

PRIVACY POLICY

Effective Date: May 25, 2018

1. Introduction

Handfree Trading Limited ("we", "our" or "us") develops, publishes and operates this site, its subdomains and related features (the "Site").

This Privacy Policy describes how we collect, store, use and disclose your personal data, and it applies whenever you visit our Site or any of the casino games available therein, or otherwise use and of our services (the "Services").

Specifically, it describes the personal data we typically receive or collect, how and for which purposes we may use such data, where we store and for how long we retain it, with whom we may share it, our use of communications and tracking technologies, our security practices, your choices and rights regarding such data, our policy concerning children, and how to contact us if you have any concerns regarding your Privacy or this Policy.

You are not legally required to provide us with any personal data, but we are required under gambling laws and regulations to collect certain data in order to allow you to play at Casino Crazy (as further described below). This is necessary to verify the identity of our players and to protect them, as in order for you to make use of this site. If you do not want to provide us with such data, you are free to avoid registering on this site.

Please read this Policy and make sure that you fully understand and agree to it. If you don't, then you should not be using our Services.

2. Data Collection

We collect three main categories of data (and to the extent it enables the identification of a specific person, or is linked to such identifying data, we will deem it as "Personal Data"):

1. Data automatically collected: when someone visits, interacts with or uses our Services, including any e-mail or text messages sent to them by us or via our Services, we may

collect or generate technical data about them. We collect or generate such data either independently or with the help of third party services.

Such data consists of connectivity, technical or aggregated usage data, such as IP address, non-identifying data regarding a device, operating system, browser version, and user activity on our Services.

We do not use such data to learn a person's true identity or contact details, but mostly to have a better understanding on how our users typically use and engage with our Services. It also helps us to improve our marketing and advertising operations (including our ad management and delivery processes, e.g. so we could provide you with a more effective and optimized ad viewing experience), and to improve the overall performance and your user experience of our Services.

2. Data received from you: you may provide us Personal Data voluntarily, such as when you register for a player account on our Services (and provide us with your identity and contact details, scanned documents, financial statements and additional information as necessary to set up your account and verify your identity and eligibility to play at our casino), when you contact us (through phone, e-mail or any other channel), or when you provide us your e-mail address (such as when you sign-up to receive e-mail updates), when you make any deposits or withdrawals, and when you play at our casino.

3. Transaction Data: Deposits will typically be processed by the relevant payment processing and gateway services, and we will not collect or store your financial data, e.g. your full credit card numbers or bank account. We may still however receive your bin number and non-financial Personal Data related to the deposit, such as your name, billing address, e-mail address and the amount deposited, in order to process your deposit and for our accounting purposes.

3. Data Uses

We use your Personal Data as necessary for the performance of our Services, in accordance with our Terms & Conditions and Privacy Policy, and for complying with applicable law. We may also use it based on our legitimate interests in maintaining and improving our Services and offerings, understanding how our Services are used, serving effective advertisements, improving our customer service and support operations, and protecting and securing our Services, ourselves and our players.

Accordingly, we use Personal Data for the following purposes:

To facilitate, operate, and provide our Services;

To develop, customize and enhance the Services and your user experience;

To authenticate the identity and verify the eligibility of our players, and allow them access to additional features;

To facilitate and improve our data security measures, and prevent and mitigate fraud or any illegal or prohibited activity;

To provide our visitors and players with customer care, assistance and technical support services;

To manage and deliver advertisements more effectively, including contextual and behavioral advertising based on your activity;

To contact our users (via e-mail, phone, text messages or any other available channels) with general or personalized service-related messages (such as deposit confirmations, billing issues or system maintenance notices); to contact our users with promotional messages (such as updates, bonuses, new features etc.); and to facilitate, sponsor and offer certain events and promotions;

To comply with any applicable laws and regulations;

To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our business partners may use to provide and improve our respective services.

4. Storage and Retention

Your Personal Data may be maintained, processed, accessed and stored by us and our authorized affiliates and Service Providers in various jurisdictions, as necessary for the proper delivery of our Services, or as may be required by law. We have taken reasonable steps to secure and protect your Personal Data which is handled by our affiliates and Service Providers.

We may retain your Personal Data as reasonably necessary to maintain and expand our relationship and to provide you with our Services, as well as for legal and accounting purposes, in accordance with our Data Retention Policy. If you have any questions about our Data Retention Policy, please contact us at privacy@hftltd.com.

5. Data Sharing

We may share your data with certain third parties, including law enforcement agencies, our service providers and our affiliates— but only in accordance with this policy:

Service Providers and Business Partners: We may engage selected third party companies and individuals to perform services complementary to our own (e.g. hosting and server co-location services, data analytics services, marketing agencies and advertising services and tools, data and cyber security services, fraud detection and prevention services, payment processing services, user engagement services, e-mail distribution and monitoring services, session recording, remote access services, and our business, legal, financial and privacy advisors) (collectively, "Service Providers"). These Service Providers may have access to your Personal Data, depending on each of their specific roles and purposes in facilitating and complementing our Services, and may only use it for such purposes. We remain responsible and liable for any Personal Data processing done by Service Providers on its behalf, other than for events outside of its reasonable control.

Legal Disclosures: We may disclose or allow government and law enforcement officials access to certain Personal Data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations, including for national security purposes. Such disclosure or access may occur with or without notice to you, if we have a good faith belief that we are legally compelled to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.

Protecting Rights and Safety: We may share your Personal Data with others, with or without notice to you, if we believe in good faith that this will help protect the rights, property or personal safety of Handfree Trading LTD, any of our users or any members of the general public.

Our Subsidiaries and Affiliated Companies: We may share Personal Data internally within our family of companies, for the purposes described in this Policy. In addition, we can share Personal Data in case of change in control, including by means of merger, acquisition or purchase of substantially all of our assets, with the parties involved. If we believe that such change in control might materially affect your Personal Data, we will notify you of this event and the choices you may have via e-mail and/or prominent notice on our Services.

We may share your Personal Data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have rendered such data non-personal and anonymous. We may transfer, share or otherwise use non-personal data in our sole discretion and without the need for further approval.

6. Communications

Service Communications: we may contact you with important information regarding our Services. For example, we may notify you (through any of the means available to us) of changes or updates to our Services, billing matters, password changes, etc. You will not be able to opt-out of receiving such service communications.

Promotional Communications: we may also notify you about new services, events and special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g. phone, mobile or e-mail), through the Services, or through our marketing campaigns on any other sites or platforms.

If you wish not to receive such promotional communications, you may notify us at any time by e-mailing us at privacy@hftltd.com or by following the "unsubscribe", "stop" or "change e-mail preferences" instructions in the promotional communications you receive.

7. Cookies and Tracking Technologies

Our Services and some of our Service Providers use “cookies”, anonymous identifiers and other tracking technologies which help us provide and improve our Services, personalize your experience and monitor the performance of our activities and campaigns, as well as the usage of our Services as a whole.

A “cookie” is a small text file that is used, for example, to collect data about activity on our Site. Some cookies and other technologies serve to recall Personal Data, such as an IP address, previously indicated by the user. While we do not change our practices in response to a “Do Not Track” signal in the HTTP header from a browser or mobile application, most browsers allow you to control cookies, including whether or not to accept them and to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

8. Data Subject Rights

If you wish to exercise your rights under applicable law (e.g. the EU GDPR) to request access to and rectification or erasure of your Personal Data held with us, or to port such Personal Data – please contact us at privacy@hftltd.com.

Please note that if you contact us by e-mail, we may require additional information, including certain Personal Data, in order to authenticate and process your request.

9. Data Security

In order to protect your Personal Data held with us and our Service Providers, we are using industry-standard physical, procedural and electronic security measures, including encryption where deemed appropriate. However, please be aware that regardless of any security measures

used, we cannot and do not guarantee the absolute protection and security of any Personal Data stored with us or with any third parties as described in Section 5 above.

10. Children

Our Services are not for children under the age of 18. We do not knowingly collect Personal Data from children and do not wish to do so. If we learn that a child is using the Services or playing in our casino, we will prohibit and block such use and will make all efforts to promptly delete any Personal Data stored with us with regard to such child.

If you believe that we might have any such data, please contact us at privacy@hftltd.com.

11. Additional Notices

Updates and amendments: We may update and amend this Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the published effective date. We will provide a 10-days' prior notice if any substantial changes are involved, via any of the communication means available to us, or on the Services. After this notice period, all amendments shall be deemed accepted by you.

Questions, Concerns or Complaints: If you have any comments or questions about this Privacy Policy or if you have any concerns regarding your Privacy, please contact us at privacy@hftltd.com. Our Data Protection Officer can be reached at dpo@hftltd.com. Our "Representative" in the EU pursuant to Article 27 of the GDPR is Handfree Trading Limited. They may be contacted on EU Privacy matters at privacy@hftltd.com. If you reside in the EU, you also have the right to file a complaint with the supervisory authority in your member state.