At VGW, we are committed to protecting and respecting your privacy and maintaining the confidence and trust of our customers. This Privacy Policy explains how your personal information is collected, why it is collected and how it is kept secure.

This Privacy Policy governs the manner in which VGW Malta Limited, VGW GP Limited, VGW RMG Malta Limited, VGW Administration Limited and other companies in the VGW group (“VGW Group”) collect, use, maintain and disclose information collected from users (each, a “User”) of Global Poker through https://globalpoker.com and all its subdomains, subpages and successor sites (the "Website"). This Privacy Policy applies to the Website and all products and services offered through the Website.

1. DATA CONTROLLER

1.1. This Privacy Policy is issued on behalf of the VGW Group so when we mention "VGW", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the VGW Group responsible for processing your data.

1.2. The Data Controller responsible for processing data collected through your use of the Website (including any data you may provide through the Website when you purchase a product or service or take part in a promotion or competition) is VGW GP Limited, having its registered address at 5-7 Matilda Court, Giuseppe Cali Street, Ta' Xbiex-XBX, Malta 1423.

2. PERSONAL IDENTIFICATION INFORMATION

HOW WE COLLECT YOUR INFORMATION

2.1. We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our Website, register on the Website, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Website.

2.2. In addition to collecting personal identification information via our Website, we may collect personal identification information from Users by telephone or in correspondence with you (including email, live chat, mail, text message or social media). All telephone calls between Users and VGW Group representatives are recorded for training, quality control and compliance purposes and by continuing with any such call you consent to it being recorded.

INFORMATION YOU PROVIDE TO US

2.3. We collect information that you voluntarily provide when you use our products and services, such as when you register as a Website User. When you register or otherwise interact with our Website or correspond with us, you may be invited to provide personal information to enhance your experience of our products and services, such as:

2.3.1. Your contact details, (i.e. email address, name and mobile number);

2.3.2. Banking and financial details, such as your credit card number and expiration date, and where appropriate, your bank account statement to process a financial transaction you have requested (to establish the source of funds where a transaction is involved);

2.3.3. Your account login details, including your username, password; and pictures associated with your profile; and

2.3.4. Your image. We ask you to provide your image to assist in verifying your identity by determining whether the photo you provide matches the photo in your identification document. Facial recognition technology collects information from your image capture, including biometric data, and shares this information with us, which assists us to
verify your ID. Biometric data is stored for the period required to fulfill our legal obligations.

2.4. You warrant any contact information you provide, included (but not limited to), your e-mail address and mobile phone number is true and accurate. You further warrant that you are the telephone subscriber and/or that you own any telephone numbers that you provide to Global Poker. You acknowledge that by voluntarily providing your telephone numbers to Global Poker, you expressly agree to be contacted at the telephone numbers you provide. You consent to receive e-mails, pre-recorded voice messages and/or autodialed calls (including text messages) by or on behalf of Global Poker relating to:

(a) this Privacy Policy and any associated Terms and Conditions;

(b) any transaction with Global Poker related to your account; and

(c) promotions from Global Poker.

2.5. The above communications may be made by or on behalf of Global Poker, even if your phone number is registered on any state or federal Do Not Call list. You acknowledge that you may incur a charge for these texts or calls by your telephone carrier and that Global Poker will not be responsible for these charges.

3. NON-PERSONAL IDENTIFICATION INFORMATION

INFORMATION ABOUT YOUR USE OF THE SERVICES

3.1. In addition to the information you provide to us directly, we may collect information about your use of our products and services. For example, we may collect non-personal identification information about Users such as:

3.1.1. Device information - your hardware model, IP address, other unique device identifiers, operating system version and browser type;

3.1.2. Usage information - such as information about the time and duration of your use of our products and services and other information about your interaction with the content offered through our Website.

4. WEB BROWSER COOKIES

PERSONAL DATA COLLECTED VIA TECHNOLOGY

4.1. When you interact with our Website or any application accessible via our Website, we try to make that experience simple and useful. We and our partners use industry standard identifiers, such as cookies or other similar technologies.

4.2. Our Website may use “cookies” to enhance User experience. Cookies are small files that are placed on your computer when you visit a website. Cookies may be used to store a unique identification number tied to your computer or device so that you can be recognized as the same user across one or more browsing sessions, and across one or more sites.

4.3. Cookies serve many useful purposes. For example:

4.3.1. Cookies can remember your sign-in credentials so you do not have to enter those credentials each time you visit our Website.

4.3.2. Cookies can help us and third parties understand which parts of our products and services are the most popular because they help us see which pages and features visitors access and how much time they spend on the pages, by collecting statistical information about how visitors use the Website.

4.3.3. Cookies can be used for marketing purposes, for example to approach our Users with advertising that is more tailored to their interests. We also use cookies to reduce the likelihood of ads playing and to measure the effectiveness of our advertising measures.

4.4. Most browsers accept cookies automatically but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. If you disable browser cookies or flash cookies, it may interfere with the proper functioning of the Website and our products and services.

BEHAVIORAL ADVERTISING

4.5. We may partner with a third party to either display advertising on our Website or any application accessible via our Website or to manage our advertising on other websites. Our third-party partner may use technologies such as cookies to gather information about your activities on our Website and other websites in order to provide you advertising based on your browsing activities and interests.

4.6. If you wish to opt-out of interest-based advertising click here (or if located in the European Union click here). Please note you will continue to receive generic advertisements.
5. HOW WE USE COLLECTED INFORMATION

5.1. We use the information that we collect to operate our Website and to provide our products and services, to facilitate your financial transactions, to respond to your questions, to fulfil all applicable regulatory requirements such as anti-fraud checks and other checks required by applicable anti-money laundering legislation.

5.2. VGW may collect and use the personal information of Users for the following specific purposes:

5.2.1. **To provide and manage the services you request** - This includes, for example, processing your registration and setting up and looking after your account, including checks made to guard against fraud.

5.2.2. **To improve customer service and our services** - Information you provide helps us respond to your customer service requests more efficiently; we may use feedback you provide to improve our products and services.

5.2.3. **To process payments** - We may use the information Users provide about themselves when placing an order only to service that order. We do not share this information with outside parties except to the extent necessary to provide the service.

5.2.4. **To personalize user experience** - We may use information which has been aggregated to understand how our Users as a group use the services and resources provided on our Website.

5.2.5. **To contact you about our services** - For example by email, live chat, telephone, text message, mail or social media; to manage promotions and competitions you choose to enter. We may periodically contact you with offers and information about our products and services, including in connection with your accounts, promotions, contests, online surveys, new features that you are entitled to access, and other important information. As set out in clause 2.4, provision of your telephone information will be deemed as your consent to receive text messages sent by automatic telephone dialing systems. Consent to receive direct advertising is not a condition of purchase.

5.2.6. **To send important notices to you** - From time to time we may send important notices to you, such as communications about purchases you have made, or legal notices regarding the changes to our terms and conditions or other policies. This information is important to your interactions with us and you acknowledge that you may not opt-out of receiving these communications.

5.2.7. **To comply with our legal and regulatory obligations** - We may use information we collect about you to assess your social gaming activity for responsible social gaming purposes, to comply with fraud and anti-money laundering laws or to comply with any other legal or regulatory obligations.

5.2.8. **To offer alternative dispute resolution services**. We may provide information we collect about you to our third-party partner for the specific purpose of resolving any disputes that have not been satisfactorily resolved through our internal processes.

6. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

GENERAL RIGHTS

6.1. We appreciate that by law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. If you wish to exercise these rights, you should contact our Data Protection Officer using the details set out below.

6.2. These rights include the right to access the personal information we hold about you, the right to object to the processing of your data and the right to withdraw consent. In some circumstances, you can ask us to delete the personal information we hold about you.

RIGHT TO COMPLAIN TO A SUPERVISORY AUTHORITY

6.3. You also have the right to complain to the relevant data protection supervisory authority about our processing of your personally identifiable information.

RIGHTS IN DIRECT ADVERTISING

6.4. If we process your personally identifiable information for the purpose of direct advertising, you have the right to object at any time to the processing of personally identifiable information relating to you for the purpose of such advertising; this also applies to profiling, where appropriate, insofar as it is associated with such direct advertising.

6.5. You may opt-out of receiving commercial messages from us by following the instructions contained in those messages or by contacting Customer Support. In the event of your objection to processing for the purpose of direct advertising, we will no longer process your personally identifiable information for these purposes.
7. HOW WE PROTECT YOUR INFORMATION

7.1. We have in place physical, electronic and operational procedures to protect the personal information that we collect. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Website. Our security measures are reviewed regularly and updated in keeping with technological advances.

8. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION

8.1. We will keep all information provided as personal data. You have the right to access personal data held by us about you. No data shall be destroyed unless required by law, or unless the information held is no longer required to be kept for the purpose of the relationship. We will retain your information, including biometric data, only for as long as is necessary for the purposes set out in this policy. After closing your account, VGW will retain your information only to the extent necessary to comply with our legal obligations such as the applicable tax/revenue laws, anti-money laundering laws and other applicable regulatory requirements, and to resolve any disputes.

For more specific information about data retention terms, please contact us at dataprivity@vgw.co and we will provide the specific data retention terms for your jurisdiction.

9. SHARING YOUR PERSONAL INFORMATION

9.1. We do not sell, trade, or rent the personal identification information of Users to others. However, there are circumstances when we share your personal data with other companies in the VGW Group, with third parties that provide services to you on our behalf, and with other third parties in the course of complying with our legal obligations.

WITH OTHER COMPANIES WITHIN VGW GROUP

9.2. We may share the personal data we collect with other companies in the VGW Group for the following purposes:

9.2.1. providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;

9.2.2. responding to your enquiries and complaints;

9.2.3. administering offers, competitions, and promotions;

9.2.4. to assess your social gaming activity for responsible social gaming purposes;

9.2.5. facilitating the secure access to online platforms;

9.2.6. updating, consolidating, and improving the accuracy of our records;

9.2.7. undertaking transactional analysis, statistical and trend analysis, market research with the aim of developing and improving products and services;

9.2.8. testing new systems and checking upgrades to existing systems; and

9.2.9. crime detection, prevention, and prosecution, as well as complying with regulatory requirements.

WITH THIRD PARTIES

9.3. We may share personal data with third parties in the following circumstances:

9.3.1. providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;

9.3.2. with our service providers to enable us to provide our services, such as companies that help us with technology services, storing and combining data, and processing payments or providing relevant online advertising for our products and services;

9.3.3. in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, when ordered to do so by any regulatory body and/or under any legal provision contained in the governing law;

9.3.4. when instructing and authorizing the financial institution with which a User’s account is held to disclose any information as may be requested by a regulator in respect of the User’s account; and
9.3.5. for fraud detection and control purposes, we may transfer your personal data to third parties, including but not limited to so-called “address verification system” service providers, payment service providers and financial institutions, and

9.3.6. to perform ID verification.

9.4. We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and Users with our business partners, trusted affiliates and advertisers for the purposes outlined above. Our partner companies will have access to your personal information only to perform services on our behalf and are obligated not to disclose or use it for any other purposes.

**TRANSFERS**

9.5. Personal information we collect may be transferred to, and stored and processed in, the European Union, the United States or any other country in which we or our processors maintain facilities. We will ensure that transfers of personal information to a third country or an international organization are subject to appropriate safeguards.

**10. OTHER IMPORTANT INFORMATION**

**COMPLIANCE WITH CHILDREN’S ONLINE PRIVACY PROTECTION ACT**

10.1. Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information on our Website from individuals we actually know are under the age of 18, and no part of our Website is structured to attract anyone under the age of 18.

**YOUR CALIFORNIA PRIVACY RIGHTS**

10.2. California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their direct marketing purposes in the preceding calendar year. We do not share personal information with third parties for their own direct marketing purposes.

**DO-NOT-TRACK SIGNALS AND SIMILAR MECHANISMS.**

10.3. Some web browsers may transmit “do-not-track” signals to the websites with which the user communicates. Due to the different ways that web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. As there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, our Website currently do not take action in response to these signals. If and when a final standard is established and accepted, we will reassess how to respond to these signals.

**11. CHANGES TO OUR PRIVACY POLICY AND ACCEPTANCE OF THESE TERMS**

11.1. This Privacy Policy may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of changes by posting changes here, or by other appropriate means.

11.2. Any changes to the Privacy Policy will become effective when the updated policy is posted on our Website. If you do not agree to these changes, please do not continue to submit personal information to us or use our products or services in any way.

11.3. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

**12. CONTACTING US**

If you have specific questions regarding your personal information or how we use it, please contact our Data Protection Officer directly by email at the following email address: dataprivacy@vgw.co and specify your place of residence and the nature of your question.