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Privacy Policy

Introduction

Data controller: The name and address of the Data Controller can be found on the footer of this website. For any privacy concerns that you may have and to raise questions about this Privacy Policy and the collection of your personal information contact our Data Protection Officer (DPO) at:

Office 1/5297 Level G, Quantum House, 75, Abate Rigord Street, Ta' Xbiex, XBX 1120, Malta

Telephone number: +13433035151

Email: dpo.ontario@SpinGenie.ca

Trading name: For the purpose of this Privacy Policy, the Data Controller is referenced through as SpinGenie (hereinafter called as “We”, “us”, “our”)

SpinGenie is operating as part of the open and regulated internet gaming (igaming) market in Ontario conducted and managed by iGaming Ontario (iGO) and is collecting, using and disclosing personal information on behalf of, and as agent to, iGO. iGO asserts the legal authority to collect personal information under the “Freedom of Information and Protection of Privacy Act” (FIPPA) (Ontario), the “Privacy and Access to Information Directive (2025)”, the “Personal Information Protection and Electronic Documents Act” (PIPEDA) (Canada), and O. Reg. 722/21: LOTTERY SUBSIDIARY - IGAMING ONTARIO made under the “Alcohol and Gaming Commission of Ontario Act”, 2019 (AGCO) (Ontario). We also collect your information in accordance with iGO’s contractual and operational requirements (hereinafter called “Applicable Laws and Regulations”).

Our Privacy Policy and all related matters are solely governed by the laws of Ontario and the applicable federal laws of Canada.

This Privacy Policy, which was last updated on 17/04/2026, sets out the data processing practices carried out by SpinGenie on behalf of iGO.

Here at SpinGenie we respect your privacy and that includes being clear, transparent and open about what we collect, how and why we use your personal information, as part of the services we provide to you.

Purpose of this Policy

Our Policy explains how we use your personal information, whether you are just visiting, making a deposit or playing one of our games. This Policy provides evidence of the nature of the personal information we collect, the purpose of processing and explains your rights in relation to the data processed. It also explains the circumstances in which we obtain and share information about you and how we use it to personalize the marketing you receive when you consent to it.

If we make any material updates to this Policy, we will inform you and you will be requested to consent to/ accept the changes, if they significantly impact on your data rights, collection and/or sharing, before accessing our website. Otherwise, we will notify you about any other minor updates of the policy and we will allow you to review the changes before continuing to our website.

Please note that all our employees undertake regular training on Data Privacy and Information Security and are required to comply with confidentiality obligations as well as internal policies and procedures whenever they handle your information. (For more information about the categories of

employees that have access to your personal information, please refer to “Access to personal information by Employees” section of this policy).

SpinGenie website and content are not intended for persons under 19 years of age (“Minors”). We are not collecting personal information from Minors. If a parent or guardian becomes aware that their Minor/ child has provided us with personal information, the parent or guardian may contact us to have such Minor’s data deleted.

We hope you will find this page helpful, but should you have any concerns or questions regarding Data Protection, including any requests to exercise your legal rights, please feel free to contact our Data Protection Officer (DPO) at dpo.ontario@SpinGenie.ca

Definitions

#	Definitions	Explanation
1)	Personal Information	Any recorded information about an identifiable individual, as defined under FIPPA, PIPEDA and the Privacy and Access to Information Directive (2025), including but not limited to name, contact details, date of birth, financial or payment information, account identifiers, device or IP data, gaming activity, transaction records, identification numbers and any other data that can directly or indirectly identify a person.
2)	Sensitive Information	Personal information that, if lost, stolen, or improperly disclosed, could reasonably result in significant harm to an individual, including but not limited to financial, medical, identification, biometric or gaming activity data. The degree of sensitivity depends on the context and the reasonable expectations of confidentiality and potential impact on the individual.
3)	Operator	SpinGenie operates the online gaming platform on behalf of iGO, pursuant to an Operating Agreement, and being responsible for ensuring compliance with the Applicable Laws and Regulations.
4)	Agent	The Operator is authorized by iGaming Ontario (iGO) to conduct and manage internet gaming on behalf of iGO under an Operating Agreement and other Applicable Laws and Regulations.
5)	Controller	An entity that determines the purposes and means of the collection, use and disclosure of personal information. For

gaming operations in Ontario, iGO is the Controller and the Operator acts as iGO's Agent.

6)	Service Provider	A third party engaged by the Operator or iGO to provide services (such as payment processing, identity verification, marketing, analytics etc.) that may involve collection, use or disclosure of Personal Information.
7)	Third Party	Any person or external entity/organization processing Personal Information, on behalf of the Operator.
8)	User/ Player/ You	A natural person who registers for, accesses or uses the online gaming services provided by the Operator as iGO's Agent.
9)	Applicable Laws and Regulations	· The Freedom of Information and Protection of Privacy Act (Ontario) (FIPPA) · The Personal Information Protection and Electronic Documents Act (Canada) (PIPEDA) · The Operating Agreement between the Operator and iGO · Privacy and Access to Information Directive (2025) · O. Reg. 722/21: LOTTERY SUBSIDIARY - IGAMING ONTARIO made under the "Alcohol and Gaming Commission of Ontario Act", 2019 (AGCO) (Ontario) · Any other subsequent directives or guidance issued by the iGO
10)	Processing	An operation or set of operations performed on Personal Information, including but not limited to collection, use, storage, recording, organization, structuring, disclosure, transmission, retention, disposal, or destruction, whether or not by automated means.

11)	Consent	Voluntary agreement by a User for the collection, use, or disclosure of their Personal Information for identified purposes, consistent with the requirements of the Applicable Laws and Regulations.
12)	Data Breach	Unauthorized access to, or collection, use, disclosure, modification or disposal of Personal Information that compromises confidentiality, integrity or availability of such information, including any event that may trigger notice obligations under the Applicable Laws and Regulations.
13)	Reportable Privacy Breach	Any data breach that may cause a significant harm to an individual, taking into consideration a) the sensitivity of the personal information affected, b) the probability that the personal information has been, is being or will be misused and c) the availability of steps that the individual could take to reduce the risk of the harm occurring, or mitigate the harm should it occur. Reportable Privacy Breaches must be reported to iGO as soon as feasible and no later than 24 hours after becoming aware of them.
14)	Operating Agreement	The agreement between iGO and the Operator establishing the Operator's authority to conduct and manage iGaming in Ontario on behalf of iGO, and setting forth privacy, security, compliance and operational obligations.
15)	Anonymized Data	Information that has been processed in such a way that it can no longer be associated with an identifiable individual and cannot be reasonably re-identified.
16)	Freedom of Information Request (FOI Request)	A request made by an individual under FIPPA to access or correct records held by public institutions, including general and personal information held by such institutions, including iGO. iGO has exclusive and unfettered control over Gaming Data held by Operators and as such, Gaming data may be subject to FOI Requests, for which iGO is responsible.
17)	Privacy Risks	Risks relating to privacy, including but not limited to, inadequate consent or no consent, the over-collection or over-retention of personal information, use exceeding scope

of identified purposes, collection, use or disclosure of personal information for inappropriate purposes, thefts, losses, or unauthorized access, use or disclosure of PI or other privacy breaches, data breaches involving personal information, data and cybersecurity incidents and complaints.

18) Privacy Impact Assessment (PIA)

PIA is a formal, documented process, conducted prior to the implementation of any new system, program, service or process (or significant change to an existing system, program, service, or process), involving the collection, use, retention, disclosure or handling of personal information to:

- a) identify and evaluate the privacy and security risks to individuals arising from the proposed system/initiatives, b)
- assess the necessity, proportionality and legality of the proposed processing of personal information, c) consider the broader privacy implications and potential harms, d) propose and document appropriate mitigation measures or safeguards to manage or reduce those risks and ensure compliance with Applicable Laws and Regulations.

The Types of Information We Collect

We collect the following types of data and information from our customers.

Personal Information

The personal information we collect through our services includes information, which is submitted directly by you, such as: phone number; full name; e-mail address; home address; date of birth; payment means (e.g. card number); identification number; and other financial information that we may need to provide you with our services. We also collect Personal Information from your device (e.g. geolocation data, IP address), information on your activity on the services we provide you with (e.g. pages viewed, online browsing, clicks, scroll, actions/ game searches, etc.) and any other personal information which you may provide to us for the purpose of receiving our services.

We may also obtain information about you by collecting it from the interaction patterns carried out on our website (i.e., use of cookies), to improve the experience of using our website and ensure its proper functioning. More details on how to use cookies and how to manage them can be found in the relevant section of this Privacy Policy.

Sensitive Information:

We may collect sensitive information about you, such as your nationality, as part of our onboarding processes and to comply with our legal and regulatory KYC requirements.

Non-personal Information

The second type of information is unidentified and non-identifiable information pertaining to you which may be made available or gathered via your use of the services. We are not aware of the identity of the user from which Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (i.e., the type of browser and operating system your device uses, language preference, access time and the domain name of the website from which you linked to our services etc.), in order to enhance the functionality of our services.

If we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information for as long as it remains combined. For the avoidance of doubt, if there is a possibility that information can be linked to an identifiable account, it will be treated as Personal Information. Also, access to the information we collect is restricted to personnel that is responsible for processing it, as part of their employment duties and responsibilities.

For more details about how we collect your personal information and what types of data we collect, please refer to sections *“How we collect your Information”* and *“What type of information do we collect and how do we use it? What is the Legal Basis for processing your personal information?”* of this Privacy Policy.

How We Collect Your Information

Collecting Information about you, from you

SpinGenie collects personal information about you whenever you use our services. Some of it you provide it directly to us, for example, when you register an account or fund your account. Other information is collected during your interactions with us, such as the bets you place or online chats with our customer services team and the email communication we have with you, when you submit your data subject requests. Also, if you consent, we will record all telephone conversations and collect your information to send you marketing material. We also collect information about the way you access, view, share, contribute to and communicate with and through our services, for example when you post comments via our social media channels or chat functionalities.

Collecting Information about you, from your device

We collect information from the devices you use when using SpinGenie content, products and services. This includes but is not limited to the following: your IP address (a number that identifies a specific device on the internet and is required for your device to communicate with websites), hardware model, operating system and version number.

Collecting Information about you, from the mobile application you use

We may collect information about you from the mobile application you use, upon the application’s installation and at the first time of opening it. This information may include your IP Address, and your address-related data obtained from the IP Address, such as your country code, state, city and postal code. We may also collect your device information, such as your platform – iOS or Android – your phone OS and application version. We can also collect your advertising ID if you specifically provide your consent to it. Your personal information is also collected when creating an account with us and registering to receive our services. This information is required for account creation, security verification, regulatory compliance and to enhance your overall experience with the application.

Collecting Information about you, from your computer and through Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to

our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalized service to you. Some of the cookies we use are essential for the site to operate. The cookies we use can be grouped into four separate categories and are explained in the section further below set out for Cookies.

Collecting Information about you, from external companies

To help us comply with our legal and regulatory KYC and Social Responsibility obligations:

- When you open your account, we will cross-check/ reference the information you supplied to us with external/governmental companies for Anti-Money Laundering and identity verification processes, as well as to ascertain whether you are registered with them because you asked not to be allowed to gamble or receive marketing. Electronic Know Your Client ("EKYC") or automatic verification solutions provided by third party providers can be used to ascertain a player's identity in accordance with the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) requirements. For these third parties, we ensure that they adhere to the same laws, regulations and standards as we do.
- We use publicly available information (on social media sites and the like) to help verify the information provided to us and we log and save the results.

Collecting personal data from a third party as part of a business or asset transfer:

We may also collect personal data about you from third parties from time to time. For example, if you are a former customer of a SpinGenie partner and your data was passed to SpinGenie we will have acquired the following categories of your personal data from your previous online betting and gaming provider in order to integrate your former account into SpinGenie's platforms and systems, and to provide our gambling services to you in accordance with our Terms and Conditions. A non-exhaustive example (which may or may not be applicable depending on the process) of such data is:

- Your account balances – to allow you to access your funds
- Your former provider's username and password (hashed and non-decipherable by us) – to allow you to continue to access your account using the same login details
- Your personal registration details were originally supplied to your former provider, such as name, Date of Birth (DOB), address, email address, telephone number and occupation
- Other account data such as your player ID, registration and login dates, country code, currency, first deposit amounts and dates, number of wins, device details (where held), gambling limits but in most cases excluding payment details and itemized, historic gaming and financial transactions. Please note, if you require access to your historic, itemized gaming and financial transactions with your former provider, please contact them in accordance with the instructions of their Privacy Policy on their website in the first instance.
- Copies of your existing KYC, identification and Enhance Customer Due Diligence documents originally supplied to your former provider – where we can, we will process these documents to allow you to access SpinGenie services without have to ask you to supply updated documents.
- If you are a 'time out' or 'self-excluded' customer, your account status and duration
- of any relevant live time out or exclusion period.

We will process the above categories of personal information for the reasons outlined in this Privacy Policy and in accordance with the Applicable Laws and Regulations.

What type of information do we collect and how do we use it? What is the Legal Basis for processing your personal information?

We use and share your Personal Information in the manners described in this Privacy Policy and for the provision of our services to you. The Personal Information will be disclosed to a third party only to the extent required for a specific purpose, as stipulated in this Privacy Policy, and in such cases, we require the relevant third party to agree to process such information in compliance with our Privacy Policy and the Applicable Laws and Regulations.

The information we collect, which may include Personal Information, is limited to the following purposes and in accordance with the legal bases described below (collection is necessary to achieve these purposes, either because it is required by a law, for the fulfillment of the contractual relationship with you etc.):

#	Type of Personal Information Collected	Purpose of Processing	Legal Basis for Processing
1)	Full legal name (including middle name or initial, if applicable) Full address (house/apartment number, city, province/state, country, postal/zip code) Date of birth Personal telephone number Descriptive Occupation, email address and feedback provided by players Player identification document details Source of the credit file (i.e., name of the Canadian, Credit Bureau) Player's credit file number Date of verification, login credentials (i.e., username, password) Player's country of residence Player's telephone number Employer name and the address of the employer Player's nationality Governmental documentation (ID,	To set up your account and to provide you with our services, including the services we provide to you via our mobile application (e.g. Identification and verification of your personal details, send out cash-out checks, process your payments, consult the national self-suspension register to determine whether we can allow you access to gambling)	Contractual necessity Fulfilment of a legal/regulatory obligation.

Passport, driver's license)

Player's alias/preferred name (if applicable),

IP address, geolocation of the player

Gaming event and transaction history (game session outcomes and game transactions)

Views, clicks, scroll, game searches

Deposit and withdrawals financial services provider, method and source of funds used for transactions.

- 2) Full legal name (including middle name or initial, if applicable) To perform our regulatory obligations in terms of Safer Gambling and Anti-Money Laundering. Fulfilment of a legal /regulatory obligation.
- Full address (house/apartment number, city, province/state, country, postal/zip code)
- Date of birth
- Personal telephone number

Descriptive Occupation,
email address and
feedback provided by
players

Player identification
document details

Source of the credit file
(i.e., name of the
Canadian, Credit Bureau)

Player's credit file number

Player's country of
residence

Player's business
telephone number

Employer name and the
address of the employer

Player's citizenship

Governmental
documentation (ID,
Passport, driver's license)

Player's alias/preferred
name (if applicable)

IP address, geolocation of
the player

Gaming event and
transaction history (game
session outcomes and
game transactions)

Views, clicks, scroll, game
searches

Deposit and withdrawals
financial services provider,
method and source of
funds used for
transactions.

	Username/ account ID		
	Email Address		
	Phone Number		
	Full legal name (including middle name or initial, if applicable)		
	Date of Birth		
	Full address (house/apartment number, city, province/state, country, postal/zip code)		Consent
3)	To identify and authenticate your access to certain features.		Contractual necessity
	Personal telephone number		
	Player identification documents and document verification data		
	Password, username, cookies, IP Address and Geolocation data, login attempts, changes to account details		
4)	Username	To indicate that you had a win (in winners' announcements on our website or on a	Consent

Email address tournament leaderboard) by using your Username. We advise against using anything that can identify you personally, however this is your choice.

5)	Email Address Personal telephone number	To communicate with you and to keep you informed of our latest updates.	Consent
6)	Email Address Personal telephone number	To market our website and products or those of any of our business partners and affiliates.	Consent
7)	Username Email address Cookies IP Address and Geolocation data	To conduct research or anonymous analytics to improve and customize our services to your needs and interests.	Our legitimate interests, provided that your interests and fundamental rights do not override such interests
8)	Full legal name (including middle name or initial, if applicable) Personal telephone number Email address IP address, geolocation of the player Username/ account ID Views, clicks, scroll, game searches, call recordings Device information App or website logs Account status	To support and troubleshoot our services and to respond to your queries.	The performance of a contract

9)	Full legal name (including middle name or initial, if applicable) Full address (house/apartment number, city, province/state, country, postal/zip code) Date of birth Personal telephone number Descriptive Occupation, email address and feedback provided by players Player identification document details Source of the credit file (i.e., name of the Canadian, Credit Bureau) Player's credit file number Date of verification, login credentials (i.e., username, password) Player's country of residence Player's business telephone number Employer name and the address of the employer Player's citizenship Governmental documentation (ID, Passport, driver's license) Player's alias/preferred name (if applicable), IP address, geolocation of the player, device identifiers	To investigate violations and enforce our policies, as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request. The fulfilment of our legal obligations.
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Gaming event and transaction history (game session outcomes and game transactions)

Views, clicks, scroll, game searches

Deposit and withdrawals financial services provider, method and source of funds used for transactions

Customer support chats, copies of correspondence with regulators or law enforcements, records of disciplinary or account enforcement actions (i.e., self-exclusions)

10)	Full legal name (including middle name or initial, if applicable)	To audit certain elements of our business practices.	Legal obligations
	Full address (house/apartment number,		

city, province/state,
country, postal/zip code)

Date of birth

Player's citizenship

Verification documents
and status (KYC/AML
Checks)

Source of funds/ wealth
documentation

Account balances and
payment reports

Views, clicks, scroll, game
searches

- | | | | |
|-----|---|---|-------------------|
| 11) | Full legal name (including middle name or initial, if applicable)

Full address
(house/apartment number, city, province/state, country, postal/zip code)

Date of birth

Personal telephone number

Descriptive Occupation, email address and feedback provided by players

Player identification document details

Source of the credit file (i.e., name of the Canadian, Credit Bureau)

Player's credit file number

Date of verification, login credentials (i.e., username, password) | To comply with our regulatory and contractual obligations under Ontario's iGaming framework with iGaming Ontario (iGO) and the Alcohol and Gaming Commission of Ontario (AGCO). | Legal obligations |
|-----|---|---|-------------------|

Player's country of residence

Player's telephone number

Employer name and the address of the employer

Player's nationality

Governmental documentation (ID, Passport, driver's license)

Player's alias/preferred name (if applicable),

IP address, geolocation of the player

Gaming event and transaction history (game session outcomes and game transactions)

Views, clicks, scroll, game searches

Deposit and withdrawals financial services provider, method and source of funds used for transactions.

12)	legal name (including middle name or initial, if applicable) Full address (house/apartment number, city, province/state, country, postal/zip code) Date of birth Personal telephone number Descriptive Occupation, email address and feedback provided by players Player identification document details Source of the credit file (i.e., name of the Canadian, Credit Bureau) Player's credit file number Date of verification, login credentials (i.e., username, password) Player's country of residence Player's telephone number Employer name and the address of the employer Player's nationality Governmental documentation (ID, Passport, driver's license) Player's alias/preferred name (if applicable), IP address, geolocation of the player Gaming event and transaction history (game session outcomes and game transactions) Views, clicks, scroll, game searches	Where we decide to sell, transfer or otherwise dispose of any part of our business in the future, we may share your information with prospective purchasers and our professional advisors for that purpose. The performance of a contract and/or our legitimate interests, provided that your interests and fundamental rights do not override such interests.
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Deposit and withdrawals
financial services provider,
method and source of
funds used for transactions

We also collect, use and disclose your personal information in accordance with the following provisions of FIPPA:

- Collection of data: under section 38(2) of FIPPA, we collect information that is necessary for the proper administration of a lawfully authorized activity – to provide you with the internet gaming services under the Gaming Control Act, 1992 and our agreement with IGO.
- User of data: under section 41(1) of FIPPA, we use your personal information only for the purposes for which it was collected, such as verifying your identity, ensuring responsible gaming, fraud detection and prevention etc.
- Disclosure of data: under section 42(1) of FIPPA, we may disclose your information after obtaining your consent, if it is necessary based on the purpose for which it was collected and where disclosure is required or authorized by law, as per the IGO, AGCO or other law enforcement.

Where the data processing is in accordance with your consent, you have the right to withdraw your consent at any time in writing to our contact details mentioned in this Policy, or by following any relevant process to withdraw your consent (i.e., unsubscribing from marketing by clicking the “unsubscribe button” on the marketing emails you receive or by changing your preferences from your account you have with us after logging in it or through our support channels). Withdrawal of your consent does not affect the lawfulness of the treatment of your data prior to its revocation.

Access to personal information by Employees

Only authorized employees may access personal information, and solely to the extent needed to perform their job responsibilities. Access is role-based, follows the principle of the least privilege and is regularly reviewed. The types of teams that may access your personal information include:

- Customer Support Department: verifying players’ identity, assisting with account management, responding to inquiries and processing self-exclusion requests

- Compliance Department: conducting AML checks, fraud and suspicious activity reviews, responsible gambling monitoring and regulatory reporting to iGO
- Payments/ Operations Department: processing deposits and withdrawals, payment verification, dispute resolution, fraud and chargeback prevention
- VIP Department: supporting high-value players, verifying VIP eligibility and performing responsible gambling reviews
- CRM Department: performing strategy planning and analysis of revenue and executing games orders
- Information Technology (IT) Department: system maintenance, troubleshooting, and responding to cybersecurity events
- Product Department: reviewing platform issues affecting specific accounts
- Information Security Department: investigating security incidents and breaches, ensuring integrity and confidentiality of information, managing encryption and access control
- Data Protection Department: handling privacy inquiries, investigating privacy complaints, handling information incidents and breaches, conducting privacy assessments and ensuring compliance with FIPPA, PIPEDA and iGO
- Business Intelligence (BI) Department: conducting reporting, forecasting and performance analysis
- Internal Marketing: campaigns setups
- B2B Department: supporting partner onboarding, generating reports, handling new and closing markets, partners support and compliance monitoring
- Brand Ambassador Department: conducting reporting, responding to clients' enquiries
- Finance Department: managing financial reporting, reconciliation, tax obligations, processor monitoring and player liability accounting
- Games Department: handling/assisting players with technical issues
- Legal Department: managing litigation, responding to legal claims and advising on regulatory matters
- Project Management Department: overseeing payment provider integrations, managing technical projects and coordinating updates with the relevant stakeholders

Access to players' information is strictly controlled and limited; no department or employee has full access to all data.

Companies that provide services on our behalf

We share your personal information with external organizations that carry out a range of services on behalf of SpinGenie. We carry out checks/regular audits to ensure that the companies we work with will give your information the same level of care and protection as we do. Both we and they are obliged to handle your information in accordance with the Applicable Laws and Regulations and iGo's privacy and security standards, and we are also required to put in place contractual measures reinforcing those obligations (i.e., signing Data Processing Agreements (DPAs) with them).

Please note that data processing may take place outside of Ontario and if it does, the processing will take place within an EU Member state. In those cases, the data is subject to the General Data Protection Regulation (GDPR) of Europe. There are cases where your data is transferred to third countries (i.e., USA) and for these cases all necessary measures for safeguarding your data and privacy rights are implemented. For more information about this, please refer to the section "*Transfers of data outside Ontario/ Canada*" below.

The main functions that are or may be carried out, fully or in part, by third parties on our behalf, are listed below:

- Management and execution of marketing
- Payment processing and
- Anti-fraud and Anti-money laundering checks (Including but not limited to Enhance Due Diligence reports utilizing publicly available sources and ID verification).
- Checks to detect unfair use of our products and
- Web hosting, management, maintenance, development of our websites, mobile applications, and IT systems, use of cookies (i.e., Google Analytics), online content services and data

- Management of competitions, contests and offers.
- Data analytics and data cleansing.
- Market research and collecting or analyzing customer
- IT services and
- Audit, Legal & Compliance- related
- Storing data for regulators to access and
- Analysis of gambling habits to ascertain potentially risky

For all data subjects located in Ontario, we operate on behalf of and as an agent to iGaming Ontario (IGO). Accordingly, all personal information collected through Ontario iGaming activities is collected on behalf of iGO, and any service providers engaged by SpinGenie are deemed to be supporting these activities on iGO's behalf. For such service providers we ensure that they meet iGO's privacy, security and confidentiality requirements as set out in FIPPA and the Privacy and Access to Information Directive (2025).

We also ensure that the companies that provide services on our behalf agree to provide all reasonable and necessary assistance to both, us and iGO, to respond to individuals' requests, such as requests for access, correction or deletion of Personal Information. For more details about your rights under the Applicable Laws and Regulations, please refer to section "*Your Rights*" of this Privacy Policy.

Also, before launching new features, technologies or partnerships that involve players' information or significantly change the existing ones, we and our service providers complete a Privacy Impact Assessment (PIA), as required by our agreement with iGaming Ontario. This process ensures that privacy risks are identified and addressed in advance, and that all activities comply with Ontario's privacy laws and iGO's standards.

Information demands from Regulators:

On a regular basis, in all licensed jurisdictions, we are regulatory required to produce reports containing non-Personal Data. The reports consist of things such as the number of self-exclusions, number of registrations, number of complaints, and number of suspicious transactions reported to authorities.

Other information sharing with third parties:

We may also share personal data with selected third parties to measure and improve customer experience, to circulate new offers and promotions that may be of interest on various similar third parties' products/services and to facilitate the resolution of customers' complaints and disputes. This sharing takes place under a suitable legal authority for the disclosure of your data with third parties.

We may also process your personal data for the purposes of any future acquisitions, sales, restructuring or other business or asset disposals or transfers of any part of our business from time to time. This may include sharing your personal data with third party prospective purchasers, bidders, investors, professional advisors and other relevant people in respect of the transaction. Where this is the case, you will receive notice of any such transfer before it takes place, along with further details about how your personal data will be processed at the relevant time.

When we share your personal data with third party service providers, we only disclose to them the information that is necessary for them to provide their service and we have an agreement in place with them, requiring them to secure your information and use it in accordance with our instructions and the Applicable Laws and Regulations.

Transfers of data outside of Ontario/Canada

We will only transfer your personal data outside of Ontario / Canada, under certain conditions:

- With your consent.
- When it is necessary to fulfil a contract, you have entered with us.
- To comply with a legal obligation.

- When there is legitimate interest for our Company (i.e., fraud prevention), given that your rights and interests are respected and not overridden by our legitimate interest.

If we transfer your personal data outside of Ontario/ Canada, whether within our group or with our partners, such as the TradeDesk, we will inform you and we will take all necessary measures to ensure that the processing of your data complies with the Applicable Laws and Regulations, implementing all necessary privacy and security standards. You also understand that, in some cases, the privacy laws in some countries, in which your data may be transferred to, do not provide the same level of protection as those in Canada or Ontario. For all the transfers though, we ensure that all security measures and safeguards are implemented in accordance with the Applicable Laws and Regulations. This may include:

- Implementing contractual agreements and/or security protocols where the recipient agrees to safeguard your personal data in accordance with the Applicable Laws and Regulations.
- Employing standard contractual clauses, or other acceptable methods to uphold the Canadian level of data protection.
- Encryption of personal data in transit and at rest.
- Access control mechanisms and continuous monitoring to prevent unauthorized access or disclosure of your personal data.

In certain circumstances, we may be compelled by law to disclose your personal data to third parties, over which we may have limited control regarding data protection measures.

How long do we keep your information?

We hold your personal information only as long as we have a valid legal reason to do so, which includes providing you with the services you have requested, meeting our legal and regulatory obligations including as required by iGO policies and our operating agreement with iGO, resolving disputes and enforcing our agreements.

The length of time for which we keep different types of personal information can vary, depending on why we originally obtained them, the reason we process them and the legal requirements that apply to them. When setting our data retention and deletion timescales we consider a range of factors, including applicable regulations and standards relating to IGO policies and our operating agreement with IGO, gambling and gaming, anti-money laundering, taxation, payment processing and complaint handling, the need to prevent or detect crime or other misuse of our services, and audit requirements. To fulfil our requirements, some of your personal data will need to be retained for a period after you cease to be a customer. When we no longer need it to fulfil the above requirements, we delete it securely or anonymize it in accordance with the applicable retention and disposition policy and schedule. With the data obtained for marketing purposes, we will retain it until you withdraw your consent.

Your Rights

You have the following Data Subject Rights:

- The right to be Transparency in how we use personal information. Hence, this detailed Privacy Policy, explaining the purpose of collecting your information, how it will be used etc.
- The right of access. This enables you to request access to your personal information and upon request, to be informed of the existence, use and disclosure of such information, e.g. receive a copy of the personal data we hold about If access to your personal data is denied, you can appeal the decision to the Information and Privacy Commissioner of Ontario (“Right to Appeal Access Decisions”).
- The right to Correction/Rectification of the personal informationF we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected/rectified or deleted, unless there is a legal obligation to retain such data.
- The right to withdraw consent. You may withdraw any consent you have provided to us for the collection, disclosure or use of your personal information at any time, unless legal requirements and/or contractual obligations exist.

- Right to Protection of Personal Information. We are required to protect your personal information against any unauthorized access, use or disclosure, unless you have consented to the disclosure of such data.

To exercise any of your rights over your personal information or to raise any complaints about our treatment of your personal information, please contact dpo.ontario@SpinGenie.ca, or as set out above.

We are permitted to ask for your ID to verify your identity prior to fulfilling your request. However, we reserve our right, in certain situations, to request your Identity to be verified via additional methods/ways up to the point where we are satisfied of the veracity and/or legality of the request. Such additional verification measures are applied to ensure that your personal information is not released to unauthorized people.

If you believe your privacy rights have been infringed, or you disagree with a decision we have made about your privacy rights, you have the right to complain to the relevant supervisory authority (Office of the Privacy Commissioner of Canada and/or IGO as described below).

In Ontario, if you are not satisfied with our response to your complaint, you can request a copy of your case file, to escalate your complaint to iGO. Please see information regarding our Complaints Process in Clause 22 of our [Terms and Conditions](#)

Freedom of Information Request (FOI Request)

As part of Ontario's open and regulated internet gaming market, we operate on behalf of and as an agent of iGaming Ontario (iGO). Under this framework, you have the right to request access to records held by the IGO under FIPPA. Records and information collected, used, or maintained by SpinGenie on behalf of IGO, may be in IGO's custody or control and, therefore, subject to such access requests.

SpinGenie does not respond directly to FOI Requests made under FIPPA. Instead, any such requests will be redirected to iGO for review and response. This includes requests that:

- Relate specifically to iGO, such as agreements or documents executed between iGO and the Company.
- Involve a requester's own personal information that is not accessible through their online account, such as for players that are self-excluded, trespassed, or have closed their accounts.
- Involve another individual's personal information, provided the requester has appropriate authorization or consent.

We will cooperate with iGO through established channels, such as **iGO Flow**—to locate and provide relevant records to facilitate iGO's response, in accordance with FIPPA and the *Privacy and Access to Information Directive (2025)*.

In accordance with FIPPA, iGO may withhold or redact information that is exempt from disclosure, including personal information, commercially sensitive information, or information that could reasonably be expected to prejudice the competitive position or contractual interests of SpinGenie or other third parties.

FOI requests should be directed to the [Freedom of Information Requests | iGaming Ontario](#) or submitted via direct mail to the following address:

iGaming Ontario

c/o Freedom of Information Office
4711 Yonge Street, Suite 602
Toronto, ON
M2N 6K8

SpinGenie will also work closely with iGO to support and assist it in handling access or correction requests that involve information collected or managed on iGO's behalf. Requests for access to personal information held by SpinGenie outside the scope of FIPPA (for example, marketing or non-Ontario operations) may be made under PIPEDA by contacting our Data Protection Officer (DPO) at dpo.ontario@SpinGenie.ca.

BetGuard Centralized Self-Exclusion Program (Ontario)

iGaming Ontario offers a voluntary centralized self-exclusion tool ("BetGuard") whereby individuals may register to centrally self-exclude from all regulated igaming sites in Ontario. BetGuard is offered subject to the BetGuard privacy policy.

In connection with BetGuard, iGaming Ontario, SpinGenie and their respective authorized suppliers on behalf of iGaming Ontario, may collect, use, share, disclose, retain, or otherwise process your Personal Information to develop, operate, maintain, sustain, update and modify BetGuard. This information may be used to verify your identity and centralized self-exclusion status, enable your centralized self-exclusion from regulated igaming sites, or for any other lawful purpose under the BetGuard privacy policy and the BetGuard terms and conditions. Personal Information will be retained only for the period allowed by the BetGuard privacy policy and Applicable Law.

For further information please review the applicable BetGuard [privacy policy](#).

Keeping your Personal Information Accurate and Current

You may update your account information by logging into the casino software and visiting your Personal Information page. You agree that you will verify and update this information regularly, to ensure that it remains accurate and up to date.

We will also keep player information and data accurate and up to date, pursuant to Section 40(2) of the Freedom of Information and Protection of Privacy Act (Ontario) ("FIPPA").

Cookie Section

What are Cookies?

'Cookies' are small text files stored in your web browser that enable us to recognize your computer when you visit our website. Cookies are essential to keep certain parts of our website functioning correctly and securely. We also use them to make things quicker, easier and more personal to you and to help us understand how our website is used. Optional/ non-essential cookies can be used to present you with more tailored advertising content, if you provide your consent and accept these cookies.

To do all these things, cookies collect some personal information about you whenever you use our website. You can choose whether to accept or reject some or all types of cookies and control them through your device's browser settings, as described in the section "Controlling my Cookies" below.

Cookies also enable SpinGenie to find out which advertisement brought you to our website, we may use the SpinGenie cookies on your computer. If we do collect such information, you will remain personally unidentifiable, and we will not share this information with any unconnected third party.

The Cookie Categories we use

The Cookies we use fall into the following categories:

- Strictly Necessary

This type of cookie allows you to navigate the website and use essential features like secure areas and online registration. These cookies don't gather any information about you that could be used for marketing or remembering where you've been on the internet. These cookies are essential in our

being able to guarantee the performance of our website, should you disable them we won't be able to ensure your security or predict how our website will perform during your visit.

- Performance

This type of cookie collects information about how you use our website e.g. which pages you visit, and if you experience any errors. The information collected is anonymous and is only used to help us improve how our website works, gauge what interests our users have and assess the effectiveness of advertising.

- Functionality

This type of cookie remembers your preferences for tools found on our website, so you don't have to re-set them each time you visit. Some of them are managed by third parties. They may for instance determine whether you see the latest or oldest comments made in relation to an article first. They may also help us greet you by name or remember your choice of language or region).

- Targeting/Tracking

These cookies are used to analyze what advertising might be most relevant to a user of the website based on the areas of the website that the user visits.

To view the list of the cookies that are used by our Site, click to the relevant button at the top right of this Privacy Policy.

Please note that our advertisers may also use cookies on their websites, and we have no control over such use

Controlling my Cookies

All modern browsers allow you to see what cookies you have, and to clear them individually or in their entirety by changing your cookie settings. Cookie settings are typically found in the 'options' or 'preferences' menu of your browser, otherwise you should use the 'Help' option in your browser for more details. You may also find the links below helpful:

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Microsoft Edge](#)
- [Cookie settings in Safari](#)

You can block cookies by activating the settings on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. We endeavor to make all parts of our site accessible to everyone but if you block some cookies, particularly Strictly Necessary cookies, your access might be impaired.

For non-essential cookies, we will ask you to consent when you first visit our site. Your first visit to our site will generate a pop-up header, requesting you to consent/ reject optional cookies and alerting you to this privacy policy. If you withdraw your consent, the cookies already installed will be deleted. A pop-up header will re-appear only if you change your cookie settings from time to time.

You can manage your cookie preferences and settings for non-essential/optional cookies at any time, by clicking to the relevant button, located at the top right of this page. If you withdraw your consent, the cookies already installed will be deleted.

The Use of Google Analytics

We use Google Analytics for 'analytical' purposes, such as keeping track of user/customer browsing patterns and building up a profile for a customized browser experience for you. Google Analytics is a

popular web analytics service provided by Google, Inc. Google Analytics uses cookies to help us to analyze how customers use our website.

Your opt-out choice is applied only to the browser from which you make the choice, so if you use different browsers you will need to opt out in each one. This opt-out is cookie based, so if you delete your cookies, you will no longer be opted out and you will need to opt out again. Google Analytics, from which you can control through your browser settings: opt out.

<https://tools.google.com/dlpage/gaoptout>.

You can also manage your cookie preferences at any time, by clicking the relevant button, located at the top right of this page.

Targeting and Retargeting

Targeting and Retargeting technologies are used to tailor our online marketing to your needs and interests and optimize your experience while using our websites, as for example the Trade Desk from Trade Desk Ltd. Such technologies are monitored and used when you visit our websites that work together with the providers of these re-targeting technologies, to be able to inform you when we meet your interests as closely as possible.

With the said technologies, cookies on our websites and on the websites of others (for retargeting purposes) track your interest in our products. With the use of random identifiers (i.e., online identifiers, cookie ids), there is no direct identification of your data, such as your name, email address etc. (“pseudonymised data”), unless you have consented to this. Also, any data collected through these cookies can be removed at any time, if consent to these cookies is withdrawn.

These cookies are mostly used for conversion tracking and retargeting (collection of information about your interests in the products of our retargeting partners – building an audience for campaigns run by the same advertisers). The data collected for targeting and retargeting purposes includes amongst others *Referrer URL, Page URL, IP Address, Time/Date, Geographic location* etc. and their collection is made after providing your consent.

When the targeting and retargeting technologies are used, your data may be transferred in the United States and processed there. All the appropriate measures for the transfer of your data outside the Ontario/ Canada are implemented, as described in the section “Transfers of data outside of Ontario/Canada” of this Privacy Policy.

You can manage your cookies preferences (Opt-In and Opt-Out), by clicking the relevant button, located at the top right of this page.

Security

SpinGenie goes to great lengths to guarantee that your personal and financial information remains 100% secure and confidential. We process your personal data via secure channels, ensuring that the appropriate measures and mechanisms for the security of the data are in place and guarantee that the requirements of the Applicable Laws and Regulations are respected and implemented to protect you from privacy risks that arise from the use and processing of your personal information, such as the use or disclosure of personal information for inappropriate purposes (i.e., unwanted marketing or spam if contact details are exposed), identity theft, loss or unauthorized access to financial or identification data, other privacy breaches involving personal information, such as reputational harm if gambling activity is disclosed publicly and other data and cybersecurity incidents and complaints.

The measures and mechanisms we take to safeguard your personal information (prevention and/or mitigation of privacy risks in case of privacy breaches) include:

- Administrative, organizational and technical controls to limit access to personal data that needs to be known in relation to the purpose of processing.
- Technical security measures (i.e., encryption, Data Loss Prevention (DLP) system, antimalware systems, access restriction etc.). We employ industry standard security protocols (The connection to this site is encrypted and authenticated using TLS 1.2 (a strong protocol),

ECDHE_RSA with X25519 (a strong key exchange), and AES_128_GCM (a strong cipher) to ensure that all transactions including deposits and withdrawals are carried out in a totally secure. This technology protects you from having your information intercepted by anyone other than SpinGenie while it is being transmitted between you and SpinGenie.

- Physical security measures (i.e., access cards logs, surveillance cameras).
- Privacy and cybersecurity training of employees to ensure that they are informed about the privacy and security obligations they have towards the processing of your personal data.
- Performance of regular Privacy Impact Assessments (PIAs)
- Restriction of access to your personal data to the employees and third parties who have a business need to know. Employees and third parties will only process your personal data based on the instructions provided by us, subject to a duty of confidentiality.
- The relevant procedures to deal with any possible data breach. If this is the case, the appropriate mechanisms are established to notify you and the iGO, within the relevant timeframe and where we are legally required to do so.

If we become aware of any privacy incident or breach, we have a defined process for responding to such privacy incidents or breaches; we will act in accordance with our “Information Security and Governance Policy” and “Incident Management Policy”. We will notify iGO of the breach as soon as feasible and no later than 24 hours after becoming aware of any breach, if it is considered as “Reportable Privacy Breach” and cooperate with iGO and any related authorities with any investigation or other response to it, addressing any resulting impacts. We will also notify you if your personal information is involved in any event of a Reportable Privacy Breach, where you have the right to make a complaint to the Information and Privacy Commissioner of Ontario.

Your responsibilities for protecting your Personal Information

We take significant steps to safeguard your personal and account information. However, you also have responsibility for maintaining the privacy and security of your personal Information. To help protect your account and personal information, we recommend the following practices:

- Use strong passwords: choose a unique password containing a mix of upper- and lower-case letters, numbers and symbols. Do not have the same password across multiple websites.
- Keep credentials confidential: never share your username, password or security PIN with anyone. We will never request your password or full payment details via email, chat or phone.
- Secure your Device: ensure your device is protected with up-to-date antivirus software and a secure internet connection. Avoid logging in to your account over public or unsecured Wi-Fi networks.
- Stay alert of Phishing Attempts: be cautious of unsolicited communications that ask for personal or financial information or direct you to suspicious websites. Always access our platform through our official website or application.
- Log out after use: always log out after finishing your session, especially when using a shared or public device.

Limits of Confidentiality

For legal reasons, SpinGenie may be required under certain circumstances to disclose your personal information. Reasons for this may include:

1. to protect and defend our rights or property;
2. to comply with any legal process served on us.