Privacy Statement

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Effective Date:

Last Updated: 12/10/2026

Introduction

Contact Information: The name and address of the Operator can be found on the footer of this website. For any privacy concerns that you may have and to raise questions about this Privacy Statement and the collection of your Personal Information contact our Data Privacy Officer (DPO) at:

Office 1/5297 Level G, Quantum House, 75, Abate Rigord Street, Ta' Xbiex, XBX 1120, Malta

Telephone number: +18882687743

Email: DPO@SpinGenie.com

Trading name: For the purpose of this Privacy Statement, the Operator is referenced through as SpinGenie (hereinafter called as "Operator", "We", "us", "our").

SpinGenie operates the Operator Website and Operator Offering as part of the regulated internet gaming (iGaming) market in Alberta conducted and managed by the Alberta iGaming Corporation (AiGC). In providing the Operator Offerings, we collect, use, disclose and otherwise process Personal Information on behalf of, and as agent to AiGC, in accordance with applicable laws, the Operating Agreement with AiGC, and applicable privacy requirements.

AiGC's authority to collect and oversee Personal Information is derived from Sections 4(a) and 4(c) of Alberta's Protection of Privacy Act ("POPA"), the iGaming Alberta Act, the Gaming, Liquor and Cannabis Act (Alberta), and related legal authorities. We collect, use and disclose Personal Information in accordance with those authorities, our obligations under the Operating Agreement with AiGC, and other applicable laws.

Here at ::DISPLAY_NAME: we are committed to protecting your privacy and being transparent about how your Personal Information is collected, used, disclosed, retained and safeguarded in connection with the Operator Offerings.

Purpose of this Privacy Statement

The purpose of this Privacy Statement is to explain how SpinGenie collects, uses, discloses, retains, safeguards and otherwise processes Personal Information in accordance with the Operator Offerings.

We collect, use and disclose Personal Information only for purposes authorized by applicable law, the Operating Agreement with Alberta iGaming Corporation ("AiGC"), and this Privacy Statement. These purposes include:

- Registering and administering Player accounts
- Verifying identity, age, eligibility and location requirements

- Providing gaming products and services
- Processing deposits, withdrawals and other financial transactions
- Complying with responsible gaming obligations
- Detecting, preventing and investigating fraud, money laundering, suspicious activity, security incidents and other unlawful activities
- Complying with legal, regulatory, audit, reporting and record-keeping requirements
- Responding to Player privacy-related inquiries, requests and complaints
- Protecting the integrity, security and operation of the Operator Offerings, and
- Carrying out other activities required to deliver the Operator Offerings and fulfil our obligations under the Operating Agreement with AiGC.

This Privacy Statement also explains the rights available to Players regarding their Personal Information and how Players may contact us with privacy-related questions or concerns.

Definitions

Term	Definition
AiGC	Alberta iGaming Corporation, the corporation responsible for conducting and managing Alberta's regulated internet gaming market.
Applicable Law	All applicable federal, provincial and local laws, regulations, directives, orders, policies and regulatory requirements relating to privacy, access to information, gaming, anti-money laundering, fraud prevention, cybersecurity and data protection, including POPA, PIPA, the iGaming Alberta Act, the Gaming, Liquor and Cannabis Act (Alberta), and applicable AiGC requirements.
Consent	A voluntary, informed and specific agreement by a Player to the collection, use or disclosure of their Personal Information for a defined purpose, where such consent is required under Applicable Law, the Operating Agreement or an AiGC Directive.
Data Incident	Any actual or suspected unauthorized access to, use of, disclosure of, alteration of, loss of, destruction of, or compromise of Personal Information, or any event that may affect its confidentiality, integrity or availability.
Disclosure	The sharing, transfer, provision of access to, or communication of Personal Information to another person, organization or authority.

Operating Agreement (OA)	The agreement entered into between the Operator and AiGC governing participation in Alberta’s regulated iGaming market and the Operator’s obligations thereunder.
Operator Offerings	The Operator Websites, mobile applications, gaming platform, products, games and services provided by the Operator pursuant to the Operating Agreement with AiGC.
Personal Information	Information about an identifiable individual, including recorded information that identifies an individual directly or indirectly, as interpreted under applicable privacy laws, including POPA and PIPA.
Privacy Impact Assessment (PIA)	A documented assessment of a project, system, initiative, technology or material change involving Personal Information that identifies and evaluates privacy risks and describes measures implemented to mitigate those risks, and that is provided to AiGC where required under the Operating Agreement or applicable AiGC Directives.
Player/ User	An individual who registers for, accesses or uses the Operator Offerings.
POPA	Alberta's Protection of Privacy Act, as amended from time to time, and its regulations.
PIPA	Alberta's Personal Information Protection Act, as amended from time to time, and its regulations.
Privacy Officer	The individual designated by the Operator to oversee compliance with applicable privacy obligations and to respond to privacy-related inquiries, requests and complaints.
Processing	Any operation performed on Personal Information, including its collection, use, disclosure, storage, organization, retrieval, transmission, analysis, retention, alteration, deletion or destruction.

Sensitive Personal Information	Personal Information that, due to its nature, context or use, requires a higher level of protection, including government-issued identification data, financial and payment information, authentication credentials, geolocation data, responsible gaming information, anti-money laundering information, fraud-related information and any other information that may create a heightened privacy risk if improperly accessed, used or disclosed.
Responsible Gaming Measures	Tools, systems, policies and controls designed to support responsible gambling, player protection and regulatory compliance, including limits, self-exclusion tools and behavioural monitoring.
Third-Party Service Provider	Any third party, vendor, subcontractor or service provider engaged by the Operator to perform services on its behalf, including identity verification, payment processing, fraud detection, anti-money laundering screening, cybersecurity, hosting, analytics, compliance or responsible gaming services.
POPA Data	Personal Information collected, used, disclosed or otherwise processed by the Operator on behalf of, and as agent to, AiGC pursuant to the Operating Agreement and governed by POPA.

Terms that are not defined in this Privacy Statement have the meanings assigned to them in the Operating Agreement (OA) with Alberta iGaming Corporation ("AiGC") and applicable AiGC Directives. In the event of any conflict, the definitions in the Operating Agreement and AiGC Directives prevail.

Legal Authority for Collection, Use and Disclosure of Personal Information

We collect, use and disclose Personal Information in connection with the Operator Offerings under the following legal authorities:

- Section 4 of the Protection of Privacy Act (Alberta) (“POPA”)
- The iGaming Alberta Act
- The Gaming, Liquor and Cannabis Act (Alberta)
- The Operating Agreement between SpinGenie and Alberta iGaming Corporation (“AiGC”)
- Applicable AiGC Directives and policies
- Other applicable federal and provincial laws of Canada, including Alberta’s Personal Information Protection Act (“PIPA”), where applicable.

Personal Information is collected, used and disclosed strictly for the purposes of operating and administering the Operator Offerings within Alberta’s regulated internet gaming market, and in accordance with the Operator’s obligations as an agent acting on behalf of AiGC.

Where Personal Information constitutes POPA Data, such information is collected, used, disclosed and otherwise processed on behalf of AiGC and is governed by POPA, the Operating Agreement and applicable AiGC Directives.

Operating on Behalf of AiGC

SpinGenie operates the Operator Website and provides the Operator Offerings as part of Alberta's open and regulated internet gaming (iGaming) market, which is conducted and managed by Alberta iGaming Corporation ("AiGC").

In providing the Operator Offerings, SpinGenie collects, uses, discloses, stores, retains and otherwise processes Personal Information on behalf of, and as agent to, AiGC, in accordance with applicable law, the Operating Agreement with AiGC, and applicable AiGC Directives.

Privacy Officer

We have designated a Privacy Officer who is responsible for overseeing and monitoring our compliance with applicable privacy laws, the Operating Agreement with Alberta iGaming Corporation ("AiGC), and applicable AiGC Directives. The Privacy Officer is also responsible for managing privacy-related inquiries, requests and complaints and privacy incidents.

Players and users of our websites may contact our Privacy Officer using the details below:

Privacy Officer Contact Details
Email: DPO@SpinGenie.com
Telephone: [Insert telephone number]
Mailing Address: [Insert mailing address]

The Privacy Officer contact channel is actively monitored during Business Days. We maintain appropriate procedures to ensure continuity of monitoring and response, including during periods of absence, vacation, or personnel changes.

We will respond to privacy-related inquiries and requests in a timely manner and in accordance with applicable legal and regulatory requirements.

Age Eligibility and Vrification

The Operator Websites and Operator Offerings are intended only for individuals who are 18 years of age or older. We do not knowingly collect Personal Information from, solicit Personal Information from or permit the use of our services by individuals under the age of 18 ("Minors").

We collect and use Personal Information to verify a Player's age, identity, and eligibility before granting access to the Operator Offerings and to prevent access to the Operator Offerings by Minors.

Where we determine, or reasonably suspect, that an individual is a Minor, we may refuse registration, suspend or close the account, and take any other action required by Applicable Law, the Operating Agreement with AiGC, or applicable AiGC requirements.

If a parent or legal guardian becomes aware that a Minor has provided us with Personal Information, they may contact our Privacy Officer at DPO@SpinGenie.com to request deletion of that information. Upon receipt of a verified request, we will take reasonable steps to investigate the matter and, where appropriate, delete the Minor's Personal Information in accordance with Applicable Law and our regulatory obligations.

Governing Law

This Privacy Statement and all matters relating to the collection, use, disclosure and protection of Personal Information in connection with the Operator Offerings are governed by the laws of the Province of Alberta and the applicable federal laws of Canada.

This Privacy Statement shall be interpreted in accordance with such laws, without regard to conflict of law principles.

Nothing in this Privacy Statement limits or restricts any rights, obligations or requirements arising under Applicable Law, the Operating Agreement with Alberta iGaming Corporation ("AiGC"), or applicable AiGC Directives.

Categories of Personal Information we collect

In connection with the Operator Offerings, we collect various categories of Personal Information, including:

- Registration and account information
- Identity verification and authentication information
- Financial and payment information
- Gaming, transaction and account activity information
- Technical, device and information
- Website and application usage information, and
- Information required for legal, regulatory, security, fraud prevention and responsible gambling purposes.

Further details regarding the categories of Personal Information we collect, the purposes for which such information is collected, used and disclosed, and the applicable legal authority for such processing are set out in the table under the section entitled "Purposes for collection, Use and Disclosure of Personal Information".

How We Collect Your Information

We collect Personal Information from the following sources:

Collecting Information about you, from you

SpinGeniecollects personal information about you whenever you use our services. Some of it you provide directly to us, for example, when you register an account or fund your account. Other information is collected during your interactions with us, such as the bets you place or online chats with our customer services team and the email communication we have with you, when you submit your data subject requests. Also, if you consent, we will record all telephone conversations and collect your information to send you marketing material. We also collect information about the way you access, view, share, contribute to and communicate with and through our services, for example when you post comments via our social media channels or chat functionalities.

Collecting Information about you, from your device

We collect information from the devices you use when using SpinGenie content, products and services. This includes but is not limited to the following: your IP address (a number that identifies a specific device on the internet and is required for your device to communicate with websites), hardware model, operating system and version number.

Collecting Information about you, from the mobile application you use

We may collect information about you from the mobile application you use, upon the application's installation and at the first time of opening it. This information may include your IP Address, and your address-related data obtained from the IP Address, such as your country code, state, city and postal code. We may also collect your device information, such as your platform – iOS or Android – your phone OS and application version. We can also collect your advertising ID if you specifically provide your consent to it. Your personal information is also collected when creating an account with us and registering to receive our services. This information is required for account creation, security verification, regulatory compliance and to enhance your overall experience with the application.

Collecting Information about you, from your computer and through Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalized service to you. Some of the cookies we use are essential for the site to operate. The cookies we use can be grouped into four separate categories and are explained in the section further below set out for Cookies.

Collecting Information about you, from external companies

To help us comply with our legal and regulatory KYC and Social Responsibility obligations:

- When you open your account, we will cross-check/ reference the information you supplied to us with external/governmental companies for Anti-Money Laundering and identity verification processes, as well as to ascertain whether you are registered with them because you asked not to be allowed to gamble or receive marketing. Electronic Know Your Client ("EKYC") or automatic verification solutions provided by third party providers can be used to ascertain a player's identity in accordance with the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) requirements. For these third parties, we ensure that they adhere to the same laws, regulations and standards as we do.
- We use publicly available information (on social media sites and the like) to help verify the information provided to us and we log and save the results.

Collecting information about you from the Use of Automated Systems, provided by third parties

- We may use Automated Systems, including third-party identity verification, authentication, fraud prevention, anti-money laundering, geolocation, security and responsible gambling tools, to help verify identity and eligibility, detect suspicious or unlawful activity, manage risk, protect the integrity of the Operator Offerings and comply with our obligations under Applicable Law, the Operating Agreement with AiGC and applicable AiGC requirements.

- These systems may generate alerts, risk indicators, recommendations or decisions that affect account access, account restrictions, transaction review, Player eligibility, responsible gambling interventions or the use of the Operator Offerings. Where required by Applicable Law, the Operating Agreement with AiGC or applicable AiGC requirements, we will provide notice of such automated processing at or before the time of collection.

- Where required by Applicable Law, the Operating Agreement with AiGC or applicable AiGC requirements, we will provide notice of such automated processing at or before the time of collection.

Collecting personal information from a third party as part of a business or asset transfer:

We may also collect personal information about you from third parties from time to time. For example, if you are a former customer of a SpinGenie partner and your data was passed to SpinGenie we will have acquired the following categories of your personal information from your previous online betting and gaming provider in order to integrate your former account into SpinGenie's platforms and systems, and to provide our gambling services to you in accordance with our Terms and Conditions. A non-exhaustive example (which may or may not be applicable depending on the process) of such data is:

- Your account balances – to allow you to access your funds
- Your former provider's username and password (hashed and non-decipherable by us) – to allow you to continue to access your account using the same login details
- Your personal registration details were originally supplied to your former provider, such as name, Date of Birth (DOB), address, email address, telephone number and occupation

- Other account data such as your player ID, registration and login dates, country code, currency, first deposit amounts and dates, number of wins, device details (where held), gambling limits but in most cases excluding payment details and itemized, historic gaming and financial transactions. Please note, if you require access to your historic, itemized gaming and financial transactions with your former provider, please contact them in accordance with the instructions of their Privacy Policy on their website in the first instance.
- Copies of your existing KYC, identification and Enhance Customer Due Diligence documents originally supplied to your former provider – where we can, we will process these documents to allow you to access SpinGenie services without have to ask you to supply updated documents.
- If you are a ‘time out’ or ‘self-excluded’ customer, your account status and duration
- of any relevant live time out or exclusion period.

We will process the above categories of personal information for the reasons outlined in this Privacy Policy and in accordance with the Applicable Laws and Regulations.

Purposes for collection, Use and Disclosure of Personal Information

We collect, use and disclose your Personal Information only where necessary to operate the Operator Offerings, comply with applicable legal and regulatory obligations, and fulfil our obligations under the Operating Agreement with AiGC.

The categories of Personal Information we collect are prescribed in the section “Categories of Personal Information we Collect” and may include registration details, identity verification information, financial information, technical and device data, and gaming activity information.

The table below describes the purposes for which we use Personal Information, the main categories of Personal Information involved, and the applicable legal authority for such collection, use and disclosure.

Type of Personal Information Collected	Purpose of Collection, Use and Disclosure	Legal Authority for Collection, Use and Disclosure

Full legal name (including middle name or initial, if applicable), full address, date of birth, country of residence, nationality, personal telephone number, occupation, email address	To set up your account and provide the Operator Offerings, including identity and age verification, eligibility checks, account administration, payment processing and determining whether you may access gambling services.	POPA Operating Agreement with AiGC iGaming Alberta Act Gaming, Liquor and Cannabis Act (Alberta) Applicable Alberta gaming legislation and regulatory requirements
Player identification document details, credit file information, verification data, login credentials, employer information, government issued identification, alias/preferred name (if applicable), PEP/HIO status, sanctions screening results, third-party determination records, electronic signature card or equivalent account-opening attestation, business telephone number where collected, and records evidencing the purpose and intended nature of the business relationship		
IP address, geolocation		
Gaming event and transaction history, usage data, deposit and withdrawal information		

Full legal name (including middle name or initial, if applicable), full address, date of birth, country of residence, nationality, personal telephone number, occupation, email address Player identification document details, credit file information, verification data, login credentials, employer information, government issued identification, alias/preferred name (if applicable), PEP/HIO status, sanctions screening results, third-party determination records, electronic signature card or equivalent account-opening attestation, business telephone number where collected, and records evidencing the purpose and intended nature of the business relationship IP address, geolocation Gaming event and transaction history, usage data, deposit and withdrawal information	To perform our regulatory obligations relating to Responsible Gambling, Safer Gambling, anti-money laundering, fraud prevention, customer due diligence and ongoing monitoring.	POPA Operating Agreement with AiGC Applicable anti-money laundering and anti-terrorist financing legislation Regulatory requirements (including FINTRAC requirements where applicable) Alberta gaming regulatory requirements
Username/ account ID, password email address Phone number, full legal name, date of birth, address Identification documents and documents verification data Cookies, IP Address and Geolocation data Login attempts, changes to account details	To identify and authenticate your access to your account and certain features of the Operator Offerings	POPA Operating Agreement with AiGC Security, authentication and account integrity requirements applicable to the Operator Offerings

Username, email address	To identify you as a winner in winner announcements, tournament leaderboards or similar features using your username	Player consent (where applicable) POPA Operating Agreement with AiGC
Email Address, personal telephone number	To communicate with you regarding your account, transactions, service updates, security notifications and other operational matters	POPA Operating Agreement with AiGC Provision and administration of the Operator Offerings
Email Address, personal telephone number	To market our website and products or those of any of our business partners and affiliates, where permitted	Player consent, where required under applicable privacy and electronic communications laws POPA
Username, email address Cookies, IP Address and Geolocation data, device and browser information, session duration, page views, navigation events and interaction metrics	To conduct analytics, research, reporting and service improvement activities and to enhance the functionality, performance and user experience of the Operator Offerings	POPA Operating Agreement with AiGC Business administration, security and continuous improvement of the Operator Offerings

Full legal name, telephone number, email address, IP address, geolocation, Username/ account ID, usage data, call recordings, device information, app or website logs, account status	To provide customer support, troubleshoot issues and respond to enquiries, complaints and requests	The performance of a contract
Consent records, cookie identifiers, timestamps, preference settings, and limited technical identifiers required to apply consent choices. User consent for cookies and similar tracking technologies is used on the website and mobile application, including recording, updating and applying user preferences for non-essential processing activities.	To manage cookie and consent preferences	Consent POPA Operating Agreement with AiGC

Full legal name, address, date of birth, telephone number, occupation, email address, country of residence, citizenship Player identification document details, credit file information, verification data, login credentials Employer information, government-issued identification, preferred name IP address, geolocation, device identifiers, Gaming event and transaction history, usage data, payment information Customer support records Correspondence with regulators or law enforcement, self-exclusion and account enforcement records	To investigate violations, enforce our policies, comply with legal processes, respond to lawful requests, and cooperate with regulators and law enforcement authorities	POPA Operating Agreement with AiGC iGaming Alberta Act Gaming, Liquor and Cannabis Act (Alberta) Applicable legal, regulatory and law enforcement requirements
Full legal name, address, date of birth citizenship KYC and AML verification records, source of funds and source of wealth documentation, account balances, payment reports, usage data	To conduct audits, compliance reviews and monitoring activities relating to our legal and regulatory obligations	POPA Operating Agreement with AiGC Applicable legal, audit, compliance and regulatory requirements

Full legal name (including middle name or initial, if applicable), full address, date of birth, country of residence, nationality, personal telephone number, occupation, email address		
Player identification document details, credit file information, verification data, login credentials, employer information, government issued identification, alias/preferred name (if applicable), PEP/HIO status, sanctions screening results, third-party determination records, electronic signature card or equivalent account-opening attestation, business telephone number where collected, and records evidencing the purpose and intended nature of the business relationship	Where we decide to sell, transfer, restructure or otherwise dispose of all or part of our business, we may disclose Personal Information to prospective purchasers and professional advisers in connection with the transaction	POPA Applicable corporate, contractual and legal requirements relating to business transactions
IP address, geolocation		
Gaming event and transaction history, usage data, deposit and withdrawal information		

Where we rely on your consent to collect, use or disclose Personal Information, you may withdraw that consent at any time, subject to legal, regulatory or contractual restrictions and reasonable notice.

You may withdraw your consent by contacting us using the contact details provided in this Privacy Statement, by updating your account preferences, by using any available unsubscribe mechanism included in our communications, such as the “unsubscribe button” on the marketing emails you receive, or through our customer support channels, as applicable.

The withdrawal of consent will not affect any collection, use or disclosure of Personal Information that occurred before the withdrawal took effect, nor will it affect any collection, use or disclosure that is authorized or required by applicable law, regulation, the Operating Agreement with AiGC, or other regulatory requirements.

Data Derived from Personal Information and Non-Personal Data

Where permitted by applicable law, the Operating Agreement with AiGC and applicable AiGC requirements, we may analyse or otherwise process Personal Information already in our custody to create data derived from

Personal Information for purposes such as research, analytics, fraud prevention, responsible gambling, compliance and service administration.

We may also create Non-Personal Data, including aggregated, anonymized or statistical Information, from Personal Information or data derived from Personal Information. We implement measures designed to prevent re-identification and will not attempt to re-identify individuals except, where permitted or required by applicable law.

We do not disclose data derived from Personal Information except, where permitted or required by applicable law, the Operating Agreement with AiGC or applicable AiGC requirements. Any disclosure of Non-Personal Data will be subject to applicable legal, regulatory and contractual requirements.

Access to personal information by Employees

Only authorized employees may access personal information, and solely to the extent needed to perform their job responsibilities. Access is role-based, follows the principle of the least privilege and is regularly reviewed and monitored. Depending on their responsibilities, authorized personnel who may access Personal Information, include employees working on the following functions:

- Customer Support Department: verifying players' identity, assisting with account management, responding to inquiries and processing self-exclusion requests
- Compliance Department: conducting AML checks, fraud and suspicious activity reviews, responsible gambling monitoring and regulatory reporting to AiGC
- Payments/ Operations Department: processing deposits and withdrawals, payment verification, dispute resolution, fraud and chargeback prevention
- VIP Department: supporting high-value players, verifying VIP eligibility and performing responsible gambling reviews
- CRM Department: performing strategy planning and analysis of revenue and executing games orders
- Information Technology (IT) Department: system maintenance, troubleshooting, and responding to cybersecurity events
- Product Department: reviewing platform issues affecting specific accounts
- Information Security Department: investigating security incidents and breaches, ensuring integrity and confidentiality of information, managing encryption and access control
- Data Protection Department: handling privacy inquiries, access and correction requests, investigating privacy complaints, managing privacy incidents and breaches, conducting privacy assessments, and supporting compliance with Applicable Law (including POPA and PIPA where applicable), the Operating Agreement with AiGC and other applicable privacy and regulatory requirements
- Business Intelligence (BI) Department: conducting reporting, forecasting and performance analysis
- Internal Marketing: campaigns setups
- B2B Department: supporting partner onboarding, generating reports, handling new and closing markets, partners support and compliance monitoring
- Brand Ambassador Department: conducting reporting, responding to clients' enquiries
- Finance Department: managing financial reporting, reconciliation, tax obligations, processor monitoring and player liability accounting
- Games Department: handling/assisting players with technical issues
- Legal Department: managing litigation, responding to legal claims and advising on regulatory matters
- Project Management Department: overseeing payment provider integrations, managing technical projects and coordinating updates with the relevant stakeholders

Access to Personal Information is limited to the information necessary for the performance of each individual's duties. No employee or department is granted unrestricted access to all Personal Information. We maintain technical, administrative and organizational safeguards designed to ensure that Personal Information is accessed only if authorized, and for legitimate business, legal, regulatory or operational purposes.

Companies that provide services on our behalf

We may share Personal Information with third-party service providers that perform services on behalf of SpinGenie in connection with the Operator Offerings and our obligations under the Operating Agreement with AiGC. We carry out checks/ regular audits to ensure that the companies we work with will give your information the same level of care and protection as we do.

Both we and our service providers are required to handle Personal Information in accordance with applicable privacy, security and regulatory requirements, including POPA, the Operating Agreement with AiGC, applicable Alberta gaming legislation, and other applicable laws. We also implement contractual measures requiring service providers to protect Personal Information, maintain appropriate security safeguards, and process Personal Information only for authorized purposes (including through written agreements such as data processing or service provider agreements, where applicable).

Some of our service providers may collect, use, disclose, store or otherwise process Personal Information outside Alberta or Canada. Where this occurs, we require such service providers to maintain appropriate privacy and security safeguards and to process Personal Information in accordance with applicable legal, regulatory and contractual requirements. For further information regarding international and interprovincial transfers and processing of Personal Information, please refer to the section *"Processing Personal Information Outside Alberta"* of this Privacy Statement.

The main functions that are or may be carried out, fully or in part, by third parties on our behalf, are listed below:

- Management and execution of marketing campaigns
- Payment processing and verification
- Anti-fraud and Anti-money laundering checks (Including but not limited to Enhance Due Diligence reports utilizing publicly available sources and ID verification)
- Checks to detect unfair use of our products and services
- Web hosting, management, maintenance, development of our websites, mobile applications, and IT systems, use of cookies (i.e., Google Analytics), online content services and data
- Management of competitions, contests and offers
- Data analytics and data cleansing
- Market research and collecting or analyzing customer feedback
- IT services and support
- Audit, Legal & Compliance- related services
- Storing data for regulators to access and view
- Analysis of gambling habits to ascertain potentially risky behaviors

Where we engage service providers to support the Operator Offerings or our obligations under the Operating Agreement with AiGC, we require them to protect Personal Information through appropriate contractual, technical and organizational safeguards. We require such service providers to comply with applicable privacy, security and confidentiality requirements and to provide reasonable assistance in responding to requests relating to Personal Information, including requests for access, correction or other rights available under applicable law (including POPA and PIPA, where applicable).

We may conduct privacy assessments, security reviews and other due diligence activities before implementing new technologies, services, vendors, business initiatives or material changes involving the collection, use or disclosure of Personal Information. These assessments help us identify and address privacy risks and support compliance with applicable privacy, security and regulatory requirements as well as any applicable AiGC Directives or Operating Agreement requirements.

Information demands from Regulators:

We may be required, from time to time, to provide information to AiGC and other competent regulatory, governmental or law enforcement authorities in connection with our obligations under applicable laws, the Operating Agreement with AiGC, and applicable regulatory requirements. Such disclosures may include aggregated, statistical, de-identified or other non-personal information, such as the number of self-exclusions, registrations, complaints, or reports of suspicious activity.

In certain circumstances, we may also be required or authorized to disclose Personal Information to other authorized recipients for compliance, licensing, reporting, audit, investigation, enforcement, public safety, fraud prevention, anti-money laundering, responsible gambling or other purposes permitted or required by Applicable Law.

Other information sharing with third parties:

We may collect, use and disclose Personal Information with selected third parties for purposes such improving our services, analyzing and enhancing customer experience, facilitating customer support and complaint resolution, and supporting the operation of the Operator Offerings, conducting analytics and business administration activities, and complying with legal, regulatory and contractual obligations, where such collection, use or disclosure is permitted or required under applicable law and the Operating Agreement with AiGC.

We may also disclose Personal Information in connection with a proposed or actual merger, acquisition, sale, restructuring, financing or other corporate transaction involving all or part of our business. This may include disclosure to prospective purchasers, investors, advisors and other relevant parties involved in the transaction. Any such disclosure will be subject to appropriate confidentiality, security and contractual safeguards and will occur only to the extent permitted by Applicable Law. Where required, we will provide notice of such changes and any applicable details regarding the handling of Personal Information.

When we engage third parties to process Personal Information on our behalf, we limit disclosures to what is necessary for the provision of their services and require them, through contractual and other appropriate safeguards, to protect Personal Information and process it in accordance with applicable privacy, security and regulatory requirements, including POPA, PIPA (where applicable), the Operating Agreement with AiGC and other Applicable Law.

We may also disclose Personal Information where required or authorized by Applicable Law, including in response to lawful requests from courts, regulatory authorities, governmental bodies or law enforcement agencies, or where necessary to protect the security, integrity and lawful operation of the Operator Offerings.

Processing Personal Information Outside Alberta

We and our service providers may collect, use, disclose, store or otherwise process Personal Information outside Alberta and, in some cases, outside Canada.

This may occur where we or our service providers engage cloud services, technology providers, payment processors, fraud prevention providers or other third-party service providers necessary for the operation of the Operator Offerings and the fulfilment of our obligations under the Operating Agreement with AiGC.

Where Personal Information is processed outside Alberta, it may be subject to the laws of the jurisdiction where the processing occurs and may be accessible to governmental, regulatory, law enforcement or judicial authorities in accordance with those laws.

We take reasonable steps to ensure that Personal Information receives a comparable level of protection to that required under applicable Alberta privacy, security and regulatory requirements, including POPA, PIPA

(where applicable) and the Operating Agreement with AiGC.

We require our service providers to implement appropriate and equivalent technical, organisational and contractual safeguards designed to protect Personal Information against unauthorized access, use, disclosure, alteration or loss.

Such safeguards may include, where appropriate:

- Contractual confidentiality and data protection obligations
- Implementation of appropriate security measures, including encryption of data in transit and at rest
- Access controls and authentication mechanisms
- Monitoring and security logging, and
- Restrictions on onward transfers and subcontracting

How long we keep your information

We hold your Personal Information only for as long as necessary to fulfill the purposes for which it was collected, including to provide the Operator Offerings, comply with applicable legal and regulatory obligations, meet our obligations under applicable privacy laws, the Operating Agreement with AiGC and applicable AiGC requirements, resolve disputes, resolve disputes, enforce our agreements, and support audit, security and fraud prevention requirements.

Retention periods may vary, depending on the type of Personal Information and the purposes for which it is processed. In determining appropriate retention periods, we consider applicable legal, regulatory and operational requirements, including those relating to gaming regulation, anti-money laundering, taxation, payment processing responsible gaming, complaint handling, fraud prevention, audit requirements, and applicable records retention and disposition requirements. Where required, we may retain your Personal Information after the termination of your account or relationship with us, for the period necessary to comply with applicable obligations or to establish, exercise or defend legal claims.

When Personal Information is no longer needed for these purposes, it will be securely deleted or anonymized, in accordance with our applicable retention and disposition policies and schedules. Where Personal Information is processed for marketing purposes, we retain it until you withdraw your consent or otherwise request that we stop using it for such purposes, subject to any legal or regulatory retention requirements.

Your Rights

Subject to applicable law, you may have the following rights regarding your Personal Information:

- Right to Be Informed. You have the right to be informed about how we collect, use, disclose, retain and otherwise handle your Personal Information. This Privacy Statement is intended to provide that information.
- Right of Access. You may request access to Personal Information that we hold about you and information regarding how that Personal Information has been collected, used and disclosed, subject to any exceptions or limitations permitted by applicable law.
- Right to Request Correction. You may request correction of your Personal Information that you believe is inaccurate or incomplete. If appropriate, we will correct the information in accordance with applicable legal requirements.
- Right to Withdraw Consent. Where we rely on your consent to collect, use or disclose Personal Information, you may withdraw that consent at any time, subject to legal, regulatory or contractual restrictions and reasonable notice. Withdrawal of consent will not affect any collection, use or disclosure that occurred before the withdrawal took effect, or any collection, use or disclosure that is required or authorized by applicable law, the Operating Agreement with AiGC or other regulatory requirements.

- Right to Request Deletion or Disposal. Subject to Applicable Law and our legal, regulatory, contractual, audit, anti-money laundering, responsible gambling, fraud prevention, security, dispute-resolution and record-retention obligations, you may request deletion or disposal of Personal Information where such a right is available under applicable law. We may be required to retain certain Personal Information even after a deletion or disposal request where retention is required or authorized by Applicable Law, the Operating Agreement with AiGC, applicable AiGC requirements or our retention schedule.
- Right to Submit a Privacy Complaint. You may contact our Privacy Officer if you have questions, concerns or complaints regarding our handling of your Personal Information.

Requests for access, correction or privacy-related enquiries and/ or complaints may be submitted to the Privacy Officer by email at DPO@SpinGenie.com or using the contact details set out in this Privacy Statement.

We may require information sufficient to verify your identity before responding to an access request, correction request or other privacy-related request. In certain circumstances, we may require additional verification measures where reasonably necessary to protect Personal Information from unauthorized access, disclosure, modification or deletion.

If you are not satisfied with our response to a privacy concern, complaint or request, you may contact the Office of the Information and Privacy Commissioner of Alberta ("OIPC Alberta"), which oversees compliance with Alberta's privacy legislation, including the Personal Information Protection Act (PIPA), and has authority to investigate complaints and review certain decisions relating to access to and correction of Personal Information.

Nothing in this Privacy Statement limits any rights that may be available to you under applicable law.

Complaints Management

If you have a question, concern or complaint about how we collect, use, disclose or otherwise handle your Personal Information, you may contact our Privacy Officer using the contact details set out in this Privacy Statement.

Upon receipt of a privacy-related complaint, we will acknowledge the complaint, we will review the circumstances, conduct any appropriate investigation and provide a response within a reasonable timeframe in accordance with applicable legal, regulatory and contractual requirements.

Where additional information is required to investigate a complaint, we may contact you during the review process. We will make reasonable efforts to resolve complaints fairly and promptly.

If you are not satisfied with our response, you may contact the Office of the Information and Privacy Commissioner of Alberta ("OIPC Alberta"), which is responsible for overseeing compliance with Alberta privacy legislation and investigating complaints relating to the handling of Personal Information.

Enquiries about this Privacy Statement

If you have any questions about this Privacy Statement or need additional information you may contact our Privacy Officer using the contact details set out in this Privacy Statement.

Keeping your Personal Information Accurate and Current

We are committed to maintaining your Personal Information accurate, complete and up to date, as necessary for the purposes for which it is collected, used and disclosed.

You are responsible for ensuring that the information you provide to us remains accurate and current. You may review and update certain account information at any time by logging into your account and accessing your account settings or profile information. If you are unable to update your information through your account, please contact our Customer Support team or Privacy Officer.

Where required by applicable law, regulatory requirements, or our obligations under the Operating Agreement with AiGC, we may request updated information or supporting documentation to verify the accuracy of your Personal Information, including your identity, contact details, residency, payment information or other account-related information. We may also take reasonable steps to update or correct Personal Information where we become aware that such information is inaccurate or incomplete.

Maintaining accurate and current Personal Information helps us provide our services, protect your account, comply with legal and regulatory obligations, and support responsible gaming, fraud prevention and anti-money laundering requirements.

Cookie Section

What are Cookies?

'Cookies' are small text files stored in your web browser that enable us to recognize your computer when you visit our website. Cookies are essential to keep certain parts of our website functioning correctly and securely. We also use them to make things quicker, easier and more personal to you and to help us understand how our website is used. Optional/ non-essential cookies can be used to present you with more tailored advertising content, if you provide your consent and accept these cookies.

To do all these things, cookies collect some personal information about you whenever you use our website. You can choose whether to accept or reject some or all types of cookies and control them through your device’s browser settings, as described in the section “Controlling my Cookies” below.

Cookies also enable SpinGenie to find out which advertisement brought you to our website, we may use the SpinGenie cookies on your computer. If we do collect such information, you will remain personally unidentifiable, and we will not share this information with any unconnected third party.

The Cookie Categories we use

The Cookies we use fall into the following categories:

- Strictly Necessary

This type of cookie allows you to navigate the website and use essential features like secure areas and online registration. These cookies don’t gather any information about you that could be used for marketing or remembering where you’ve been on the internet. These cookies are essential in our being able to guarantee the performance of our website, should you disable them we won’t be able to ensure your security or predict how our website will perform during your visit.

- Performance

This type of cookie collects information about how you use our website e.g. which pages you visit, and if you experience any errors. The information collected is anonymous and is only used to help us improve how our website works, gauge what interests our users have and assess the effectiveness of advertising.

- Functionality

This type of cookie remembers your preferences for tools found on our website, so you don’t have to re-set them each time you visit. Some of them are managed by third parties. They may for instance determine whether you see the latest or oldest comments made in relation to an article first. They may also help us greet you by name or remember your choice of language or region).

- Targeting/Tracking

These cookies are used to analyze what advertising might be most relevant to a user of the website based on the areas of the website that the user visits.

You can review and manage your cookie preferences at any time by clicking the floating cookie settings buttons available on the left side of the website.

Please note that our advertisers may also use cookies on their websites, and we have no control over such use

Controlling my Cookies

All modern browsers allow you to see what cookies you have, and to clear them individually or in their entirety by changing your cookie settings. Cookie settings are typically found in the 'options' or 'preferences' menu of your browser, otherwise you should use the 'Help' option in your browser for more details. You may also find the links below helpful:

- Cookie settings in Chrome
- Cookie settings in Firefox
- Cookie settings in Microsoft Edge
- Cookie settings in Safari

You can block cookies by activating the settings on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. We endeavor to make all parts of our site accessible to everyone but if you block some cookies, particularly Strictly Necessary cookies, your access might be impaired.

For non-essential cookies, we will ask for your consent when you first visit our site. When you first access our site, a cookie banner will appear allowing you to accept or reject optional cookies and provide access to this Privacy Policy. You may withdraw or update your cookie preferences at any time by clicking the floating cookie settings button available on the website. If you withdraw your consent, any non-essential cookies previously placed on your device will be disabled or deleted where applicable.

The Use of Google Analytics

We use Google Analytics for ‘analytical’ purposes, such as keeping track of user/customer browsing patterns and building up a profile for a customized browser experience for you. Google Analytics is a popular web analytics service provided by Google, Inc. Google Analytics uses cookies to help us to analyze how customers use our website.

Your opt-out choice is applied only to the browser from which you make the choice, so if you use different browsers you will need to opt out in each one. This opt-out is cookie based, so if you delete your cookies, you will no longer be opted out and you will need to opt out again. Google Analytics, from which you can control through your browser settings: opt out. https://tools.google.com/dlpage/gaoptout.

You can review and manage your cookie preferences at any time by clicking the floating cookie settings buttons available on the left side of the website

Targeting and Retargeting

Targeting and Retargeting technologies may be used to tailor our online marketing to your needs and interests and optimize your experience while using our websites. This technology is monitored and used when you visit our websites that work together with the providers of these re-targeting technologies, to be able to inform you when we meet your interests as closely as possible.

With the said technologies, cookies on our websites and on the websites of others (for retargeting purposes) track your interest in our products. With the use of random identifiers (i.e., online identifiers, cookie ids), there is no direct identification of your data, such as your name, email address etc. ("pseudonymised data"), unless you have consented to this. Also, any data collected through these cookies can be removed at any time, if consent to these cookies is withdrawn.

These cookies are mostly used for conversion tracking and retargeting (collection of information about your interests in the products of our retargeting partners – building an audience for campaigns run by the same advertisers). The data collected for targeting and retargeting purposes includes amongst others *Referrer URL, Page URL, IP Address, Time/Date, Geographic location* etc. and their collection is made after providing your consent.

When the targeting and retargeting technologies are used, all the appropriate measures for the transfer of your data are implemented.

You can review and manage your cookie preferences at any time by clicking the floating cookie settings buttons available on the left side of the website.

Security

SpinGenie goes to great lengths to protect the confidentiality, integrity and availability of the Personal Information collected in relation with the Operator Offerings. We implement reasonable administrative, technical and physical measures and mechanisms designed to protect Personal Information against unauthorized access, collection, use, disclosure, modification, loss, theft or destruction.

We continuously assess and manage privacy and security risks arising from the processing of Personal Information and maintain policies, procedures and controls designed to protect Player information and support compliance with applicable legal, regulatory and contractual requirements.

The safeguards we use may include:

- Administrative, organizational and technical controls to limit access to Personal Information to authorized personnel who require access to perform their job duties.
- Technical security measures (i.e., encryption, Data Loss Prevention (DLP) system, antimalware systems, access restriction etc.). We employ industry standard security protocols (The connection to this site is encrypted and authenticated using TLS 1.2 (a strong protocol), ECDHE_RSA with X25519 (a strong key exchange), and AES_128_GCM (a strong cipher) to ensure that all transactions including deposits and withdrawals are carried out in a totally secure manner. This technology protects you from having your information intercepted by anyone other than SpinGenie while it is being transmitted between you and SpinGenie.

- Physical security measures designed to protect facilities, systems and information assets (i.e., access cards logs, surveillance cameras).
- Privacy and cybersecurity training of employees to ensure that they are informed about the privacy and security obligations they have towards the processing of your Personal Information.
- Performance of regular Privacy Impact Assessments (PIAs)
- Restriction of access to your personal information to the employees and third parties who have a business need to know. Employees and third parties will only process your personal information based on the instructions provided by us, subject to a duty of confidentiality.
- The relevant procedures to deal with any possible data breach. If this is the case, the appropriate mechanisms are established to notify you and the iGO, within the relevant timeframe and where we are legally required to do so.

Access to Personal Information is restricted to employees and service providers who require such access for legitimate business, legal, regulatory or operational purposes and who are subject to appropriate confidentiality obligations.

Privacy Incidents and Data Breaches

We maintain policies and procedures for identifying, investigating, managing and responding to privacy incidents and security breaches involving Personal Information.

If we become aware of a privacy incident or security breach involving Personal Information, we will take reasonable steps to assess and mitigate the incident and comply with applicable legal, regulatory and contractual notification requirements.

Where required under applicable law, regulation or our obligations under the Operating Agreement with AiGC, we will notify AiGC and cooperate with AiGC and any relevant authorities in relation to the investigation, management and remediation of the incident. Where required by applicable law, affected individuals will also be notified of a privacy incident involving their Personal Information.

Your Responsibilities for Protecting Your Personal Information

While we take reasonable administrative, technical and physical measures to protect your Personal Information, you also play an important role in safeguarding your account and information.

To help protect your account and Personal Information, we recommend that you:

- Use strong passwords. Choose a unique password containing a combination of upper- and lower-case letters, numbers and special characters, greater than 8 characters long. Avoid reusing passwords across multiple websites or services.
- Keep your credentials confidential. Do not share your username, password, one-time passcodes, security questions or other account credentials with anyone. We will never ask you to disclose your password or full payment details via email, chat or phone.
- Secure your devices. Ensure that the devices you use to access your account are protected with up-to-date security software, operating system updates and appropriate security settings.
- Use secure internet connections. Avoid accessing your account through public or unsecured Wi-Fi networks whenever possible.
- Remain alert to phishing and fraud attempts. Be cautious of unsolicited emails, text messages, telephone calls or other communications requesting personal, financial or account information. Always access our services through our official website or mobile application.
- Log out after use. Always log out of your account when using shared or public devices.
- Keep your account information current. Promptly update your contact information and other account details to help us maintain accurate records and communicate with you when necessary.

Limits of Confidentiality

While we take reasonable measures to protect the confidentiality of your Personal Information, confidentiality cannot be guaranteed in all circumstances.

We may collect, use or disclose Personal Information where required or authorized by applicable law, regulation, court order, legal process, or pursuant to our obligations under the Operating Agreement with AiGC and other applicable regulatory requirements.

Additional information regarding the circumstances in which Personal Information may be shared or disclosed is provided throughout this Privacy Statement.

Changes to This Privacy Statement

We may update this Privacy Statement from time to time to reflect changes in our operations, technologies, legal obligations or regulatory requirements.

Where we make material changes, we will take appropriate steps to notify you in advance or at the time of such change. Where required by applicable law, the Operating Agreement with AiGC or regulatory requirements, in case of material changes, we may also require you to review and accept the updated Privacy Statement before continuing to access or use the Operator Offerings. Otherwise, we will notify you about any other minor updates of the policy and we will allow you to review the changes before continuing to our website

The most current version of this Privacy Statement will always be available on our websites and applications.