

PRIVACY POLICY FOR THE VISITORS OF THE WEBSITE

Last update and effective date of this page: May 2022

Last update and effective date of the information on cookies: May 2022

Pursuant to art. 13 of Regulation (EU) 2016/679 (hereinafter the "**Regulation**"), this page describes the methods of processing the personal data of users (the "**Data Subjects**" or "**Users**") who consult the website acme.sisal.com (the "**Site**").

It is specified that this information does not concern other sites, pages or online services that can be reached via hypertext links that may be published on the Site but referring to resources outside the domain or sub-domains of the Site.

Specific information is also published on the pages of the Site prepared for the provision of certain services.

DATA CONTROLLER

The Data Controller (the "**Data Controller**") is **Acme S.r.l.** with registered office in 20159 Milan, Via Ugo Bassi 6, which can be contacted at privacy_sisal@legalmail.it.

DATA PROTECTION OFFICER

The Data Controller has appointed a Data Protection Officer, (the "**Data Protection Officer**" or "**DPO**"). The DPO can be contacted at the following email address: dpo@sisal.it.

CATEGORIES AND TIMES OF CONSERVATION OF THE PROCESSED DATA AND PURPOSE AND LEGAL BASIS OF THE PROCESSING

Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some **personal data whose transmission is implicit in the use of Internet communication protocols**. This category of data includes, for example, the IP addresses or domain names of the computers and terminals used by the Users, the URI / URL (Uniform Resource Identifier / Locator) notation addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the IT environment of the User.

These data, necessary for the use of web services, are also processed for the purpose of:

- a) obtain **statistical information** on the use of services (most visited pages, number of visitors by time or day, geographical areas of origin, etc.);
- b) check the **correct functioning of the services offered**.

The legal basis of these processing is the pursuit of the **legitimate interest** of the Data Controller (Article 6 paragraph 1 letter f) of the Regulation), which is equally balanced with the legitimate interest of the Data Subjects, as the data processing activity personal data is limited to what is strictly necessary for the execution of the operations and other processing indicated in this paragraph. The data will be processed until the legitimate interest of the Data Controller is exhausted, without prejudice to any need to ascertain crimes against the Site or to comply with requests from public authorities and / or supervisory bodies.

Data communicated by the User

The optional, explicit and voluntary sending of messages to the contact addresses published on the Site, **the use of telephone / fax numbers, private messages** sent by Users to the institutional profiles / pages of the Data Controller on social media (where this possibility is provided for), as well as **the compilation and forwarding of the forms on the Site**, entail the acquisition of the sender's contact data, necessary to respond to the requests of the same, as well as all personal data communicated by the Data Subject or requested as part of the compilation of any forms. The data thus

acquired will be processed for the time necessary to respond to the Data Subject's request and will be deleted after 36 months at the latest.

Furthermore, where provided, the User can voluntarily provide the Data Controller with their personal data also by creating their own **account**. The personal data thus provided are collected and processed by the Data Controller to generate and manage the User's account. The data will be processed for the time in which the account is active and deleted following the request for deactivation of the same by the User or, automatically, in case of non-use of the account by the User for a certain period. of time. The legal basis of these processing is the **execution of the request of the Data Subjects** (Article 6 paragraph 1 letter b) of the Regulation).

If the Data Subject requests it, the Data Controller may process the personal data of the same to send him **newsletters and information communications regarding the functioning and characteristics of the gaming services marketed by the Data Controller and by the companies of the Sisal group** (for example, information regarding shares, jackpot, probability of winning, minimum bets, any bonuses offered) **and the existence of new products and / or services related to them**, in compliance with the provisions of the AGCOM Guidelines referred to in resolution no. 132/19 / CONS of 18 April 2019, adopted in implementation of art. 9 of Legislative Decree "Dignity Decree" 12 July 2018, n. 87 converted into Law no. 96. The legal basis of these processing is the **execution of the information service requested by the Data Subject** (Article 6 paragraph 1 letter b) of the Regulation), without prejudice to the possibility at any time for the Data Subjects to withdraw from the service by sending a communication to the contacts referred to in the paragraph "Rights of the Data Subject".

Furthermore, with the specific consent of the Data Subjects, the data may also be processed for the purposes of:

- a) send the Data Subjects **commercial and B2B marketing communications** and regarding the products and services of the Data Controller and of the Group companies (including market research, surveys, etc.);
- b) carry out the **profiling** of the Data Subjects connected to the sending of B2B marketing communications and / or the information communications referred to above. Profiling is carried out by processing some "clusters" (homogeneous groups consisting of profiles that present a degree of correlation), after studying the habits and interests expressed by the Data Subjects through the use of the services available to them.

The data processed in this way will be kept until the consent is revoked by the Data Subject for purpose a) and for a maximum of 24 months from the acquisition, without prejudice to the term of processing as a consequence of the withdrawal of consent by the Data Subject, for purpose b). The legal basis of these processing is the **consent** expressed by the Data Subject to the processing of their personal data for these specific purposes (Article 6 paragraph 1 letter a) of the Regulation).

METHODS OF PROCESSING

The processing of personal data takes place using **IT and telematic tools and, residually, manual**, with logic strictly related to the purposes highlighted above and, in any case, in compliance with the precautions, guarantees and necessary measures prescribed by the reference legislation, aimed at **ensuring the confidentiality, integrity and availability of personal data**, as well as **avoiding damage**, whether material or immaterial (e.g. loss of control of personal data or limitation of rights, discrimination, theft or usurpation of identity, loss financial, unauthorized decryption of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social damage).

COMMUNICATION AND DIFFUSION

For the pursuit of the aforementioned purposes, the Data Controller reserves the right to communicate personal data to recipients belonging to the following categories:

- public authorities and / or supervisory bodies (eg judicial authorities, Customs and Monopolies Agency, Bank of Italy, public security authorities, Financial Investigations Office, etc.);

- other companies of the group to which the Data Controller belongs, or in any case parent companies, subsidiaries or associates, pursuant to art. 2359 of the Italian Civil Code, also located abroad, in the context of the existing intercompany agreements for the management of the activities referred to in the aforementioned purposes;
- subjects who carry out data acquisition, processing, processing and storage services;
- subjects that provide services for the management of the Data Controller's information system and telecommunications networks (including chat and mailing services);
- subjects who carry out assistance activities to the Data Subject;
- professional firms or companies in the context of assistance and consultancy relationships;
- subjects who carry out communication assistance and consultancy activities;
- subjects who carry out operations of control, revision and certification of the activities carried out by the Data Controller;
- subjects who for various reasons succeed the Company in the ownership of legal relationships (eg transferees or potential transferees of goods, credits and / or contracts).

The subjects belonging to the categories listed above operate independently as **separate data controllers**, or as **Data Processors** appointed for this purpose by the Data Controller. The updated list of third parties to whom the data is transmitted is available by sending a request to privacy_sisal@legalmail.it. The data may also be known, in relation to the performance of the assigned tasks, by the Data Controller's **staff**, specifically authorized by the Data Controller for processing.

Personal data, in any case, **will not be disseminated** and, therefore, will not be brought to the attention of indeterminate subjects, in any form, for example by making them available or consulting, without the express consent of the Data Subject, when required. However, Users who use the forums, or other channels, possibly made available by the Data Controller, to publish their contents, including their personal data, on the Site, acknowledge that the information made public can be read, collected and used by part of third parties who have no relationship with the Data Controller, even for sending unwanted messages. The Data Controller declares himself exempt from liability for any improper use that third parties may make of the personal data that Users choose to publish through the aforementioned channels.

TRANSFER OF DATA OUTSIDE THE EU

The Data Controller acknowledges that, for the pursuit of the aforementioned purposes, the personal data of the Data Subjects may be disclosed to subjects located in countries **outside the European Union** for the pursuit of the aforementioned purposes. This transfer will take place solely in the face of the existence of international agreements or adequacy decisions by the Commission (pursuant to Article 45 of the Regulation) or on the basis of the instruments referred to in art. 46 of the Regulations, including the Standard Contractual Clauses or the stipulation of binding corporate rules ("Binding Corporate Rules" or "BCR" pursuant to Article 47 of the Regulation) and the adoption of other measures required by the applicable processing legislation. A copy of any personal data transferred abroad, as well as the list of third countries / international organizations to which the personal data have been transferred, can be requested from the Data Controller at the email address privacy_sisal@legalmail.it.

RIGHTS OF THE DATA SUBJECT

Pursuant to articles 15 to 22, the Regulation confers on the Data Subjects the possibility to exercise specific rights. In particular, the Data Subject can obtain: a) confirmation of the existence of personal data processing concerning him and, in this case, **access** to such data; b) the **correction** of inaccurate personal data and the integration of incomplete personal data; c) the **cancellation** of personal data concerning him, in cases where this is permitted by the Regulation; d) the limitation of processing, in the cases provided for by the Regulation; e) the **communication**, to the recipients to whom the personal data have been transmitted, **of requests for rectification / cancellation** of personal data and for the limitation of processing received from the Data Subject, unless this proves impossible or involves a disproportionate effort; f) the receipt, in a structured format, commonly used and readable by an automatic device, of the personal data

provided to the Data Controller, as well as the transmission of the same to another data controller (so-called data **portability**). The Data Subject also has the right to **object** at any time, for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection, except in the case in which the Data Controller demonstrates the presence of overriding legitimate reasons or to exercise or defend a right pursuant to art. 21 of the Regulation. The Data Subject also has the **right not to be subjected to a decision based solely on automated processing, including profiling**, which produces legal effects concerning him or which significantly affects his person in a similar way, unless this decision: a) is necessary for the conclusion or execution of a contract between the Data Subject and the Data Controller; b) is authorized by the law of the Union or of the Member State to which the Data Controller is subject; c) is based on the explicit consent of the Data Subject. In the cases referred to in the aforementioned letters a) and c), the Data Subject has the right to obtain human intervention from the Data Controller, to express their opinion and to contest the decision. The Data Subject may submit requests to the address privacy_sisal@legalmail.it indicating in the subject "Privacy - exercise of privacy rights", detailing which right he intends to exercise and providing the Data Controller with the information needed to identify him pursuant to Articles 11 and 12 of the Regulations. The Data Subject also has the right to **lodge a complaint with the supervisory authority**, in particular in the Member State in which he habitually resides, works or in the place where the alleged violation has occurred (e.g. the Garante per la protezione dei dati personali in Italy, which can be contacted at the addresses available on the website www.garanteprivacy.it), as required by art. 77 of the Regulation, as well as to **take the appropriate judicial offices** pursuant to art. 78 and 79 of the Regulation.

NATURE OF THE PROVISION

Except for what is specified on **navigation data, the failure to provide it makes it impossible for the Data Controller to follow up on the interaction with the Site by the Data Subject and, for the Data Subject, to use the Site and all its features**, the User is **free to provide** their personal data to use the features and services made available in the Site. The only consequence deriving from the failure to provide such data will be the impossibility for the Data Subject to use the related services, without this entailing any consequence injurious.

UPDATE OF THIS PAGE

The Data Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained herein so as to stay updated with respect to any changes that have occurred since the last consultation.