

Website Privacy Notice

**CopyBet (EU) Ltd**  
**Website Privacy Notice**  
**Last Updated: 30 November 2023**

## Document Control

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### Document Release:

This document remains the property of CopyBet (EU) Ltd. Release to regulatory authorities is permitted as required. Release to other organisations or individuals may only be authorised by CopyBet Directors.

## **Introduction**

The website is managed by CopyBet (EU) Ltd. We are a limited company registered in Cyprus under registration number HE387170 and we have our registered office at 22A Agias Zonis, Floor 1, Flat/Office 101, Limassol, 3027, Cyprus.

CopyBet (EU) Ltd, and its affiliates, subsidiaries and related entities including CopyBet UK Ltd (“CopyBet”, “us”, “we”, “our”) are committed to protecting the privacy and security of the Personal Data we collect about end customers and users of our services (“you/your”).

Unless we notify you otherwise, we are the controller of the Personal Data (defined below in the ‘What is Personal Data’ section) we process about you. This means that we decide what Personal Data to collect and how to process it.

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it when you visit this website (our “Website”) and our mobile, tablet and other applications. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘Contact us’ section.

## **Who this privacy notice applies to**

This privacy notice applies to you if:

1. You visit our Website
2. You enquire about our products and/or services
2. You sign up for our products, services, and/or our betting platform
3. You are an existing customer
4. You contact us by email, telephone or by using our online contact form
5. You sign up to receive newsletters and/or other promotional communications from us

## **What is Personal Data**

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by an identifier such as your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

## Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you.

We collect and process the following categories of Personal Data about you:

Type of Personal Data	Categories of Personal Data included
Registration Information	Information we require you to provide us when you register an account with CopyBet such as your name, sex, date and place of birth, postal address, email address, contact number, security information, nationality, ID, photo, passport data, marketing preferences and any other information we may request from you as part of the registration process.
Contact Information	Your name, date of birth, postal address, email address, phone number or social media channels.
Verification & Know Your Customer Documentation	Information to enable us to verify your identity. We may request that you provide documents such as a copy of your driver's licence or passport, documentation that confirms your address such as bank statements or utility bills, or any other information we deem necessary to confirm your age and/or identity.
Publicly Available Information	Information from publicly available sources such as social media platforms.
Account Information	Information required or which we may request from you for the continued use of our Website, platforms, products and/or services.
Cookie & Tracking Information	For information about our use of cookies and similar technology, please see our <a href="#">Cookie Policy</a> .
Platform Activity	Information on how you use our Website such as pages visited and engaged with, content viewed, links and buttons clicked.
Betting & Transaction Information	Your betting, gaming, deposits, Payment Information (see below) and other account transactions.
Correspondence	Your telephone, postal, website, social channel, email and/or other communications with us including through chat and message functions on our Website or through social media channels.
Device Information	Information related to the browser or device you use to access our Website.
Server Logs & Traffic Information	Information collected during your visits to our Website and your Internet Protocol (IP) address, login data, browser type and version, device type, time zone setting, browser plug-in types and versions, operating system and platform.
Payment Information	Information such as your credit/debit card details, bank account details, transaction history, deposits and/or withdrawals history and other data necessary for processing payments and fraud prevention, including security code numbers and other related billing information.

For the purposes and legal bases we rely upon for each type of Personal Data, see the table below in the section entitled 'Purposes for which we use Personal Data and the legal bases'.

## How we collect your Personal Data

We collect most of the Personal Data directly from you by telephone, text or email and/or via our Website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists;
- others to whom you have provided consent;
- other betting partners;
- publicly available sources such as social media platforms;
- sub-contractors in technical, payment and delivery services;
- advertising networks;
- analytics providers; and
- search information providers.

## Purposes for which we use Personal Data and the legal basis

When providing services to you, we may use your Personal Data for the following purposes and on the following lawful bases:

Purpose	Type of Personal Data	Lawful Basis for Processing
To register you onto our platform, confirm your identity and contact details, and deliver our services in accordance with the terms and conditions.	Registration Information.	Performance of a contract. Legal and Regulatory Obligations.
For responding to correspondence from you (through our Website, email, social channels or by any other means).	Registration Information. Contact Information.	Legitimate Interests. It is in our legitimate interest to respond to enquiries made via our Website, by email, through our social channels or any other means.
To verify your age, ensuring that underage accounts are not set up.	Registration Information. Verification & Know Your Customer Documentation.	Performance of a contract. Legal and Regulatory Obligations.

Purpose	Type of Personal Data	Lawful Basis for Processing
	Publicly Available Information.	
To perform affordability and/or anti money laundering checks.	Registration Information. Verification & Know Your Customer Documentation.	Performance of a contract. Legal and Regulatory Obligations.
To detect and prevent fraud	Registration Information. Account Information. Cookie & Tracking Information. Platform activity.	Performance of a contract. Legal and Regulatory Obligations.
For information security and loss prevention purposes (for the protection of our privacy, rights, interests, business, safety, property and/or those of another person).	Registration Information. Betting & Transaction Information. Correspondence. Device Information.	Legitimate Interests. It is in our legitimate interests to protect our privacy, rights, interests, business, safety, property and/or those of another person. Legal and Regulatory Obligations.
For Financial Reporting & Analysis (maintaining financial records in accordance with the law).	Registration Information. Betting & Transaction Information.	Legal and Regulatory Obligations.
To analyse customer behaviour to improve our services, products and/or platform.	Registration Information. Betting & Transaction Information.	Legitimate Interests. It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our products/platform.
For diagnostics, research and development (diagnosis of faults, maintenance of our	Device Information. Server Logs & Traffic Information.	Legitimate Interests. It is our legitimate interest to allow analytics and technical providers to help test and analyse our systems/products/platform.

Purpose	Type of Personal Data	Lawful Basis for Processing
systems, testing and analysis of the Website and platform).		
To process payments, payment methods, deposits and/or withdrawals.	Registration Information. Payment Information. Cookie & Tracking Information. Device Information.	Performance of a contract.
To send you information about our platform or product/service information which may be of interest.	Registration Information. Contact Information.	<p>We rely on your consent to receive marketing communications from us or if you are an existing or past customer, we rely on our legitimate interests to contact you for marketing purposes to promote our products and services.</p> <p>If we send you a marketing email or text message, it will include instructions on how to opt out of receiving future marketing messages. If you opt-out, your contact moves first to the Inactive Contacts list immediately. Take note that after this, the contact stays in the system for 60 days, and after this time we fully remove it from the system.</p> <p>If you wish to opt out of receiving push notifications on your device, you can do so by updating your notification settings on your device.</p> <p>You may also opt out of receiving marketing communications from us at any time by changing your preferences in your account settings on the Website.</p> <p>You may object to the processing of your Personal Data for marketing purposes by emailing <a href="mailto:dpo@copybet.com">dpo@copybet.com</a> or contacting us through the details in the 'Contact us' section below.</p>

Purpose	Type of Personal Data	Lawful Basis for Processing
		If you have consented to receiving marketing communications from us, that consent may be withdrawn at any time by emailing <a href="mailto:dpo@copybet.com">dpo@copybet.com</a> , contacting us through the details in the 'Contact us' section below or using the unsubscribe option in the communication.
To provide you with enhanced betting services and products.	Registration Information. Information from Betting Partners.	We process this information with your consent.
Improving our Website and the overall visitor and user experience of our Website.	Cookie & Tracking Information.	We use cookies on our Website with your consent.

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Where we have relied upon our legitimate interests to process your Personal Data, we have carried out a balancing test in advance of any such processing. For further information about any such balancing test, you can contact us using the information provided below under the 'Contact us' section.

## Cookies

We use cookies on our Website.

This helps us to provide you with a good experience when you browse our Website, allows us to improve our Website, and understand how you interact with us.

For detailed information on these cookies, the way we use them, your rights and choices about cookies, and the purposes for which we use them, please see our [Cookie Policy](#).

## Sharing your data

As we are part of the CopyBet Group, we may share your information with other companies within our group and also disclose your information to third parties in connection with the purposes set out in this privacy notice. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf for the purposes set out above (Neteller, Skrill, Ecommpay, Apple, Google for example)



- advertisers, social media platforms, and advertising networks
- analytics and search engine providers
- IT service providers

We may also share Personal Data from customers in the European Union (“EU”) with our KYC (Know Your Customer) checking provider, Sumsb, and with our marketing and emailing platform, GetResponse.

This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy policy of every website you visit.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider necessary to protect the rights, property or safety of CopyBet, its personnel, users or others.

## International Transfers

We process your Personal Data within the European Economic Area (“EEA”) and the United Kingdom (“UK”). Where we transfer your Personal Data to the UK, we rely on the decision of the European Commission, which has confirmed the UK provides an adequate level of protection for personal data (an “adequacy decision”). You can [view this adequacy decision here](#).

It is unlikely that we will ever share your Personal Data outside the EEA or UK. However, if it becomes necessary for the purposes of providing our services to you, we will only share it with organisations in countries benefiting from an adequacy decision or where we have taken appropriate steps to ensure that the Personal Data processed has an essentially equivalent level of protection to that guaranteed in the EU. We do this by ensuring that:

- Your Personal Data is only processed in a country subject to an adequacy decision from the European Commission; or
- We enter into Standard Contractual Clauses (“SCCs”) with the receiving organisations and adopt supplementary measures, where necessary. (A model form of the SCCs can be found here [Standard Contractual Clauses \(SCCs\)](#)).

We will inform you about any such transfer of your Personal Data by updating this privacy notice, by reference to (i) the categories of Personal Data transferred, (ii) the territory to which they are transferred; and (iii) the mechanism used to safeguard any such transfer.

## How long we keep your data

We will retain your Personal Data for as long as is necessary to provide you with our services for a reasonable period thereafter to enable us to meet our contractual and legal obligations (such as applicable laws and regulations concerning gambling and gaming, anti-money laundering, audit requirements and taxation) and to deal with complaints and claims.

At the end of the retention period, your Personal Data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

If you want to know how long we store specific types of Personal Data, please see our Data Retention Policy and Schedule.

## How we protect your data

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction.

We have added SSL certificates to our Website to secure online transactions and to keep customer information private. This technology creates an encrypted link between the web server and web browser, therefore guaranteeing the safety of your information. SSL technology safely protects information from being captured by third parties.

We also rely on access control, regular monitoring, and backup of our systems to guarantee the safety, integrity, and availability of the Personal Data we hold. In addition, we also implement the appropriate organisational policies and procedures to ensure information safety is embedded in our activities.

We constantly improve our safety technologies to protect the system from unauthorized access and to make it impossible to use our database without permission.

In addition to the technical and organisational measures we have put in place, there are simple things you can do to in order to further protect your personal information, such as:

- Never share One Time Passcodes (OTPs).
- Never enter your details after clicking on a link in an email or text message.
- Always send confidential information by encrypted email to reduce risk of interception.
- If you're logged into any online service do not leave your computer unattended.
- Close down your internet browser once you've logged off.
- Never download software or let anyone log on to your computer or devices remotely, during or after a cold call.
- You can easily identify secure websites by looking at the address in the top of your browser which will begin `https://` rather than `http://`.

## Your data protection rights

CopyBet would like to make sure you are fully aware of your rights. We will always ensure, no matter where you are located in the world, that we adhere to and fully respect your data protection rights.

You have the following rights if you are located in the EU:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their Personal Data.
Right of access	Individuals have the right to receive a copy of their Personal Data, and other supplementary information.
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete.
Right to erasure (the 'right to be forgotten')	Individuals have the right to request their Personal Data to be erased, in certain circumstances.
Right to restrict processing	Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular: <ul style="list-style-type: none"> <li>• if your Personal Data is not accurate;</li> <li>• if your Personal Data has been used unlawfully but you do not want us to delete it;</li> <li>• if your Personal Data is no longer needed, but you want us to keep it for use in legal claims; or</li> <li>• if you have already asked us to stop using your Personal Data but you are waiting to receive confirmation from us as to whether we can comply with your request.</li> </ul>
Right to data portability	You have the right to obtain and reuse their Personal Data, which they have provided, in a machine-readable format, for their own purposes across different services, in certain circumstances.
Right to object	<p>You have the right to object to the processing of your Personal Data, in certain circumstances.</p> <p>Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way.</p> <p>Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so.</p> <p>For more information on the legitimate interests we rely upon and how to manage your marketing preferences, please see the section "Purposes for which we use Personal Data and the legal basis" above.</p>
Rights with respect to automated decision-making	You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

In addition to the above, an individual also has the following rights:

Rights	Description
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Right to withdraw consent (if applicable)	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
Right to lodge a complaint with a supervisory authority	You have the right to raise a complaint about how we handle your Personal Data in the country that you reside in or, the country of your place of work or the country where the alleged infringement took place. Please <a href="#">click here</a> for contact details of the supervisory authorities in the EEA.

### **Exercising your data protection rights**

You will not have to pay a fee to access your Personal Data (or to exercise any of the other data protection rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to act on the request in such circumstances. If you wish to exercise any of your data protection rights, please email [dpo@copybet.com](mailto:dpo@copybet.com).

### **Children's Privacy**

We do not market our products or services to children, and we do not knowingly collect their Personal Data. If we learn that a child has provided us with their Personal Data, we will securely and permanently delete it, in accordance with applicable law.

If you are a parent or guardian and you are aware that your child has provided us with their Personal Data, please contact us via the details below.

### **Contact us**

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us using the details below:

CopyBet (EU) Ltd  
22A Agias Zonis,  
Floor 1, Flat/Office 101,  
Limassol, 3027,  
Cyprus

Alternatively, you can email us at [dpo@copybet.com](mailto:dpo@copybet.com).

We have also appointed a Data Protection Officer ("DPO"). Our DPO is Evalian Limited and can be contacted by using the above email or postal address.

### **Changes to this privacy notice**

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 30 November.