Introduction

Our company, with name “OPAP S.A.”, having its seat at 112 Athinon Ave., Athens (hereinafter “OPAP S.A.”), is, according to the applicable legislation, responsible for processing your personal data within the framework of the provision of games of chance services through its Website www.pamestoixima.gr (hereinafter the “Games of Chance”).

The protection of your personal data is very important to us. Our team makes every possible effort to protect your personal data at all times, by using top-notch technologies and conducting constant controls.

The present Privacy Notice aims at informing you on the type of personal data that we collect for you, on the way and the purposes for which we collect your data, on the third parties with which we share such data, as well as on your rights, in order for OPAP S.A. to comply with L. 2472/1997, as well as with EU Regulation 679/2016 “on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC”.

Categories of personal data that we collect and process

OPAP S.A. collects your personal data through your browsing in website www.pamestoixima.gr or the usage of the respective Mobile App, your registration to the services provided through the Website and your participation in the Games offered through it. In particular:

- Identity verification details, such as: full name, date of birth, home address, ID or passport number.
- Contact details, such as: email address.
- Information regarding the transactions of the Player’s Account, such as: balance, deposits, withdrawals. It shall be clarified that this information will be available to the Customer, whom it regards, through his/her online Player Account.
- Information relevant to the use of the Games of Chance services offered through the Website, such as: websites preferences, software bugs reports, geo-location data, cookies, connection date and time, IP addresses.
- Other information that may contain personal data, such as: complaints or remarks regarding the services provided, for which a file of recorded phone calls with our call center and a file of written communication (emails, chat sessions) is kept.

Why we collect personal data

The information above and the personal data collected by OPAP S.A. regarding its Players and/or third parties will be saved in OPAP S.A.’s databases and servers, always in accordance with the provisions of the applicable legislation and, especially, with those provisions on the confidentiality of communications and on the protection of the person against the processing of personal data.
The legal basis, as well as the reasons of processing are the following:

i. Necessary processing for the performance of the terms of our contractual relationship and for the provision of the Games of Chance services to you. Within this context, we process your data for the following purposes:
   - To create, operate and manage the Player’s Account, in accordance with the terms of the Agreement of Accession.
   - To promote bets and process transactions effected through the Website, including payments.
   - To communicate with the account holders for the announcement of significant changes to the services and the Terms of Use (including the Privacy Notice).

ii. Necessary processing for the compliance with our legal obligations. Within this context, we process your data for the following purposes:
   - For OPAP S.A. to comply with the applicable legislative framework and, in particular, with the provisions regulating the online gaming market in Greece.
   - To conduct the necessary security controls, identity verification and age confirmation of the Customers, through the control of their identification documents and through the use of their contact details, so as to ascertain that they indeed belong to you.
   - To monitor the transactions, aiming at deterring or verifying cases of fraud, irregular betting, money laundering, for sports integrity matters etc.

iii. Necessary processing for the purposes of our legal interests, namely:
   - For the improvement of the Games of Chance services provided through the Website, by using statistics regarding the Website’s use, as well as for the optimum service of OPAP S.A.’s Customers, especially by recognizing the Player when he/she calls the call center, so that he/she is given priority in terms of service, and so that the agent attending to him/her has the details of his/her online account readily available.
   - For the provision of evidence as to the transactions effected, by processing recorded oral or written (in soft or hard copy) communication.
   - Specifically, the mobile telephone number provided by the Player will be also used for his/her immediate information in case of detection of transactions from his/her online account that raise reasonable suspicions of non-authorized use or of fraud, without this meaning that OPAP S.A. undertakes the obligation to detect any eventual non-authorized use or suspicious transaction.

iv. Processing based on your specific consent, which is provided by selecting the relevant field upon your registration or afterwards. If you wish so, the company will process your personal data and playing behavior to understand your preferences, and will contact you for advertising and promotional purposes. Our aim is to inform you, via the means specified in your statement of consent, on products and services that we believe match your selections and that may be of your interest.

In any case, you hold the right to revoke the aforementioned specific consent to the processing of your personal data for the particular reasons and to request your data’s deletion at any given moment. In such case, the company will stop any processing that is based on your consent, without this affecting the lawfulness of the processing that was based on your consent prior to its withdrawal or of the processing described under points i to iii.
Recipients

The processing of your personal data, within the context of the provision of Games of Chance services, will be carried out by the competent employees of OPAP S.A. who are duly authorized to this end. Recipients of the personal data are also third parties (external partners, such as call center services providers), to the extent that this is necessary for your optimum service and for the provision of our services. In this case, our company undertakes that its partners are under the control and act only following its orders, that they have been specifically authorized for this purpose and that they are fully bound by secrecy and by the obligations set forth in the legislation on the collection and processing of the aforementioned data.

Finally, we shall inform you that our company may disclose your data to the competent administrative authorities, insofar as this is imposed by the applicable legislative and regulatory framework, following relevant request or when it ought to submit a report with the said data, without giving you any special prior notice.

Retention Period

Your personal data that refers to your identity verification, as well as the information referring to the transactions effected through the Website (including messages history) will be kept for ten (10) years as of their registration and, in any case, for five (5) years as of the end of the customer relationship.

Your Rights

You have the right to access, namely the right to be informed, following your request, on the extent to which your personal data is being processed, on one hand, and to receive further information regarding the processing carried out, on the other hand. Furthermore, you have the right to request the correction of inaccurate personal data of yours or the supplementation thereof, and if the conditions set out in Law are met, to exercise the right of deletion, the right of processing limitation, the right of data portability, and the right of opposition to its processing. In case you exercise the rights to correction, deletion and limitation of your data, these requests will be forwarded as well to the third parties/ recipients, to which this data was disclosed within the framework of provision of Games of Chance services.

You can exercise any of the abovementioned rights by submitting a written request to OPAP. You can expect a reply to such a request within one (1) month following its receipt by OPAP and in any case, within three (3) months, if the complexity of your request or in general the number of requests received, so requires.

Finally, you shall promptly notify OPAP S.A. of any eventual change to the information that you provided upon registering and opening your online account.

Disclaimer

Our services are not addressed to persons below twenty one (21) years of age. Any person who provides his/her details to us through any of our services warrants that he/she is above twenty one
(21) years of age. We do not take on any obligation or liability for the practices, actions or policies that are beyond our control.

The present Privacy Policy may be amended. We will make sure to inform you on any amendment but, in any case, we invite you to visit our Website regularly, where the updated Privacy Policy will be posted.

**Our Commitments**

OPAP reassures that it has taken all adequate technical and organizational measures, according to current technological standards and applicable laws and regulations, to guarantee that the processing of your personal data (by OPAP or by any third parties on behalf of OPAP) is lawful, adequate and secure against any unauthorized or accidental access, disclosure, processing, erasure, modification or other use.

**Contact Information**

For any request regarding the processing of your data, within the framework of provision of Games of Chance services, as well as in case you ascertain that we have not observed the principles stipulated in the present Privacy Policy, we kindly ask you to address, the soonest possible, OPAP S.A.’s Personal Data Protection Officer at email address dpo@opap.gr.

In case you consider that the protection of your personal data is affected in any way, you may appeal to the Hellenic Data Protection Authority, using the following details: Website: www.dpa.gr | Address: 1-3 Kifisias Ave., 115 23, Athens | Call Center: +30 210 6475600 | Fax: +30 210 6475628 | email: contact@dpa.gr