

Privacy notice for Whistleblowers

Last update: 25 May 2022

This Privacy notice applies to all individuals engaged with or by SB Group Ltd. as well as any of the Superbet group companies and its affiliates (hereinafter referred to as “**Superbet**”), in relation to the Whistleblowing Procedure, including Superbet employees, Superbet customers/clients, vendors and any other third parties (hereinafter referred to as “**the Whistleblower**”, “**you**”, “**your**”, “**yours**”).

Where any disclosures are made and/or investigations carried out in accordance with the Whistleblowing Procedure, certain personal data will be processed as a result.

There is no limitation on those who may disclose misconduct – anyone who suspects misconduct is encouraged to come forward and disclose this to us.

You have the option to make a disclosure anonymously and as such, no personal data of yours will be processed. If you choose to provide your details and identity, the identity of any person against whom an allegation has been made (the “**alleged wrongdoer**”) or any other third party identities (e.g. witnesses, etc.), such personal data will be treated with the utmost confidentiality and will only be shared in exceptional circumstances with Superbet personnel on a strictly need-to-know basis in order to carry out an investigation and/or as required by law specified below.

By reading this Privacy Notice, you hereby acknowledge and agree that the personal data you provide to us in the course of a whistleblowing report is supplied at your own free will and will be used in accordance with the purposes described in this Privacy Notice. If you do not understand this Privacy Notice, please do not share your personal data with us and speak to a Whistleblowing Officer for general information and guidance on what this Privacy Notice means.

We reserve the right to change and/or update our Privacy Notice at our discretion and at any time. You will be notified before we make these changes and/or updates, which we kindly ask you to read these changes carefully and make sure you understand and agree with them.

1 General information

Superbet is a Controller of the personal data. As used in this Privacy Notice, “**personal data**” means any information that can be used to individually identify you, directly or indirectly, alone or along with other information.

“Processing” means the way in which we collect, use, retain and delete your personal data.

2 What personal data do we collect?

We will only collect personal data, which is adequate, relevant and necessary, for the whistleblowing case you have disclosed to us in accordance with the Whistleblowing Procedure. An initial check of the information provided to us will be undertaken and only the information that is relevant to the case will be kept. Personal data, which is of no interest or relevance to the allegations will not be further processed.

The categories and volume of personal data that we collect vary depending on the information included in the any disclosures made by you and include, but are not limited to:

- **Identification data** – such as your name and position.
- **Contact details** – such as your email address.
- **Any information you choose to provide in your disclosure that could directly or indirectly identify you or any other person.**

Special category information, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and data concerning health or sex life not relevant for the disclosure will be avoided to be processed, unless it is relevant for the allegation and forms an integral part of the investigation of the alleged wrongdoing.

3 How we collect your personal data?

We will only collect your personal data with your knowledge and when you voluntarily disclose an alleged wrongdoing on our digital whistleblowing platform or to a Whistleblowing Officer.

Once collected, we shall at all times ensure that any processing of your personal data is carried out in compliance with our internal Policies, applicable data protection laws, with this Privacy Notice and for the purpose for which you submitted your data to us.

In situations where the report identifies you as an alleged wrongdoer, we will collect personal data about you provided by individuals submitting such reports on our designated platform, such as name, position and any information included in the report that could directly or indirectly identify you. Such collection of personal data will be done in accordance with our Whistleblowing Procedure and is kept confidential throughout the whole process in order not to compromise the investigation.

In certain situations, we share information about the alleged wrongdoing with you to give you the opportunity to defend yourself. Where further processing of your personal data is envisaged, you will be notified accordingly.

4 What we use your personal data for?

The data we collect about you will only be used for the purposes of investigating potential allegations of wrongdoings and breaches of internal policies, to perform our legal obligations and our legitimate interests in specific circumstances. Such purposes are made clear to you at the point of collection or in this Privacy Notice. Thus, we process your personal data for the following purposes:

- **To comply with the applicable laws**
- **Based on your consent** (e.g. when you authorise Superbet to reveal your identity as a whistleblower, etc.)
- **Based on our legitimate interests which we or a third party may have**, except when such interests are overridden by your interests or fundamental rights and freedom (e.g. to investigate potential allegations of wrongdoings and breaches of internal policies such as Anti Bribery and Corruption Policy, Anti-money Laundering, etc. and necessary for the establishment, exercise or defence of legal claims);

If the information you provide us in relation to your disclosure contains special category data, the lawful basis we rely on to process is:

- Your explicit consent;
- Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law;
- Processing is necessary for the establishment, exercise or defence of legal claims;
- Processing is necessary for the purposes of complying with various laws, obligations and rights in the field of employment, social security and social protection.

Also, we make sure that all our employees who have access to your personal data will process them only according to their confidentiality and job related responsibilities and in compliance with all internal applicable policies, laws, regulations or with your consent.

5 What happens if you do not provide or allow us to use your personal data?

You have the option to make a disclosure anonymously, however it is important for us to emphasize that while you may make anonymous disclosures, this will impact our ability to effectively investigate the disclosure and update you on our progress.

6 Who do we share your personal data with?

Your identity will be treated with the utmost confidentiality and never be revealed. Information collected as part of the disclosure will not be transferred to any third parties, unless it is necessary for the legitimate performance of a task or investigation. Where disclosure of an alleged case is needed, information about you as a whistleblower or witness in an alleged case will be removed from the documents except in exceptional circumstances:

- (a) you have consented/authorised such a disclosure; and/or
- (b) if this is required by any subsequent criminal law proceedings; and/or
- (c) if this is required at law.

7 Where is your personal data stored?

Your personal data will be kept, processed and stored by us and our service provider in the European Union.

Our service provider who processes and stores your personal data has an obligation to keep it protected and secured, in accordance with applicable industry standards and contractual obligations.

8 How long we keep your personal data for?

Superbet will retain the records described herein for no longer than it is necessary and proportionate for the purpose for which your personal data was collected and necessary for the establishment, exercise or defence of legal claims, in compliance with Superbet's Data Retention Policies.

Depending on the information in the disclosure and the outcome of the case, different retention periods apply. Information that is not within the scope of the investigation and not relevant to the allegations will not be further processed and will be securely deleted as soon as possible.

If a longer retention period is envisaged, access to the personal data will be limited. These disclosures reports will be separated from the main case management system/daily system in use.

Any whistleblowing-related personal data retained for statistical purposes will be made anonymous.

Upon expiration of the set retention periods, your personal data will be deleted or anonymised. If, at any time, you want us to discontinue the use of your personal data, please contact us in the manner described in “**How to contact us**” section.

If your request to delete your personal data violates our legal or regulatory obligations, or the data related to the request for deletion is necessary to exercise or defend our legal claims, we may not be able to act upon your request and we will notify you of this decision.

9 How we keep your personal data secure?

Superbet has ensured that the service provider used adheres to strict technical and organizational security measures, whether physical, electronic or procedural, to protect the confidentiality and security of the personal data you share with us. These measures have been implemented to protect data against unauthorized access, destruction, loss, alteration, access, disclosure or use. Access to personal data is monitored, flagged and addressed accordingly. Security assessments are undertaken annually.

10 Your rights

At any given time, you will have the following rights regarding your personal data processed by us. Please note, not all rights are absolute and compliance with them will depend on other laws, as applicable.

- (A) **The right to information:** you have the right to be provided with information on the identity of the personal data controller, on the reasons for processing your personal data and other relevant information necessary to ensure the correct and transparent processing of your personal data.
- (B) **The right of access:** you have the right to make a request for details of your personal data and a copy of that personal data.
- (C) **The right of rectification:** you have the right to have inaccurate information about you corrected or removed without undue delay.
- (D) **The right of erasure ("right to be forgotten"):** you have the right to have certain personal data about you deleted from our records.
- (E) **The right to restriction of processing:** you have the right to ask us to use your personal data for restricted purposes only.
- (F) **The right to data portability:** you have the right to ask us to transfer the personal data you have given us to you or to someone else in a format that can be read by computer.

(G) **The right to object:** you have the right to object to us processing (including profiling) your personal data in cases where our processing is based on a task carried out in the public interest or where we have let you know it is necessary to process your information for our or a third party's legitimate interests. You can object to us using your information for direct marketing and profiling purposes in relation to direct marketing.

In order to exercise any of the above rights, you can send a written request by email at whistleblowing@superbet.com. Your request will be reviewed and answered within one calendar month upon receipt, in accordance with applicable laws. If we receive a large number of requests, or particularly complex requests, the deadline can be extended by a maximum of another two months. In certain circumstances as prescribed by data protection law (i.e. excessive requests), we might refuse to act upon your request.

In the event your personal data is processed based on your consent, you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing carried out on the basis of the consent before its withdrawal.

You also have the right to lodge a complaint with the relevant national Data Protection Authorities or courts of law. The list of all local Data Protection Authorities can be found [here](#).

11 How to contact us

If you have any questions, comments, complaints or suggestions relating to this notice, or any other concerns about the way in which we process information about you, please contact our Data Protection Officer by emailing gdpr@superbet.com.