

# Privacy Policy

To download a copy of this policy, please click [here](#).

## Introduction

Data Controller: The legal name and registered address of the Data Controller are set out in the footer of this website. For the purposes of this policy, references to primescratchcards.co.uk ("primescratchcards.co.uk", "we", "us", "our") denote the relevant website and brand and should be interpreted as referring to the Data Controller.

Skill On Net Limited (Registered No. 14264775) supplies processing agent services (covering both deposits and withdraws) to Skill On Net Ltd (Malta – registration number C50024).

SkillOnNet (Malta) Registered  
Office Address:

Office 1/5297, Level G, Quantum House,  
75, Abate Rigord Street,  
TA'XBIEX, XBX 1120,  
Malta

This Privacy and Cookies Policy (herein after called “our Policy”, “Privacy Policy”), which was last updated on 27/01/2026, sets out the data processing practices carried out by PrimeScratchCards.

Here at PrimeScratchCards we respect your privacy and that includes being clear, transparent and open about what we collect, how and why we use your personal data, as part of the services we provide to you.

## GamProtect (Single Customer View)

*We participate in GamProtect, a scheme that protects the most high-risk customers in the UK. If you meet the requirements of being entered onto GamProtect, your personal data will be shared with GamProtect and then to other gambling companies you hold an account with who are participating in GamProtect. The legal bases for sharing your personal data with GamProtect are: legitimate interests, substantial public interest, safeguarding of children and of individuals at risk.*

*For more information about how your personal data is processed within GamProtect please visit the GamProtect privacy notice: <https://www.gamprotect.co.uk/privacy>*

## Controller Relationship for GAMPROTECT

When we participate in the Single Customer View initiative (GAMPROTECT), we share certain customer information with the SCV system, operated by Tutelar. For the processing of shared personal data, including special category of data, we act as the controller of the data we submit, while Tutelar acts as a Data Processor.

*Outside of the SCV system, we remain an independent controller of your personal information. In rare cases where the original operator is no longer available (“orphan” data), both the receiving operator and GAMPROTECT are considered as joint controllers to ensure that the data is processed for safer gambling purposes.*

## **GamProtect - Appeal Process**

If you wish to appeal your account closure or your inclusion in GamProtect, please follow the Redress Process outlined in the GamProtect Privacy Notice by visiting [www.gamprotect.co.uk/privacy](http://www.gamprotect.co.uk/privacy). If you have any inquiries about GamProtect please contact us at [playerprotection@skillonnet.com](mailto:playerprotection@skillonnet.com).

## **Purpose of this Policy**

Our Policy explains how we use your personal data, whether you are just visiting our website, making a deposit or playing one of our games, in accordance with the UK General Data Protection Regulation (“UK GDPR”, “the data protection law”). This Policy provides evidence of the nature of the personal data we collect, the purpose of processing and explains your rights in relation to the data processed. It also explains the circumstances in which we obtain and share information about you and how we use it to personalize the marketing you receive when you consent to it.

Please note that all our employees undertake regular training on Data Privacy and Information Security and are required to comply with confidentiality obligations as well as internal policies and procedures whenever they handle your information.

**Protecting the privacy of minors is extremely important for us. Please note, however, that our services are not directed at minors and therefore, no such personal data is collected or retained by us.**

We hope you will find this page helpful, but should you have any concerns or questions, regarding Data Protection, including any requests to exercise your legal rights, please feel free to contact our Data Protection Officer (DPO) at [dpo@PrimeScratchCards.com](mailto:dpo@PrimeScratchCards.com).

## **The Types of Information We Collect**

We collect two types of information from our customers.

### Personal Information

Personal is the Information which can be used to identify directly or indirectly an individual. The personal information we collect through our services includes information which is submitted directly by you, such as: phone number; full name; e-mail address; home address; Occupation and Salary; date of birth; payment means (e.g. card number); governmental documentation; and other financial information that we may need to provide you with our services. We also collect Personal Information from your device (e.g. geolocation data, IP address), information on your activity on the services (e.g. pages viewed, online browsing, clicks, scroll, actions/ game searches, etc.) and any other personal information which you may provide to us for the purpose of receiving our services.

We may also obtain information about you by collecting it from the interaction patterns carried out on our website (i.e., use of cookies), to improve the experience of using our website and ensure its proper functioning. More details on how to use cookies and how to manage them can be found in the relevant section of this Privacy Policy.

### Sensitive Information:

We may collect sensitive information about you, such as your nationality, as part of our onboarding processes and to comply with our legal and regulatory KYC requirements.

### Information used for the Single Customer View (SCV), GAMPROTECT

As part of an industry-wide safer gambling initiative, we may share certain personal data with the SCV system. This may include identification information (such as your name, date of birth, postcode, email address, telephone number and unique customer ID set by us). We also share a simple status flag indicating that you have been added to the SCV system due to being identified as at risk of gambling-related harm. We do not share your gambling history, patterns of play, self-exclusion information and any internal safer gambling indicators. Only the minimum data necessary for the SCV purpose is shared.

### Non-personal Information

The second type of information is un-identified and non-identifiable information pertaining to you, which may be made available or gathered via your use of the services. We are not aware of the identity of the user from which the Non-personal Information was collected. Non-personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time and the domain name of the website from which you linked to the services; etc.), in order to enhance the functionality of our services.

If we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information for as long as it remains combined.

## **How We Collect Your Information**

### Collecting Information about you, from you

##PrimeScratchCards collects personal information about you whenever you use our services. Some of it you provide it directly to us, for example, when you register an account or fund your account. Other information is collected during your interactions with us, such as the bets you place or online chats you have with our customer services team. Also, if you consent, we will record all telephone conversations and collect your information to send you marketing material. We also collect information about the way you access, view, share, contribute to and communicate with and through our services, for example when you post comments via our social media channels or chat functionalities.

### Collecting Information about you, from your device

We collect information from the devices you use when using PrimeScratchCards content, products and services. This includes but is not limited to the following: your IP address (a number that identifies a specific device on the internet and is required for your device to communicate with websites), hardware model, operating system and version number.

### Collecting Information about you, from the mobile application you use

We may collect information about you from the mobile application you use, upon the application's installation and at the first time of opening it. This information may include your IP Address, and your address-related data obtained from the IP Address, such as your country code, state, city and postal code. We may also collect your device information, such as your platform – iOS or Android – your phone OS and application version. We can also collect your advertising ID if you specifically provide your consent to it. Your personal information is also collected when creating an account with us and registering to receive our services. This information is required for account creation, security verification, regulatory compliance and to enhance your overall experience with the application.

### Collecting Information about you, from your computer and through Cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service to you. Some of the cookies we use are essential for the site to operate. The cookies we use can be grouped into four separate categories and are explained in the section further below set out for Cookies.

### Collecting Information about you, from external companies

To help us comply with our legal and regulatory KYC and Social Responsibility obligations:

- When you open your account, we may cross check /reference the information you supplied to us with external/governmental companies for Anti-Money Laundering (AML) and ID verification processes, as well as to ascertain whether you are registered with them because you asked not to be allowed to gamble.
- We use publicly available information (on social media sites and the like) to help verify information provided to us and we log and save the results.

In all the above cases we will log and save the results.

### Collecting personal data from a third party as part of a business or asset transfer:

We may also collect personal data about you from third parties from time to time. For example, if you are a former customer of a PrimeScratchCards partner and your data was passed to PrimeScratchCards we will have acquired the following categories of your personal data from your previous online betting and gaming provider in order to integrate your former account into PrimeScratchCards's platforms and systems, and to provide our gambling services to you in accordance with our Terms and Conditions, which can be found in our website. A non-exhaustive list of examples (which may or may not be applicable depending on the process) of such data is:

- Your account balances – to allow you to access your funds;
- Your former provider's username and password (hashed and non-decipherable by us) – to allow you to continue to access your account using the same login details;
- Your personal registration details originally supplied to your former provider, such as name, Date of Birth (DOB), address, email address, telephone number and occupation;
- Other account data such as your player ID, registration and login dates, country code, currency, first deposit amounts and dates, number of wins, device details (where held), gambling limits but in most cases *excluding payment details and itemised, historic gaming and financial transactions*. Please note, if you require access to your historic, itemised gaming and financial transactions with your former provider please contact them in accordance with the instructions of their Privacy Policy on their website in the first instance;
- Copies of your existing KYC, identification and Enhance Customer Due Diligence documents originally supplied to your former provider – where we can, we will process these documents to allow you to access PrimeScratchCards services without have to ask you to supply updated documents.
- If you are a 'time out' or 'self-excluded' customer, your account status and duration of any relevant live time out or exclusion period.

We will process the above categories of personal data for the reasons outlined in this Privacy Policy and in accordance with the relevant data protection legislation.

### **How do we use the information we collect? What is the Lawful Basis for processing your personal data?**

We use and share your Personal Information in the manners described in this Privacy Policy and for the provision of our services to you. The Personal Information will be disclosed to a third party only to the extent required for a specific purpose, as stipulated in this Privacy Policy, and in such cases, we require the relevant third party to agree to process such information in compliance with our Privacy Policy and the UK GDPR.

We will not disclose your Personal Data with any third parties outside of the United Kingdom and European Union in countries where there is no adequate data protection regime. However, in the event that such a data transfer occurs, we will take all reasonable steps possible to ensure that your data is treated as securely as it is within the European Union and in accordance with this Privacy Policy and the UK GDPR (i.e., use of Standard Contractual Clauses (SCCs) with the third parties we share your data that is registered outside the EU). Additionally, we will update the current Privacy Policy to reflect the cross-border data transfer and the relevant safeguards for your privacy.

The information we collect, which may include “Personal Information”, is used for the following purposes:

- To set up your account and to provide you with our services, including the services we provide to you via our mobile application (i.e., Identification and verification of your personal details, send out cash-out checks, process your payments, consult the national self-suspension register to determine whether we can allow you to access to gambling etc.). The legal bases for this processing activity are the performance of the contract and the fulfilment of a legal /regulatory obligation.
- To perform our regulatory obligations in terms of Safer Gambling and Anti-Money Laundering. The legal basis for this processing activity is the fulfilment of a legal /regulatory obligation.
- To identify and authenticate your access to certain features (i.e., verification of your identity and age). The legal basis for this processing activity is the fulfilment of a legal/ regulatory requirement.
- To indicate that you had a win (in winners’ announcements on our website or on a tournament leaderboard) by using your Username. We advise against using anything that can identify you personally, however this is your choice. The legal basis for this processing activity is your consent.
- To communicate with you and to keep you informed of our latest updates. The legal basis for this processing activity is your consent.
- To market our website and products or those of any of our business partners and affiliates, including. The legal basis for this processing activity is your consent.
- To perform research or to conduct anonymous analytics to improve and customize our services to your needs and interests. The legal basis for this processing activity is our legitimate interests, provided that your interests and fundamental rights do not override such interests.
- To support and troubleshoot our services and to respond to your queries. The legal basis for this processing activity is the performance of a contract.
- To investigate violations and enforce our policies, as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request. The legal basis for this processing activity is the fulfilment of our legal obligations.
- To participate in Single Customer View, GAMPROTECT initiative. We process specific personal data with the SCV, as described in section “The types of information we Collect” of this policy, to help identify players who may be at risk of gambling-related harm. This allows us and other licensed operators to take appropriate and timely safer gambling actions, such as additional checks, limits or interventions where required. The lawful bases for this processing activity are the legitimate interest we have as a UK-licensed operator to support harm-prevention and safer gambling and the substantial public interest we have when processing customers’ special category data, as per the UK Data Protection Act 2018.
- To audit certain elements of our business practices. The legal basis for this processing activity is the fulfilment of our legal obligations.
- Where we decide to sell, transfer or otherwise dispose of any part of our business in the future, we may share your information with prospective purchasers and our professional advisors for that purpose. The legal bases for this processing activity are the performance of a contract

and/or our legitimate interests, provided that your interests and fundamental rights do not override such interests.

Where the data processing is in accordance with your consent, you have the right to withdraw your consent at any time in writing by contacting us at [DPOPrimeScratchCards.com](mailto:DPOPrimeScratchCards.com), or by following any relevant process to withdraw your consent (e.g., unsubscribing from marketing, by clicking the “unsubscribe button” on the marketing emails you receive or by changing your preferences from your account you have with us after logging in it or through our support channels). Withdrawal of your consent does not affect the lawfulness of the treatment of your data prior to its revocation.

### **Companies that provide services on our behalf**

We share your personal information with external organizations that carry out a range of services on behalf of PrimeScratchCards. We carry out checks to ensure that the companies we work with will give your information the same level of care and protection as we do. Both we and they are obliged to handle your information in accordance with the data protection law, and we are also required to put in place contractual measures reinforcing those obligations.

The main functions that are or may be carried out, fully or in part, by third parties on our behalf are listed below:

- Management and execution of marketing campaigns
- Payment processing and verification
- Credit Reference Agencies including but limited to affordability checks. For more information on how Credit Reference Agencies collect/handle and process your personal data please check [here](#).
- Anti-fraud and Anti-money laundering checks (Including but not limited to Enhance Due Diligence reports utilizing publicly available sources and ID verification)
- Checks to detect unfair use of our products and services
- Web hosting, management, maintenance, development of our websites, mobile applications, and IT systems, online content services and data storage
- Management of competitions, contests and offers
- Data analytics and data cleansing
- Market research and collecting or analysing customer feedback
- IT services and support
- Audit-, Legal- & Compliance- related services
- Storing data for regulators to access and view
- Analysis of gambling habits to ascertain potentially risky behaviours

### **Information we share with GAMPROTECT**

We may share personal data with the SCV (GAMPROTECT) system/ State Tutelar. This data may be accessed by other licensed gambling operators strictly for the purpose of assessing cross-operator risk and supporting safer gambling interventions. Information is not shared with any third party for marketing or commercial purposes.

### **Information demands from Regulators:**

On a regular basis, in all licensed jurisdictions, we are regulatory required to produce reports containing non-Personal Data. The reports include information such as number of self-exclusions, number of registrations, number of complaints, number of suspicious transactions reported to authorities.

### **Other information sharing with third parties:**

We may also share personal data with selected third parties to measure and improve customer experience, to circulate new offers and promotions that may be of interest on various similar third parties' products/services and to facilitate the resolution of customer complaints and disputes. This

sharing takes place further to legitimate interests (which do not override your fundamental rights and freedoms) or under another suitable lawful basis identified by us.

We may also process your personal data for the purposes of any future acquisitions, sales, restructuring or other business or asset disposals or transfers of any part of our business from time to time. This may include sharing your personal data with third party prospective purchasers, bidders, investors, professional advisors and other relevant persons in respect of the transaction. Such data sharing will take place further to our legitimate interests (which do not override your fundamental rights and freedoms) in disposing of or restructuring our business interests, or under another suitable lawful basis identified by us under the data protection legislation at the appropriate time. Where this is the case, you will receive notice of any such transfer before it takes place, along with further details about how your personal data will be processed at the relevant time.

When we share your personal data with third party service providers, we only disclose to them the information that is necessary for them to provide their service and we have an agreement in place with them, requiring them to secure your information and use it in accordance with our instructions.

### **How long do we keep your information?**

We hold your personal information only as long as we have a valid legal reason to do so, which includes providing you with the services you have requested, obtaining your explicit consent, meeting our legal and regulatory obligations, having a legitimate interest and resolving disputes and enforcing our agreements.

The length of time for which we keep different types of personal information can vary, depending on why we originally obtained them, the reason we process them and the legal requirements that apply to them. When setting our data retention and deletion timescales we take into account a range of factors including applicable regulations and standards relating to gambling and gaming, anti-money laundering, taxation, payment processing and complaint handling, the need to prevent or detect crime or other misuse of our services, and audit requirements. To fulfil our requirements, some of your personal data will need to be retained for a period after you cease to be a customer. When we no longer need it to fulfil the above requirements, we delete it securely or anonymize it.

The personal information we share with the SCV will be retained only for as long as necessary to fulfil the SCV's harm-prevention purpose. Retention periods for this information may differ from our standard account data retention periods due to the specific safeguarding and safer gambling purpose of the SCV. Orphan SCV data is retained in accordance with the SCV harm-prevention purpose, even if the original operator is no longer available.

### **Your Rights**

You have the following Data Subject Rights:

- The right to be informed. Transparency in how we collect and use your personal data. Hence, this detailed Privacy Policy.
- The right of access. This enables you to e.g. receive a copy of the personal data we hold about you.
- The right to rectification. Correction/Rectification of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected/rectified.
- The right to erasure. This enables you to ask us to erase your personal data [known as the 'right to be forgotten'] and only applies in certain circumstances (i.e., the personal data is no longer necessary for the purpose, which was originally obtained, the processing of personal data relies on the consent you provided etc.).
- The right to data portability. This gives you the right to receive the personal data you have provided to a controller in a structured, commonly used and machine-readable format. It also gives you the right to request that a controller transmits this data directly to another controller.
- The right to restrict processing. This enables you to ask us to restrict the processing of your personal data, i.e. use it only for certain things, if:
- It is not accurate,

- It has been used unlawfully but you do not wish for us to delete it,
- It is not relevant anymore, but you want us to keep it for use in possible legal claims,
- You have already asked us to stop using your personal data, but you are waiting us to confirm if we have legitimate grounds to use your data.
- The right to object. This gives you the right to object to the processing of your personal data. The right to object only applies in certain circumstances. Whether it applies depends on your purposes for processing and the lawful basis for processing. For example, individuals have the absolute right to object to the processing of their personal data if it is for direct marketing purposes. Individuals can also object if the processing is for the following, unless there are compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individuals or for the establishment, exercise or defence of legal claims:
  - A task carried out in the public interest
  - The exercise of official authority vested in you
  - Your legitimate interests (or those of a third party)
  - In relation to automated decision making and profiling.

Regarding your rights in relation to GAMPROTECT, you have the right to request access to the personal data we process about you for the SCV. However, please note that certain rights, such as the right to erasure or the right to object and others, may be limited where processing is necessary to safeguard individuals at risk of gambling related harm/substantial public interest. We will inform you if any such limitations apply when responding to your request. For the SCV records where the original operator is no longer available ("orphan" data), your data rights may be exercised through the Receiving Operator or GamProtect Ltd, who act as joint controllers for these records.

In order to exercise any of your rights over your Personal Data, please contact our DPO at [dpo@PrimeScratchCards.com](mailto:dpo@PrimeScratchCards.com).

If your request relates to your personal data processed in connection with the GAMprotect scheme, please contact us at [playerprotection@skillonnet.com](mailto:playerprotection@skillonnet.com).

We are permitted to ask for your ID to verify your identity prior to fulfilling your request. However, we reserve our right, in certain situations, to request for your Identity to be verified via additional methods/ways up to the point we are satisfied of the veracity and/or legality of the request. Such additional verification measures are applied to ensure that Personal Data are under no circumstances released to unauthorised persons.

If you believe your privacy rights have been infringed, or you disagree with a decision we have made about your privacy rights, you have the right to complain to the relevant supervisory authority.

### **Transfer of data outside the UK and EEA**

We will only transfer your personal data outside the UK and European Economic Area (EEA), under certain conditions:

- With your explicit consent.
- When necessary to fulfil a contract, you have entered with us.
- To comply with a legal obligation.

If we transfer your personal data outside the EEA, whether within our group or with our partners, such as the TradeDesk, we will take all necessary measures to ensure its protection to UK and EEA standards and to confirm that your privacy rights continue to be safeguarded as outlined in this Privacy Policy. This may include:

- Relying on a determination by the European Commission that the receiving country offers adequate protection for personal data. For more information, please refer to the justice section of the European Commission website.
- Implementing contractual agreements where the recipient agrees to safeguard your personal data to EEA standards.

- Employing standard contractual clauses, binding corporate rules, or other acceptable methods to uphold EEA-level data protection.

In certain circumstances, we may be compelled by law to disclose your personal data to third parties, over which we may have limited control regarding data protection measures.

There are cases where third parties that may process your personal data, such as the SCV system that is operated by Tutelar, may process your personal data on secure infrastructure located inside or outside the UK/EEA. Where any transfer of your personal data related to the SCV requires it to be processed or stored outside the UK/EEA, we ensure that the appropriate safeguards are in place, such as the UK Addendum to the EU Standard Contractual Clauses or another mechanism approved under the UK data protection law. These safeguards ensure that your data continues to be protected to the standards required under the UK GDPR.

## **Cookie Section**

### What are Cookies?

'Cookies' are small text files stored in your web browser that enable us to recognize your computer when you visit our website. Cookies are essential to keep certain parts of our website functioning correctly and securely. We also use them to make things quicker, easier and more personal to you and to help us understand how our website is used. Optional/ non-essential cookies can be used to present you with more tailored advertising content, if you provide your consent and accept these cookies.

To do all these things, cookies collect some personal information about you whenever you use our website. You can choose whether to accept or reject some or all types of cookies and control them through your device's browser settings, as described in the section "Controlling my Cookies" below.

Cookies also enable PrimeScratchCards to find out which advertisement brought you to our website, we may use the PrimeScratchCards cookies on your computer. If we do collect such information, you will remain personally unidentifiable, and we will not share this information with any unconnected third-party.

### **The Cookie Categories we use**

The Cookies we use fall into the following categories:

- Strictly Necessary

This type of cookie allows you to navigate the website and use essential features like secure areas and online registration. These cookies don't gather any information about you that could be used for marketing or remembering where you've been on the internet. These cookies are essential in being able to guarantee the performance of our website, should you disable them we won't be able to ensure your security or predict how our website will perform during your visit.

- Performance

This type of cookie collects information about how you use our website e.g. which pages you visit, and if you experience any errors. The information collected is anonymous and is only used to help us improve how our website works, gauge what interests our users have and assess the effectiveness of advertising.

- Functionality

This type of cookie remembers your preferences for tools found on our website, so you don't have to re-set them each time you visit. Some of them are managed by third parties. They may for instance determine whether you see the latest or oldest comments made in relation to an article first. They may also help us greet you by name or remember your choice of language or region.

- Targeting/Tracking

These cookies are used to analyse what advertising might be most relevant to a user of the website based on the areas of the website that the user visits.

To view the list of the cookies that are used by our Site, click to the relevant button at the top right of this Privacy Policy.

Please note that our advertisers may also use cookies on their websites, and we have no control over such use.

## **Controlling my Cookies**

All modern browsers allow you to see what cookies you have, and to clear them individually or in their entirety by changing your cookie settings. Cookie settings are typically found in the 'options' or 'preferences' menu of your browser, otherwise you should use the 'Help' option in your browser for more details. You may also find the links below helpful:

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Microsoft Edge](#)
- [Cookie settings in Safari](#)

You can block cookies by activating the settings on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. We endeavour to make all parts of our site accessible to everyone but if you block some cookies, particularly Strictly Necessary cookies, your access might be impaired.

For non-essential cookies, we will ask you to consent when you first visit our site. Your first visit to our site will generate a pop-up header, requesting you to consent/ reject to optional cookies and alerting you to this privacy policy. If you withdraw your consent, the cookies already installed will be deleted. A pop-up header will re-appear only if you change your cookie settings from time to time.

You can manage your cookie preferences and settings for non-essential/optional cookies at any time, by clicking to the relevant button, located at the top right of this page. If you withdraw your consent, the cookies already installed will be deleted.

## **The Use of Google Analytics**

We use Google Analytics for 'analytical' purposes such as to keep track of user/customer browsing patterns and to build up a profile for a customised browser experience for you. Google Analytics is a popular web analytics service provided by Google, Inc. Google Analytics uses cookies to help us to analyse how customers use our website.

Your opt-out choice is applied only to the browser from which you make the choice, so if you use different browsers you will need to opt out in each one. This opt-out is cookie based, so if you delete your cookies, you will no longer be opted out and you will need to opt out again. Google Analytics, from which you can control through your browser settings: opt out.

<https://tools.google.com/dlpage/gaoptout>.

You can also manage your cookie preferences at any time, by clicking the relevant button, located at the top right of this page.

## **Targeting and Retargeting**

Targeting and Retargeting technologies are used to tailor our online marketing to your needs and interests and optimize your experience while using our websites, as for example the Trade Desk from Trade Desk Ltd. Such technologies are monitored and used when you visit our websites that work together with the providers of these re-targeting technologies, to be able to inform you when we meet your interests as closely as possible.

With the said technologies, cookies on our websites and on the websites of others (for retargeting purposes) track your interest in our products. With the use of random identifiers (i.e., online identifiers, cookie ids), there is no direct identification of your data, such as your name, email address etc. (“pseudonymised data”), unless you have consented to this. Also, any data collected through these cookies can be removed at any time, if consent to these cookies is withdrawn.

These cookies are mostly used for conversion tracking and retargeting (collection of information about your interests in the products of our retargeting partners – building an audience for campaigns run by the same advertisers). The data collected for targeting and retargeting purposes includes amongst others *Referrer URL*, *Page URL*, *IP Address*, *Time/Date*, *Geographic location* etc. and their collection is made after providing your consent (Art.6, paragraph 1 (a) of the UK GDPR).

When the targeting and retargeting technologies are used, your data may be transferred in the United States and processed there. All the appropriate measures for the transfer of your data outside the EEA are implemented, as described in the section “Transfer of data outside the EEA” of this Privacy Policy.

You can manage your cookies preferences (Opt-In and Opt-Out), by clicking the relevant button, located at the top right of this page.

UK General Data Protection Regulation (GDPR) – UK Representative

## **Security**

PrimeScratchCards goes to great lengths to guarantee that your personal and financial information remains 100% secure and confidential. We process your personal data via secure channels, ensuring that the appropriate measures and mechanisms for the security of the data are in place and guarantee that the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, confidentiality and accountability, as per Article 5 of UK GDPR, are respected and implemented.

The measures and mechanisms we take to safeguard your data include:

- Administrative, organizational and technical controls to limit access to personal data that needs to be known in relation to the purpose of processing
- Technical security measures (i.e., encryption, Data Loss Prevention (DLP) system, antimalware systems, access restriction etc.) The connection to this site is encrypted and authenticated using TLS 1.2 (a strong protocol), ECDHE\_RSA with X25519 (a strong key exchange), and AES\_128\_GCM (a strong cipher) to ensure that all transactions including deposits and withdrawals are carried out in a totally secure manner. This technology protects you from having your information intercepted by anyone other than PrimeScratchCards while it is being transmitted between you and PrimeScratchCards.
- Physical security measures (i.e., access cards logs, surveillance cameras)
- Training of employees to ensure that they are informed about the privacy obligations they have towards the processing of your personal data
- Restriction of access to your personal data to the employees and third parties who have a business need to know. Employees and third parties will only process your personal data based on the instructions provided by us, subject to a duty of confidentiality.
- The relevant procedures to deal with any possible data breach. If this is the case, the appropriate mechanisms are established to notify you and any applicable regulator, within the relevant timeframe and where we are legally required to do so.

## **Limits of Confidentiality**

For legal reasons, PrimeScratchCards may be required under certain circumstances to disclose your personal information. Reasons for this may include:

1. To protect and defend our rights or property.

2. To comply with any legal process served on us. In addition, we reserve the right to disclose your personal information, including player identification, name, physical address, billing address, e-mail and/or phone number, to third parties as we believe necessary or appropriate in connection with any investigation of fraud, intellectual property infringement, piracy or any other unlawful or prohibited activity that might expose us to legal liability

## **Complaints**

If you have a complaint about our handling of your Personal Data or regarding this Privacy Policy , please contact us on [dpo@PrimeScratchCards.com](mailto:dpo@PrimeScratchCards.com) We request that a complaint be made in writing. Please provide details about your concern or complaint so that we can investigate it.

We will determine whether to take action in response to your complaint, which, if we do so, may include conducting internal discussions with relevant business representatives. We may contact you for additional details or clarifications about your concern or complaint. We will contact you to inform you of our response to your complaint. UK and European Users also have the right to make a complaint at any time to a supervisory authority (for more information go to [Make a complaint | ICO](#)).

There may be legal or other reasons why we cannot, or are not obliged to, fulfil a request to exercise your rights. We will use available lawful exemptions to your individual rights to the extent appropriate. If we decline your request, we will tell you why, subject to legal restrictions.

## **Changes to this Privacy Policy**

We may modify or amend this Privacy Policy from time to time. When we make changes to this Privacy Policy, we will update the revision date at the top of this page and such updated Privacy Policy will be effective from that revised date. To this end, please visit our Privacy Policy regularly, to stay up to date with any changes made since your last visit.