



GLOBALPOKERACADEMY.COM

PRIVACY POLICY

VERSION: 1.0

DATE UPDATED: 16 December 2022

At VGW, we are committed to protecting and respecting your privacy and maintaining the confidence and trust of our customers. This privacy policy ("**Privacy Policy**") explains how your personal information is collected, why it is collected and how it is kept secure.

This Privacy Policy governs the manner in which VGW Holdings Limited, VGW Malta Limited, VGW GP Limited, VGW Games Limited, VGW Administration Limited and other companies in the VGW group ("**VGW Group**") collect, use, maintain and disclose information collected from users (each, a "**User**") of Global Poker Academy through <https://globalpokeracademy.com/> and any subdomains, subpages, successor sites or any application accessible via our website (the "**Website**"). This Privacy Policy applies to the Website and all products and services offered through the Website.

1. DATA CONTROLLER

- 1.1. This Privacy Policy is issued on behalf of the VGW Group so when we mention "**VGW**", "**we**", "**us**" or "**our**" in this Privacy Policy, we are referring to the relevant company in the VGW Group responsible for processing your data.
- 1.2. The data controller responsible for processing data collected through your use of the Website (including any data you may provide through the Website) is **VGW GP Limited**, having its registered address at Trident Park, Notabile Gardens, No6 – Level 3, Central Business District, Mdina Road, Zone 2 Birkirkara CBD2010 Malta (the "**Data Controller**").

2. TYPE OF INFORMATION WE COLLECT

We collect two basic types of information - personal information (as defined below) and anonymous information (as defined below) - and we may use personal and anonymous information to create a third type of information, aggregate information (also defined below). For example, we collect:

- (a) Contact details, such as your first name and surname and email address;
- (b) activity, technical and device information about your use of our Website, such as the content you view, the time and duration of your visit on our Website, how often you use our services, how you first heard about our Website, your preferences and information about your interaction with the content offered through our Website, your hardware model, device type, other unique device identifiers, operating system version, browser type and IP address.

3. HOW WE COLLECT YOUR INFORMATION

- 3.1. We collect information that Users provide to us in a variety of ways, including, when Users visit our Website, respond to a survey, fill out a form, and in connection with other activities, services, features or resources we make available on our Website.

You warrant any contact information you provide, including (but not limited to) your email address, is true and accurate.

- 3.2. We also collect information about your use of our products and services through a variety of technologies that are present when you visit our Websites or use our applications on third party sites or platforms (whether or not you are logged in or registered) including cookies, flash cookies, pixels, tags and application program interfaces (“API”). Please see the section entitled “Personal Data Collected via Technology” below for further information.
- 3.3. Analytics tools are also used by us to collect information, including when you visit our Website or use our applications or services on third party sites or platforms.

4. HOW WE USE COLLECTED INFORMATION

- 4.1. The Data Controller is responsible for and may use your information for the purposes described in this Privacy Policy. Other members of VGW Group may access your information where they act on behalf of the Data Controller as a data processor for the purposes described in this Privacy Policy. In summary, we use the information collected to operate our Website and to provide our products and services, to respond to your questions and to fulfil all applicable regulatory requirements.
- 4.2. In accordance with applicable law and any elections made available to you, VGW may collect and use the information of Users for the following specific purposes:
 - (a) **To improve customer service and our services** - Information you provide helps us respond to your customer service requests more efficiently; we may use feedback you provide to improve our products and services.
 - (b) **To personalize user experience** - We may use information which has been aggregated to understand how our Users as a group use the services and resources provided on our Website.
 - (c) **To send important notices to you** - From time to time we may send important notices to you. This information is important to your interactions with us and you acknowledge that you may not opt-out of receiving these communications.
 - (d) **To comply with our legal and regulatory obligations** - We may use information we collect about you to comply with fraud or to comply with any other legal or regulatory obligations (including detection, investigation and prevention of activity that violates our terms and conditions or that may be illegal).
- 4.3. We do not use automated decision making within the meaning of European data protection laws.

5. PERSONAL DATA COLLECTED VIA TECHNOLOGY

- 5.1. When you interact with our Website, we try to make that experience simple and useful. We and our partners use industry standard identifiers, such as cookies or other similar technologies.
- 5.2. Our Website may use technologies to enhance User experience. These technologies are small files that are placed on your computer, tablet, mobile phone or other devices when you visit a website. They allow us to record certain pieces of information whenever you visit or interact with the website.
- 5.3. The following are examples of these types of technologies:
 - (a) **Cookies.** These are small text files placed in your device browsers to store your preferences. Most browsers allow you to block and delete cookies. However, if you do that, the service may not work properly.

You can change your preferences with regards to cookies and other trackers at any time by clicking on the ‘Your Privacy Choices’ link at the bottom of the screen.
 - (b) **Pixel tags/web beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Website that collects information about Users engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on or forwarded.
 - (c) **Event tagging.** Event tagging (including Facebook App Events and Playfab Events) allows us to track actions that occur in the Website such as application installs and purchase events. By tracking these events we can view analytics, measure ad performance, and build audiences for ad targeting.

Behavioral Advertising

- 5.4. We may partner with a third party to either display advertising on our Website or any application accessible via our Website or to manage our advertising on other websites (for example, using custom audiences on Facebook). Our third party partner may use technologies such as cookies to gather information about your activities on our Website and other websites in order to provide you advertising based on your browsing activities and interests.
- 5.5. If you wish to opt-out of interest-based advertising click [here](#) (or if located in Canada click [here](#)). Please note you will continue to receive generic advertisements.

6. YOUR RIGHTS OVER YOUR INFORMATION

General Rights

- 6.1. We appreciate that by law and subject to certain conditions, you have a number of rights concerning the personal information we hold about you. These rights include the right to access the personal information we hold about you, the right to object to the processing of your data and the right to withdraw any consent provided. In some circumstances, you can ask us to delete the personal information we hold about you.
- 6.2. To exercise the right described at clause 6.1, please complete the Global Poker Customer Request Form [here](#) or alternatively email dataprivacy@vgw.co.

Right to complain to a supervisory authority

- 6.3. You also have the right to complain to the relevant data protection supervisory authority about our processing of your personally identifiable information.

7. HOW WE PROTECT YOUR INFORMATION

We have in place physical, electronic and operational procedures to protect the information that we collect. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Website. Our security measures are reviewed regularly and updated in keeping with technological advances.

8. HOW LONG WILL WE RETAIN YOUR INFORMATION

We will retain your information for the period of time required to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

9. SHARING YOUR INFORMATION

- 9.1. We do not sell, trade, or rent the personal identification information of Users to others. However, there are circumstances when we share your personal data with other companies in the VGW Group, with third parties that provide services to you on our behalf, and with other third parties in the course of complying with our legal obligations.

With other companies within VGW Group

We may share the information we collect with other companies in the VGW Group for the purposes set out in this Privacy Policy:

- 9.2. Please see Transfers below for further information on how we share information within the VGW Group.

With third parties

- 9.3. We only share information with third parties in limited circumstances including the following:
 - (a) when you allow us to share your information with third parties;
 - (b) when providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;
 - (c) with our service providers to enable us to provide our services, such as companies that help us with technology services, storing and combining data, or providing relevant marketing and advertising for our products and services. The partner companies will have access to your personal information only to perform services on our behalf and are prohibited from using your personal information for purposes other than those requested by us or required by law. Where service providers use personal information for their own purposes, where permitted by law, such service provider will act as data controller;
 - (d) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, when ordered to do so by any regulatory body and/or under any legal provision contained in the governing law of a particular jurisdiction;
 - (e) when we share your personal information with third parties to enforce our terms and conditions set out on our Website, to protect our rights and property and the rights and property of our customers and third parties, to detect fraud or other illegal activities, and to comply with law or legal processes; and
- 9.4. We may also share generic aggregated demographic information not linked to any personal identification information regarding visitors and Users with our business partners, trusted affiliates and advertisers for the purposes outlined above.

Transfers

- 9.5. VGW Group operates in several international jurisdictions and personal information we collect may be transferred to, and stored and processed by, individual companies in the VGW Group or third parties in, the European Union, the United States, Canada, Australia, the Philippines or any other country in which we or our third party processors maintain facilities. We will ensure that transfers of personal information to any country or an international organization are subject to appropriate safeguards. Additionally, without limitation where applicable, when transferring personal information from the European Union, we may use standard contractual clauses approved by the European Commission or otherwise adopt other means in accordance with European data protection laws for ensuring adequate safeguards.

10. OTHER IMPORTANT INFORMATION

Compliance with Children's Online Privacy Protection Act

- 10.1. Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information on our Website from individuals we actually know are under the age of 18, and no part of our Website is structured to attract anyone under the age of 18.

Your California Privacy Rights

- 10.2. California residents may learn more about their rights, including how to exercise their rights under the California Consumer Privacy Act of 2018, by clicking [here](#).

Do-Not-Track Signals and Similar Mechanisms.

- 10.3. Some web browsers may transmit "do-not-track" signals to the websites with which the user communicates. Due to the different ways that web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. As there currently is no industry standard concerning what, if anything, websites should do when they receive such signals, our Website currently do not take action in response to these signals.

If and when a final standard is established and accepted, we will reassess how to respond to these signals.

11. CHANGES TO THIS PRIVACY POLICY

- 11.1. This Privacy Policy may be updated from time to time to reflect changes in the way we work or the way our work is regulated. We will notify you of material changes and, where required by law, will obtain your consent. Notice may be by the posting of such changes on our Website or by other means in accordance with applicable law.
- 11.2. Any changes to the Privacy Policy will become effective when the updated policy is posted on our Website.
- 11.3. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

12. DEFINITIONS

- 12.1. **Personal information** means information that identifies (whether directly or indirectly) a particular individual, such as the individual's name, postal address, email address, and telephone number. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as personal information.
- 12.2. **Anonymous information** means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual.
- 12.3. **Aggregate information** means information which does not identify and cannot reasonably be used to identify an individual customer.

13. CONTACTING US

If you have specific questions regarding your personal information or how we use it, please contact our Data Protection Officer directly by email at the following email address dataprivacy@vgw.co and specify your place of residence and the nature of your question or, alternatively, complete the Global Poker Customer Request Form [here](#).