



Privacy Policy

1. To ensure proper processing and protection of clients' personal data, the Company is guided by The General Data Protection Regulation (GDPR).

The company's staff has Data Protection Officers (DPO), who carry out all practical measures to implement the provisions of GDPR. If you have any questions regarding personal data protection, please contact us by email dpo@totup.com

2. Totup System Limited assures Players that their personal data is processed fairly, lawfully and in accordance with good practice and is only collected for specific purposes which are known and accepted by the Player when such Player chooses to make use of the Totup System Limited Internet Site and Software systems.

3. By opening an Account with Totup System Limited, the Player consents that Totup System Limited uses your personal data for the following purposes:

- performance of these T&Cs by Totup, suppliers and any third party acting on their behalf;
- own internal marketing and promotion of activities;
- storage and processing in terms of the laws & regulations covering anti money laundering.

4. Personal data of Players given to Totup System Limited can only be accessed by Totup System Limited's employees in possession of the required clearance.

Personal data of players may be processed by authorized employees of Totup System Limited in order to implement the Anti-Money Laundering Policy.

5. All the aforementioned is in place in order to assure Totup System Limited's Players that their personal data is at all times:

- processed in accordance with the rights of the concerned Player;
- processed fairly and lawfully;
- obtained only for a specific and lawful purpose;
- adequate, relevant and not excessive to its purpose;
- accurate and updated;
- kept in a secure manner;
- not kept longer than is necessary for its purpose;
- not transferred to jurisdictions not adhering to the aforementioned Directives; and
- utilised for marketing purposes based on the so called opt-in principle.

6. We do not transfer your personal data to third parties for marketing purposes that are not related to the services provided by Totup System Limited. Distribution messages using client email addresses, messengers linked to your phones, SMS is

made only with your consent. This distribution messages may only contain newsletter about company services.

You can unsubscribe at any time using the appropriate button in the settings of your personal account.

If the company uses the services of specialized providers for sending messages, then only reliable service providers that is observed the GDPR procedures are involved. At the same time we do not transfer your personal data to a third party, and we remain the operator (controller) of your personal data.

7. We may share personal data with third parties in the following circumstances:

- when ordered to do so by any regulatory body and/or under any legal provision contained in the governing law;
- we may instruct and authorise the Financial Institution with which an Account Holder's account is held to disclose any information as may be requested by the MGA in respect of an Account Holder's account;
- for verification, and fraud detection purposes, we may transfer your personal data to third parties, including but not limited to so-called Address Verification System service providers, Payment Service Providers, Financial Institutions..

8. The personal data that we collect from clients may be transferred to, and stored at, a countries outside the European Economic Area ("EEA"). It may also be processed by companies operating outside the EEA who work for us or for one of our service providers. To ensure your personal information remains safe when transferred like this, we will take all reasonable steps to maintain a suitable level of protection in line with this Agreement.

Any transfer of your personal information to a location outside the EEA will be based on:

- the contractual Standard Data Protection Clauses adopted by the European Commission or a relevant data protection authority; or
- an adequacy decision from the European Commission, confirming that the third country provides adequate protection for your personal information; or
- Your consent, or another legal basis on which we are entitled to make the transfer.

9. You have a right to request a copy of the personal information we hold about you. You also have the right to request that information we hold about you which may be incorrect, or which has been changed since you first told us, is updated or removed. These requests are free of charge and can be sent by email to our Data Protection Officer at dpo@totup.com.

In some circumstances, you can ask us to erase personal information we hold about you ('the right to be forgotten'). This includes when:

- the information is no longer necessary in relation to the purpose for which it was collected;
- we don't have a lawful ground under data protection law to process your information;
- the data has to be erased to comply with a legal requirement;

This right is subject to mandatory retention periods under EU laws.

10. You have the right to ask us to restrict the processing of your personal information. When processing is restricted, we can still store your information, but will not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in the future. This right is available to you when:

- you dispute the accuracy of the personal information, while we verify matters;
- the processing is unlawful, and you object to the erasure of the information and request that we restrict processing instead;
- we no longer need the data, but you require it to establish, exercise or defend a legal claim; and
- we process your information for our legitimate business interests but you object and while we verify the grounds for continued processing.

11. You can object to the processing of your personal information based on our legitimate business interests.

You also have the right to object to the use of your personal information for direct marketing purposes, such as when you receive emails from us newsletter which we think will be of interest to you.

You have the right to withdraw your consent to the use of your personal data for newsletters at any time.

12. In accordance with this agreement, in order to use our gaming website, you provide your personal data, and confirm that you are required to provide your actual, accurate and complete data. Furthermore, you must inform us of any changes to your information so as to ensure it is kept up-to-date and accurate.

If you are found to be in breach of your obligations or if we have reasonable suspicion that the information you provide is false or incomplete or in any way contrary to Data Protection Law, we retain the right to reject your application for registration or to suspend or terminate your account immediately without notice. In this case, you have no right to any compensation due to the rejection of your application, or the suspension or termination of your account.

13. We sometimes may use systems to make automated decisions based on your personal information. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know.

We may use automate decisions making in the following situations:

- We can automatically analyze your betting history, in order to identify your preferences for kinds of sports, leagues, and teams, and then recommend coupons that are most likely to be of interest to you.
- detecting fraud - we use your personal information to help decide and detect if your account may be being used for fraud or money-laundering. If we think there is a risk of fraud, we may block or suspend the account;
- opening account - when you open an account with us, we check that the product or service is relevant for you, based on what we know. We also check that you meet the conditions needed to open the account. This may include checking age, residency, nationality;

You have the right not to be subject to a decision - including profiling - when it is based on the automated processing of your personal information and it has a legal effect or a similarly significant effect on you.

Please note that the right does not apply when the processing is:

- necessary for entering into or for the performance of a contract with you; or
- when it is authorised by law; or
- when it is based on your explicit consent.

Any requests relevant to this Section must be addressed in writing to our Data Protection Officer on dpo@totup.com.