

Ver. 2.0 of 21st May 2018

This Privacy Policy sets out and describes the way in which Tumas Gaming (hereinafter also the “Company” ; “we” ; “us” ; “our”) collects and processes the personal information and data the Customer (hereinafter also “you” ; “your”) provides or is requested to provide to us when visiting our Casino.

We are committed to protecting our Customers' privacy and we will only collect and process any personal information about you in accordance with this Policy.

1. Data Controller

The Controller of your personal data is Tumas Gaming Limited, Level 3 Portomaso Business Center, STJ4011, and St. Julians, Malta. Telephone Number: 00356 - 21372292; email : info@portomasogaming.com.

2. Grounds and Purposes of the Processing

As a Company operating in the highly regulated gaming industry, we need to collect and process your data for normal administrative and business purposes; to provide you with information and updates about promotional offers and our products and services, where you consented to; to comply with our legal and regulatory obligations; to pursue our legitimate business interests such as the prevention and detection of fraudulent activities, frauds attempt and provision of the relevant evidence detect; the detection of health and safety issues and prevention of accident; the resolution of possible disputes with customers arising by the participation in gambling, the protection of our legal position in the event of legal proceedings.

We only collect and process only data and information that you, voluntarily, also following a request, provide to us or which derivate or we otherwise are able to obtain from them (e.g. a profile based on your gaming habits).

Where we intended to process your data for one or more lawful purposes other than which it was collected, we will provide you with information on such purposes and any other relevant details. In the event that any further purpose requires your consent, we will refrain from the processing until we have explicitly obtained it.

3. Categories of Personal Data we process

- Registration

On your first visit to our Casino, you will be requested to register with us and therefore to provide us with a number of personal information, such as your full name, your date and place of birth, your nationality, your address, your contact details (the “**Registration Data**”).

We are required by law to identify and verify the identity of our Visitors and therefore to collect and archive the Registration Data. If you do not provide this data we may be unable to comply with our obligations and you may be denied the access to our premises.

- Gaming Sessions

Whenever you access our premises to engage in gambling activities we may collect certain information, relating to your gaming sessions, such as your playing preferences and patterns, the duration of your gaming sessions, your interactions with other players or with our staff; information

of your level of activities, such as the amount of your cash-ins and / or drops, the amount of your winnings, your average stake.

- **Transactions**

Whenever you wish to cash-out your chips or where you request us certain services such as the issuing of a winners cheques or a winning certificate or the funding of your account, we may require additional personal information, such as your payment and bank details or information about your residential address or your professional profile to provide the requested service or to verify certain details provided among the Registration Data.

If you do not wish to provide this data we may be unable to comply with our legal and regulatory obligations and / or to provide you with the requested services

- **Surveillance and CCTV Operations**

We monitor our premises on a 24/7 basis through a CCTV Surveillance System and therefore, where you access certain areas of the Casino such as the Reception, the Cash-Desk and the Tables/Slot area, your voice and image may be recorded.

Further details about our Surveillance System may be found in the Notices prominently placed in our Casinos.

4. Data Security and Disclosure

We will take all reasonable steps to ensure that your information is kept secure and protected to the highest possible standards. We have appropriate, adequate and effective technical and physical safeguards as well as highly trained personnel to protect your personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

We are a very structured and articulated Group and therefore we may share your personal data between the parent Companies of the Group when it is necessary to better manage our business and your relationship with us, to comply with our legal and regulatory requirements or to facilitate the exercise of your rights as data subject.

Although any category of personal data in accordance with this Policy is processed by the relevant Department, your information may be disclosed, on a strict need-to-know basis, to line managers, senior management and to our Money Laundering Reporting Officer or the Designated Employee.

For the purposes of preventing fraud and money laundering and for data verification purposes, we may use third parties, including credit reference agencies who will record any searches on your file. Where your information is processed on our behalf by any third party, we protect your personal data by putting in place contractual clauses and undertakings aimed to ensure a level of protection at least as appropriate and adequate as ours.

In respect of your data we process to comply with our legal and regulatory obligations, we might be required to disclose your information to Regulatory bodies and Organisations, such as the Malta Gaming Authority, the Financial Intelligence Analysis Unit and other competent public Authorities.

We will not release your personal information to any third-party nor will we transfer it to any third-Country or international organisations.

5. Retention Period

As a general principle, we keep your personal data stored only for the time that is strictly necessary to the processing for the purposes stated in this Policy in relation to the different categories of data or, where you consented to the processing, until you wish to withdraw your consent.

Nevertheless, in some cases we are legally required to retain personal data for a given period of time or for longer periods. In general, your data will be retained, in accordance with this policy, up to 5 years following your last gaming session.

CCTV Recordings are retained up to 14 days from the date of the recording unless we are required by the competent Authorities to keep them for a longer period due to a pending investigation.

6. Your Rights

In respect of any of your personal data collected and processed by us in accordance with this Policy, at any time you have the right to:

- Access your personal data and periodically obtain a free of charge copy of them;
- Rectify your personal data;
- Oppose to the processing where you deem that the pursuit of our legitimate business interests is overridden by your rights as data subject;
- Request the restriction of processing your personal data.

Where you have given your consent to processing, in addition to the right stated above, at any time you have the right to:

- Withdraw the consent to processing without affecting the lawfulness of the processing based on consent before withdrawal;
- Request the erasure of your personal data.

In order to exercise your rights you might be asked to provide us with a form of identification.

You may obtain further information on how to exercise your rights or to request access to or rectification or erasure of your data or to oppose to the processing by sending an email at: info@portomasogaming.com.

If, at any time, you deem that the processing of your personal data is not being conducted in compliance with this Policy or with any applicable law, you may lodge a complaint with the Data Protection Officer:

Information and Data Protection Commissioner, Floor 2, Airways House, Triq Il-Kbira, Sliema. Tel. 00356-23287100; email: idpc.info@idpc.org.mt.

7. Changes to this Policy

We will periodically review this Policy. Any changes we may make to our Privacy Policy in the future will be posted on this page and any such changes will become effective upon posting of the revised Privacy Policy.

Summary:

Category of Data Subject	Categories of Data
Casino Customers	Registration Data
	Payment Data
	Profile
	Transactions Data
	Due Diligence Data
	Marketing Data
	CCTV
Casino Visitors	Visit Log Data
	CCTV

Where to Retrieve the Data - Customers

Department and Contact Person	Categories	Paper Archive	Digital Archive (Local)	Digital Archive (On-Line)
Casino, Operations – Jesmond Galea	Registration, Verification	No	No	Yes (BO)
Casino, Cashdesk - Jeffrey Gauci	Payment, Transactions	No	Yes	Yes (BO)
Casino, MLRO – Stephen Micallef	Profile, Due Diligence	Yes	Yes	No
Casino, Surv. Petra	CCTV	No	No	Yes
Casino, Marketing – Duncan Cachia	Marketing	Yes	TBD	Yes (TBD)

Where to Retrieve the Data – Visitors

Department and Contact Person	Categories	Paper Archive	Digital Archive (Local)	Digital Archive (On-Line)
Casino, Reception -	Visit Log	Yes	No	No
Casino, Surv. - Petra	CCTV	No	Yes	No

Retention Period

Category of Data	Retention Period
Registration Data	TBD / Until MGA requires
Payment Data	Up to 5 years following the last transaction
Profile	Up to 5 years following the last transaction
Transactions Data	Up to 5 years following the last transaction
Due Diligence Data	Up to 5 years following the last transaction
Marketing Data	Until the consent is withdrawn
CCTV Data	Up to 30 days following the acquisition
Visits Log	TBD / Until MGA Requires

Data Subject Rights:

Right	Way it is granted(*)
Access	Mail, Downloadable form
Rectification	
Erasure	
Withdrawal of Consent	Mail, Opt-out
Opposition	TBD