INFORMATION ON PERSONAL DATA PROCESSING
by Palasino Group, a.s.

OPERATION OF GAMES OF CHANCE

1. INTRODUCTORY PROVISIONS

Palasino Group, a.s., with its registered office at Česká Kubice 64, 345 32 Česká Kubice, Company ID: 643 58 267, a company entered in the Commercial Register maintained by the Regional Court in Plzeň, Section B, File No. 492 (hereinafter referred to as "the **Palasino Group**"), is a company which operates a technical game of chance and live game of chance on the basis of licences granted by the Ministry of Finance of the Czech Republic (hereinafter referred to as the "**Licences**"). Palasino Group operates games of chance in the following casinos:

- PALASINO casino Česká Kubice, located at Česká Kubice 64, 345 32 Česká Kubice,
- PALASINO casino Dolní Dvořiště, located at Dolní Dvořiště 225, 382 72 Dolní Dvořiště,
- PALASINO casino Hatě, located at Chvalovice, Hatě 199, 669 02 Znojmo,
- PALASINO casino Mikulov, located at 28. října 1794/1a, 692 01 Mikulov,

The Palasino Group operates games of chance in the casinos on the basis of a live game plan and a technical game plan. These game plans have been approved by the Ministry of Finance of the Czech Republic within the Licences and are available on electronic terminals at the casino reception desks and on the website www.palasino.eu (hereinafter referred to as the "**Live Game Plan**", "**Technical Game Plan**", or jointly "**Game Plans**"). The Palasino Group and all casino visitors are obliged to comply with the provisions of the Game Plans.

On the grounds of its scope of business activity, the Palasino Group acts as the data controller for its customers, as required by Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "**GDPR**").

The purpose of this text is to inform you, as the Palasino Group´s customers, of how we process your personal data, for what purpose and based on what legal reason within the meaning of Article 6(1) of the GDPR.

2. PROCESSING BASED ON COMPLIANCE WITH A LEGAL OBLIGATION

The Palasino Group processes personal data that are necessary to comply with a legal obligation.

The Palasino Group shall process personal data in particular on the basis of the following legal regulations:

- **Act No. 253/2008 Sb., on Certain Measures Against Money Laundering and Terrorist Financing** (hereinafter referred to as the "**AML Act**")

  The Palasino Group is an obligated entity under the AML Act and, within its activities, is thus obligated to implement a number of measures to detect suspicious transactions, etc.

  In addition to the AML Act, the Palasino Group is also obligated to comply with the obligations set out in the System of Internal Policies, which is an internal directive regulating the obligations set out in the AML Act within the specific activities of the Palasino Group. The Palasino Group shall comply with the obligations set out in the AML Act in the context of operating the games of chance as well as in the context of operating an exchange office.

- **Act No. 186/2016 Sb., on Gambling** (hereinafter referred to as "the **Gambling Act**")

  The Palasino Group is an operator of games of chance under the Gambling Act and, as part of its activities, complies with this Act and the obligations set out therein in relation to participants in games of chance and those interested in participating in games of chance.

- **Act No. 254/2004 Sb., on the Restriction on Cash Payments**

  Pursuant to Act No. 254/2004 Sb., on the Restriction of Cash Payments, the Palasino Group is obligated to make all payments exceeding CZK 270,000 by noncash transfer. In the case of such payments, the Palasino Group shall draw up a form for non-cash payments, within the framework of which your personal data is processed.

- **Act No. 563/1991 Sb., on Accounting**

  The Palasino Group, as an accounting entity, is obligated to keep accounting records for bookkeeping purposes for the period specified in the Accounting Act.

2.1. Scope of Personal Data

In fulfilling the obligations laid down by legal regulations, the Palasino Group shall process the following personal data:

- Name (and/or names)
- Surname (and/or maiden name)
- Domicile
- Permanent or other similar residence
- Contact details to the extent than enables to contact you using at least 2 different communication means
  - mailing address
  - contact email
  - contact phone
  - data box identifier
- Birth Registration Number
- Date of birth (if no birth number has been assigned)
- Place of birth
- Citizenship
- Type of ID card
- ID card number
- State/authority issuing the ID card
- Validity period of the ID card
- Data regarding the participation in games of chance, especially:
  - Duration of the participation in a game
  - Self-restricting measures
  - Exclusion from games of chance due to being on the list of excluded persons or using the panic button
  - Gambling and financial data
  - Purchase and exchange of chips
  - Records of cash and gaming funds related to participation in a game of chance, transactions relating to them and actions taken when a user account is cancelled
  - Casino surveillance footage
- Data specified in the game plan, in particular:
  - indication of legal capacity
  - signature
  - a record of any incident involving the player
- Daily records of casino visitors, including in particular:
  - visitor's name and surname,
  - visitor's date of birth,
  - the date and time the visitor entered the gaming room or casino
- Sex (if no birth number has been assigned)
- Copy of the ID card
- Information on the international sanctions applied
- Information about a politically exposed person
- Information necessary to carry out a client check under the AML Act, in particular:
  - Details of the client's employment or employer or business, if justified by the risk assessment
  - Source of cash
  - Copies of documents proving the source of cash
  - Publicly available information indicating the risk profile of the client (information published on social networks, in the insolvency register, in execution records, in other public registers and lists)
  - Frequency of casino entries

  - Frequency of game participation
  - All transactions made through the client's player account
  - Deposits, winnings and losses
  - Detailed description of a game
- Data required to make a non-cash payment, in particular:
  - Account number
  - IBAN
  - Bank name
  - Swift Code
  - Amount to be transferred.

In the event that you inform the Palasino Group that you do not wish to be contacted with incentives to participate in a game of chance and you are also registered or have been registered for that game of chance in the last three years, the Palasino Group shall keep the information about your non-consent.

2.2. Purpose of Personal Data Processing

All personal data listed in this article are processed by the Palasino Group for the purposes of the proper operation of games of chance and compliance with the obligations arising from the aforementioned legislation.

2.3. Period of Keeping Personal Data

The Palasino Group shall keep personal data for the period required by legal regulations, which is defined as follows:

- Personal data processed on the basis of the AML Act (in particular data necessary for the identification and control of the client, including the signature on the registration form): **10 years after the termination of the business relationship**
- Personal data processed on the basis of the Gambling Act (in particular data related to participation in games of chance, only if not already collected under the AML Act):
  - Data collected within the registration and data for the verification of such data, data recorded in the user account, indication of non-acceptance of solicitation with incentives to participate in a game of chance: **3 years from the date of cancellation of the user account**
  - Information about the purchase and exchange of chips: **10 years**
  - Casino surveillance footage: **2 years**
  - Daily records of casino visitors: **3 years from the date of the last entry**
  - Data collected according to the game plan: **for the duration of the user account; in the case of an indefinite ban from the casino, the incident data is stored permanently**
- Personal data processed on the basis of the Cash Payment Restriction Act: **10 years after the termination of the business relationship**
- Personal data processed under the Accounting Act**: up to 10 years**

2.4. Access to Personal Data

Personal data processed on the basis of legal regulations shall be processed by the Palasino Group, but may also be processed for the Palasino Group by other processors, in particular persons providing technical and administrative support, consulting, marketing and other activities to the Palasino Group. Furthermore, personal data will only be disclosed to competent Palasino Group employees, who are obliged to maintain the confidentiality of personal data and the measures used to secure it.

2.5. Additional Information on Personal Data Processing

If you do not provide the above personal data, the business relationship between you and Palasino Group cannot be concluded.

3. PROCESSING BASED ON CONSENT

MARKETING

3.1. Scope of Personal Data

The Palasino Group shall process the following personal data on the basis of the data subject's consent:

- Name
- Surname

- Mobile phone
- E-mail
- Signature

3.2. Purpose of Personal Data Processing
The personal data specified above are processed by the Palasino Group for the purpose of sending commercial communications. The personal data under this article are processed in the event that the Palasino Group has not obtained your personal data in connection with your participation in games of chance or where the Palasino Group does not offer its own games of chance within commercial communications.

3.3. Period of Keeping Personal Data
Personal data processed for marketing purposes are kept by the Palasino Group for a period of 3 years and are kept electronically in the Palasino Group's internal system.
After the storage period expires, the personal data will be deleted from the Palasino Group database.

3.4. Access to Personal Data
Personal data processed on the basis of legal regulations shall be processed by the Palasino Group, but may also be processed for the Palasino Group by other processors, in particular persons providing technical and administrative support, consulting, marketing and other activities to the Palasino Group. Furthermore, personal data will only be disclosed to competent Palasino Group employees, who are obliged to maintain the confidentiality of personal data and the measures used to secure it.

3.5. Additional Information on Personal Data Processing
You are not obliged to provide the Palasino Group with the personal data mentioned in this article. In the event that you do not provide the personal data referred to in this article, commercial communications will not be sent to you. You are entitled to withdraw your consent to the personal data processing at any time using the contact details provided in Article 5 of this document.
Participation in poker tournaments organised by the Palasino Group may require separate consent to the processing of personal data for marketing purposes. This consent will be provided to you upon registration and is voluntary but necessary for the publication of tournament results and marketing promotion of the casino. You are entitled to withdraw your consent to the processing of personal data at any time using the contact details set out in Article 5 of this document.

The Palasino Club Application

3.6. Scope of Personal data
Based on the data subject's consent, Palasino Group processes the following personal data in addition to the data specified in Sections 2.1 and 3.1:

- Technical data (device identifier, IP address, device type, operating system, logs, cookies)
- Location data (processed only with the data subject's consent; consent can be withdrawn at any time in the device settings)
- Transaction data (purchases of F&B packages, reservations, loyalty point balances, payment methods, earned bonuses and their redemption)
- In-app activity data (screens viewed, clicks, interactions, analytics data)

3.7. Purpose of Personal Data Processing
The above-menitoned personal data are processed by Palasino Group for the purposes of providing the functionalities of the Palasino Club Application and CRM, including registration, login, profile management, analytics and improvement of the user experience, sending marketing communications (with the option to unsubscribe), compliance with legal obligations, and the protection of the rights of the operator of the Palasino Club Application.The Application may also be used to fulfill Palasino Group’s legal obligations. If you do not provide the necessary personal data, it will not be possible to properly use the Palasino Club Application.

3.8. Period of Keeping Personal Data
Personal data processed for the purposes of the Palasino Club Application are retained by Palasino Group for the duration of the account's existence. Upon account deletion, such personal data are erased unless otherwise required by law. Personal data processed in accordance with accounting

legislation are retained by Palasino Group for a period of up to 10 years.

3.9. Access to Personal Data

Personal data are processed by Palasino Group; however, they may also be processed on behalf of Palasino Group by other data processors, particularly persons providing technical and administrative support, consulting, marketing, and other services to Palasino Group. Personal data will further be accessible only to authorized employees of Palasino Group, who are obliged to maintain confidentiality regarding personal data and the measures implemented to protect them.

3.10. Additional information on Personal Data Processing

You are not required to provide Palasino Group with the personal data referred to in this section. However, if you do not provide the personal data specified herein, you will not be granted access to the Palasino Club Application.

Pre-registration in the Palasino Club Application (hereinafter referred to as "Pre-registration")

3.11. Scope of Personal Data

Palasino Group processes the following selected personal data based on the data subject's consent:

- First name
- Last name
- Date of birth
- Mobile phone number
- Email address
- Residential address
- Nationality
- Place of birth
- Connection to a high-risk country
- Self-exclusion measures
- Source of income

3.12. Purpose of Personal Data Processing

The above-mentioned personal data are processed by Palasino Group solely for the purposes of pre-registration in the Palasino Club Application and its partial access provision. These personal data are subsequently used during the in-person registration and identification of the client at one of the Palasino Group casino premises, in accordance with the Gambling Act, the gaming rules, and the General Terms and Conditions of Palasino Group.

3.13. Period of Keeping Personal Data

Personal data processed for the purposes of Pre-registration are retained by Palasino Group for a period of 30 days from the completion of the Pre-registration process. Upon expiration of the retention period, the personal data will be deleted from the Palasino Group database and can no longer be used for registration at a Palasino Group venue in accordance with the Gambling Act, the gaming rules, and the General Terms and Conditions of Palasino Group.

3.14. Access to Personal Data

Personal data are processed by Palasino Group; however, they may also be processed on behalf of Palasino Group by other data processors, in particular entities providing technical and administrative support, consulting, marketing, and other services to Palasino Group. Personal data will further be disclosed only to the relevant employees of Palasino Group who are bound by confidentiality obligations

3.15. Additional information on Personal Data Processing

You are not required to provide Palasino Group with the personal data requested for Pre-registration and partial activation of the Palasino Club Application. If you do not provide the data required for Pre-registration, access to the Palasino Club Application will not be granted until the full registration process has been completed.

4. PROCESSING BASED ON CONTRACT PERFORMANCE

ACTIVITIES RELATED TO PARTICIPATION IN GAMES OF CHANCE

In connection with your visit to a Palasino casino, you may take advantage of other services provided by the Palasino Group. In order to use the following types of services, it is necessary to process your personal data in order to perform the contract concluded with you:

- **Participation in a loyalty programme**
- **Casino shuttle service**
- **Storage in a casino locker room** *(only if the number identifying your personal belongings is lost)*

4.1. Scope of Personal Data

On the basis of the contract performance, the Palasino Group shall process the following personal data:

- Name
- Surname
- E-mail
- Phone number

The following personal data are also processed to enable participation in the loyalty programme:

- Address (permanent or other residence)
- Date of birth
- Guest ID number
- Deposits, winnings and losses
- Frequency of casino entries
- Frequency of game participation
- Preferred games
- Food&Beverage preferences
- Points account balance
- Signature

4.2. Purpose of Personal Data Processing

The purpose of the processing is to enable the use of the loyalty programme, the casino shuttle service or the identification and delivery of your personal belongings stored in the locker rooms of PALASINO casinos.

4.3. Period of Keeping Personal Data

The data specified above are stored by the Palasino Group:

- **Participation in the loyalty programme** – for the duration of your participation in the loyalty programme, i.e. for the duration of the contract for such participation, and for 3 years from the date of the termination of your participation in the loyalty programme
- **Casino shuttle service** – for a period of one month from the end of your transportation to and from PALASINO casinos
- **Storage in a casino locker room –** for a period of three months from the loss of this number

After the expiry of the personal data storage period, the personal data defined in this article will be deleted from the internal system of the Palasino Group.

4.4. Access to Personal Data

Personal data processed on the basis of legal regulations shall be processed by the Palasino Group, but may also be processed for the Palasino Group by other processors, in particular persons providing technical and administrative support, consulting, marketing and other activities to the Palasino Group. Furthermore, personal data will only be disclosed to competent Palasino Group employees, who are obliged to maintain the confidentiality of personal data and the measures used to secure it.

4.5. Additional Information on Personal Data Processing

If you do not provide personal data in accordance with this article, the contract between you and Palasino Group cannot be fulfilled and you will not be able to participate in the PALASINO Casino Bonus loyalty programme.

PARTICIPATION IN GAMES OF CHANCE

4.6. Scope of Personal Data

In addition to the data that the Palasino Group is obliged to process under the Gambling Act in connection with participation in games of chance, the Palasino Group shall process the following personal data on the basis of the performance of the contract for the participation in games of chance:

- Guest ID number
- Photograph

In the case of non-cash payment of funds, the Palasino Group shall also process the following personal data:

- Account number
- IBAN
- Bank name
- Swift Code.

4.7. Purpose of Personal Data Processing

The purpose of the processing is to enable your participation in casino games of chance, to enable your identification when entering the casino and to fulfil other rights and obligations arising from the contract for the participation in games of chance.

4.8. Period of Keeping Personal Data

With regard to the fact that the Palasino Group is obliged to keep all data collected for the purpose of fulfilling its obligations under the AML Act for 10 years after the termination of the business relationship, the Palasino Group shall also keep the personal data under this article for 10 years after the termination of the business relationship.

After the expiry of the personal data storage period, the personal data defined in this article shall be deleted from the Palasino Group's internal system.

4.9. Access to Personal Data

Personal data processed on the basis of legal regulations shall be processed by the Palasino Group, but may also be processed for the Palasino Group by other processors, in particular persons providing technical and administrative support, consulting, marketing and other activities to the Palasino Group. Furthermore, personal data will only be disclosed to competent Palasino Group employees, who are obliged to maintain the confidentiality of personal data and the measures used to secure it.

4.10. Additional Information on Personal Data Processing

If you do not provide personal data in accordance with this article, the contract between you and the Palasino Group cannot be fulfilled and you cannot be allowed to participate in games of chance in PALASINO casinos.

CONSUMER COMPETITIONS

The Palasino Group shall process personal data that are necessary for the performance of the contract concluded with you regarding the participation in consumer competitions organised by the Palasino Group.

4.11. Scope of Personal Data

On the basis of the performance of the contract for your participation in the consumer competition, the Palasino Group shall process the following personal data:

- Name
- Surname
- Guest ID number
- Time of arrival to the casino
- Tickets and Ticket Number for the participation in the consumer competition
- Winning

4.12. Purpose of Personal Data Processing

The purpose of the processing is to enable your participation in consumer competitions organised by the Palasino Group and the fulfilment of other rights and obligations arising from the contract for the participation in the consumer competition.

4.13. Period of Keeping Personal Data

The Palasino Group keeps personal data collected for the purpose of the participation in consumer competitions for a period of 3 months after the end of the consumer competition, both in electronic form within the Palasino Group's internal system and in written form in the form of game tickets.
Upon expiry of the storage period, the personal data defined in this article will be removed from Palasino Group's internal system and the game tickets will be destroyed.

4.14. Access to Personal Data

Personal data processed on the basis of legal regulations shall be processed by the Palasino Group, but may also be processed for the Palasino Group by other processors, in particular persons providing technical and administrative support, consulting, marketing and other activities to the Palasino Group. Furthermore, personal data will only be disclosed to competent Palasino Group employees, who are obliged to maintain the confidentiality of personal data and the measures used to secure it.

4.15. Additional Information on Personal Data Processing

If you do not provide personal data in accordance with this article, you may not be allowed to participate in the PALASINO casino consumer competition.

5. PROCESSING BASED ON LEGITIMATE INTEREST

The Palasino Group shall process personal data that are necessary for the purposes of its legitimate interests.

SURVEILLANCE SYSTEM

5.1. Scope of Personal Data

On the basis of a legal title of a legitimate interest of a controller, the Palasino Group operates a surveillance system on the following premises: parking lots and exterior premises of the building and technological equipment installed on the outer shell of the buildings and around the building.

5.2. Purpose of Personal Data Processing

The purpose of the personal data processing is to protect the property of the Palasino Group and casino guests, due to the fact that the property of the Palasino Group and casino guests is often handled on the premises where the surveillance system is located.

5.3. Period of Keeping Personal Data

Surveillance footage is stored by the Palasino Group for ten days.

5.4. Access to Personal Data

Personal data processed on the basis of legal regulations shall be processed by the Palasino Group, but may also be processed for the Palasino Group by other processors, in particular persons providing technical and administrative support, consulting, marketing and other activities to the Palasino Group. Furthermore, personal data will only be disclosed to competent Palasino Group employees, who are obliged to maintain the confidentiality of personal data and the measures used to secure it.

5.5. Additional Information on Personal Data Processing

In order to protect the property of the Palasino Group, your property and the property of other guests of PALASINO casinos, the use of the surveillance system seems to be the most effective way to achieve the desired objectives. In this case, it is therefore necessary to interfere with your right to privacy, as it is in the interest of the Palasino Group to operate the surveillance system and to carry out the aforementioned protection.
The Palasino Group operates the surveillance system to the minimum possible extent, including limiting the period of storing the surveillance footage.

MARKETING

5.6. Scope of Personal Data

The Palasino Group shall process your personal data in accordance with this article to the following extent:

- Name

- Surname
- Phone number
- E-mail

5.7. Purpose of Personal Data Processing

The purpose of personal data processing is to send commercial communications. The Palasino Group has a legitimate interest in carrying out direct marketing for its services.
Personal data under this article are only processed where the Palasino Group has obtained your personal data in connection with the provision of gambling services and the commercial communications are for the purpose of offering the Palasino Group´s games of chance.

5.8. Period of Keeping Personal Data

The personal data processed on the basis of this article are stored by the Palasino Group for a period of 3 years. The personal data pursuant to this article are stored in electronic form. After the personal data storage period expires, the personal data will be deleted from the Palasino Group database.

5.9. Access to Personal Data

Personal data processed on the basis of legal regulations shall be processed by the Palasino Group, but may also be processed for the Palasino Group by other processors, in particular persons providing technical and administrative support, consulting, marketing and other activities to the Palasino Group. Furthermore, personal data will only be disclosed to competent Palasino Group employees, who are obliged to maintain the confidentiality of personal data and the measures used to secure it.

5.10. Additional Information on Personal Data Processing

If you do not wish to receive commercial communications, you may unsubscribe at any time by using the link provided within each commercial communication.

6. RIGHTS OF DATA SUBJECTS

According to the General Data Processing Regulation (GDPR), you have the right to:

- withdraw the consent to the processing of personal data at any time;
- request information from the Palasino Group about how your personal data are processed;
- request from the Palasino Group the access to, rectification or erasure of your personal data or restriction of their processing;
- object to the processing of your personal data;
- request the portability of your personal data;
- lodge a complaint about the processing of your personal data with the Personal Data Protection Office in the Czech Republic.

You can also exercise your rights under the GDPR by using the downloadable form. If you do not use the form, it is essential that the data subject is properly identifiable when making the request according to the method chosen.

A request to exercise the rights with the Palasino Group under the General Data Protection Regulation can be delivered in the following ways:

a) Data box – data box ID: **7h2cruf**

b) by e-mail with a certified signature to **info@palasino.eu**

c) by a letter containing the request with an authenticated signature to the mailing address Česká Kubice 64, 345 32 Česká Kubice, Czech Republic

d) by personally completing a paper form, request at any branch or headquarters of the Palasino Group after prior identification by our authorised employee.

If there are no conditions under the GDPR for granting your request under this article, in particular if there is a statutory minimum period for storing personal data, your request under this article cannot be granted.

7. FINAL PROVISIONS

The Palasino Group may, in justified cases, disclose personal data to its owner's representatives or to audit or control companies designated by the owner, which may be based outside the EU/EEA. In such a case, the Palasino Group has put in place a set of measures to ensure sufficient protection of rights and freedoms. These measures include minimising the scope of personal data transferred, using anonymisation or pseudonymisation of the data transferred, protecting the data during the transfer through encryption, adopting internal guidelines and contracting with a data recipient in a non-EU/EEA country. We will provide you with specific information about the possible transfer of your personal data upon your request sent to the contacts listed in this document.

This information on the processing of personal data has been compiled to inform you of the purposes, method and legal grounds for the processing of personal data provided by participants in games of chance to the Palasino Group. It is available at all PALASINO casino locations and is also available online at www.palasino.eu. This information on the processing of personal data is effective as of 1st September 2026.