

## **PRIVACY NOTICE**

### **Introduction**

Allwyn ("we" or "us" or "our") respects the privacy of our users ("user" or "you"). This Privacy Notice explains how we collect, use, disclose, and safeguard your information when you visit our website <https://www.allwynentertainment.com/>, including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the "site"). Please read this Privacy Notice carefully. If you do not agree with the terms of this Privacy Notice, please do not access the site.

We reserve the right to make changes to this Privacy Notice at any time and for any reason. We will alert you about any changes by updating the "Last Updated" date of this Privacy Notice. Any changes or modifications will be effective immediately upon posting the updated Privacy Notice on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Notice to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Notice by your continued use of the Site after the date such revised Privacy Notice is posted.

If you have any questions regarding your information or this notice, you can reach us anytime at [privacy@allwynent.com](mailto:privacy@allwynent.com).

### **What this Privacy Notice Covers**

This Privacy Notice covers how we treat Personal Data that we gather when a user accesses or uses our Site.

"Personal Data" means any information that identifies or relates to a particular individual such as your name, email address, and company name, that you voluntarily give to us through an email sign up. Personal Data also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations.

This Privacy Notice does neither cover the practices of companies we don't own or control or people we don't manage, nor use of anonymised data, as it cannot be used to identify a natural person.

### **Personal Data and Information We Collect**

We may collect information about you in a variety of ways. The information we may collect on the Site includes:

#### **Personal Data Obtained Directly from You**

As we do not collect Personal Data (eg. first and last name, email, phone number, or any categories of data comprising to personal information or personally identifiable information, as defined by applicable laws) from the users proactively, we generally obtain your Personal Data from you (usually through an email signup). You are under no obligation to provide us with personal information of any kind, however certain features of the Site may be available only to the registered users or users who have actively signed up for those.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

### **Derivative Data**

Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site. If you are using our mobile application, this information may also include your device name and type, your operating system, your phone number, your country, your likes and replies to a post, and other interactions with the application and other users via server log files, as well as any other information you choose to provide.

### **Data that is Not Personal Data**

We may create aggregated, de-identified or anonymized data from the Personal Data we collect including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Site and promote our business, provided that we will not share such data in a manner that could identify you.

### **Use of your information**

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the Site to:

- Deliver you an Investor Email Alert or Investor newsletter.
- Deliver you other targeted newsletters, and other information regarding us and the Site to you.
- Monitor and analyze usage and trends to improve your experience with the Site.
- Increase the efficiency and operation of the Site through compiling an anonymous statistical data and analysis (for use internally or with third parties).

### **Subscribing and unsubscribing from Investor Email Alerts and Investor Newsletters**

To opt-in for investor email alerts, you have to enter your email address in the respective opt-in form and select at least one alert option (you can sign up for additional alert options at any time). After submitting your request, you will receive an activation email to the requested email address. You must click the activation link to complete your subscription.

By completing your subscription, you are providing consent to us to send you the requested Investor Email Alert updates and Investor Newsletters.

To opt-out of Investor Email Alerts and Investor Newsletters, you have to enter your email address in the respective opt-out form. After submitting your email, you will receive a confirmation email to the requested email address. You must click the confirmation link to complete your request to unsubscribe. You will be removed from all investor relations email alerts to which you are subscribed.

The Investor Email Alerts and Investor Newsletters service is operated through mailing services located in the United States ("U.S").

If you experience any issues with the subscription / opt-out process, please contact us for further assistance.

If you no longer wish to receive correspondence, emails, or other communications related to us from third parties, you are responsible for contacting the third party directly.

### **Disclosure of your information**

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

- **Investor Communications**  
With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for investor relations purposes, as permitted by law.
- **By Law or to Protect Rights**  
If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.
- **Third-Party Service Providers**  
We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, technology and communication services, security and fraud prevention services, customer service, and marketing assistance.
- **Affiliates**  
We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Notice. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
- **Other Third Parties and Eligible Users**  
We may share your information with our advisors for the purpose of conducting general business analysis, as permitted by law.

### **Tracking technologies**

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site [and our mobile application] to help customize the Site and improve your experience. For more information on how we use cookies, please refer to our Cookie Policy posted on the Site. By using the Site, you agree to be bound by our Cookie Policy.

## **Security of your information**

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

## **Allwyn's European Union Data Subject Rights' Statement**

This part of the Privacy Notice is focused on European Personal Data and addresses the applicable European Data Protection Laws. For the purpose of this Privacy Notice, Europe (EU) and European mean the European Economic Area, the United Kingdom and Switzerland.

If there are any conflicts between this section and any other provision of this Privacy Notice, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether the following applies to you, contact us at [privacy@allwynent.com](mailto:privacy@allwynent.com).

### **EU Data Subject and Data Controller**

If you are a resident of the EU as defined above, you may have additional rights under the applicable European Data Protection Laws with respect to your Personal Data, as outlined below.

Allwyn will be the controller of your Personal Data collected and processed in connection with your use of the Services. Note that we may also process Personal Data of our customers' end users in connection with our provision of certain services to customers, in which case we are the processor of Personal Data. If we are the

processor of your Personal Data (i.e., not the controller), please contact the controller party in the first instance to address your rights with respect to such data.

### **Personal Data We Collect**

Please refer to the "Personal Data and Information We Collect" section in this Privacy Notice on the Personal Data we collect from you.

### **Personal Data Use and Processing Grounds and Sharing of Personal Data**

Please refer to the "Use of your information" and "Subscribing and unsubscribing from Investor Email Alerts and Investor Newsletters" sections in this Privacy Notice on how we use your Personal Data.

Please note that we will only process your Personal Data if we have a lawful basis for doing so.

The "Disclosure of your information" section in this Privacy Notice details how we share your Personal Data with third parties.

### **EU Data Subject Rights**

Where applicable, you have certain rights with respect to your Personal Data, including those set forth below:

- **The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- **The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.
- **The right to object.** You have the right to object to our processing of your Personal Data.
- **The right of restriction.** You have the right to request that we restrict the processing of your personal information.
- **The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- **The right to withdraw consent.** You also have the right to withdraw your consent at any time where Allwyn relied on your consent to process your personal information.
- **Right to File Complaint.** You have the right to lodge a complaint about Allwyn's practices with respect to your Personal Data with the supervisory authority of your country or relevant EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

For more information about these rights, or to submit a request, please email us at [privacy@allwynent.com](mailto:privacy@allwynent.com).

In some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law. In those circumstances, we will still respond to notify you of such a decision.

In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

### **Transfer of Personal Data**

Allwyn and its service providers may store, transfer or process information outside of the EU.

For instance, this Site is hosted in the U.S. through Cloudflare.

The Investor Email Alerts and Investor Newsletters service is operated through mailing services, Mailchimp, and their servers are located in the U.S.

If you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Site, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, may be hosted on U.S. servers.

Where we transfer your Personal Data outside of the EU, we take certain steps to ensure that your Personal Data receives the same level of protection as if it remained within the EU. We will only transfer your Personal Data to countries where it is permitted pursuant to an adequacy ruling by the relevant regulator(s). Where such adequacy ruling is not in place, we will contract with service providers on terms and conditions that are approved by the relevant regulator(s) to provide an adequate level of protection to EU Personal Data.

### **Whistleblowing Service**

Allwyn (specifically, Allwyn AG, Allwyn International a.s., Allwyn Services Czech Republic a.s., and Allwyn Services UK Ltd) operate a whistleblowing service to foster high standards of ethical behaviour and maintain public confidence in our business. Our purpose is to investigate your disclosures and take action. Allwyn use an independent service provider called WhistleB Whistleblowing Centre AB to give you access to a confidential online reporting tool. Their terms of use can be read [here](#). Data is hosted within the EU. The lawful basis Allwyn rely on to process whistleblowing reports is compliance with legal obligations or legitimate interests, as applicable. Allwyn will treat your Personal Data in accordance with applicable data protection laws. You have certain rights under applicable data protection laws, however, the exercise of these rights may be subject to limitations on a case-by-case basis, for instance, to protect the rights and freedoms of others involved in the whistleblowing process or other legitimate reasons.

### **Contact us**

If you have questions or comments about this Privacy Notice, please email us at [privacy@allwynent.com](mailto:privacy@allwynent.com).

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