

PRIVACY POLICY

1. INTRODUCTION AND SCOPE

This Privacy Policy (“**Policy**”) explains how, Precise Interactive Inc. company incorporated under the laws of Panama (the “**Company**”, “**Operator**”, “**we**”, “**us**”, or “**our**”), collects, uses, stores, discloses, and protects personal data when you access or use the platform, including all related websites, mobile versions, applications, and services (the “**Platform**”).

This Policy applies to all users, visitors, and individuals whose personal data is processed in connection with the Platform. By accessing or using the Platform, you acknowledge that you have read and understood this Policy and agree to the processing of your personal data as described herein. If you do not agree with this Policy, you must immediately discontinue use of the Platform including registered players, poker participants, tournament entrants, cash-table users, promotional participants, and customer support correspondents]. By accessing or using the Platform, you acknowledge that you have read and understood this Policy and agree to the processing of your personal data as described herein including processing necessary for poker account administration, gameplay integrity monitoring, anti-collusion controls, fraud detection, anti-money laundering checks, and regulatory compliance screening. If you do not agree with this Policy, you must immediately discontinue use of the Platform and must not register a player account, participate in poker games or tournaments, deposit funds, or submit identity or payment information through the Platform. This Policy should be read together with the Platform Terms and Conditions, Poker Rules, Responsible Gaming Policy, AML Policy, and any game-specific or tournament-specific rules, which together describe how personal data is processed in connection with poker gameplay, financial transactions, and integrity controls. Personal data may be processed using automated and manual risk, fraud, and poker-integrity monitoring systems, including gameplay pattern analysis, device and session monitoring, and hand-history review, for the purposes of detecting bots, real-time assistance (RTA), collusion, chip-dumping, multi-accounting, and other prohibited poker conduct. The Platform is not intended for use in jurisdictions where online gaming is restricted or prohibited, including India. Personal data may be processed to determine user jurisdiction and eligibility to access poker and gaming services. Geo-location and jurisdiction screening controls are applied at onboarding and during continued Platform use.

2. REGULATORY AND OPERATIONAL FRAMEWORK

The Company operates the Platform as a licensed Curaçao based gaming operator and processes personal data in accordance with applicable data protection principles, gaming regulations, and compliance obligations relevant to the jurisdictions in which it operates, including Asia and Africa and in connection with the provision of online real-money poker services, poker tournaments, cash tables, promotional poker events, and related gameplay infrastructure. Such processing includes player identity verification, poker

account administration, gameplay integrity monitoring, anti-collusion and anti-bot detection, anti-money laundering screening, payment processing, dispute handling, and regulator reporting obligations connected with licensed online poker operations.

The Company applies a consistent, risk-based data protection framework designed to safeguard personal data while enabling lawful gaming, payment processing, fraud prevention, and regulatory compliance including poker-specific integrity controls, hand-history analysis, behavioural risk scoring, device and session fingerprinting, and automated detection of prohibited poker practices such as collusion, chip-dumping, real-time assistance (RTA) use, bots, and multi-accounting. Personal data is processed only on recognized lawful bases, including performance of a contract with the user, compliance with legal and regulatory obligations, legitimate interests in maintaining platform security and poker game integrity, fraud and financial crime prevention, and where applicable user consent for marketing and promotional communications. Where required under applicable data protection laws, the Company documents and maintains records of lawful basis assessments for poker gameplay monitoring, fraud detection systems, and compliance screening activities. As part of licence and compliance obligations, the Company applies jurisdiction screening controls, including restricted territory detection covering India. Personal data is processed to enforce territorial access restrictions and gaming licence conditions. Accounts or transactions linked to restricted jurisdictions may be flagged, restricted, or blocked through compliance processing.

3. PERSONAL DATA WE COLLECT

We may collect and process the following categories of personal data:

a) Account and Identification Information:

- Full name
- Date of birth
- Email address
- Phone number
- Username and account identifiers

b) In accordance with our Anti-Money Laundering Policies, we may collect verification and compliance information, as required from time to time and upon occurrence of certain events set out therein:

- Government issued identification documents
- Proof of address
- Source of funds or source of wealth documentation
- Internal compliance and risk assessment records

c) Financial and Transaction Information:

- Deposit and withdrawal history

- Payment method identifiers (processed securely via third party providers)
- Betting, wagering, and gameplay history
- Bonus usage and promotional participation

d) Technical and Usage Information:

IP address and general location indicators

- Device and browser information
- Login timestamps and activity logs
- Cookies and similar technologies

e) Communications Information:

- Customer support correspondence
- Chat records
- Complaint and dispute related communications

We do not knowingly collect personal data relating to individuals under the age of 18.

4. SOURCES OF PERSONAL DATA

Personal data may be collected directly from you, automatically through your interaction with the Platform, from third party service providers such as payment processors and verification partners, or from publicly available or regulatory sources where permitted by law including poker software providers, game engine providers, tournament management systems, anti-collusion and gameplay integrity monitoring vendors, fraud detection partners, and risk-scoring service providers engaged in connection with online poker operations. Data may also be generated and collected through your participation in poker games, poker tournaments, cash tables, sit-and-go events, leaderboard promotions, and related gameplay features, including hand histories, gameplay decisions, table interactions, chip movements, and session metadata recorded by the Platform's poker systems. We may further receive personal and risk-related data from affiliated group companies, brand partners, and platform operators for fraud prevention, responsible gaming controls, bonus abuse prevention, multi-account detection, and cross-platform integrity enforcement, where permitted by law. Third-party identity, sanctions, politically exposed person (PEP), and anti-money laundering screening databases may also be used to validate and supplement user-provided information. We may obtain jurisdiction and risk signals from geo-location providers, fraud prevention databases, and compliance screening partners. Third-party verification and risk providers may assist in detecting restricted territory access, including India. These sources are used strictly for compliance, fraud prevention, and license enforcement purposes.

5. PURPOSES OF PROCESSING

We process personal data for the following purposes:

- Account creation, administration, and security
- Identity verification and age validation
- Processing deposits, wagers, withdrawals, and payouts
- Fraud detection, prevention, and investigation
- Compliance with gaming, payment, and anti-money laundering requirements
- Prevention of bonus abuse, collusion, and prohibited activities
- Customer support and complaint handling
- Responsible gaming monitoring
- Marketing or promotion of products/services offered by the Company or its affiliates
- Internal analytics, audits, and business operations
- Protection of the Company's legal rights and interests
- Operation, delivery, and integrity monitoring of real-money poker services, including poker cash games, tournaments, sit-and-go events, leaderboard campaigns, and promotional gameplay features.
- Recording and analyzing poker hand histories, gameplay actions, betting patterns, chip flows, table behavior, and session metadata for game integrity, anti-collusion, anti-bot, anti-RTA (real-time assistance) and fair play enforcement purposes
- Detection and prevention of prohibited poker conduct, including collusion, chip dumping, soft play, ghosting, multi-accounting, automated play, solver or RTA usage, and coordinated table behavior.
- Risk scoring, behavioral profiling, and transaction monitoring for fraud, AML, and platform security purposes using automated and manual review system.
- Compliance with legal and regulatory obligations, license conditions, regulator requests, law enforcement requests, and dispute resolution processes applicable to online poker and gaming operations
- Enforcing the Terms and Conditions, Poker Rules, Bonus Terms, and platform policies, including investigation, defense, and resolution of claims, disputes, and integrity reviews
- Where required under applicable data protection frameworks, processing is carried out on one or more lawful bases, including performance of contract, compliance with legal obligations, legitimate interests in fraud prevention and platform integrity, and user consent for marketing communications
- To perform jurisdiction eligibility screening and enforce restricted territory rules, including India access restrictions.
- To detect and prevent VPN, proxy, or masking-based circumvention of territorial poker and gaming restrictions.
- To support geo-blocking, license compliance, and restricted market enforcement controls.

6. DATA SHARING AND DISCLOSURE

The Company may share personal data with:

- Payment service providers and financial institutions

- Identity verification, fraud prevention, and compliance partners
- Game providers and technology service providers
- Affiliates of the Company assisting in the distribution of the Platform or the Company's business
- Professional advisers, including legal and compliance consultants
- Regulatory authorities, licensing bodies, and law enforcement agencies where required
- Poker software providers, poker network operators, tournament platforms, hand history processors, game integrity and anti-collusion service providers supporting poker tables, tournaments, and gameplay monitoring.
- Risk management vendors, behavioral analytics providers, bot/RTA detection providers, and security monitoring partners used to detect cheating, collusion, prohibited poker tools, and unfair gameplay pattern
- AML, sanctions screening, and transaction monitoring providers for customer due diligence, source-of-funds checks, and ongoing compliance reviews
- Payment processors, blockchain analytics providers, and cryptocurrency wallet infrastructure providers where crypto deposits or withdrawals are use
- Other licensed gaming operators or integrity networks where information sharing is reasonably necessary for fraud prevention, bonus abuse detection, poker integrity protection, or multi-account investigations, subject to lawful basis and safeguard
- Personal data may be shared with geo-screening, fraud detection, and jurisdiction compliance partners for restricted territory enforcement.
- This includes vendors that help identify access from prohibited jurisdictions such as India.
- Such sharing is limited to compliance, security, and license enforcement purposes.

Data is shared strictly on a need to know basis and subject to appropriate confidentiality and security measures. All recipients are required by contract or law to process personal data only for permitted purposes, maintain confidentiality, and implement appropriate technical and organizational security measures.

7. INTERNATIONAL DATA TRANSFERS

Due to the international nature of the Platform, personal data may be transferred to, stored in, or processed in jurisdictions outside your country of residence. These transfers are carried out using appropriate safeguards and security measures consistent with the Company's data protection framework. Such cross-border transfers may occur between the Company, its group entities, poker network partners, game providers, payment processors, cloud hosting providers, analytics providers, fraud prevention partners, and compliance service providers that support the operation of real-money poker games, tournaments, payments, and account security. Where applicable data protection laws require transfer safeguards, the Company implements appropriate mechanisms such as contractual data protection clauses, data processing agreements, and security controls designed to ensure an adequate level of protection for transferred personal data. You

acknowledge that some jurisdictions to which data may be transferred may not provide the same level of statutory data protection as your country of residence, but the Company will apply reasonable technical and organizational safeguards to protect your data in transit and at rest. Cross-border transfers may occur where geo-screening, fraud detection, or poker integrity monitoring providers operate internationally. Such transfers support restricted jurisdiction enforcement and license compliance controls.

By using the Platform, you acknowledge and accept that such international transfers may occur. Where required by applicable law, your acceptance of this Policy and continued use of the Platform constitutes your informed acknowledgement of such international data transfers for gaming, poker operations, payments, fraud prevention, and regulatory compliance purposes.

8. DATA RETENTION

Personal data is retained only for as long as necessary to fulfil the purposes outlined in this Policy or to comply with legal, regulatory, and operational requirements. Retention periods are determined based on contractual necessity, gaming and poker regulatory obligations, anti-money laundering requirements, fraud prevention needs, dispute resolution timelines, and legitimate business and security interests.

In particular:

- Verification and compliance data may be retained for several years in accordance with regulatory obligations including KYC, AML, sanctions screening, poker integrity investigations, and source-of-funds/source-of-wealth records, which may be retained for up to the maximum period required under applicable gaming and financial crime regulations.
- Financial and transactional data is retained for audit and compliance purposes including deposit, withdrawal, wallet, wagering, poker hand history, tournament participation, and payment processing records required for audit trails, regulator inspection, fraud detection, and game integrity review.
- Data relating to closed or dormant accounts may be retained to address legal or regulatory claims and to prevent duplicate accounts, bonus abuse, collusion, prohibited poker conduct, chargebacks, and security threats across the Platform and related poker network services.
- Where permitted by law and no longer required, personal data may be securely deleted, anonymized, or irreversibly de-identified for statistical, poker network analytics, and platform improvement purposes.
- Jurisdiction screening logs and restricted territory detection records (including India-related flags) may be retained for audit and compliance defense.
- VPN and circumvention investigation records may be stored for fraud and gaming purposes integrity.
- Retention may continue after account closure where required for regulatory or dispute handling.

9. DATA SECURITY

The Company implements reasonable technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or alteration. These measures include access controls, secure storage, and internal security policies. Such measures may include encryption in transit and at rest, role-based access restrictions, audit logging, intrusion detection, network security controls, and secure authentication mechanisms applied across account, payment, and poker gameplay systems. Personal data relating to identity verification, payments, and poker account activity is accessible only to authorised personnel and vetted service providers on a strict need-to-know basis and subject to confidentiality obligations.

While we take data security seriously, no system can be guaranteed to be completely secure. You acknowledge that transmission of information over the internet and blockchain or payment networks is not completely secure and is undertaken at your own risk, although we apply industry-standard safeguards consistent with licensed online poker and gaming operator practices. Security controls include monitoring systems designed to detect prohibited jurisdiction access and circumvention attempts. Access to jurisdiction screening and poker integrity data is restricted to authorized compliance personnel. Detection systems are part of Platform fraud, AML, and territorial enforcement safeguards.

10. USER RIGHTS AND CONTROLS

You may request access to or correction of your personal data by contacting customer support through the Platform. Requests will be assessed in accordance with applicable laws and the Company's compliance obligations. Subject to applicable law, you may also have the right to request deletion, restriction of processing, objection to processing, and data portability, where such rights apply and where the Company is not legally required to retain the data. The Company may require you to verify your identity before processing any data rights request and may request additional information to confirm that the request originates from the account holder.

Certain requests may be limited or declined where retention or processing of data is required for regulatory, security, or legal reasons. This includes, without limitation, situations involving anti-money laundering obligations, gaming integrity investigations, fraud prevention, poker collusion or cheating investigations, dispute resolution, or regulatory record-keeping duties. Where a request is refused or limited, the Company will provide a general explanation where permitted by law and security requirements. Data rights requests may be restricted where data is required for jurisdiction enforcement, restricted territory investigations, or licence compliance. This includes investigations involving access from prohibited jurisdictions such as India. Certain records may be retained notwithstanding erasure requests where legally required.

11. MARKETING COMMUNICATIONS

The Company may send promotional or informational communications relating to the Platform. You may opt out of marketing communications at any time; however, operational and compliance related communications will continue where necessary. Marketing communications may include poker tournament announcements, poker promotions, bonus campaigns, platform feature updates, and related gaming or casino product updates.

The Company may further use your personal information in order to contact you from time to time to introduce you to our products or any events, activities, projects, plans, developments, undertakings and special offers that are taking place or being promoted or supported by the Company. We may contact you via email, live chat or internal support ticket. When you supply us with your personal information, you are agreeing that you do not consider our use of such personal information in accordance with this Privacy Policy as any breach of your rights under any applicable laws. At any time, you have the right to opt out from receiving any promotional and/or marketing materials that we may send you. You are encouraged to contact us should you wish to do so. You may opt out at any time by using the unsubscribe link included in marketing emails, adjusting your account communication preferences where available, or contacting customer support. Opt-out requests will not affect mandatory service, security, responsible gaming, AML, KYC, or account-related communications. Marketing eligibility may be restricted based on jurisdiction status, including exclusion of users located in India. Jurisdiction screening data may be used to suppress poker and gaming promotions in restricted territories. Compliance communications may still be sent where required regardless of marketing opt-out.

12. COOKIES AND TRACKING TECHNOLOGIES

A cookie is a data packet which is used solely for web analytic purposes. The Platform uses cookies and similar technologies to enable functionality, enhance security, and improve user experience. You may manage cookie preferences through your browser settings, although disabling cookies may affect Platform performance. Cookies and similar technologies may also be used for account authentication, session management, fraud detection, anti-collusion and poker integrity monitoring, gameplay session tracking, and prevention of multiple or unauthorized account access. We may use first-party and third-party cookies, analytics tools, and security monitoring tools to understand Platform usage patterns, including poker table usage, tournament participation trends, and feature interaction, in order to improve platform performance and user experience. Certain cookies are strictly necessary for the operation of real-money gaming and poker services, including secure login, wallet functionality, and wager processing, and cannot be disabled without materially affecting Platform functionality. Cookies and similar technologies may be used for security, fraud detection, and geo-location enforcement purposes. This includes restricted territory detection and VPN/circumvention risk signals. Disabling such cookies may affect jurisdiction verification and Platform access controls.

13. THIRD PARTY WEBSITES

The Platform may contain links to third party websites. The Company is not responsible for the privacy practices or content of such websites. This includes, without limitation, third-party poker tools, game providers, tournament information pages, affiliate sites, payment processor pages, identity verification providers, and promotional partner websites that may be linked from the Platform. Where you access a third-party website through a link on the Platform, your personal data will be processed in accordance with that third party's privacy policy and terms, and not this Policy. You are encouraged to review their privacy and data handling practices before submitting any personal information. The Company does not control and is not responsible for third-party tracking technologies, cookies, or analytics tools that may be deployed on such external sites. Third-party verification, geo-screening, and poker integrity service providers may process limited data under their own privacy terms. Such providers may assist with restricted jurisdiction detection, including India screening. Users should review third-party privacy policies before submitting personal data.

14. CHANGES TO THIS POLICY

The Company reserves the right to amend this Policy at any time. Updated versions will be published on the Platform and will take effect immediately upon publication. Where changes are material, the Company may provide reasonable notice by email, platform notification, or account message, particularly where such changes affect how personal data relating to poker gameplay, tournaments, financial transactions, or compliance monitoring is processed. The "Last Updated" date at the top of this Policy will be revised whenever amendments are made, and Users are professionally expected to review the Policy periodically. Continued use of the Platform, including continued participation in poker games, tournaments, or related services after an updated Policy becomes effective, constitutes acceptance of the revised Policy. This Policy may be updated to reflect changes in licensing conditions or restricted jurisdiction lists, including India restrictions. Updates may include changes to geo-screening and jurisdiction enforcement processing. Continued use confirms acceptance of such compliance-driven updates.

15. CONTACT

Privacy related enquiries may be submitted through the customer support channels available on the Platform or via an email to support@coinpoker.com.

16. GOVERNING LAW

This Privacy Policy shall be governed by and construed in accordance with the laws of Panama.