

Betonalfa Privacy Policy, Document 2. License No. A005 / B005

Last updated on 20/02/2024.

At **BET ON ALFA LTD (National Betting Authority License Number A005 & B005)**, as the data controller of your personal information, we care about the protection of privacy and the security of your personal data and we take measures to ensure that your personal data receives the proper processing while in our possession and when disclosed to other individuals or entities.

This policy explains when and why we collect personal data for individuals visiting our website as well as for individuals in general. It outlines how we use this data, the terms under which we may disclose it to third parties, and how we ensure its secure retention.

It is possible for us to change this policy from time to time. When we do so, we will display a relevant notification regarding the change on our main website and we will ask you to visit the website and ensure that you are satisfied with any alterations. Regarding the information we collect related to our general operations, whether you have used our website or not, you can contact our Data Protection Officer (contact details provided below) in case you are not satisfied with any changes to our Privacy Policy.

In compliance with the Law of 2018 (Law 125(I)/2018) on the Protection of Natural Persons with regard to the Processing of Personal Data and on the Free Circulation of such Data , in force since 31/7/2018, and Regulation 679/2016 of the EU on the Protection of Personal Data, our company has appointed a Data Protection Officer (DPO). In case you have any questions regarding this Privacy Policy or any inquiries or complaints about the handling of your personal data, you can contact our DPO as follows:

Dr. Christiana Markou, Address: Amhipoleos 2, Office 201, 2025 Strovolos, Nicosia, Cyprus,
Phone: 22377863, Fax: 22377860, Email: dpo@betonalfa.com.cy

This Privacy Policy is in effect as of 20/02/2024.

About us:

BET ON ALFA LTD (HE 237951) is a Cypriot company established in 2009, holding Class A and Class B licenses from the National Betting Authority of Cyprus. The company offers odds for various sports, both online and in physical shops across the entire Republic of Cyprus. Bet on Alfa Ltd provides a wide range of pre-game and live betting options for popular sports such as football, basketball, tennis, cricket, rugby, Formula 1, as well as special bets related to events like the World Cup, the UEFA European Football Championship, and the Eurovision Song Contest.

BET ON ALFA LTD

Kennedy Avenue 70, 1st floor, Nicosia, P.O. Box 1076, Cyprus

Phone: 22558589

Email 1: support@betonalfa.com

Email 2: hr@betonalfa.com

Websites: <https://www.betonalfa.com/> ; <https://www.betonalfa.com.cy/intro/betonalfa/>

How do we collect information from you?

Personal data about you is collected when you use our website, for example, when you contact us with a request, question, or complaint, when you register to receive information from us, or when you create a player account or place bets on our website.

Information about you is also collected while you are using our website, even if you do not engage in any of the aforementioned activities, simply by browsing our site and clicking on the links displayed. This information is automatically recorded in the server logs of the website and/or through cookies, as explained below Privacy Policy. Your activity on our Facebook page, our Instagram profile, and LinkedIn is also recorded in a similar way. Additionally, we collect information about you when you like, share, or comment on our Facebook page, our Instagram profile, or LinkedIn, or when you send us a message on Facebook, Instagram, LinkedIn, or any other means of remote communication.

We also collect any other information you provide to us by completing and submitting forms, such as when you submit your coupon (betting slip) or when you bet or win more than 2,000 euros or create a player account at one of our agencies or stores. Please note that your personal data on the forms for new players and/or forms for bets equal to or exceeding 2,000 euros are collected and processed due to our legal obligation in accordance with Article 6(1)(g) of Regulation (EU) 2016/679 and under the provisions of the Law on the Prevention and Suppression of Money Laundering from Illegal Activities for the purpose of preventing the legalization of proceeds from illegal activities and the financing of terrorism, as provided in paragraph 7.4.3 of Directive 15.2023 of the National Betting Authority, and is explained within the forms themselves and further below in Privacy Policy.

Personal data about you is also collected when you are one of our members or registered players, when we need to pay you a winning coupon and when you communicate with us by submitting requests, questions, or complaints, or by any means of remote communication.

What kind of information is collected from you?

The personal information we collect may include your name, date of birth, passport or ID card number, phone number, address, email address, IP address, IBAN account, passport or ID card copies, and, if applicable, the payment method you use. Additionally, we may collect information about the pages you have visited on our website, when and which bets you have placed, your deposits, how much money you have won, or withdrawn from your account, and, in general, your betting activity on our website.

We may also collect information about you when you choose self-exclusion. In such cases, we record this specific event and the details of your self-exclusion request, including the time it is applied.

Any other information you provide us by completing and submitting forms on our website or on our Facebook page, Instagram profile, or LinkedIn is also collected. This includes questions, instructions, ratings, comments, requests, or complaints. If you like our Facebook page, follow us

on Instagram or LinkedIn, we collect your name on Facebook, Instagram, and LinkedIn, as well as any likes, views, or comments you make in connection with posts on these social media platforms. We also collect anonymous statistics about how users engage with them, as provided by Facebook, Instagram, and LinkedIn.

We also collect any other information you provide to us in general when you communicate with us in the manner described in the previous section of Privacy Policy.

When you make a payment on our website, we do not collect or retain your credit card details or other payment information. We only collect minimal information, such as the first 4 and last 6 digits of your credit card for identification and customer service purposes. This information is collected by third-party payment service providers we collaborate with for this purpose, such as Sage, Nuvei, Ecommpay, Skrill, Neteller, Oktopay, and Paysafecard. We believe that these providers are data processors themselves and are subject to all requirements of the General Data Protection Regulation. For more information about these providers and the arrangements between us, please refer to the Privacy Policy below.

We have reviewed all our forms to ensure that we collect and process only the information that is absolutely necessary for the intended purpose, as determined or evident to you or required by law, thus avoiding excessive or unnecessary processing.

How is your information used?

We use your information in accordance with **Article 6(1)(a)**, i.e. for the purposes you have consented to, **Article 6(1)(b)**, i.e. the processing is necessary for the conclusion and execution of a contract with you, **Article 6(1)(c)**, that is, for the purposes of compliance with our legal obligations (such as tax legislation, payment of taxes and contribution to the National Betting Authority, as provided in the Betting Law (Law 37(I)/ 2019) and the Law on the Prevention and Suppression of Money Laundering from Illegal Activities of 2007 (188(I)/2007), and **Article 6(1)(f)**, that is, for the purposes of the legal interests we pursue as a business.

We provide more details below to help you understand exactly how we use your information.

We use your information for the following purposes:

Article 6(1)(b):

- To respond to orders, place bets, suggestions, requests, or questions submitted by you, or when we communicate with you, as further explained below.
- To process or consider orders or submissions for bets that are placed and submitted by you.
- To set up, operate, and manage the player account you create.
- To pay out any winning bets.

- To fulfill our obligations arising from any contracts entered into between you and us or to take steps to enter into such a contract.

Article 6(1)(c):

- To confirm the validity of your identity, your age, and your email address.
- To comply with or respond to the requirements of the National Betting Authority or, in general, with our obligations arising from laws related to betting services, the legalization of income from illegal activities, and taxation.

Article 6(1)(f):

- To inform you about changes to our services or our privacy policy, if necessary.
- To monitor transactions for the purpose of preventing or detecting fraud or the legalization of income from illegal activities or the opening of multiple player accounts, or to identify irregular, abnormal, or suspicious betting behaviour.
- To make our content available to you on social media for users who have chosen to follow us on social media.
- To conduct customer surveys, research, and statistics after anonymizing the relevant data.

Article 6(1)(a):

- To provide you with information about promotional offers and our products and services, considering you have given your consent for such forms of communication.
- To send you communications you have requested, such as a response to a question or to inform you of any issues related to your account or to respond to self-exclusion requests.

We will not contact you for marketing purposes by post, email, or text message unless you have given your prior consent. You can change your preferences regarding marketing and withdraw your consent at any time by contacting the Data Protection Officer (DPO), whose details are provided at the beginning of this Privacy Policy. If you withdraw your consent, there will be no consequences for the lawfulness of processing based on consent before its withdrawal, or any other consequences.

You are welcome to contact the DPO, whose details are provided at the beginning of this Privacy Policy, if you need further explanations about how your information is used.

Where and how long do we keep your information?

Your personal data is mainly stored electronically on servers (computer servers) located in Cyprus. In certain cases, such as when there is a problem that needs to be resolved, the relevant information about you may be stored in physical files which are kept at our premises in Nicosia, Cyprus. If you contact us by email, the personal information contained in the corporate email is stored on Microsoft servers.

We retain your personal data only for as long as necessary to serve your player account and to process any payments, as required to comply with our legal or regulatory obligations. Specifically,

these obligations arise from gambling legislation, tax legislation, and legislation against the legalization of income from illegal activities, allowing us to defend or exercise any legal actions on behalf of our company and to maintain a record of canceled accounts or high-risk accounts, thereby ensuring fraud prevention. Your personal data will be retained for a minimum period of at least five (5) years from the date of the last transaction and any information related to your account and bets cannot be destroyed unless five (5) years have passed, and after the approval of the National Betting Authority is secured (in compliance with Article 61 and 53 of the Law on Betting (N. 37(I) 2019)). Additionally, your data will be retained for a minimum period of at least five (5) years from the date of the last transaction in the case of either winning collections, betting deposits or both, exceeding two thousand euros (€2,000), in compliance with Article 60(e) of the Law on Prevention and Combating of Money Laundering from Illegal Activities of 2007 (188(I)/2007). In general, for the above purposes, we keep your information for as long as we maintain a contractual relationship with you and up to eight (8) years after the termination or expiry of this relationship.

In case we have obtained your consent for the collection or use of information for a specific purpose, such as commercial product promotion or commercial communications, we will retain that information unless you decide to withdraw your consent or object to their processing.

We retain the information collected about you as a simple visitor to our website for one year. A six-month retention period applies to the information we have collected as a result of your enquiry or comment sent to us via email or otherwise when we have not entered into any agreement with you.

The data regarding likes, shares, comments, and messages for those who follow us on social media or participate solely in like and share type of contests on social media platforms (such as Facebook, Instagram, and LinkedIn) are kept until the post is deleted or until you withdraw your reaction to our posts (like, share, etc.) or up to 1 month after the completion of the contest.

Data in a sports betting loss declaration are retained for a period of 6 years from the submission of the declaration and/or for as long as necessary for handling potential legal disputes between the customer and the company and for the company's compliance with tax legislation.

In case there is a maximum retention period determined by the Commissioner for Personal Data Protection, which applies to our service sector, we will immediately adhere to such a specified maximum retention period.

After the expiration of the aforementioned retention periods, we will either withdraw the information from our systems by deleting it, or we will keep the information fully anonymous so that your identification is no longer possible through this information. In this case, we will not delete all the information but only those details such as the name, address, and email address that reveal that this information belongs to you.

Who has access to your information?

We will never sell or transfer your information to third parties, and we will not disclose it to third parties for commercial promotion purposes.

We may disclose your information to third-party service providers. These third parties may be providers of technical services that provide us with the software systems (or their maintenance)

that are necessary to fulfill the administrative duties inherent in providing our services to you or conducting business, or they are messengers and/or courier companies that we use to send correspondence. We will only disclose to these individuals the personal information that is absolutely necessary to provide the service or to perform the mission in question. When required by the Regulation, we maintain an agreement that requires them to keep your information secure and in accordance with the principles and rules of the General Data Protection Regulation and not to use this information for direct marketing purposes or for other purposes other than providing the service or completing the work as explained above.

We also transmit your information contained in your email messages to Microsoft, which provides us with relevant technical data processing services for the aforementioned purposes. We maintain a contract that requires the provider, currently Microsoft, to keep your information secure and in accordance with the principles and rules of the General Data Protection Regulation. You can view the contract here:

<https://www.microsoft.com/en/servicesagreement/>

The information you submit or record through our Page on Facebook or our profiles on Instagram and LinkedIn is also transmitted to Facebook, Instagram, and LinkedIn. These platforms provide us with the service that enables us to create and manage a Page on Facebook or a profile on Instagram or LinkedIn. These providers are data controllers themselves and are bound by all the obligations of the General Data Protection Regulation. You can view their privacy policies on their respective websites.

It is also possible for us to transfer your information to our lawyers and accountants/auditors to the extent necessary to defend or make legal claims and to comply with our legal obligations regarding financial accounts and for tax purposes, respectively.

When you make payments through our website, your payment is processed by a third-party payment service provider specializing in secure electronic transaction processing, depending on the payment method you choose. Since this processing is not carried out by us, and we do not retain the related data, your rights, as explained in the next section of this Policy regarding credit card details or transactions, will be directly exercised with that payment service provider. In case you address a relevant request to us, we will take reasonable measures to satisfy your request to the extent possible. We consider these providers to be data controllers themselves, who are bound by all the obligations of the General Data Protection Regulation. You can view their privacy policies on their respective websites. In exceptional cases, specifically when a payment service provider excludes a player's payments due to suspicion of fraud or for other reasons, such as exceeding maximum transactions per hour, we may disclose your information to the provider if you ask us to help you resolve the issue with them.

We may also transfer your personal data to our banks in Cyprus, which may request it for compliance with anti-money laundering legislation and combating the legitimization of income from illegal activities, and generally due to the security systems they implement. This is specifically for the purpose of paying your winnings and other payments or benefits. The banks themselves are

data controllers responsible for processing personal data and are bound by all the obligations of the General Data Protection Regulation and their own privacy policies.

We may transfer your personal data to third parties as part of a sale of part or all of our activities and assets to any third party, or as part of any restructuring or reorganization of our business. In this case, we will take measures to ensure that all principles and rights related to personal data protection, as arising from the General Data Protection Regulation, are fully complied with before, during, and after the relevant transfer.

Finally, we may disclose your information to public and/or regulatory authorities (e.g., MOKAS, FIFA, National Betting Authority, Police) if such disclosure is required by law or a court order, or as part of our compliance with the licensing terms imposed by the betting law and/or the National Betting Authority.

What are your rights?

You can send us any of the following requests at any time, and we will comply with them as soon as possible and in any case within one month from the date of receiving your request. We will inform you of the action we have taken. If your request is complex to process or fulfill for any reason, we will ask you for an extension before the aforementioned one-month period expires.

If we have valid reasons to refuse to satisfy your request, we will inform you accordingly, and in this case, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection, <https://www.dataprotection.gov.cy/>, if you believe that our decision is unjustified.

Below are the requests you can submit to us:

Request to permanently delete all or some of your data from our records (*right to be forgotten or erased*), for example, when we no longer have reasons to retain them.

Request to access the information we hold in our records (right of access). It is noted that the player's right of access to data concerning him/her may be partially or entirely waived in accordance with the provisions of Regulation (EU) 2016/679, the Law on the Protection of Individuals with regard to the Processing of Personal Data and the Free Movement of such Data –

(a) for the purpose of fulfilling the obligations of the recipient and supervisory authorities arising from the Law on Preventing and Combating Money Laundering from Illegal Activities, or

(b) in order not to obstruct official or legal investigations, analyses, or procedures for the purposes of the Law, ensuring that the prevention, investigation, and detection of money laundering from illegal activities and the financing of terrorism are not jeopardized (paragraph 7.4.4 of Directive 15.2023 of the National Betting Authority).

Request to provide you with a copy of the information held in our records, in print or electronic format. If you require more than one copy, we may charge you a maximum fee of €10.00 as administrative expenses (*right to obtain a copy*).

Request to update or correct the information we hold in our records (*right to rectification*), for example, if it is not up to date or contains errors or inaccuracies.

Request to provide you with information concerning you that we hold in our records in a structured, commonly used, and machine-readable format, or to transmit it to another provider of your choice, if such transmission or transfer is technically feasible (*right to data portability*). Please note that this right applies only to data you have provided to us and that we **process electronically**.

Request to cease processing your information without, however, deleting it from our records (*right to restrict processing*).

Request to cease processing your information for purposes of direct marketing or based on legitimate interests pursued by our company, as explained in the fourth question of this Privacy Policy, or for reasons of public interest (*right to object*). In the case of direct marketing, we will cease processing your information. In other cases, we will do the same, unless we have compelling reasons to refuse to do so, in which case we will inform you accordingly.

If you wish to exercise any of the above rights, you can do so by contacting the DPO at any of the contact details mentioned above in this Privacy Policy, preferably via email, specifying the type of right you wish to exercise.

Please note that before we take any action in response to any of the above requests from you, we may ask you to prove your identity if we doubt the true or correct identity. If we cannot identify you due to not holding personal data belonging to the person you claim to be, we will inform you accordingly and will not act on your request.

The data related to the handling of the above requests are retained for a period of nine (9) months from the notification of the outcome or the final conclusion of any process related to the request, if such a process exists.

What security measures do we apply to protect your information?

We implement both organizational and technical measures to ensure the security and protection of your information against unauthorized disclosure, alteration, accidental loss, or any other form of unlawful processing, in accordance with the Company's security policy. These measures aim, among other things, to restrict access to personal data, ensure secure storage, limit the risk of viruses and other harmful incidents, maintain secure backups, and effectively destroy unnecessary or outdated data.

Data concerning the handling of any personal data breach incidents are retained for a period of twelve (12) months from the notification to the competent authority or the final conclusion of any process related to the breach, if such a process exists.

Cookies Usage

Click [here](#) to read our Cookie Policy.

Transfer your information outside the European Union

We do not transfer your information outside the European Union.

Except in cases where technical service providers with whom we collaborate, as explained above, use servers to store data in third countries such as the United States and/or England, we do not transfer your information outside the European Union. If we ever need to transfer your personal data to a country that is not a Member State of the EU, we will ensure that your personal data will be treated with equivalent and/or appropriate respect and protection. Specifically, we will sign agreements with parties outside the EU, such as data exchange agreements or 'controller-to-processor' agreements, which meet the requirements of the Regulation, particularly Article 46, if the country does not have an EU Commission Decision on Adequacy according to Article 45 of the Regulation. You have the right to receive details about these agreements, so if you request it and your data is actually transferred, we will provide you with the relevant details.