

## Privacy Policy and Cookie notice

This notice together with the General Terms and Conditions available on the site sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our site you are accepting and consenting to the practices described in this policy.

Netgen Global LTD is a data controller for the information that we obtain on you through this website.

This privacy notice is issued on behalf of Netgen Global LTD so when we mention "COMPANY", "we", "us" or "our" in this privacy notice, we are referring to Netgen Global LTD responsible for processing your data to provide a particular service in question.

**Netgen Global LTD** is the owner and operator of the website and manages and administers all aspects related to the front end, the content on the site as well as all marketing/CRM activities related to the business carried out on the site. You will also receive communications directly from the COMPANYY.

### Information we collect About you

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by filling in our forms on our site or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, subscribe to our service, make deposits or withdrawals on our site, participate in chat rooms, accept bonuses or other promotions available on our site, any due diligence documentation you share with us, including the source of wealth questionnaire and supporting documentation, and when you report a problem or make a complaint with us. The information you give us may include your name, username, address, date of birth, country of residence and nationality, identification number, e-mail address, and phone number, financial and credit card information, personal description, proof of identification, proof of address, proof of funds and photograph.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the games or payment services). In this case, we may have to close your account.

- **Information we collect about you when visiting the site.** With regard to each of your visits to our site or usage of our site we will automatically collect the following information:
- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version,

time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL), games you played and duration on each game and page, page interaction information.
- **Information received from cookies.** Please refer to our Cookie Notice below for further details on the types of cookies in use and on the manner in which Cookies may be disabled.
- During the course of delivering services to you, we are also working closely with third party data processors (including, for example, business partners, sub-contractors in technical, payment and delivery services as well as for delivery of marketing information where we have the necessary consent from you (such as CRM Tool Providers, Email Marketing Partners, SMS Providers, Direct Mail Distributors and Outbound Call providers,) advertising networks and affiliate networks, analytics providers, due diligence intelligence companies, search information providers, credit reference agencies). This category includes information we receive from our Publishers, Advertisers and other Partners that we work with to help us deliver ads and personalized content to you and recognize you across browsers and devices. This may include pseudonymous advertiser identifiers that some Advertisers or other third party ad platforms choose to share with us. Data processors process personal data according to our written instructions and their activities will be limited to those that are needed from them to assist us deliver the service to you.

### **Categories of Data Held About You**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The personal data collected and processed on you can be grouped into the following categories and may contain:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, employment status and occupation.
- **Contact Data** includes residential address, email address and telephone numbers.
- **Financial Data** includes details of bank account, payment card or payment account details, including information contained within any bank statements, payslips and similar documentation collected for KYC Purposes.
- **Transaction Data** includes details about deposits and withdrawals, wagering and other details of games you have played on our sites.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services, your username and password (encrypted), games played, login, logout times, duration of play, bonuses and promotions claimed
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### **Uses made of the information (Purpose)**

**Information you give to us.** We will use this information:

- to carry out our obligations arising from the terms and conditions entered into between you and us and to provide you with gaming services that you request from us, to accept your deposits and process your withdrawals, to carry out fraud management processes, to answer to any query or complaint that you may have as well as other ancillary matters related to the main services we are providing to you;
- provided that you have granted consent to contact you with marketing information, to provide you with information about our services, bonuses schemes and promotions and information about the products and promotions, present or future, offered by us;
- to provide customized advertising on the site based on your interactions with the site or your Usage Data;

If you are an existing customer, we will contact you (in line with the consent you have given us) by electronic means (e-mail or SMS) or by direct mail or by phone with information about our products or promotions. You must be aware and understand that your data, including all personal information obtained by us as mentioned in this privacy policy, will be accessible and processed by both Netgen Global LTD and the relevant entity that owns, administers or manages the site. Provided that you have granted consent to direct marketing, they may also contact you in relation to products available on the site, bonuses and promotions, present and future, and may also be involved in the customer support processes.

- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- to meet obligations arising from Anti-Money Laundering Legislation and rules and regulations thereunder and all other laws that we may be subject to from time to time.

**Information we collect about you.** We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. Such information will typically be collected through the use of Cookies. For more information on Cookies please refer to our Cookie Notice below which also provides guidance on the manner in which Cookies may be disabled;
- to carry out fraud management and risk management activities, including assigning a risk profile or a risk status to your account;
- to assess your behavior and patterns through the site which will be used to help build a detailed customer profile on you, on different subject matters, including but not limited to:
  - As part of our commitment to prevent money laundering and terrorist financing, we also analyze your personal data and compare it to third party data sources, build an AML profile on you and risk score your account based on the information you have provided to us and the information we have collected about you. We shall also keep a register of all high-risk customers from an Anti-Money Laundering perspective.
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant promotions to you;
- to make suggestions and recommendations to you about our products.
- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## **Creation of a User Account**

All the information that we hold about you, whether provided to us by you, whether we have collected it from you or from third parties, is collated into one user profile (Player Account) that we create on you.

### Lawful Basis for Processing of Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

<b>PURPOSE/ACTIVITY</b>	<b>CATEGORY OF DATA</b>	<b>LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST</b>
To register you as a new customer	(a) Identity (b) Contact (c) Usage	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To provide gaming services to you (a) Manage deposits and withdrawals; (b) Deliver games to you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy (b) Maintain a Player Account with us.	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated) (c) necessary to comply with a legal obligation
To enable you to partake in a promotion;	(a) Identity (b) Contact (c) Usage	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To inform you about a promotion/bonus or other offer;	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications	Consent (if we contact you by means of direct marketing).
To administer and protect our business and this	(a) Identity (b) Contact	Personal Data Necessary to comply with a legal

website from any illegitimate activities, including money laundering, fraud, collusion and similar activities.	(c) Technical (d) Special Categories of	obligation (to prevent money laundering, fraud, collusion)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation (to safeguard client funds)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	Necessary for our legitimate interests (to deliver relevant products to you through the site based on your past activity and preferences)
To use data analytics to improve our website, products, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products, to keep our website updated and relevant and to develop our business)

## Disclosure of your information

We shall share your personal information with:

- Any member of Netgen Global LTD which requires access to your personal information in order to provide the services you request. Data we receive and collect on you may be used for fraud and bonus abuse prevention and AML in fulfilment of legal obligations and legitimate business interests;
- Through the course of providing you with services, we will share data with selected third parties, under a data processing agreement with us that ensures the safeguard of your personal information, including:

- suppliers of age and identity verification tools and other suppliers that can verify know your client information generally, specifically, but without limitation, Aristotle, C6, GB Group;
- with our banks or payment service providers or payment gateways in order to be able to complete payment instructions to you;
- with our lawyers, advisors, consultants who we may engage from time to time to advise on any matter which requires them to gain access to personal information;
- with any person, company, NGO, governmental body, regulatory authority that maintains a register or database having the objective of preventing crime, money laundering or terrorist and proliferation financing.
- in the event that we agree to transfer or sell our business relating to this site, in which case we will disclose your personal data to the prospective buyer or their lawyers, consultants, financial advisers and employees both during the due diligence process and also as part of the transfer of the business. This includes any transfer of data required under any agreement between us and the owner and/or operator of the site on termination of our services by the owner and/or operator of the site.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation which may or may not be specifically listed above, or in order to enforce or apply our terms and conditions and other agreements; or to protect our rights, property, or safety. This includes exchanging information with other companies and organizations for the purposes of fraud protection

#### **Where we store your personal data**

- Primarily, the data we collect from you will be stored on servers in Europe. However, the data that we collect from you will be transferred to third parties as mentioned in earlier parts of this policy and such data will therefore be stored by them. Some of the third parties that we share data with may have their servers at a destination outside the European Economic Area ("EEA"). It will also be processed by staff or company representatives operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We will ensure that your data is treated securely and in accordance with this privacy policy and that the persons we are sharing data with employ similar organizational and technical measures as us. When personal data is transferred outside the EEA we will seek to take additional steps such as entering into EU compliant data transfer agreements with the data importer where necessary.
- All information you provide to us is stored on our secure servers.
- Any payment transactions will be encrypted using SSL technology.

- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data. You have the right to access information held about you. Some of the personal data held about you can be accessed by logging into your account. Additional information may be requested by contacting us on [support@quizandmoney.com](mailto:support@quizandmoney.com). We shall comply with any reasonable access request. In the events that the access request involves a disproportionate amount of work, we reserve the right, in line with applicable law, to charge a fee covering the work involved.
- Request correction of your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. You have the right to ask us to delete any information we hold about you which is not relevant to purpose for which we collect it. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You may also request for us to delete all your personal data, in which case we ask you to close your account. There may be legal obligations which may prohibit us from deleting all or any information held about you immediately at the time of the request (such as Anti-Money Laundering legislation), however we will process your request at the earliest opportunity whenever any applicable data retention period expires.
- Object to processing of your personal data. You have a right to object to our processing of personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes on ground of legitimate interest (as opposed to consent). You may also object to us showing you targeted ads on our site, in which case you will not see any less ads but you will see ads that are less relevant to your interests. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.



- Request restriction of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; or (b) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it; or (c) where you contest that our use of your personal data is unlawful.
- Right to withdraw consent for direct marketing. You have the right at any time to change your mind in relation to us being able to contact you with direct marketing. You can exercise your right to stop receiving direct marketing by accessing your account and unticking the consent boxes related to direct marketing or by contacting customer support. You may also unsubscribe by following the unsubscribe instructions on the communication itself. Any withdrawal of consent for the processing of personal data for marketing purposes will apply for the site you make the request through.
- We will retain copies of any communications that you send to us (including copies of any emails) in order to maintain accurate records of the information that we have received from you.

You can also exercise your rights at any time by contacting us at [support@quizandmoney.com](mailto:support@quizandmoney.com). All communications with us must be through the e-mail address that is associated with your account. We will verify your identity prior to responding to any request.

### **Time Limit to Respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Data Retention**

By law we have to keep basic information about you including Contact, Identity, KYC, Financial and Transaction Data for five years after you close an account with us, or any longer time period required by the law of any jurisdiction.

You can ask us to delete your data by closing your account. In that case, we will immediately delete all information aside from that which we are required to maintain to fulfil our legal obligations as indicated above.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **Cookies**

Our website uses cookies. A cookie is a small file of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

For more information on Cookies, please see our Cookie Notice below.

## **On-Site Advertising**

From time to time, we may place on-site advertising using information you make available to us when you interact with our sites, content, or services. On-site ads, also sometimes referred to as personalized or targeted ads, are displayed to you based on information collected through cookies or through interactions with the site.

Further, as described in the Cookie Notice above and below, you may modify the settings in most browsers to notify you when you receive a new cookie and disable cookies altogether.

## **Advertising on Third Party Sites**

We use third parties who collect data about their apps' and sites' visitors through their own cookies, web beacons, and other technologies regarding your online activities, in an effort to understand your interests and deliver you advertisements that are tailored to your interests. We purchase ad space on third party sites and our ads may appear when the third party determines that our ad is relevant to your interest according to the information they have collected.

We do not provide any personal information to advertisers or to third party sites that display our interest-based ads, however they may have collected certain personal information from you through the use of their site (such as articles read, types of ads clicked etc.), or through data analytics platforms (such as Google Analytics – see Cookie Notice below for more information) and they may therefore customize advertising material published on their site according to your interests.

Third party advertisers or advertising companies working on their behalf sometimes use technology to serve our advertisements. They automatically receive your IP address when this happens. They may also use cookies to measure the effectiveness of their advertisements and to personalize advertising content.

We do not have access to or control over cookies or other features that advertisers and third party sites may use, and the information practices of these advertisers and third party websites are not covered by our Privacy Notice. Please contact them directly for more information about their privacy practices.

### **Changes to our privacy policy**

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy. In the event that you do not agree with any changes, we recommend that you contact customer support or otherwise close your account.

### **Cookie notice**

Our website uses cookies. A cookie is a small file of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

### **How to Control Cookies**

You can manage cookie usage through your browser settings. The help function in your preferred browser should provide you with the correct information. Some browsers provide helpful cookie guides:

- Chrome: [https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn\\_cookies](https://support.google.com/chrome/bin/answer.py?hl=en&answer=95647&p=cpn_cookies)
- Firefox: <http://support.mozilla.org/en-US/kb/Cookies>
- Internet Explorer: <http://support.microsoft.com/kb/278835>
- Safari 5 for Mac: <http://docs.info.apple.com/article.html?path=Safari/5.0/en/9277.html>
- Opera: <http://help.opera.com/Linux/10.50/en/cookies.html>

Alternatively, <http://www.allaboutcookies.org> provides advice on how to do this, and further information on cookies and how to manage them.

In addition, Google Analytics provides its own opt-out options:

<http://tools.google.com/dlpage/gaoptout>

N.B. In the case of some mobile devices, it may be necessary to consult the device's instruction manual to manage cookies effectively.

### Cookie Classification

CLASSIFICATION	DESCRIPTION
Strictly necessary cookies	<p>These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website.</p> <p>Note. Blocking these cookies will prevent registration/authentication to the site and will make some content/functions unavailable.</p>
Performance cookies	<p>These cookies collect information about how customers use a website, for instance which pages customers go to most often, and if they get error messages from web pages. These cookies don't collect information that identify a visitor. All information these cookies collect is aggregated and therefore anonymous.</p>
Functionality cookies	<p>These cookies allow the website to remember choices you make such as your username, language or the region you are in and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages you can customize. They may also be used to provide services you have asked for such as watching videos or commenting on a blog. The information these cookies collect may be anonymized and they cannot track your browsing activity on other websites.</p>
Targeting/advertising cookies	<p>These cookies record your visit, the pages you have visited, the games you have played, the financial transactions you have made, and your general behavior on the Website. These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of time you see an advertisement as well as help measure the effectiveness of the advertising campaign. We will use this</p>

	information to make our website and the advertising displayed or received by you more relevant to your interests. We may also share this information with third parties for this purpose who assist us in analytics.
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### **Third Party Cookies**

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

We don't control the setting of these cookies, so it is recommended to check the third-party website for more information about their cookies and how to manage them.

### **Cookies Behavior**

#### Session Cookies

- Session cookies are created temporarily when a user visits a website. Once the user leaves the site/closes the browser, the session cookie is deleted.

#### Persistent Cookies

- A persistent cookie file remains on the user's device and is re-activated when the user visits the website that created that particular cookie. These cookies expire after a certain period (set in the file), or can be removed manually.

We use both Session and Persistent Cookies.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [support@quizandmoney.com](mailto:support@quizandmoney.com).