

## Privacy Policy Spin Marketing

With this Privacy Policy we, the SPIN MARKETING BV, Saturnusstraat 38, Curaçao, registry no. 160163, (“Bet90“, “Spinbookie“, “we“, “us“ or “our”) informs you on the collection and processing of personal data with the use of our websites [bet90partners.com](http://bet90partners.com) and [spinbookiepartners.com](http://spinbookiepartners.com) (“Website”). This Privacy Policy is inseparably linked to our Terms & Conditions, of which it forms a part, and its acceptance is a prerequisite for an account registration. Any capitalized terms used herein which are not defined shall take their meaning from the Terms & Conditions.

We will collect and process all personal data which we obtain with the use of our Website and of the services offered thereon exclusively in the manner set out in this Privacy Policy. We are committed to preserving the privacy of our visitors and to complying with all applicable data protection laws and regulations, especially the General Data Protection Regulation (EU) 2016/679 (“GDPR”, downloadable under <http://eur-lex.europa.eu>) as well as the Maltese Data Protection Act implementing and adapting the national law to the latter.

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1. Name and contact details of the controller and contact details of the data protection officer

(1) The controller within the meaning of Art. 4 par. 7 GDPR is the Spintastic NV, Abraham de Veerstraat 9, Willemstad, Curaçao, registry no. 158762, email: [support@bet90.com](mailto:support@bet90.com) or [support@spinbookie.com](mailto:support@spinbookie.com)

(2) The contact details of the Data Protection Officer are the following:

Abraham de Veerstraat 9

Willemstad

Curaçao

Registration number: 158762

Email: [support@bet90.com](mailto:support@bet90.com)

Email: [support@spinbookie.com](mailto:support@spinbookie.com)

(3) If and insofar as we use the services of commissioned service provider for single functionalities of our offers or if and insofar as we would like to use your personal data for promotional purposes we will inform you on the respective processes in the following. Thereby we also mention the predetermined criteria for the retention period.

## 2. Collection of personal data in case of a mere informational visit of our Website

(1) In case of a mere informational use of our Website, hence, if you do not register or provide us otherwise with personal data, we will only collect the personal data which your browser transfers to us. If you would like to visit our Website without registering for our services or contacting us otherwise, we therefore collect the following data which is technically necessary to display our Website and to guarantee its stability and security:

- IP-address;
- Date and time of visit;
- Time zone difference to the Greenwich Mean Time (GTM);
- Content of the demand (precise page);
- Access status/HTTP-status code;
- The quantity of data transferred;
- The website from which the access takes place;
- The browser used;
- The operation system and its interface;
- Language and version of the browser software.

(2) The legal basis of this processing is Art. 6 par. 1 sent. 1 lit. f GDPR. Our justified interest derives from the aforementioned purposes of displaying our Website and of guaranteeing the stability and security.

3. Contacting our affiliate support via email ([affiliates@bet90.com](mailto:affiliates@bet90.com) and [affiliates@spinbookie.com](mailto:affiliates@spinbookie.com))

(1) You may contact our affiliate support via email at [affiliates@bet90.com](mailto:affiliates@bet90.com) and [affiliates@spinbookie.com](mailto:affiliates@spinbookie.com). This is also possible without a registration.

(2) In case of contacting via email we shall collect:

- Your first name and your last name
- Your email-address, and
- Your email-message.
- If you already have registered as an affiliate, we would like to ask you to also provide your affiliate/company name to us.

(3) In some cases, we may ask you to provide further evidence of your identity as the case may be, in order to enable us to verify that the inquiry was actually filed by you. If this should become necessary, then we will inform you accordingly and explain in detail which identity proof we require.

(4) The collection and processing of your personal data described above happens in accordance with Art. 6 par. 1 sent. 1 lit. b) GDPR in order to enable us to process your query. The deletion of your emails takes place according to the retention periods described in sec. 7 of this Privacy Policy.

4. Collection and processing of personal data with the registration as an affiliate and for the execution of the affiliate contract

(1) In order to be an affiliate with us you have to register by providing your email-address, a username which you may freely choose and a password chosen by yourself. There is no constraint to use your clear name but a pseudonymous use is also possible.

(2) Furthermore, we are obliged - due to anti-money laundering reasons - to collect the following personal data of you:

- Your First and last name
- Your Affiliate/Business name
- Your Postal address (street, postal code, city, country)
- Your Email address
- Your Telephone number
- Your Skype name
- Your MSN name (if applicable)
- The Name of your website and your URL as well as the category of the website

(3) For the purpose of executing the payment of the commissions due to you, we also collect the following payment data from you:

- Your preferred payment option (bank transfer, Skrill or Neteller)
- The account holder name
- and depending on the selected payment method:
  - o either (with the payment method "bank transfer")
    - ☐ Name of the bank
    - ☐ Postal address (street, postal code, city, country) of the bank
    - ☐ Account number
    - ☐ Bank code
    - ☐ IBAN
    - ☐ BIC/Swift code
  - o or (with the payment methods "Skrill" or "Neteller")
    - ☐ The email address you used to register for your Skrill or Neteller account

(4) The collection and processing of your personal data takes place for the purposes described above and again summarized and allocated to the respective legal basis in the following and is necessary for those purposes:

- According to Art. 6 par. 1 sent. 1 lit. b) GDPR for the fulfilment of contractual obligations respectively for the execution of pre-contractual measures: to process your registration, to assign and process the data generated by your activities, to execute the commission payments you are entitled to and to be able to offer you affiliate support, to correspond with you, to process claims by you or by us, to ensure the technical administration of our website and to manage the data of our affiliates;
- Pursuant to Art. 6 par. 1 sent. 1 lit. b) and c) GDPR for the fulfilment of contractual obligations and due to statutory requirements: to send you important e-mails about the use of the website, the affiliate terms and conditions, information about technical problems or matters in connection to our legal or regulatory obligations; and
- In accordance with Art. 6 par. 1 sent. 1 lit. c) GDPR due to statutory prerequisites or in compliance with Art. 6 par. 1 sent. 1 lit. e) GDPR in the public interest: in order to protect you and us (including affiliated companies) from fraud and manipulation as well as for purposes of identity verification (to prevent money laundering and terrorist financing).

## 5. Newsletters

(1) As part of your registration or - after the registration - in the settings of your affiliate account, you can give us your consent for us to be able to send you promotional emails, in particular our newsletter, which we use to inform you about our current interesting offers. The advertised goods and services are named in the declaration of consent.

(2) After you have given your consent, we will save your email address for the purpose of sending you advertising emails. The legal basis is Art. 6 para. 1 sentence 1 lit. a GDPR.

(3) You can revoke your consent to the sending of our advertising e-mails at any time and unsubscribe from them. You can declare your revocation by clicking on the link provided in each advertising email or by emailing us at [affiliates@bet90.com](mailto:affiliates@bet90.com) and [affiliates@spinbookie.com](mailto:affiliates@spinbookie.com).

(4) We would like to point out that we evaluate your user behaviour when sending our advertising emails. For this evaluation, the emails sent contain the so-called web beacons or tracking pixels, which represent one-pixel image files that are stored on our website. For the evaluations, we link the in para. 2 mentioned data and the web beacons with your email address and an individual ID. The data is only collected in a pseudonymized form, so the IDs are not linked to your other personal data.

(5) You can object to this tracking at any time by clicking on the separate link provided in every email or by informing us via another contact. The information is stored for as long as you have subscribed to the newsletter. After unsubscribing, we save the data purely statistically and anonymously.

## 6. Cookies

(1) In addition to the personal data mentioned in sec. 2, cookies are stored on your PC or on your mobile device when using our Website. Cookies are small text files which are stored on your hard disk or on your mobile device allocated to the browser used by you and through which certain information is provided to the controller using the cookie (here to us). Cookies may not execute programs or transfer viruses to your device. They serve the purpose to make the internet more user-friendly and more efficient overall.

(2) Use of cookies by us:

a) This Website uses the following kinds of cookies, whose extent and manner of function are explained in the following:

- Transient cookies (thereto under lit. b))
- Persistent cookies (thereto under lit. c))

b) Transient cookies are automatically deleted, if you close the browser. To transient cookies belong especially the session-cookies. Such store a so-called session-ID with the help of which different requests of your Browser may be allocated to the same session. Thereby your device may be recognized if you return to our Website. Such session-cookies are deleted if you lock-out or close the browser.

c) Persistent cookies remain on your hard disk or on your mobile device also beyond the termination of the browser session and will be deleted after a pre-determined period which may differ depending on the cookie. You can delete cookies at any time in the security settings of your browser. We use those persistent cookies in order to facilitate for you the use of our Website as well as of the offers provided there, by storing certain information and settings in a way that you do not permanently need to re-enter them. With the help of the persistent cookies we may identify you for subsequent visits, if you register for a player account on our Website. Without the persistent cookies you would need to log in to your account any time you visit our Website. Furthermore, persistent cookies enable us to measure the use of our Website statistically and serve the optimization of our offers, as well as to design our Website and the offers provided there in a more personalised way..

d) The cookies may also be such of third parties (so called “third party cookies”), because we use several partners complementing our offer and helping thereby to make the Website and the offers provided there more interesting to you (see thereon also sec. 11 of this Privacy declaration).

e) You may configure your browser settings so that they correspond to your preferences and e.g. reject the acceptance of third - party cookies of all cookies, allow those only in certain cases or activate the automated deletion of cookies with the closing of the browser. However, we point out to you that in this case you may not be able to use our Website and the offers contained thereon unobstructed. Further information on cookies and on the undertaking of browser settings concerning cookies you may find under [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies).

f) The flash-cookies used are not collected by your browser, but by flash-plugin-ins. In addition to that, we use HTML5 storage objects which are stored on your device. These objects store the necessary data independently of the browser used by you and do not have an automated expiry date. If you do not desire the processing of flash cookies, then you will need to install a corresponding add-on, e. g. “Better Privacy” for Mozilla Firefox (<https://addons.mozilla.org/de/firefox/addon/betterprivacy/>) or the Adobe-Flash-Killer-cookie for Google Chrome. The use of HTML5 storage objects may be prevented by setting your browser in private mode. Additionally, we recommend to manually delete your cookies and the browser-route.

g) The collection and processing of your personal data, by means of the cookies described for the aforementioned purposes, happens on the legal basis of Art. 6 par. 1 sent. 1 lit. f) GDPR. It is necessary for the preservation of our legitimate interests.

## 7. Your rights in connection with your personal data

(1) You have the following rights against us concerning your personal data:

- The right of access to the personal data stored by us on you (Art. 15 GDPR),
- The right to rectification of incorrect or to the completion of your personal data stored by us (Art. 16 GDPR),
- The right to erasure of your personal data stored by us (under certain prerequisites), as far as the processing is not necessary for exercising the right of freedom of expression and information; for compliance with a legal obligation, due to reasons of public interest or for the establishment, exercise or defence of legal claims (art. 17 GDPR),
- The right to a restriction of processing as far as you contest to the accuracy of the data, the processing is unlawful but you oppose the erasure of the personal data and we no longer need the personal data for the purposes of the processing, but you require the data for the establishment, exercise or defence of legal claims or if you have objected to the processing pursuant to Art. 21 par. 1 GDPR (Art. 18 GDPR),
- The right to data portability in a structure, common and machine readable format (Art. 20 GDPR), and
- The right to object to the processing (Art. 21 GDPR) as far as your personal data is processed on the legal basis of legitimate interests according to Art. 6 par. 1 sent. 1 lit. f) GDPR and as far as there are reasons which arise from your special situation or you object to the use for promotional purposes. In the latter case you have a general, unconditioned right to object, which shall be implemented by us also without a special situation (see also above under 4. on this).

(2) If you would like to exercise one or more of the above mentioned rights, please contact our affiliate support via email at [affiliates@bet90.com](mailto:affiliates@bet90.com) or [affiliates@spinbookie.com](mailto:affiliates@spinbookie.com). Please ensure that your message has been sent from the email-address registered for your player account under the provision of the following information:

- Your first and last name,
- Your affiliate/business name,
- All details on your query.

In case of use of another email-address than the one which is registered for your player account, delays in our response may be possible.

(3) Several of the rights nominated in paragraph (1) are only applicable under certain circumstances (see already the description of the rights in par. (1)). If we shall not therefore be able to comply with your query, then we will describe the reasons for this to you.

#### 8. Duration of storage/retention periods

We generally process your personal data no longer than it is necessary for the purposes for which we collected it, unless we are subject to a longer statutory retention period. Due to commercial and tax law requirements, we are obliged to keep your contact and payment details for a period of ten years. If you close your account with us, the account will be marked as "closed" and the associated personal data will be kept securely until the statutory retention period has expired. This data is then destroyed in a secure manner.

#### 9. Transfer of personal data to data processors and/or third parties

(1) Partially, we use the services of external service providers for the processing of your personal data (data processor or third parties). Those have been carefully chosen and commissioned by us. As far as the external service providers are data processors, they are bound to our instructions and are regularly audited. In all cases in which we disclose your personal data, we make sure that there is a contract in place with the recipient, which guarantees that the data disclosed is transferred in a secure manner and that we only disclose the necessary minimum amount of personal data. Under no circumstances will we sell your personal data to third parties.

(2) We cooperate with the following data processors and/or third parties:

- Payment service providers;
- Services for the administration of our affiliate data and for the processing of approaches of our affiliate support via email;
- Services in connection with the identity check and the prevention of money laundering, terrorist financing, fraud and manipulation;
- Analysis services;
- Systems for the monitoring of the performance of our Website and security systems;
- Marketing and promotion agencies;

- Providers of communication platforms;
- Social media platforms;

(3) Occasionally, we receive a request from prosecution-, regulatory- and supervision authorities to disclose personal data of players. In cases of such requests we always make sure that the entity demanding the disclosure provides the corresponding legal basis for the request, and will - in all cases - only disclose the necessary minimum amount of information in a safe way. Furthermore, we will transfer your personal data to prosecution-, regulatory- and supervision authorities, if we are of the opinion that you have committed a criminal offence or that you may commit a criminal offence.

#### 10. Transfer of personal data to third countries (non-EU and non-EEA-states)

Your personal data will not be transferred to third countries (in non-EU or non-EEA countries). All processing takes place within the European Union or the EEA.

#### 11. Security

We use suitable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third parties. For example, we use a "role and rights" concept, according to which, only designated departments within the organisation responsible can access and process your personal data, such as affiliate support, payments & fraud, AML analysts and compliance. Your personal data will also be encrypted. Our security measures are continuously improved in line with technological developments.

#### 12. Web analytics and social media plug-ins

##### a. Use of Google Analytics

(1) This Website uses google analytics, a web analysis service of the Google Inc. ("Google"). Google analytics uses the so called "cookies", text files which are stored on your device and which make possible the analysis of your use of the Website. The information generated by the cookie on your use of our Website is regularly transferred to a Google server (located in USA) and stored there. In case of an activation of the IP-anonymization on this Website, your IP-address will be shortened by Google within the Member States of the EU or in another contracting state of the EEA prior to the transfer to USA. The complete, not shortened IP-address will only be transferred to a Google server in USA in exceptional cases and will then be shortened there. In commission of the operator of this Website, Google will use this information to analyse your use of the Website in order to draft reports on the Website-activities as well as to render further services to us, all connected to the website use and the internet use.

(2) The IP-Address transferred by your browser within the framework of Google Analytics will not be merged with other Google data.

(3) You may prevent the storage of cookies through a corresponding setting of your browser-software; however, we need to point out to you that in this case you may not be able to fully use all functions of this Website. Beyond that you can prevent the collection of the data generated by the cookie and correlated to your use of the Website (including your IP-address) and the processing of such data by Google by downloading and installing the browser-plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.



(4) This Website uses Google Analytics with the extension “anonymize Ip()”. Thereby the IP-addresses are shortened. This means that the possibility of an individualization of a particular individual is excluded. As far as the data collected on you is linked to your person, this link is immediately excluded and the individualization is deleted without further delay.

(5) We use Google Analytics in order to be able to analyse our Website and to improve it regularly. With the statistics gained thereby we can improve our offers and design more interesting ones for our users. For the exceptional cases in which personal data is transferred to USA, Google has submitted itself to the Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The legal basis for the use of Google Analytics is Art. 6 par. 1 sent. 1 lit. f) GDPR.

(6) Information on the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, facsimile: +353 (1) 436 1001. Terms of use: <http://www.google.com/analytics/terms/de.html>, overview on data protection: <http://www.google.com/intl/de/analytics/learn/privacy.html>, as well as the privacy declaration: <http://www.google.de/intl/de/policies/privacy>.

(7) This Website additionally uses Google Analytics for a device overarching analysis of visitor streams, which is undertaken by a user-ID. You may deactivate the device overarching analysis of your use in your player account under “my data” and then under “personal data”.

#### b. Use of social media plug-ins

(1) Currently we use the following social-media-plug-ins: Facebook, Google+, Twitter and LinkedIn. We thereby have implemented the “two-clicks-solution”. That means that in general, when you visit our website, no personal data is transferred to the plug-in-provider. The provider of the plug-in can be recognised by the marking on the box above, by the initials or with the help of the logo. We provide the possibility to you to directly communicate with the provider of the plug-in. Only if you click on the marked field and thereby activate it, the plug-in provider will receive the information that you have opened on the respective website of our online-offer. Moreover, the data mentioned in sec. 2 of the Privacy Declaration (Collection of personal data in case of a mere informational visit of our Website) will be disclosed. Hence, by activating the plug-in, your personal data will be transferred to the plug-in provider and will be stored on the servers of the latter (in case of US-American providers in the USA). However, in the case of Facebook, the IP-address is anonymized in Germany immediately after the collection according to the provider. Because the plug-in provider undertakes the data collection especially by means of cookies, we advise that you delete all cookies in the security settings of your browser before you click on the box with the plug-in.

(2) We neither have influence on the personal data collected (or its processing) nor are the complete extent of the data collection, the purposes of the processing or the retention periods known to us. We do not provide any information either on the deletion of personal data gathered by the plug-in provider.

(3) The plug-in provider stores the personal data gathered as user profile and uses these for promotional purposes, for market research and/or for a needs-oriented design of its website. Such an analysis takes place especially (also for users who are not locked into their account) for the display of needs-based advertising and to inform other users of the social network on your activities on our website. You do have the right to object against the creation of these user profiles, whereas you must refer to the plug-in provider for the exercise of this right. With the help of the plug-ins we provide the possibility for you to interact with the social networks and other users, so that we may

improve our offer and design it in a more interesting way for you as a user. The legal basis for the use of the plug-ins is Art. 6 par. 1 sent. 1 lit. f) GDPR.

(4) The disclosure of the personal data takes place independently, regardless if you possess an account at the social network or not and whether you have signed in into this account or not. If you have signed into your account, then your personal data stored by us will be related to your account existing at the plug-in provider. If you confirm the activated button and e. g. link the Website, then the plug-in provider will store this information in your user account and will communicate it publicly. We advise to log out from your account regularly after the use of a social network, especially prior to the activation of the button, because thereby you may avoid the assignment to your user profile at the plug-in provider.

(5) Further information on the purpose and extent of the data collection and the data processing by the plug-in provider you may find in the privacy declarations of those providers mentioned in the following paragraph. There, you may also find further information on your rights concerning your personal data and the setting options for the protection of your privacy.

(6) Addresses of the plug-in providers and URLs to their privacy declarations:

i) Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA;  
<http://www.facebook.com/policy.php>; further information on the collection and processing of personal data: <http://www.facebook.com/help/186325668085084>,  
<http://www.facebook.com/about/privacy/your-info-on-other#applications> as well as  
<http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook has submitted itself to the EU-US-Privacy-Shield, <https://www.privacyshield.gov/EU-US-Framework>.

ii) Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA;  
<https://www.google.com/policies/privacy/partners/?hl=de>. Google has submitted itself to the EU-US-Privacy-Shield, <https://www.privacyshield.gov/EU-US-Framework>.

iii) Twitter, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA;  
<https://twitter.com/privacy>. Twitter has submitted itself to the EU-US-Privacy-Shield, <https://www.privacyshield.gov/EU-US-Framework>.

iv) LinkedIn Corporation, 2029 Stierlin Court, Mountain View, California 94043, USA;  
<http://www.linkedin.com/legal/privacy-policy>. LinkedIn has submitted itself to the EU-US-Privacy-Shield, <https://www.privacyshield.gov/EU-US-Framework>.

c. Use of the AddThis-bookmarking

(1) Our Website contains AddThis-pug-ins. Those plugins enable you to set bookmarks and the sharing of interesting content with other users. Via these plug-ins we provide the possibility to you to interact with social networks and other users, so that we may improve our offer and may design it in a more interesting way for you as a user. The legal basis for the use of those AddThis-plug-ins is Art. 6 par. 1 sent. 1 lit. f) GDPR.

(2) Via these AddThis-plug-ins your browser builds up a direct connection with the servers of AddThis and – as the case may be – with the social network or bookmarking-service. These providers receive the information that you have visited the respective website of our online-offer as well as the data mentioned in sec. 2 of this Privacy Statement (Collection of personal data in case of a mere informational visit of our Website). That information is processed on the servers of Add This in theUSA. If you send content of our Website to social networks or bookmarking services, then a

connection between the visit on our website and your user profile at the respective network may be created. We don't have influence neither on the personal data collected or its processing, nor are the full extent of the collection or processing, the purpose of the processing or the retention periods known to us. We also don't have information on the deletion of the personal data gathered by the plug-in provider.

(3) The plug-in provider stores this data as user profiles and uses these for promotional purposes, for market research and/or for a needs-oriented design of its website. Such an analysis takes place (also for users who are not locked into their account) for the display of needs-based advertising and to inform other users of the social network on your activities on our website. You do have the right to object against the creation of these user profiles, whereas you have to refer to the plug-in provider for the exercise of this right.

(4) If you do not want to participate in this procedure, then you may object to the data collection and storage at any time by installing an opt-out cookie with effect for the future: <https://www.addthis.com/privacy/opt-out>. Alternatively, you may change the settings of your browser in a way that the installation of a cookie is prevented.

(5) Further information on the purpose and extent of the data collection and processing by the plug-in provider, as well as further information on your rights regarding your personal data and the options of settings for the protection of your privacy can be found at the Add This LLC, 1595 Spring Hill Road, Suite 300, Vienna, VA 22182, USA, [www.addthis.com/privacy](http://www.addthis.com/privacy).

### 13. Links

This Website may contain links to other third-party websites. If you follow a link to any of those third-party websites, please note that these may have their own privacy policies and that we cannot accept any responsibility or liability for these policies.

### 14. Currency and modifications of this Privacy Policy

(1) This Privacy Declaration is currently valid and has the start date of June 2018.

(2) Because of the advancement of our website, the offers made over it or due to be modified regulatory as a result of government requirements it may become necessary to modify this privacy policy. You can always download, save and print the at-a-time valid version of this Privacy Policy under <https://bet90partners.com/> and <https://spinbookiepartners.com/>.

### 15. Contact

If you have any questions about this Privacy Policy please contact affiliate support at [affiliates@bet90.com](mailto:affiliates@bet90.com) or [affiliates@spinbookie.com](mailto:affiliates@spinbookie.com).

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