# **Privacy Policy**

#### What is the purpose of the charter?

For Octo, the protection of your personal data is a priority.

The purpose of this charter is to inform you about the way in which we process your personal data.

Be assured, we comply, in the collection and management of your data to the law of 1978 called "Informatique et Libertés", and the European regulation of April 27, 2016 (hereinafter: the "**RGPD**").

#### What is personal data?

When you use the mobile application "Octo" (hereinafter: the "**Application**") we may ask you to provide us with personal data about you in order to use our services.

The term "**personal data**" refers to all data that identifies you as an individual.

#### What personal data does Octo collect?

Within the framework of our activity, we are led to collect a certain number of information concerning you, and in particular your **name**, first name, gender, pseudonym, pseudonym on the various video game consoles, avatar, photograph, date of birth, telephone number.

This data may be collected when you download the Application or when you use our Services. You acknowledge that you are over 15 years of age to use our Services.

#### Who is the data controller?

BetOnYou, operating under the commercial name "Octo" SAS - RCS of Rouen: 844 094 540 34 rue Raymond Aron 76130 MONT-SAINT-AIGNAN

We have appointed a contact point for personal data protection: E-mail: <u>hello@bet-on-you.com</u>

### 1. Use of your personal data

On what basis is your data collected and used?

Agreement: This collection is necessary in order to execute the agreement entered into when you use our Services on our Application.

Legitimate Interest: When you voluntarily provide us with personal data, we collect it in order to better respond to your requests for information about our Application.

For what purpose(s) is your data collected and used?

- Create a file of users and registered users.
- Manage your access to certain services available on the Application and its use.
- Develop statistics and traffic statistics for our Application
- Personalize the answers to your information requests.
- Sending information.

NB/ You can always refuse to provide us with your data, we will then inform you of the possible consequences of this refusal if this data is mandatory.

# 2. Recipients of collected data

Will have access to your personal data:

- (i) Our team, the services in charge of the control (auditor in particular);
- (ii) Our subcontractors: data hosting provider.

Without forgetting (less fun) public bodies, court officers (bailiffs, notaries, etc.), judicial officers and organizations in charge of debt collection.

Please note that your personal data will never be transferred, rented or exchanged for the benefit of third parties.

# 3. Duration of storage of personal data

#### User data:

The data is kept for the duration of your registration to the Application, and for a period of :

- Three (3) years from the time you unsubscribe for the use of the data for prospecting purposes. At the end of this three (3) year period, we may contact you again to find out if you wish to continue to receive commercial solicitations.
- The time strictly necessary to verify your identity with regard to the data relating to identity documents, in the event that you exercise your right of access or rectification.
- At least three (3) years from the exercise of the right of opposition concerning the information allowing your right to be taken into account.
- Five (5) years from the date of your unsubscription for compliance with legal and regulatory obligations, and to allow proof of a right or contract.

- Thirteen (13) months regarding the cookies referred to in the Appendix Cookie Policy.

### 4. Security

Don't worry! We (and our subcontractors) have taken all necessary precautions, as well as appropriate organizational and technical measures to preserve the security, integrity and confidentiality of your personal data.

### 5. Hosting

Your data is kept and stored for the duration of its processing on the servers of the company Google Cloud Platform Europe (Belgium and Germany), in the European Union.

# 6. Transfer outside the European Union

Within the framework of the tools we use (see article "Recipients of collected data" concerning our subcontractors), your data may be transferred outside the European Union. The transfer of your data in this context is secured by means of the following tools:

- Either these data are transferred to a country that has been deemed to offer an adequate level of protection by a decision of the European Commission;
- Either we have entered into a specific contract with our processors governing the transfer of your data outside the European Union, based on the standard contractual clauses between a data controller and a processor approved by the European Commission.

# 7. Your Rights

What rights do you have over your data?

**Right to information:** This is precisely why we have drafted this charter.

Right of access: You have the right to access all your personal data at any time.

**Right of rectification:** You have the right to rectify at any time your inaccurate, incomplete or obsolete personal data.

**Right to limitation:** You have the right to obtain the limitation of the processing of your personal data in certain cases defined in art.18 of the RGPD.

**Right to portability:** You have the right to receive your personal data in a readable format and to require its transfer to the recipient of your choice.

**Right to forget:** You have the right to demand that your personal data be deleted and to prohibit any future collection of such data.

**Right to file a complaint:** with a competent control authority (in France, the CNIL), if you consider that the processing of your personal data constitutes a violation of the applicable texts.

**Right of opposition:** You have the right to object to the processing of your personal data. Please note, however, that we may continue to process them despite this opposition, for legitimate reasons or the defence of legal rights.

Regarding prospecting, you can oppose it at any time via the unsubscribe link located at the bottom of each of our prospecting emails.

You may exercise the above rights by writing to us at hello@bet-on-you.com.

Or at the following address, for pen enthusiasts: Octo, 34 rue Raymond Aron 76130 MONT-SAINT-AIGNAN

You must, on this occasion, prove your identity by any means. If we have doubts about your identity, we may ask you for additional information that appears necessary, including, if applicable, a copy of a signed identity document.

# 8. Coming into force

This charter came into force on November 20, 2019.

### 9. Modifications

We reserve the right, at our sole discretion, to modify this charter, in whole or in part, at any time.

You will be informed of this publication by a message that will be displayed the next time you open the Application.

These changes will come into force upon publication of the new charter. Your use of the Application following the coming into force of these changes will be deemed to be an acknowledgement and acceptance of the new charter. If you do not accept the new policy, and if the new policy does not suit you, you will no longer have access to the Application.