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<b>Process owner</b> CRO / MLRO		<b>Date</b> 1st February 2024	<b>Appendix no.</b> 1	<b>Revision</b> 1



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# Data Protection Policy

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Policy, version 1.0

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## 1. Introduction

Leikur UAB (hereinafter Company) with registered address at Gedimino pr. 20, LT-01103 Vilnius, Lithuania, is a fintech that is focused on serving the international online gaming industry, game-tech, and related service companies, like affiliate marketers, in a BaaS agreement with ConnectPay in Lithuania.

This Data protection policy sets out the basis on which the Company processes customer's personal data. This is further enforced by the Leikur's internal policies and procedures. All activities of the Leikur UAB are regulated by the applicable laws related to electronic money, including, but not limited to all legal acts related to the financial institutions and financial services. Moreover, as the Leikur UAB collects and uses the personal data (hereinafter – the Personal data) of its customers (hereinafter – the Customers), the Company is obligated to use and process the Personal data of the Customers only in accordance with this privacy policy and the applicable acts which regulate the protection of Personal data.

At Leikur UAB we are committed to protecting and respecting your financial and personal privacy. Before going into detail, there are some important things to say about how we handle your personal information:

- We promise to treat it securely, fairly and lawfully at all times.
- We will not ask you to disclose more information than is required.
- We will not disclose more of your information than is necessary or agreed by you.
- We will ensure your information is protected by appropriate security measures.
- We will ensure those handling your information respect your privacy.
- We will be transparent about how we use your information and will give you opportunity to tell us if you do not wish your information to be used in a particular way.

## 2. Scope

This policy, together with our terms of conditions and any other documents referred to on it, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. The Company commits to comply with the provisions of General Data Protection Regulation, the Law on Legal Protection of Personal Data of the Republic of Lithuania and other applicable Personal data protection regulations and legal acts in the Republic of Lithuania and the European Union. For more info about above please see GDPR policy.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.leikur.com](http://www.leikur.com) you are accepting and consenting to the practices described in this policy. In the event of any conflict between this privacy policy and any of our other terms or policies or other documents, the standard terms and conditions of account opening will prevail. The principles that the Company strictly follows to comply with the needs to protect its Customers' Personal data are, as follows:

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- Personal data is collected for specified and legitimate purposes and will not be further processed in a way that is incompatible with those purposes established prior to the collection of Personal data.
- Personal data is processed in a lawful, honest, and transparent way.
- Personal data is accurate and regularly updated.
- Personal data is collected in the way which is necessary to fulfil the specified legitimate purpose.
- Personal data is stored for the period specified by the Company, but not longer than the terms set forth by the applicable legal acts. When the term has expired, the Personal data will be removed and erased.
- Implementation of adequate organizational measures designed to secure Personal data against accidental or illegal destruction, modification, disclosure, and any other illegal management.
- Implementation of measures designated for the prevention of the use of Personal data by persons seeking to acquire funds by fraudulent means.
- The Personal data of the Customers is considered as strictly confidential information and may only be disclosed to third parties in accordance with the rules and procedure provided in the Privacy Policy, internal documents of the Company and the legal acts of the Republic of Lithuania.
- In some cases, Personal data can be used for some services and products for the purposes of risk management in accordance with the Company's legal obligations.

### 3. Information we may collect

#### 3.1. Information you may provide to us:

You may give us information about you, by filling in forms on our app or website, or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our services, search for a product, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem or complain with our site. The information you give us may include your name, address, email address and phone number, financial information, personal description and photograph, passport or other identification details.

#### 3.2. Information we collect about you:

With regard to each of your visits to our site, we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

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### 3.3. Information we receive from other sources:

We may receive information about you if you use any of the other websites where we operate or the other services we provide. In this case we would have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## 4. Cookies

4.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and it also allows us to improve our site. The Company has its own website, and cookies may be obtained in order to provide the Data subject with the full range of Services provided by the Company during website visits, and in order to improve the quality of the Services provided to the Data subject’s computer (device). The Company may use the following types of cookies:

- **Strictly necessary cookies** – these cookies are essential for the browsing of the website and use its features, such as accessing secure areas of the site. These cookies are mandatory and cannot be switched off.
- **Functionality cookies** —these cookies allow a website to remember choices the Customer has made in the past, like what language they prefer, or what their username and password are so as to facilitate automatic log in.
- **Google Analytical cookies** —these cookies record information such as how many pages a Customer has visited on this website, the traffic source that brought them to the website, and how much time they have spent on the page. This collected information is used to measure, monitor and improve website performance. No sensitive personal information is collected through Google Analytics.  
None of this information can be used to identify or contact the Customer. It is all aggregated and, therefore, anonymized. Their sole purpose is to improve website functions. To find out about Google Analytics, click [here](#). However, for Customers who still wish to opt out of Google Analytics cookies, more information can be found [here](#).
- **Facebook Marketing cookies** – the Company may from time to time use Facebook Advertising, Facebook Pixel for remarketing and tracking purposes. This tool allows the Company to understand and deliver ads and make them more relevant to the Customer. The collected data remains anonymous and the Company cannot see the personal data of any individual user.

Collected data is saved and processed by Facebook. Facebook may be able to connect the data with Customer’s Facebook account and use the data for their own advertising purposes (in accordance with Facebook’s Data Use Policy that can be found [here](#)). Facebook has ultimate control of the information gathered through Facebook Advertising, Facebook Pixel Re-Marketing. Customer can opt-out of Facebook’s use of cookies and Facebook Pixel Re-Marketing through settings on your Facebook Account [here](#).

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4.2. The Customer has to express their consent or non-consent for the use of cookies. The cookies settings present the Customer with an overview of the cookie categories. The cookies (except for strictly necessary cookies) are used only when the Customer consents to their usage.

4.3. Delete stored cookies

4.4. If at a certain moment you have allowed the use of cookies when visiting our website and now you wish to opt out and delete the cookies collected, please find instructions on how to proceed according to your browser.

## 5. Use of the information held

5.1. We use information held about you in the following ways:

- to carry out our obligations arising from any contracts entered between you and the Company and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer, which are similar to those that you have already purchased or enquired about;
- provided you have consented to receiving such information, to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you.

5.2. We do not share your data with third parties for their marketing purposes without your consent.

Except where you have indicated otherwise, if you are an existing customer, we may contact you by electronic means (e-mail or SMS) with information about goods and services similar to those of a previous sale or discussion of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

5.3. Information we collect about you:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of marketing and advertising we serve to you and others, and to deliver relevant marketing and advertising to you;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;

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- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

#### 5.4. Information we receive from other sources:

We may combine this information along with information you provided to us and information we collected about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## 6. Disclose of your information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- Advertisers, advertising networks and social media companies that require the data to select and serve relevant adverts to you and others. We may make use of the personal data we have collected from you to enable us to display an advertisement to a particular target audience.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- To a prospective buyer of our business or assets (in which case personal data held by it about its customers will be one of the transferred assets) or to a prospective seller of a business or assets which we are seeking to acquire.
- We may use your personal data to enforce or apply our website terms of conditions or our standard account terms and conditions; or to protect our rights, property, or the safety of, our customers, or others. This includes exchanging information with other companies, organisations and agencies for the purposes of fraud protection and credit risk reduction.
- We may also share your personal information with third parties with your consent and/or according to the terms of any agreement between you and us.

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## 7. Storage and data retention period

7.1. The data that we collect from you may be transferred to, and stored at, a destination within the European Economic Area ("EEA"). By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7.2. By law (Law on the Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania and in view of the statute of limitations) the Company has the right to store Personal data records for a maximum of 10 years after the termination of their business relationship with the Customer. Such records include Personal data such as Customer's name, contact details, account details, transactional history, etc.

Consent for direct marketing is valid until such time as the Customer has withdrawn it, but no longer than 5 years. For more detailed information on the specific retention periods applicable for other categories of personal data, please contact us directly.

## 8. Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes, according to GDPR policy. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [contact@leikur.com](mailto:contact@leikur.com).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

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## 9. Changes

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## 10. Contact

When we obtain your personal information, we will always give you options to modify or delete information at any time. If you have any concerns about the information we hold about you or the way in which we may use this information, you can contact us at any time at [contact@leikur.com](mailto:contact@leikur.com). Any questions, comments and requests regarding this policy are welcomed.

## 11. Access to information

The data protection regulation gives you the right to access information held about you. Your right of access can be exercised in accordance with law. Any access request may be subject to a fee in order to meet our costs in providing you with details of the information we hold about you.



