

Privacy Notice for the Allwyn Scratch Wall Miami Physical Competition

This Privacy Notice explains how Allwyn Management Services AG, with registered seat at Mühlenplatz 9, 6004, Lucerne, Switzerland (hereinafter “Organiser”, “we”, “us”, “our”) collect, use and disclose personal data in connection with the Allwyn Scratch Wall physical Competition (“Competition”). “You/your/user(s)” means you as a participant in the Competition.

By “Personal Data”, we mean any information which, either alone or in combination with other data, identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household.

This notice is designed to meet global privacy standards, including the Swiss Federal Act on Data Protection (FADP), the UK and EU General Data Protection Regulations, and relevant U.S. privacy laws. Regardless of your country of residence, your information will be handled securely and in accordance with these standards.

Please read it together with the **Competition Terms & Conditions**, available via the QR code.

Privacy Policy Changes.

We reserve the right to change or update this Policy by posting such changes or updates to this URL or emailing you notice of the changes. You can tell if this Policy has changed by checking the last modified date that appears at the end of this Policy. Your continued participation in a Competition following the posting of any amendment, modification or change shall constitute your acceptance thereof.

Personal Data We Collect

When you take part in our Miami Competition, we may collect or process the following personal data:

- **Identifiers** from winners of the Competition including full name, email address, telephone number, postal address, age and where required, driver’s license, passport or other government-issued identification details.
- **Audio and Visual Information** such as pictures.
- **Location Data** such as place of residence to confirm eligibility.

We will also conduct a visual ID check to confirm you are aged 18 or over, however, no copy of your ID is taken or stored unless required if you win a prize.

Sensitive Personal Data. We collect personal information that may be considered Sensitive Personal Data under state privacy law, including driver's license, passport, or other government-issued ID. We do not use or disclose Sensitive Personal Data for any business purposes other than as permitted by law, including providing good and services, verifying your identity and eligibility, complying with applicable legal requirements and/or as permitted by further regulations.

The potential consequence of not providing the personal data is that we might not be able to confirm you meet the eligibility criteria or we might not be able to fulfil prizes.

Lawful Basis

Certain laws outside the U.S. require us to identify a legal basis for collecting and using your Personal Data. Where these applicable laws apply, we rely on one or more of the following legal bases:

- Performance of a contract with you: Processing is necessary for the performance of the Competition Terms & Conditions.
- Legitimate interests: Processing is necessary for our legitimate interests in operating a fair competition, ensuring community standards, and delivering prizes.

How We Collect Your Personal Data

Information You Provide to Us. We may collect Personal Data from you that you voluntarily provide to us in various ways, including, but not limited to information that you provide to us to arrange prize fulfilment and travel.

How We Use Your Personal Data

Our primary purpose for processing your Personal Data is to operate the Competition. This includes using your Personal Data to identify your entry and administer the Competition, confirm eligibility, and arrange prize fulfilment and travel.

We may also use your Personal Data to:

- Resolve disputes and/or questions about the Competition.
- Enforce our Competition Terms & Conditions and the terms of this Policy.
- For our own internal business purposes.
- Protect our interests, including establishing, exercising and defending legal rights and claims.

- As necessary to comply with legal requirements, to prevent fraud, to co-operate with law enforcement and regulatory authorities, and to stop other prohibited, illegal, or harmful activities.
- For purposes disclosed at the time you provide/we request your information or as otherwise set forth in this Policy.

How We Share Your Personal Data

Service Providers. We may use third-party service providers to perform certain business services and may disclose your information to such service providers as needed for them to perform these business services. Business service providers include:

- PromoVeritas Ltd (UK) – our adjudication and fulfilment partner;
- Velocity (UK) – our event agency managing on-site operations;
- Travel or prize suppliers – to arrange flights, accommodation, or delivery;
- External service providers under data processing agreements, such as service provider hosting our customer relationship management system for secure storage of winner contact details and

Internal Third Parties. We may share your information with our affiliated entities, successors, predecessors, assigns, licensees, or business partners, and others who may use the information for the purposes described above, including:

- Affiliates of Allwyn Management Services AG – involved in administering or supporting the Competition.

On Our Website and Social Media Channels. In accordance with the *Winner Notifications* section of our Competition Terms & Conditions, the winner’s name, country, and photograph may be published on Allwyn’s official website or social media channels for competition purposes.

Categories of Personal Data that have been shared with service providers and internal third parties for a business purpose in the past twelve months include Identifiers, Audio and Visual Information, and Location Data.

In certain circumstances, we may also share your personal information as follows:

Business Transactions. If we seek investors or go through a business transition, including but not limited to, an acquisition of another business, merger, acquisition by another company, or a sale of all or a portion of our assets, your information will likely be shared as part of the negotiation of the transaction and will likely be among the assets transferred to the new owners in the event of a change in our business.

Legal Process. Subject to applicable law, we may also disclose or share your information when required to do so by law, regulation or legal process, to cooperate with law

enforcement authorities, banking providers or payment service providers and/or in connection with investigations or other legal proceedings of suspected or actual unlawful activity, when we believe disclosure is necessary or appropriate to protect against misuse or unauthorized participation in the Competition, to limit our legal liability and protect our rights or to protect the rights, property or safety of users or the public.

Personal Data Sold or Shared for Targeted Advertising. Organiser does not sell any personal information and has no actual knowledge of any sales or sharing of personal information of minors under 16 years of age. Organiser does not share personal information for targeted advertising as part of the physical Competition.

Data Transfers.

Where possible, we process data within the UK, EU, and Switzerland. The European Commission has determined that the UK and Switzerland provide an adequate level of data protection comparable to that of the EEA (Art. 45 GDPR). If data is transferred outside these regions, appropriate safeguards (such as adequacy decisions or Standard Contractual Clauses) are applied, as required.

Data Retention Periods

- Winner contact details: stored for up to 12 months, for audit and fulfilment of prize, then deleted.

Non-winning participant details are not collected.

California Privacy Rights

California Consumer Privacy Act. The California Consumer Privacy Act as amended (“CCPA”) provides consumers who are California residents with specific rights regarding their Personal Data. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know. Once we receive and confirm your verifiable consumer request as described below, you have the right to request, no more than twice in any 12-month period, that we disclose what Personal Data we have collected about you in the immediately preceding 12-month period, including, the categories of Personal Data we collected about you; the categories of the sources from which the Personal Data is collected; our business or commercial purpose(s) for collecting, selling or sharing that Personal Data; the categories of third parties to whom we disclosed that Personal Data; and the specific pieces of Personal information we collected about you.

In addition, if we sold or disclosed your Personal Data for a business or commercial purpose, we will provide you with two separate lists disclosing:

- Disclosures for a business purpose, identifying the Personal Data categories disclosed that each category of recipient obtained; and

- Sales and/or disclosures for a commercial purpose, identifying the Personal Data categories that each category of each category of recipient obtained.

Right to Delete. You have the right to request that we delete any or all of your Personal Data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Data from our records, unless an exception applies.

Right to Correct. You have the right to correct inaccurate Personal Data that we maintain about you.

Right to Opt-Out of the Sale/ Sharing. You have the right to opt-out of the sale or sharing of your Personal Data. We do not sell or share your Personal Data collected in connection with the Competition.

Right to Limit the Use or Disclosure of Sensitive Personal Data. You have the right to request that we limit the use and disclosure of Sensitive Personal Data to specific business purposes approved by the CCPA. Our use and disclosure is already limited to approved business purposes.

Right to Non-Discrimination. You have the right not to be discriminated against for exercising any of your CCPA rights. Unless permitted by the CCPA, if you exercise any of your California rights, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Other California Privacy Rights. California residents have the right to receive information that identifies any third party companies or individuals that Chalkboard has shared your Personal Data for their direct marketing purposes, with in the previous calendar year, as well as a description of the categories of Personal Data disclosed to that third party. You may obtain this information once a year and free of charge by contacting us at privacy@allwyn.com.

Other State Privacy Rights

Depending on your jurisdiction of residence, you have certain rights with respect to your personal information. This section describes your privacy rights and explains how to exercise those rights.

Right of Access. You have the right to confirm whether we are processing your Personal Data and to access such Personal Data we process. You may exercise this right not more than two times per calendar year.

Right to Correct. You have the right to correct inaccurate personal information that we maintain about you, though we may need to verify the accuracy of the new data you provide to us.

Right to Delete. You have the right to request that we delete Personal Data that we collected about you under certain circumstances. Please note, that some information may not be eligible for deletion based upon applicable law or requirements of contracts.

Right to Portability. You have the right, to the extent the data is available in a digital format, to obtain a copy of your Personal Data in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance. You may exercise this right not more than two times per calendar year.

Right to Opt-Out. You have the right to opt out of processing Personal Data for the purposes of: (i) targeted advertising, (ii) the sale of Personal Data, or (iii) profiling in furtherance of a decision that produces a legal or similarly significant effect. We do not sell Personal Data or engage in profiling. Targeted advertising is not applicable to our in person Competitions.

Right to Withdraw Consent: You have the right to withdraw your consent at any time where we are relying on consent to process your Personal Data. If you withdraw your consent, we may not be able to provide certain products or services to you.

Right to Non-Discrimination: Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under applicable law.

Right to Appeal. You have the right to appeal any decision that includes a refusal to take action on a request. If applicable, you can file an appeal by emailing us at privacy@allwyn.com within fifteen (15) calendar days from receipt of our decision.

Exercising Your Privacy Rights

Requests to know, correct, or delete can be submitted by email to privacy@allwyn.com. Please note that these rights currently apply only to California, Nebraska and Texas consumers. Only you or a person that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Data.

Authorizing an Agent to Act on Your Behalf

Where applicable and except where you have provided an agent with a Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code, when using an authorized agent you must provide that person with written permission clearly describing their authority to make a request on your behalf. That agent must also be able to verify their identity with us and provide us with their authority to act on your behalf. An individual to whom you have provided Power of Attorney pursuant to applicable state rules may also make a request on your behalf. We may deny a request from an authorized agent if the agent does not provide us with the signed written permission demonstrating that they have been authorized to act on your behalf.

Verifying your request

The verifiable consumer request initiated by your or your authorized agent must:

- Include your full legal name, email and phone number, which we will need to contact you in order to verify that you are the person about whom we collected Personal Data or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- If you are making the request as an authorized agent you must also provide; the full legal name of the party for which you are making the request and documentation for which your authorization is based.

We cannot respond to your request or provide you with your Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you. Making a verifiable consumer request does not require you to create an account with us. One of our representatives will contact you in order to verify your identity. You may need to provide additional information in order to verify your request. We will only use Personal Data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavour to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Exceptions. These rights are not absolute and are subject to certain exceptions. For example, we cannot disclose or permit access to specific pieces of Personal Data if granting your request would present a certain level of risk to the security of the Personal Data at issue, your account with us or the security of our systems. We may deny your deletion request if retaining the information under certain circumstances, for example, when it is necessary for us or our service providers to complete a contract or transaction with you or to comply with legal obligations.

Swiss, EU, and UK Privacy Rights

Where applicable, you may have certain rights in relation to the processing of your personal data, subject to applicable prerequisites and exceptions, and these are summarised below in the table:

<u>Rights</u>	<u>What does it mean?</u>

The right to be informed	It enables you to be provided with clear and transparent information about how we use your information as outlined in this privacy notice.
The right of access	It enables you to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this privacy notice).
The right to rectification	It enables you to have your information corrected if identified as inaccurate or incomplete.
The right to erasure	It enables you to request the deletion or removal of your information where, for example, there is no compelling reason for us to keep using it.
The right to object to processing	It enables you to object to certain types of processing, including processing based on our legitimate interests. Please note that we may demonstrate that we have legitimate grounds to process your information which may override your right.
The right to restriction of processing	It enables you to request the restriction of the processing of your information in specific cases, for example, when you are challenging the accuracy of the information.
The right to data portability	It enables you to receive your information in a structured, commonly used, and machine-readable format and to share it with a third party.
The right to lodge a complaint in relation to data protection matters	<p>You can lodge a complaint to the data protection supervisory authority in your country. The complaint can also be lodged with the supervisory authority of the EU country in which you have your habitual residence or work, or with the supervisory authority of the place where the alleged infringement took place.</p> <p>A full list of data protection authorities in the EU is available here: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en</p> <p>However, if you have any concerns, we encourage that you raise them with us first so we can try to resolve them amicably, by contacting us at privacy@allwyn.com.</p>

You may exercise any of the aforementioned rights by submitting a written request to Allwyn to privacy@allwyn.com. You may expect a reply to such a request within one (1) month following receipt. This period may be extended by two (2) additional months, if the complexity of your request or the overall number of requests received requires so.

6. Contact Us

Should you require any further information on the processing of your personal data or have any queries with respect to your rights, please contact us at privacy@allwyn.com.

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