

## **"DLV" LTD Privacy Policy and Principles of Personal Data Processing** (in force from the 25<sup>th</sup> of May, 2018)

In Privacy Policy and in the Principles of Personal Data Processing of LTD "DLV" is described the order of the way, how LTD "DLV" processes the personal data (further in the text - Policy).

The detailed information about the Processing of Personal data can be described in other documents related to the services, and also on the web-site of LTD "DLV": [www.dlvbet.lv](http://www.dlvbet.lv), as also information is accessible in the gambling halls of LTD "DLV": "Zilais Dimants", "Dimants Z" and "Dimanta Bingo".

The Privacy Policy is used if the Client of LTD "DLV" uses, has used or has expressed a desire to use the given services of LTD "DLV" or otherwise is related to the given services of LTD "DLV" including in the relationships with Client, which has been formed before the Privacy Policy was in force.

If Client does not agree with The Privacy Policy or its separate terms than LTD "DLV" unfortunately will not be able to give the possibility to use all or some of the given services of LTD "DLV" to the Client.

LTD "DLV" is not responsible for the inexact, incomplete or erroneous data given by Client. If the data, indicated by the Client has been changed or information about Client, which is processed by LTD "DLV" is inexact or wrong, the Client has the Right to inquire to change, specify or correct this information.

### **1. Definitions**

Data Processing is any activity (including collection, bringing, storage, change, grant of access, realization of queries, transmission etc.) carried out with the Personal data.

**LTD "DLV"** is a legal entity with single registration Number 40003227719, legal address: 9, Kridenera dambis, Riga, LV - 1019 (to LTD "DLV" belongs the internet page: [www.dlvbet.lv](http://www.dlvbet.lv); gambling halls of LTD "DLV": "Zilais Dimants", "Dimants Z" and "Dimanta Bingo") that operates in status of Personal Data Manager. A list of places, where accessible services of LTD "DLV" are fulfilled, are enumerated on the web-site: [www.dlvbet.lv](http://www.dlvbet.lv).

**The Client** is any physical person that uses. used or expressed a desire to use some services given by LTD "DLV" or other related to them.

**Personal data** is any information, which is directly or indirectly related to the Client.

**Regulation is GDPR (General Data Protection Regulation) No. 2016/679** of European Parliament and European Council (EU) from April 27, 2016 about The Protection of physical persons regarding the processing of their personal data and free turnover of such data, and in this connection GDPR abolishes the Directive No. 95/46/EK (General Data Protection Regulation).

### **2. General conditions**

**2.1.** Within the framework of the applied normative acts LTD "DLV" provides confidentiality of Personal data and carries out the corresponding technical and organizational events for the protection of Personal data from an unauthorized division, illegal treatment or distribution, casual loss, change or elimination. A client is informed that communication of data in the internet itself is not safe and LTD "DLV" cannot guarantee safety of the data sent by means of the internet.

**2.2.** To manage and provide the realization of services LTD "DLV" has a right to use Personal data processing, concluding with Personal data Processor the corresponding agreements. In such cases LTD "DLV" carries out the necessary events in order to provide that such Personal data processing is carried out according to the stated in the contracts between LTD "DLV" and Processor of Personal data, and also in accordance with the GDPR and by the other applied normative legal acts and observing the corresponding events of safety.

**2.3.** Sources of Personal data of the Client are: Personal data can be collected from the Client, from the sources of the use of services of Client and outsourcing, for example, from the public registers and publicly accessible information.

### **3. Categories and types of Personal data**

Categories and types of Personal data that can be collected are the following data but not only these:

**The authentication data**, for example: first name, last name, personal code, date of birth, sex, photo, data of document of certifying personality (for example: these passports, these ID cards).

**Contact information**, for example: declared and actual place of residence, telephone number and e-mail address.

**Financial data**, for example: information about bank credit card of the Client to pay a money sum to perform the rate; Checking Account number of the Client to that will be paid the gambling gain in the case of win.

**Data** that are received and /or created, executing the duties stated in normative acts, for example: data that come from the information queries, that are got from the investigation institutions, sworn notaries, institutions of tax administration, courts and sworn bailiffs.

**Communication Data** are the Data that are gathering, when the Client visits the gambling halls of LTD "DLV" and web-sites, where LTD "DLV" provides the services or contacts with LTD "DLV" by phone, by email correspondence, by messages and other communication means, for example: social media, data that is received at the visit by the Client of LTD "DLV" web-site or connecting with LTD "DLV" by another channels, as also visual recordings and /or audio recordings (Picture of the Client made by video supervision system).

**Data** related to the services, for example: received services, paid winnings, given requests, queries and complaints.

### **4. Purposes and Basis of Personal data Processing**

**LTD "DLV" originally carries out Personal data processing:**

#### ***4.1. For the implementation of the Legal duties and verification of identity of the Client***

In order to execute the applied laws and normative acts (including, but not limited LTD "DLV" is under the obligation to make sure in the age of visitors of casino, playing halls or bingo halls, to shut out participating of minor persons in the interactive gaming or interactive lotteries and to prevent the further participating in gaming of gaming dependent players (regarding the statement of the person that he was not admitted in gambling halls), as also LTD "DLV" is obliged in the order and size set in normative acts to pay for winnings an income-tax from the population; also LT "DLV" is under an obligation in the order (set in normative acts by 3<sup>rd</sup> part of Article 36 of the Law about gaming and lotteries) to pay winning to the player; also LTD "DLV" is under the obligation in the order set in normative acts to conduct the investigations about the Clients, to give data to the competent institutions, to remove, to expose, to investigate and to notify about the possible legalization of the criminally earned facilities, financing of terrorism, if the Client belongs to the financial sanctions or is politically significant person or in legitimate interests of LTD "DLV" is to provide a carefully thought out of risk management and management of the company.

#### ***4.2. For general management of the relations with the Clients and for providing and administration of access services***

In order to provide the services of actuality and correctness of data, checking and complementing data, using external and internal sources, based on implementation of services or in order to execute a legal duty.

#### **4.3. For the Protection of the interests of the Client and /or of LTD "DLV"**

To protect the interests of the Client and /or LTD "DLV" and manage the quality of the provided services of LTD "DLV" and to give the proofs, based on the implementation of services or to execute a legal duty, or consent of the Client, or in legitimate interests of LTD "DLV" to prevent, to limit and to investigate the unconscientious or illegal use of services and products of LTD "DLV" or creation of legal bars in them, for the internal educating or for the providing of quality of services.

In order to guarantee the safety of LTD "DLV" and /or Client and to protect life and health of the Client and other rights for LTD "DLV" and for the Client, based on legitimate interests of LTD "DLV" in the protection of the Clients, employees, visitors and material values and assets of them and of LTD "DLV".

#### **4.4. In order to avoid the unconscientious use of services and for the corresponding providing of services**

In order to sanction and to control the access to digital channels and to the activity, to remove an unauthorized access and its unconscientious use and to provide the safety of information, on the basis of performing contract or to execute a legal duty or pursuant to the consent of Client or in legitimate interests of LTD "DLV" to control authorizing, access and activity of digital services of LTD. "DLV".

In order to improve the technical systems, IT infrastructure, to influence the reflection of services in devices and to develop services of LTD "DLV", for example: testing and perfecting the technical systems and IT infrastructure, on the basis of legitimate interests of LTD "DLV" to improve the technical systems and IT infrastructure.

#### **4.5. For formation, realization and asserting a right of requirement of debt**

In order to form, carry out, defend and execute a right of the requirement of debt, or to execute a legal duty or to carry out in legitimate interests of LTD "DLV" a right of the requirement of debt.

### **5. Profiling, personalized suggestions and automated acceptance of decisions**

**5.1.** Profiling is the automatic processing of Personal data, which is used in order to estimate the certain personal signs of the Client. Profiling is used for the realization of analysis of the Client and for consulting with the purpose of the direct marketing, for the automated acceptance of decisions, for example: for risk management, for providing of the given remote services, including the control of services, in order to eliminate a fraud and this is based on the legitimate interests of LTD "DLV", on the implementation of legal duties, providing of service (agreement) or consent of the Client.

**5.2.** LTD "DLV" can process Personal data in order to improve experience of the use of digital services of the Client, for example, tuning the reflection of service in the used device and, to prepare suitable suggestions to the Client. If only the Client did not limit the direct response marketing regarding himself than LTD "DLV" can conduct processing of Personal data for the preparation of general and personalized services of LTD "DLV". Such marketing can be based on the services used by the Client and on that, how the Client uses the services and on that, how the Client operates in the digital channels of LTD "DLV".

**5.3.** For profiling based on the personalized suggestions and marketing that is conducted pursuant to legitimate interests of LTD "DLV", LTD "DLV" provides that Clients could do a choice and use a comfortable instrument for a management tuning of confidentiality.

**5.4.** LTD "DLV" can also collect the statistical data about the Client, including the characteristic about his behavior and way of life, on the basis of demographical data about the households. The Statistical data for the formation of segments /of profiles can be obtained also from external sources and can be incorporated with these internal data of LTD "DLV".

## 6. Recipients of Personal Data

***The personal data are passed to other recipients, for example:***

- 6.1. to the server providers and other third persons that participate in the providing of services of the LTD "DLV";
- 6.2. to any auditor, financial consultant, collector of debts, legal adviser, sworn attorney, sworn notary and /or sworn bailiff or other Processor designated by LTD "DLV" for the Processing Personal data on the choice of LTD "DLV" (including LTD "BLIKS", single registration Nr. 40103004068, and LTD "OPTRON", registration number 40103066693);
- 6.3. To the Inspection of supervision of lotteries and gaming, State Income Service and other institutions (for example, human rights establishments and institutions of financial investigations, courts, out-of-court institutions for decision of spores, administrators of process of insolvency);
- 6.4. to the confessed companies on the study of market and public opinion (within the framework of EU) - for canvassing and researches in connection with the offered services of LTD "DLV";
- 6.5. to other persons, connected with the providing of services to LTD "DLV", including representatives of archiving, postal services etc.

## 7. Geographical area of the Processing

- 7.1. The personal data are processed in the zone of European Union /European Economic Zone (EU/EEZ).

## 8. Storage Period

8.1. Storage period of the processed Personal data can be based on the Agreement with the Client, legitimate interests of LTD "DLV" or applied normative acts (for example: laws about the book-keeping, archives, legalization of the criminally earned facilities, limitation period, civil law etc.). LTD "DLV" keeps the Personal data of the Client in accordance with purposes and intentions, and also in accordance with the requirements of GDPR and normative acts, including, for the observance of legitimate interests LTD "DLV" (for providing of proofs on requirements about disparity of service and /or implementation of contractual obligations, and also for providing of proofs on possible requirements that come from a delict), LTD "DLV" keeps Personal data of Client ten years from the day of implementation of service or agreement.

## 9. Rights of the Client as subject of data

***The Client (subject of data) has rights regarding the processing of the data that are pursuant to the applied normative acts is classified as Personal data. These rights in the whole are the following:***

- 9.1. to request the correction of the Personal data if they are incongruous, incomplete or inexact;
- 9.2. to object against the processing of the Personal data if the use of Personal data is based on legitimate interests, including profiling for the direct response marketing (for example, receipt of suggestions of marketing or for participating in questioning);
- 9.3. to request to delete the Personal data, for example, if Personal data are processed, on the basis of consent, if Client has recalled the consent. These rights do not have force, if Personal data, which removal was requested, are processed also being based on other legal framework, for example, agreement or coming from duties arising from the corresponding normative acts of (for example, Law about the legalization of the criminally earned facilities and removal of financing of terrorism) or in other cases indicated in this GDPR;
- 9.4. to limit the processing of the Personal data pursuant to the applied normative acts, for example, in time, when LTD "DLV" estimates, whether the Client has a right to delete his data;
- 9.5. to get the information, whether LTD "DLV" processes his Personal data and, if processes, then to give the access to them and to obtain the information, as they are processed and whom they are passed;

- 9.6. to receive the Personal data, that he has given and which are processed on the basis of performing the contract of consent in writing or in some from mostly used electronic formats and, if possible, to pass such data to other service provider (bearableness of data);
- 9.7. to recall the consent to process the Personal data, if the Personal data were given to LTD "DLV" on the basis of consent of the Client;
- 9.8. to be not fully inferior to the automated acceptance of decisions, including profiling, if such acceptance of decisions have law consequences or, that in a similar kind considerably influence on the Client. These rights do not have force, if a decision-making is needed, to conclude or perform contract with Client, if a decision-making is settled pursuant to the applied normative acts or, if Client gave the obvious consent;
- 9.9. to give the complaints about the use of Personal data to the Data State inspection ([www.dvi.gov.lv](http://www.dvi.gov.lv)), if the Client considers that processing of his Personal data violates his rights and interests pursuant to the applied normative acts.

## 10. Cookies

The Policy of LTD "DLV" about the use of Cookies is accessible on the homepage of LTD "DLV": [www.dlvbet.lv](http://www.dlvbet.lv). On the homepage: [www.dlvbet.lv](http://www.dlvbet.lv) is used the technology of Cookie files "Cookies" that collects the information about the Client, including the information if the Client has visited the homepage before, whether the Client is new user and what information the client has looked on the homepage. The use of Cookies helps to improve the provided services, for example, not allowing once again to enter information that is already entered. The use of Cookies helps to register the number of visitors and summarize the statistics and information about that, how users use services, to improve quality of homepages, appendixes and services, and also to create user oriented content by the means of advertisement.

## 11. Principles of Personal data processing

- 11.1. LTD "DLV" collects and processes the Personal data of the Client in accordance with following legal bases: implementation of service (agreements); providing of legitimate interests LTD "DLV"; implementation of legal duties LTD "DLV"; consent of Client. In accordance with the indicated in the legal acts to the volume and terms of processing of data of the Client, one or few of indicated legal frameworks can be applied.
- 11.2. LTD "DLV" by carrying out the processing of Personal data of the Client, strictly observes the requirements of the applied normative acts provides, that Personal data:
  - 11.2.1. Are processed justly, honestly and in review to the subject of data kind ("legality, honesty and visibleness");
  - 11.2.2. Are collected for the concrete, clear and legitimate purposes and their further processing is not conducted in incompatible with the mentioned in the whole kind; further processing with the purpose of archiving in the interests of LTD "DLV", for scientific or historical research purposes or for the statistical purposes according to the Point 1 of the Article 89 of GDPR, and are not considered as incompatible with the primary purposes ("special purpose limitations");
  - 11.2.3. are adequate and corresponding and include only necessary the information for their processing ("minimization of data");
  - 11.2.4. are exact or if needed, renewed; there is needed to execute all the reasonable measures, to provide that the inexact personal data, taking into account purposes in that they are processed, without deceleration are deleted or corrected ("exactness");
  - 11.2.5. are kept in a kind that assumes authentication of subjects of data but no longer that for necessary purposes. in that the corresponding Personal data are processed; The personal data can be kept longer, if the Personal data are processed only for the archiving in the interests of LTD "DLV", for the scientific or historical research purposes or for the statistical purposes according to the Point 1 of

the Article 89 of GDPR, with the condition that corresponding technical and organizational measures that are foreseen in this GDPR in order to protect the rights and freedom of the subject of data ("limitation of storage");

- 11.2.6. are processed in such a kind in order to provide the safety of corresponding Personal data, including the protection from unsolved or illegal processing and from the occasional loss, elimination or spoilage, using corresponding technical and organizational events ("integrity and confidentiality").

## 12. Contact information and order of consideration of queries

12.1. The Client may contact LTD "DLV" in the connection with questions, review of consent, queries, exercising right of subject of data and complaints about the use of Personal data.

12.2. Contact information of LTD "DLV" is accessible on a web-site LTD "DLV": [www.dlvbet.lv](http://www.dlvbet.lv).

12.3. Contact information of the appointed Specialist on Protection of data: \_\_\_\_\_ or \_\_\_\_\_, with a mark "Specialist on Protection of data".

12.4. To protect the data of the Client from illegal distribution, LTD "DLV", getting the query of the Client about the grant of data or about realization of rights for other Clients, makes sure in the Personality of the Client. For this purpose of LTD "DLV" has a right to request to specify the personal data from the Client, comparing, whether the indicated data of the Client coincide with the corresponding personal data, which are at the disposal of LTD "DLV". Conducting this verification, LTD "DLV" also can report notification of control on the indicated number of the Client or e-mail (reports or as an e-mail), asking to perform the authorization. If procedure of the verification was not successful (e.g., the indicated data of the Client do not coincide with the personal data, which are at the disposal of LTD "DLV" or Client did not executed the authorizing after sending the report or notification in the e-mail), LTD "DLV" will be forced to establish that Client is not the subject of the inquired personal data, and will be forced to decline the query given by Client. Getting the request from the Client on realization of some rights for Client and successfully executing the beforehand indicated procedure of verification, LTD "DLV" is obliged without a hitch, in any case, but not later, than during one month from the end of procedure of receipt and verification of the request from the Client, to give to the Client the information about actions, that LTD "DLV" has executed in accordance with the request given by Client. Taking into account the complication and amount of requests LTD "DLV" has a right to prolongate a term of one month for two months longer, informing about it the Client till the end of the first month and specifying the reasons of such prolongation. If the request of the Client is given by electronic facilities then LTD "DLV" will give an answer also by electronic facilities, except for the cases, when it will not be (for example, because of high volume of the information) or then, if the Client asks to answer by another way. LTD "DLV" is competent to reject the request of the Client with the motivated answer, if there will be stated the circumstances, which are indicated in legal acts, informing Client about it in the written form. If the queries of the Client (subject of data) are obviously groundless or excessive, in particular because of their regular reiteration, then LTD "DLV" as a manager can or:

a) to request the reasonable fee, taking into account the administrative charges that are related to providing of information or implementation of requested actions; or b) to refuse to execute a query.

## 13. Validity and amendments of Privacy Policy

13.1. A privacy policy for the Clients is accessible in the playing halls of LTD "DLV" and on a homepage: [www.dlvbet.lv](http://www.dlvbet.lv)

13.2. LTD "DLV" has a right at any moment in the one-sided order to change the Privacy Policy according to the applied normative acts, reporting to the Client about the corresponding amendments in the playing halls of LTD "DLV" and on a homepage: [www.dlvbet.lv](http://www.dlvbet.lv), by mail or by other method (for example, in mass medias).