractor involved in processing. Each access is recorded in a monitoring system to ensure that only the necessary level of handling of your personal data is achieved to provide the highest quality of our services. Organisational measures help promote handling of all data generated during your use of our services securely and effectively prevent intentional and unintentional leakage.

In the very unlikely event of loss, destruction or unauthorised alteration of your data, you will be informed without delay. Your data is our first priority.

8 YOUR RIGHTS AS DATA SUBJECT

If you exercise any of your rights under this Section or under applicable law, we will inform any recipient to whom the data has been disclosed pursuant to Section 6 of this Data Protection Policy of the action taken or the erasure of your personal data or the restriction of processing in accordance with your request, unless this proves impossible or involves disproportionate effort.

If you wish to exercise your rights and/or obtain relevant information, you may do so by logging into your User Account at www.tipsport.cz.

If you do not have a User Account with us, but would still like to exercise any of your rights below to protect your privacy, you may contact us via email at osobniudaje@tipsport.cz or using the form available at <https://www.tipsport.cz/podpora>.

To log in to your User Account at www.tipsport.cz you need to know your login details (email and password). If you exercise your rights in any other way, we may ask you to provide some of the identifying information you have previously provided to us. Providing such information is necessary to verify that the relevant request was actually sent by you. We will respond to you within one month of receiving your request, but we reserve the right to extend this period by two months.

8.1 What can you request?

In line with applicable legislation, you are entitled to request rectification of certain data we process about you as data controller. In certain cases, you have the right to request erasure of your data; furthermore, you have the right to access your personal data or to have your personal data transmitted (e.g. to another service provider), in some cases you have the right to object and you also have the right to request the restriction of the processing of your personal data by us. You can also withdraw at any time the consent to data processing that you may have previously provided to us. The individual rights and how to exercise them are described in more detail below.

8.2 Right to Rectification of your Personal Data

Under applicable law, you have the right to have your personal data shared with us rectified. If you have created a User Account at www.tipsport.cz, you can modify certain information directly after logging into your User Account. If some data cannot be rectified through your User Account and/or you have not created such an account, please contact us via email at osobniudaje@tipsport.cz or using the form available at <https://www.tipsport.cz/podpora>.

We take reasonable measures to ensure that you can keep your personal data accurate and up to date. You can always contact us to ask if we are still processing your personal data.

8.3 Erasure of your Personal Data

You can ask us to erase your personal data at any time by using your User Account and/or, if you do not have an account, via email at osobniudaje@tipsport.cz or using the form available at <https://www.tipsport.cz/podpora>. If you approach us with such a request, we will promptly erase any personal data we keep about you, unless we no longer need your personal data to comply with our contractual and legal obligations (in particular our obligations under the AML Act, as referred to in Section 4.2.2 above) or to protect our legitimate interests, as described above. We will also erase (and cause our processors to erase) all of your personal data if you withdraw your consent to the processing of the data, if you have previously provided us with consent to the

processing of such data, or if further processing is not required by law (in particular the AML Act as described above in Section 4.2.2).

8.4 Consent Withdrawal

You may withdraw the consent to data processing that you have previously provided to us at any time without giving any reason. Please contact us via email at osobniudaje@tipsport.cz or using the form available at <https://www.tipsport.cz/podpora>. In such case, we will delete your personal data in accordance with the procedure set out in Section 8.3.

Please note that the withdrawal of your consent does not affect the lawfulness of any processing carried out on the basis of your previously given consent prior to its withdrawal by you.

8.5 Disclosure and Portability of your Personal Data

You have the right to obtain personal data relating to you and the personal data you have provided to us. Most data are automatically made available to you through your User Account. If you wish to confirm the scope of the data we process about you and/or if you have not created a User Account, please contact us via email at osobniudaje@tipsport.cz or using the form available at <https://www.tipsport.cz/podpora>. If you request the transmission of your personal data to another provider, we may transmit some of your personal data (in particular, data that we process based on the performance of a contract and/or your consent) directly to the third party (another data controller) that you specify in your request, provided that such a request will not adversely affect the rights and freedoms of others and is technically feasible.

8.6 Right to Object

Where we process your personal data on the basis of our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. In this case, unless we can demonstrate our compelling legitimate grounds for processing which override your interests or rights and freedoms or unless we can demonstrate that the data is necessary for the establishment, exercise and defence of our legal claims, we will no longer process the data and will delete it without undue delay. If you object to the processing of your personal data for direct marketing purposes, we will cease processing your data for this purpose without further delay.

8.7 Restriction of processing

If you ask us to restrict the processing of your personal data, e.g. in case you question the accuracy, lawfulness or our need to process your personal data, we will restrict the processing of your personal data to the minimum necessary (storage) and, where applicable, we will only process it for the establishment, exercise or defence of legal claims, or to protect the rights of another natural or legal person, or for other limited reasons prescribed by the applicable legislation. If the restriction is lifted and we continue to process your personal data, we will inform you without undue delay.

8.8 Complaint with the Office for Personal Data Protection

You have the right to lodge a complaint regarding our processing of your personal data with the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7. Office's website: www.uoou.cz.

9 TERMS AND DEFINITIONS

Capitalized terms used in this Data Protection Policy shall have the following meanings (unless expressly stated otherwise) and/or the meanings used in other documents referred to in this Data Protection Policy, i.e. the [Game Rules fo Odds Betting](#), [Game Rules for Online Technical Games](#) or [Game Rules for Online Live Games](#) or [General Terms & Conditions](#).

- (1) the AML Act means Act No. 253/2008 Sb., on Certain Measures against the Legitimation of Proceeds of Crime and Financing of Terrorism, as amended, which imposes on Tipsport the obligation to identify the Bettor upon the establishment of the contractual relationship by providing the personal data specified by the AML Act as part of the registration under the applicable Game Rules, and in some cases also by providing other information and Bettor's declarations required by law (see also Section 5, Section 7 and Section 9 of the AML Act).
- (2) Temporary User Account means an account opened for the Registration Applicant until the Registration is completed successfully, for a maximum of 30 days; it shall cease to exist (i) upon the transfer of its balance to the User Account; or (ii) in the event of failure to complete a proper Registration, upon the payment of any unused deposits in accordance with the provisions of the Gambling Act and the applicable Gaming Rules.
- (3) Games of chance mean Odds Betting operated through Branches and also as Online Games, Online Technical Games and Online Live Games, or other types of Games of chance operated by Tipsport.
- (4) CHANCE means CHANCE a.s., registered office at Beroun, Politických vězňů 156, post code 266 01, registered in the Commercial Register of the Metropolitan Court in Prague, File No. B 12550, ID No.: 281 78 815.
- (5) Web Application means a web application on Tipsport's web portals used to effect Bets and Registration and Bettor's access to their User Account; it is also accessible from iOS and Android mobile applications.
- (6) Online Technical Game means a game of chance provided by Tipsport in accordance with the Game Rules for Online Technical Games.
- (7) Online Live Game means a game of chance provided by Tipsport in accordance with the Game Rules for Online Live Games.
- (8) Odds Betting means a game of chance provided by Tipsport in accordance with the Game Rules for Odds Betting through its Branches and also online (Online Odds Betting).
- (9) Funds mean funds used for making contributions to and payments from the User Account.
- (10) Branch means an Operator's operating location where Odds Betting, Registration and certain other activities related to the operation of Games of chance, in particular deposits to and withdrawals from the User Account, are carried out.

- (11) Identity Document means a document issued by a public authority, which must be valid, contain an image that bears the holder's likeness and contain at least (i) the holder's first name(s) and surname, (ii) date of birth, (iii) birth certificate number, if assigned, and (iv) place of birth, or other personal information of the holder that is required for the Registration and identification of the Bettor under the AML Act; a citizen of the Czech Republic shall present a valid identity card as proof of identity, if this cannot be presented, then a passport or a driving licence; a foreign national shall present only a personal identification card (equivalent to a Czech identity card) or a passport or a residence permit for the Czech Republic as proof of identity.
- (12) Registration is a basic condition for participation in the Games of chance, where the Registration for all other gambling games operated by Tipsport takes place at the same time; the purpose of Registration is to provide and verify the personal data provided by the Registration Applicant in the Web Application; it includes, in particular, determining and verifying the identity and age of the Registration Applicant, setting up Self-Restricting Measures and registering the Funds.
- (13) Bet means a bet the voluntary conclusion of a one-off contract between the Bettor and Tipsport according to specified rules.
- (14) Bettor means a participant in the Games of chance who pays for the Bet in compliance with the applicable Game Rules.
- (15) Self-Restricting Measures mean responsible gaming measures chosen by the Bettor under the Gambling Act; their types and basic set-up conditions are detailed in the Game Rules for each type of Game of Chance and also in the Web Application.
- (16) Services mean services, except for Games of chance provided by Tipsport, in particular competitions, community services and other services;
- (17) Tipsport SK means TIPSPORT SK, a.s., registered office at J. Kalinčiaka 14, Žilina 010 01, Slovak Republic, registered in the Commercial Register of the District Court in Žilina, Section Sa, Entry 10502/L, ID No.: 36 436 861 (www.tipsport.sk);
- (18) User Account – an account with Tipsport in which Funds, in particular the Deposits, Bets and Winnings, are recorded; it is automatically created for each Bettor upon their Registration; subject to the terms and conditions stipulated by the Gambling Act and Game Rules for Games of chance, the balance of the Bettor's Gaming Account registered with CHANCE to play the Online Odds Betting prior to the effective date of each Game Rules will be transferred to the User Account.
- (19) Gambling Act means Act No. 186/2016 Sb., on gambling, as amended.
- (20) Registration Applicant means a natural person who has reached the age of 18 years and who has initiated the Registration process with the Operator for a game of chance operated by Tipsport in the Web Application.

We may modify or update the Data Protection Policy from time to time. Any changes to this Data Protection Policy will become effective upon publishing. We will notify you of material changes through your User Account prior to the Effective Date.

15 December 2021

Tipsport.net a.s.