

Privacy Policy Ontario

Change History

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1 Introduction

Below you will find the Ontario Privacy Policy of Air Dice with regards to the data processed of individuals situated in Ontario or data processed within Ontario. First of all, we provide extensive information about the privacy practices at Air Dice to accurately and thoroughly illustrate the way in which Air Dice protects and processes personal data. This Privacy Policy also discusses all matters that apply to the processing and safekeeping of the data. Air Dice adheres to the Freedom of Information and Protection of Privacy Act (FIPPA) and Personal Information Protection and Electronic Documents Act (PIPEDA) to ensure compliance with the way in which data is handled within the organization. Ontario privacy legislation states that within the private sector of Ontario, the PIPEDA mainly applies to the collection, use and disclosure of personal information in the course of commercial activities. Since the core activities of Air Dice are commercial in nature, the PIPEDA mainly applies.

Outside of the FIPPA and PIPEDA, Air Dice adheres to the ISO-27001 certification for information security. The ISO 27001 standard focuses on a process-based approach to planning, implementation, application, monitoring, evaluation, maintenance and (continuous) improvement of information security management and is worldwide-recognized. Our certification number is NL 801.1.1. We value your privacy and will take the appropriate measures to secure and safeguard all processed personal data as shown by the certification.

2 Categories of personal data

Our Services collect “personal information,” which means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, including any information that constitutes “personal information” under applicable privacy laws. The FIPPA indicates that personal information is in any case:

- A person’s race, national or ethnic origin, color, religion, age, sex, sexual orientation, or marital or family status;
- Medical, educational, financial, employment and criminal history;
- Address, telephone and other numbers assigned to the person, such as social security numbers;
- Private correspondence with Air Dice;
- Views or opinions linkable to a particular individual.

Where applicable, we indicate whether and why you must provide us with your personal information, as well as the consequences of failing to do so. In order to provide our visitors, clients and partners with the best possible support, it is necessary for us to collect/process certain data, including personal data. In the context of Air Dice, we use, among other things, personal data that

we have collected through our website or websites through other activities of Air Dice active in Ontario or involved with our services aimed at Ontario. We only process and store data that has been provided to us directly, or of which it has been unambiguously stated that they are provided for processing to us.

3 Basis for data processing

By providing Air Dice with your personal information, using our services and/or by using our website, you are consenting to the collection, use and disclosure of your personal information in accordance with the terms of this Policy. If Air Dice requests additional personal information or intends to use or disclose your personal information differently than described in this Policy, we will advise you when we collect it or before we use it. There are circumstances established by law under which Air Dice may collect, use or disclose your personal information without obtaining your consent, primarily in the event of a legal dispute.

You may refuse or withdraw your consent to the collection, use and disclosure of your personal information. You should be aware that your choice to refuse or withdraw consent may negatively affect our ability to provide you with certain products or services.

For the sake of completeness: When you provide us with personal data from someone other than yourself, for example from the legal representative of the company you work for or from colleagues, we request that you provide that person with a copy of this Privacy Policy before submitting his/her personal data to Air Dice.

Below, the various data that Air Dice may collect are listed under a type of data processing circumstance to further illustrate the processing of the data as a whole. Do you have direct questions about the processing circumstances? Then contact our Ontario Privacy Officer.

1. **Contacting Air Dice (through E-mail)**

Did you give us information by sending an e-mail? In this case, it is possible that we store your information. This information can be a Name, Contact information, Age, Nationality. We will use this only to be able to contact you about the requested matter: we will never approach you in the context of marketing (or other unsolicited approaches).

2. **Cookies placed via our website**

We may place cookies on your device to gain insight into the website usage, to recognize the visitors to our website, count the number of visitors and determine how they use our website (this helps us to improve our website and to allow visitors to find what they need faster and easier).

3. **Complaint Procedure**

At Air Dice we value qualitative and stable service greatly and process these data's for resolving the complaint. Did you notice something on our website, or otherwise? Please share this with us through e-mail! Note: complaints about the online casino where you

have played one of our games (or technical issues), should be outed at the customer service of the relevant operator.

4. Financial Administration

For our financial administration we may process data such as a Name, Job title, Contact details including telephone number and e-mail address, Invoice address, Bank details (Name of bank/ IBAN/ BIC), Outstanding balance and/ or data on payment arrears.

5. Invoicing

For invoicing purposes, we may process various data among which a Company name, Invoice address, Chamber of Commerce number, VAT number, Customer number, Telephone number, E-mail address.

6. Relationship management

Air Dice may process various information for internal relationship management this can be a Name, E-mail address, Telephone number, Chamber of Commerce number, business address. In some cases, we process data in the context of satisfaction surveys (name, email address).

7. General services: entering into and executing business relationships, contacts with consultants, (legal) advisers, suppliers, contractors and maintenance companies.

When making use of inquiring about the various services and products of Air Dice, Air Dice may process various data such as a Name, Contact data, File data, Financial data; other data which is relevant for the case. This is important to be able to perform our regular business activities in a correct and effective manner, to be able to provide and improve our services, to prevent fraud, swindling or other unlawful behavior, for communication, commercial and administrative purposes and for marketing purposes.

8. Providing servers: end user data.

Air Dice needs certain information to be able to perform a service, as decided by agreement. For this we process end user play data on behalf of our customers. For this purpose, we collect among other things: IP address, the browser used, balances on the account, transactions made per game, gaming behavior and pseudonymized user ID.

4 Period of storage

Certain storage periods apply to all processing purposes described above. Air Dice will retain the information we collect about you in accordance with our record retention policies. The retention periods in our policies are selected so that we can comply with our legal and regulatory obligations, resolve disputes, reasonably manage our business, and enforce contractual agreements. Your personal information will typically be retained for as long as you have an active relation with Air Dice such as an agreement and/or inquiry with an additional three years, unless otherwise required by contract or applicable laws and/or regulations.

Air Dice may also process personal data for statistical purposes. In these cases, we anonymize the data, which means that the information can no longer be linked to you and may store the data indefinitely as the anonymized data is not considered personal data.

Note: We will store data on our own protected servers. In connection with applicable regulations regarding terrorism financing, money laundering and possibly other regulations, this data may be subject to a different retention period.

5 Recipients of personal data

In some cases, we are (legally) obliged to share certain personal data with third parties. For example, if we are involved in legal proceedings, have to comply with a legal obligation, comply with a court order or instructions from a government agency; and also, for the implementation of agreements. Below is an overview of recipients of personal data:

1. General

- Bookkeeper;
- Insurance Company (Personnel);
- Work Healthcare;
- Legal Services.

2. Air Dice

Air Dice shares information between de different Air Dice entities, including with the multiple locations where external servers of Air Dice are located such as in Malta, Belgium and Finland. All data shared outside of Ontario is shared in accordance with the Ontario privacy legislations.

3. Government agencies

If Air Dice is asked by a relevant government agency to share (certain) data, Air Dice will always comply with this when the grounds of the request are FIPPA and/or PIPEDA compliant.

Where this is required under the FIPPA and/or PIPEDA, we have concluded a processor agreement with the recipient concerned. We take our role as controller seriously and monitor it closely. Your personal data will always be shared in accordance with Ontario privacy legislations.

6 Security

Air Dice has its own internal security protocol to guarantee the security of your personal data as well and completely as possible. Every staff member (those involved within the organization with the process of processing data) must behave in accordance with these guidelines. Viewing personal data is only possible for those who are authorized to do so within Air Dice. Personal data, both

digital and physical, is strictly secured at all times. Air Dice is also ISO 27001 certified and adheres to the strict data protection requirements of the ISO 27001.

Air Dice takes strict measures to protect your personal data. Both digitally and physically. For example, all our devices are protected with a password and/or fingerprint scan and/or facial recognition. This concerns devices such as (mobile) telephones, laptops, tablets and computers. USB sticks with which information is transported are also secured. Physical data is kept within a locked office. The building in which the office is located is also equipped with an alarm system. Only authorized personnel have the possibility to view this data.

7 Your rights with regard to your personal data

In accordance with the PIPEDA we outline the various rights that you as an individual have, but do note that we are incapable of responding to any personal data requests coming from consumers because we do not know their identity. We can only respond to data requests coming from our operator customers. To exercise your rights, we advise to approach the specific operator that processes your personal data. You have various rights in relation to your Personal Information, in general these are:

- The right to obtain confirmation that we are processing your Personal Information and request a copy of your Personal Information held by Air Dice.
- The right to request that we update your Personal Information we hold about you, or correct such Personal Information that you think is incomplete or inaccurate.
- The right to withdraw your consent to our processing of your personal information. If we verify your request and cease processing we will also instruct third parties (if any) to cease processing your personal information, subject to applicable legal requirements.

In certain circumstances, Air Dice may decline a request to exercise a right of an individual, if Air Dice has reasons to suspect the identity of the requester, and cannot reasonably verify if the identity of the requester matches the identity of the particular individual that the data pertains to. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request. We would like to point out that the rights described above are not absolute rights. There may be (legal) circumstances that prevent Air Dice from complying with a specific request. If we do not (cannot) comply with a specific request, we will inform you of this and provide the reasons.

8 Duties

Air Dice always processes data on the basis of a legitimate interest. Personal data will never be resold to a third party. Air Dice furthermore always processes data in line with the ten fair information principles as outlined in the PIPEDA, the principle of accountability, identifying

purposes, consent, limiting collection, limiting use disclosure and retention, accuracy, safeguards, openness, individual access and challenging compliance.

Information that we consider necessary to collect is at least required to perform our services properly. If this information is not provided to Air Dice, it is not possible to perform the services adequately. If it proves necessary to share data with any third party, permission will always be requested. This can be done by means of changes to Air Dice's Ontario Privacy Policy or by direct request for permission.

Air Dice also reserves the right to disclose data, if this is required by law or if Air Dice deems this justified to comply with legal proceedings. This will also be the case when it comes to property rights or general protection of Air Dice. But your privacy rights are always taken into account and adhered to.

9 Changes

This Privacy Policy can be changed, for example as a result of a change in law or a relevant change in Air Dice's business operations. We therefore advise you to regularly read the Privacy Policy for any changes. Changes will be notified to you by sending the amended Privacy Policy or via our website.

Air Dice can - under certain conditions - process your personal data for purposes that are not yet stated in this Privacy Policy. In that case, Air Dice will contact you about this before using your data for these new purposes, to inform you of the changes to our Privacy Policy and to give you the opportunity to refuse processing for those new purposes.

Air Dice has appointed Peter Granfelt as Chief Privacy Officer to oversee compliance within Air Dice with regards to Ontario and applicable privacy legislation. For additional information on the privacy practices of Air Dice, or to exercise the various rights of an individual, or to express concern about compliance with this Privacy Policy, please contact Air Dice at:

Telephone number: +358 10 419 7490

Email: privacy@airdice.com