

# INFORMATION ON THE PROCESSING OF PERSONAL DATA

## by Trans World Hotels & Entertainment, a.s.

### GAMBLING PARTICIPANTS

#### 1. INTRODUCTORY PROVISIONS

Trans World Hotels & Entertainment, a.s., with its registered office at No. 64, 345 32 Česká Kubice, Company ID No.: 643 58 267, registered in the Commercial Register maintained by the Regional Court in Pilsen, Section B, File No. 492 (hereinafter referred to as “**TWHE**”), is a company which operates the “technical game” gambling game pursuant to the provisions of Section 3 (2) (e) and the “live game” gambling game pursuant to the provisions of Section 3 (2) (f) of Act No. 186/2016 Coll., on gambling (hereinafter referred to as the “**Gambling Act**”), the operation of these gambling games being based on Decision of the Ministry of Finance of the Czech Republic Ref. No. MF 19127/2017/34-10 and Decision Ref. No. MF 19130/2017/34-26 (hereinafter referred to as the “**Basic Permits**”). TWHE operates gambling games in the following casinos:

- American Chance Casino Česká Kubice establishment, located at No. 64, 345 32 Česká Kubice,
- American Chance Casino Dolní Dvořiště establishment, located at No. 225, 382 72 Dolní Dvořiště,
- American Chance Casino Hatě establishment, located at Chvalovice, Hatě 199, 669 02 Znojmo.

TWHE operates gambling games in the casinos based on the game plan for the live game and the game plan for the technical game. These game plans have been approved by the Ministry of Finance of the Czech Republic within the Basic Permits and are placed at the TWHE casinos’ receptions and on the website [www.american-chance-casinos.com](http://www.american-chance-casinos.com) (hereinafter referred to as the “**Game Plan for the Live Game**”, “**Game Plan for the Technical Game**”, or jointly “**Game Plans**”). TWHE and all casino visitors are obliged to comply with the provisions of the Game Plans.

Based on its scope of business, TWHE acts as the data controller for its customers, as required by Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “**GDPR**”)

The purpose of this text is to inform you, as TWHE customers, of how, for what purpose and based on what legal reason, within the meaning of Article 6 (1) of the GDPR, we process your personal data.

#### 2. PROCESSING BASED ON THE FULFILMENT OF A LEGAL OBLIGATION

TWHE processes personal data that is necessary to fulfil a legal obligation.

##### AML ACT

##### 2.1. Scope of personal data

TWHE is a liable entity under Act No. 253/2008 Coll., on certain measures against the legalization of proceeds from crime and financing of terrorism (hereinafter referred to as the “**AML Act**”) and, within its activity, it is obliged to take a number of measures to detect suspicious trades, etc. In addition to the AML Act, TWHE is also obliged to comply with the obligations laid down by the Internal Principles System, which is an internal policy governing the obligations laid down by the AML Act within a specific activity carried out by TWHE.

The obligations laid down by the AML Act are fulfilled by TWHE in operating gambling games, as well as in operating the exchange office.

In fulfilling the obligations laid down by the AML Act and the Internal Principles System, TWHE processes the following personal data:

- Name
- Surname
- Gender
- Address (permanent or other residence)
- Date of birth
- Birth certificate number
- Place of birth
- Citizenship
- Type of ID card
- ID card number
- State/authority issuing the ID card
- Validity period of the ID card
- Copy of the ID card
- Information on the application of international sanctions
- Information on the politically exposed person
- Source of funds
- Copies of documents proving the source of funds
- Publicly available information on the client’s risk profile (information published on social networks, in the insolvency register, in execution records and in other public registers and lists)
- Frequency of casino entries
- Frequency of participation in the game
- Deposits, winnings and losses
- Exact description of the game

##### 2.2. Purpose of the processing of personal data

All of the personal data listed in this article is processed by TWHE for the purposes of proper operation of gambling games and the fulfilment of obligations related to the detection of legalization of proceeds from crime and financing of terrorism.

##### 2.3. Period of keeping personal data

Pursuant to the provisions of Section 16 of the AML Act, TWHE is obliged to keep all personal data obtained under this article for the period of 10 years from the termination of the business relationship with you, i.e. after cancelling your registration.

The personal data processed under this article is kept by TWHE in electronic form within its internal system. The registration forms containing your personal data in the scope of:

- Name
- Surname
- Gender
- Address (permanent or other residence)
- Date of birth
- Birth certificate number
- Place of birth
- Citizenship
- Type of ID card
- ID card number
- Information on the politically exposed person
- Information on the application of international sanctions

are also kept by TWHE in written form, for the period of 3 months after your registration.

#### 2.4. Access to personal data

All of the personal data processed on the basis of the AML Act is made available to the TWHE employees working in the following departments or positions:

- Management
- Reception
- Cash Desk
- IT Department

The TWHE employees working in the following departments or positions:

- Supervision Department
- Technical Game End Device Operation
- Live Game Operation

only have access to personal data in the following scope:

- Name
- Surname
- Gender
- Information on the politically exposed person
- Information on the source of funds
- Publicly available information
- Frequency of participation in the game
- Deposits, winnings and losses
- Exact description of the game

The personal data processed on the basis of the AML Act is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- Other persons providing technical, administrative, or other support to TWHE.

#### 2.5. Other information on the processing of personal data

In the event of failure to provide the aforementioned personal data, the business relationship between you and TWHE may not be entered into.

#### GAMBLING ACT

Based on the obligations laid down by the Gambling Act, TWHE processes the following personal data.

#### 2.6. IDENTIFICATION DATA

- Name
- Surname
- Maiden name
- Address (permanent or other residence)
- Date of birth
- Birth certificate number
- Place of birth
- Citizenship

Pursuant to Section 46 (5) and Section 58 (5) of the Gambling Act, TWHE is obliged to keep the identification data for the period of 10 years.

#### 2.7. CONTACT DETAILS

- Mobile phone
- Email
- Data box ID
- Address

The contact details are kept by TWHE for the duration of the business relationship.

#### 2.8. DATA ON PARTICIPATION IN GAMBLING GAMES

- Duration of participation in the game
- Self-limiting measures
- Frequency of participation in the game
- Deposits, winnings and losses
- Purchase and exchange of cheques and chips

Under Section 58 (5) of the Gambling Act, any data related to live game transactions must be kept by TWHE for the period of 10

years. Under the Basic Permit for operating the technical game, any data related to technical game transactions must be kept by TWHE for the period of at least 10 years after their creation. In accordance with this obligation, the TWHE keeps such data for the period of 10 years. The data concerning the settings of self-limiting measures is kept by TWHE for the duration of the business relationship, i.e. for the duration of your registration.

#### 2.9. CCTV SYSTEM

Pursuant to Section 72 of the Gambling Act, TWHE is obliged to equip the casino with a CCTV system that monitors the entire casino premises throughout the casino business hours. Both the picture and sound are recorded. The casino recordings are further used to investigate casino incidents and other cases related to the casino operation. Pursuant to Section 72 (5) of the Gambling Act, TWHE is obliged to keep the recordings made by the monitoring device for the period of 2 years.

#### 2.10. CASINO INCIDENTS

In the event of any action by any gambler in the casino that inherently constitutes a violation of the Game Plan or raises suspicion that such an action occurred, TWHE is obliged, in accordance with the Game Plan, to make a record containing the following information:

- Gambler's identification data
- Nature of the incident and description of the circumstances of its occurrence
- Date of imposing a ban on entry to the casino and its duration

The personal data processed in the event of casino incidents is kept for the duration of the business relationship between you and TWHE. In the event of imposing a ban on entry to the casino for an indefinite period, the personal data under this provision is kept permanently.

#### 2.11. OTHER PERSONAL DATA

Based on the obligations laid down by the Game Plans in conjunction with the Gambling Act, TWHE also processes the following personal data:

- Signature
- Legal capacity

The personal data processed under this article is kept by TWHE for the duration of the business relationship.

#### 2.12. Purpose of processing of personal data

All of the personal data processed on the basis of this article is processed by TWHE for the purposes of proper operation of gambling games.

#### 2.13. Access to personal data

All of the personal data processed on the basis of this article is made available to the TWHE employees working in the following departments or positions:

- Management
- Reception
- Cash Desk
- IT Department

The TWHE employees working in the following departments or positions:

- Supervision Department
- Technical Game End Device Operation
- Live Game Operation

only have access to personal data in the following scope:

- Name
- Surname
- Maiden name
- Frequency of participation in the game
- Casino incidents and their course
- Photograph
- Date of imposing a ban on entry to the casino and its duration
- Duration of participation in the game
- Deposits, winnings and losses
- Purchase and exchange of cheques and chips
- Self-limiting measures

- Casino recording

If any casino incidents are investigated, the casino recording is in some cases also displayed to gamblers who committed the incident or are suspected of having committed the incident.

The personal data processed on the basis of the AML Act is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- Other persons providing technical, administrative, or other support to TWHE.

#### 2.14. Other information on the processing of personal data

The personal data processed under the Gambling Act is kept by TWHE in electronic form within its internal system.

In the event of failure to provide the aforementioned personal data, the business relationship between you and TWHE may not be entered into.

### LIMITATION OF CASH PAYMENTS

Pursuant to Act No. 254/2004 Coll., on the limitation of cash payments, TWHE is obliged to make all payments in excess of CZK 270,000 by means of cashless payment. In the event of such payment, TWHE fills in a cashless payment form, in which the following personal data is processed:

- Name
- Surname
- Guest ID number
- Account number
- IBAN
- Name of the bank
- Swift code
- Amount to be transferred

#### 2.15. Purpose of the processing of personal data

The personal data processed within the cashless payment form is processed by TWHE in order to comply with the obligations pursuant to the Cash Payments Limitation Act.

#### 2.16. Period of keeping personal data

Due to the fact that TWHE is obliged to keep any data on transactions related to live and technical games for the period of 10 years, TWHE keeps the original and an electronic copy of the cashless payment forms for the period of 10 years.

#### 2.17. Access to personal data

All of the personal data processed on the basis of the Cash Payments Limitation Act is made available to the TWHE employees working in the following departments or positions:

- Management
- Cash Desk
- IT Department

#### 2.18. Other information on the processing of personal data

In the event of failure to provide the aforementioned personal data, it is not possible to make payments of amounts exceeding CZK 270,000, both in cash and by cashless payment.

### 3. PROCESSING BASED ON CONSENT

#### MARKETING

##### 3.1. Scope of personal data

Based on the data subject's consent, TWHE processes the following personal data:

- Name
- Surname
- Mobile phone
- Email
- Signature

##### 3.2. Purpose of the processing of personal data

The aforementioned personal data is processed by TWHE for the purpose of sending commercial communications.

The personal data pursuant to this article is processed if TWHE has not obtained your personal data in connection with your participation in gambling games or if TWHE does not offer its own gambling games within commercial communications.

##### 3.3. Period of keeping personal data

The personal data processed for the marketing purposes is kept by TWHE for the period of 5 years and is kept in electronic form in TWHE's internal system.

After the personal data retention period has elapsed, the personal data will be erased from TWHE's database.

##### 3.4. Access to personal data

All of the personal data processed for the marketing purposes is made available to the TWHE employees working in the following departments or positions:

- Management
- Marketing Department
- DCO

The personal data processed for the marketing purposes is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- Other persons providing technical, administrative, or other support to TWHE.

##### 3.5. Other information on the processing of personal data

You are not obliged to provide TWHE with the personal data listed in this article. If you do not provide the personal data listed in this article, you will not be sent commercial communications.

You are entitled to withdraw consent to the processing of personal data at any time using the following contact details:

- E-mail: info@acc.cz
- Telephone number : +420 379 792 011
- Postal address: Česká Kubice 64, 345 32 Česká Kubice

### 4. PROCESSING BASED ON CONTRACT PERFORMANCE

#### LOYALTY PROGRAMME

TWHE processes personal data that is necessary for the performance of a contract concluded with you the subject of which is participation in the American Chance Casino loyalty programme.

##### 4.1. Scope of personal data

Based on the performance of the contract, TWHE processes the following personal data:

- Email
- Name
- Surname
- Telephone number
- Date of birth
- Guest ID number
- Deposits, winnings and losses
- Frequency of casino entries
- Frequency of participation in the game
- Preferred games
- Food & Beverage preferences

##### 4.2. Purpose of the processing of personal data

The purpose of the processing is to enable your participation in the American Chance Casino loyalty programme and to fulfil the rights and obligations arising from the contract between you and TWHE the subject of which is participation in the loyalty programme.

#### 4.3. Period of keeping personal data

The aforementioned data is kept by TWHE for the duration of your participation in the loyalty programme, i.e. for the effective period of the contract for such participation. Personal data is only kept electronically in TWHE's internal system. After the personal data retention period has elapsed, the personal data defined in this article will be erased from TWHE's internal system.

#### 4.4. Access to personal data

All of the personal data processed on the basis of the Gambling Act is made available to the TWHE employees working in the following departments or positions:

- Management
- Marketing Department

The TWHE employees working in the following departments or positions:

- Reception
- Cash Desk
- IT Department
- Food & Beverage
- Technical Game Operation
- Live Game Operation

only have access to personal data in the following scope:

- Name
- Surname
- Guest ID number
- Date of birth
- Preferred games
- Food & Beverage preferences

The personal data processed for the purpose of participation in the loyalty programme is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- Other persons providing technical, administrative, or other support to TWHE.

#### 4.5. Other information on the processing of personal data

In the event of failure to provide personal data pursuant to this article, the contract between you and TWHE cannot be performed and you may not be allowed to participate in the American Chance Casino loyalty programme.

#### PARTICIPATION IN GAMBLING GAMES

TWHE processes personal data that is necessary for the performance of a contract concluded with you the subject of which is participation in the gambling games in American Chance Casino.

#### 4.6. Scope of personal data

In addition to the data that must be processed by TWHE pursuant to the Gambling Act, TWHE processes the following personal data based on the performance of the gambling game participation contract:

- Guest ID number
- Photograph

In the event of cashless payments of funds, TWHE also processes the following personal data:

- Payment card number
- Payment card validity period

#### 4.7. Purpose of the processing of personal data

The purpose of processing is to enable your participation in the gambling games in the casino, to enable your identification when entering the casino, and to fulfil other rights and obligations under the gambling game participation contract.

#### 4.8. Period of keeping personal data

Due to the fact that TWHE is obliged to keep any data obtained for the purposes of fulfilling its obligations under the AML Act for the period of 10 years from the termination of the business

relationship, TWHE keeps personal data pursuant to this article for the period of 10 years from the termination of the business relationship.

After the personal data retention period has elapsed, the personal data defined in this article will be erased from TWHE's internal system.

#### 4.9. Access to personal data

All of the personal data processed on the basis of the Gambling Act is made available to the TWHE employees working in the following departments or positions:

- Management
- Reception
- Cash Desk
- Supervision Department
- Technical Game Operation
- Live Game Operation
- IT Department

The personal data processed on the basis of the gambling game participation contract is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- Other persons providing technical, administrative, or other support to TWHE.

#### 4.10. Other information on the processing of personal data

In the event of failure to provide personal data pursuant to this article, the contract between you and TWHE cannot be performed and you may not be allowed to participate in the gambling games in American Chance Casino.

#### TRANSPORTATION OF GAMBLERS TO THE CASINO

TWHE processes personal data that is necessary for the performance of a contract concluded with you the subject of which is your transportation to and from American Chance Casino.

#### 4.11. Scope of personal data

Based on the contract for transportation to and from the casino, the TWHE processes the following personal data:

- Name
- Surname

#### 4.12. Purpose of the processing of personal data

The purpose of processing is to enable your participation in the gambling games in the casino, to enable your transportation to and from the casino, and to fulfil other rights and obligations under the transportation contract.

#### 4.13. Period of keeping personal data

TWHE keeps personal data pursuant to this article for the period of one month from the termination of your transportation to and from American Chance Casino, in electronic form.

After the personal data retention period has elapsed, the personal data defined in this article will be erased from TWHE's internal system.

#### 4.14. Access to personal data

All of the personal data processed on the basis of the transportation contract is made available to the TWHE employees working in the following departments or positions:

- Management
- Reception
- IT Department

#### 4.15. Other information on the processing of personal data

In the event of failure to provide personal data pursuant to this article, the contract between you and TWHE cannot be performed and you may not be allowed to use transportation to and from American Chance Casino.

#### SAFE KEEPING IN THE CLOAKROOM

TWHE processes personal data that is necessary for the performance of a contract concluded with you the subject of which is safe keeping of your personal belongings in the American Chance Casino cloakroom, only if the number identifying your personal belongings is lost.

#### **4.16. Scope of personal data**

Based on the contract for transportation to the casino, the TWHE processes the following personal data:

- Name
- Surname
- Address (permanent or other residence)
- Mobile phone
- Description of clothes
- Signature

#### **4.17. Purpose of the processing of personal data**

The purpose of the processing is to enable identification of your personal belongings kept in the American Chance Casino cloakroom in case your number normally used for identification is lost.

#### **4.18. Period of keeping personal data**

The personal data pursuant to this article is kept by TWHE for the period of 3 months from the loss of this number, only in written form.

After the personal data retention period has elapsed, the form containing your personal data pursuant to this article will be disposed of.

#### **4.19. Access to personal data**

All of the personal data processed pursuant to this article is made available to the TWHE employees working in the following departments or positions:

- Management
- Reception
- Security

#### **4.20. Other information on the processing of personal data**

In the event of failure to provide personal data pursuant to this article, your personal belongings kept in the American Chance Casino cloakroom cannot be identified and handed over.

### **CONSUMER COMPETITIONS**

TWHE processes personal data that is necessary for the performance of a contract concluded with you the subject of which is participation in the consumer competitions organized by TWHE.

#### **4.21. Scope of personal data**

Based on the performance of the contract for your participation in a consumer competition, we process the following personal data:

- Name
- Surname
- Guest ID number
- Time of arrival at the casino
- Number of the ticket for participation in the consumer competition
- Winnings

#### **4.22. Purpose of the processing of personal data**

The purpose of processing is to enable your participation in the consumer competitions organized by TWHE and to fulfil other rights and obligations under the consumer competition participation contract.

#### **4.23. Period of keeping personal data**

TWHE keeps personal data obtained for the purpose of participating in consumer competitions for the period of 2 months from the end of the consumer competition, in electronic form within TWHE's internal system, as well as in writing, in the form of competition tickets.

After the personal data retention period has elapsed, the personal data defined in this article will be erased from TWHE's internal system and the competition tickets will be disposed of.

#### **4.24. Access to personal data**

All of the personal data processed on the basis of the Gambling Act is made available to the TWHE employees working in the following departments or positions:

- Management
- Cash Desk
- Reception

The personal data processed on the basis of the gambling game participation contract is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- Other persons providing technical, administrative, or other support to TWHE.

#### **4.25. Other information on the processing of personal data**

In the event of failure to provide personal data pursuant to this article, the contract between you and TWHE cannot be performed and you may not be allowed to participate in the consumer competition in American Chance Casino.

### **5. PROCESSING BASED ON LEGITIMATE INTEREST**

TWHE processes personal data that is necessary for the purposes of its legitimate interests.

#### **CCTV SYSTEM**

##### **5.1. Scope of personal data**

Based on the legal title of the controller's legitimate interest, TWHE operates a CCTV system on the following premises:

- car park

##### **5.2. Purpose of the processing of personal data**

The purpose of the processing of personal data is to protect the property of TWHE and the casino guests, given the fact that the property of both TWHE and hotel guests is often handled on the premises where the CCTV system is placed.

##### **5.3. Period of keeping personal data**

The CCTV system recordings are kept by TWHE for the period of 10 days.

##### **5.4. Access to personal data**

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Management
- Camera Surveillance Department
- IT Department

##### **5.5. Other information on the processing of personal data, proportionality test**

In order to protect TWHE's property, your property and the property of other guests of American Chance Casino, the use of a CCTV system seems to be the most effective way to achieve the desired goals. In such a case, it is necessary to interfere with your right to privacy due to TWHE's interest in operating the CCTV system and carrying out the aforementioned protection. TWHE operates the CCTV system in the minimum scope possible, including the limitation of camera recording retention period.

#### **PAYMENT OF LARGE WINNINGS**

TWHE processes your personal data if you win at least the amount of EUR 10,000 in American Chance Casino.

##### **5.6. Scope of personal data**

TWHE processes your personal data pursuant to this article in the following scope:

- Guest ID number
- Duration of participation in the game
- Deposits, winnings and losses

### 5.7. Purpose of the processing of personal data

The purpose of the processing of personal data for winnings in excess of EUR 10,000 is to enable TWHE to verify the proper course of the game.

### 5.8. Period of keeping personal data

The personal data processed pursuant to this article is kept by TWHE for the period of 1 month from the winnings.

The personal data pursuant to this article is kept in electronic form.

After the personal data retention period has elapsed, the personal data will be erased from TWHE's database.

### 5.9. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Management
- Reception
- Cash Desk
- Supervision Department
- Technical Game Operation
- Live Game Operation
- IT Department

The personal data listed in this article is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- Other persons providing technical, administrative, or other support to TWHE.

### 5.10. Other information on the processing of personal data, proportionality test

TWHE has a legitimate interest in the processing of your personal data in order to protect its property and to verify that any large winnings have been obtained legitimately, based on the proper course of the game.

## MARKETING

### 5.11. Scope of personal data

TWHE processes your personal data pursuant to this article in the following scope:

- Name
- Surname
- Telephone number
- Email

### 5.12. Purpose of the processing of personal data

The purpose of the processing of personal data is to send commercial communications. TWHE has a legitimate interest in carrying out direct marketing for its services.

The personal data pursuant to this article is only processed if TWHE has obtained your personal data in connection with the provision of gambling game services and if TWHE offers gambling games within commercial communications.

### 5.13. Period of keeping personal data

The personal data processed pursuant to this article is kept by TWHE for the period of 5 years.

The personal data pursuant to this article is kept in electronic form. After the personal data retention period has elapsed, the personal data will be erased from TWHE's database.

### 5.14. Access to personal data

The personal data listed in this article is made available to the TWHE employees working in the following departments or positions:

- Management
- Marketing
- DCO

The personal data processed for the marketing purposes is processed by TWHE, but it may also be processed for TWHE by the following processors:

- INTELLIGENT GAMING SYSTEMS LIMITED, registered in England and Wales, ID number: 06979780, located at Unit 2, Aniseed House, Broadgat, Oldham Business Park, Chadderton, Oldham, OL9 9XA, United Kingdom of Great Britain and Northern Ireland IGS Neon CMS system in which personal data is stored
- SaFra NETidea s.r.o., with its registered office at Lochotínská 1217/4, 301 00 Plzeň, ID number: 04410891, which provides marketing services
- The Rocket Science Group, LLC, located 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA, which operates the MailChimp marketing service; in this case, your personal data is transferred to a third country, and The Rocket Science Group, LLC is committed to complying with the Privacy Shield rules as defined by Commission Decision 2016/1250 of 12 July 2016 on an adequate level of protection provided by the EU - US Privacy Shield
- TxtLocal Ltd, ID number: GB 876 2738 79, with registered office at IMLmobile, 5 St. John's Lane, Farringdon, London, EC1M 4BH, United Kingdom of Great Britain and Northern Ireland, which provides the mobile marketing service "Textlocal"
- Other persons providing technical, administrative, or other support to TWHE.

### 5.15. Other information on the processing of personal data

If you do not wish to receive commercial communications, you can unsubscribe from their sending at any time using the link sent in each commercial communication

## 6. RIGHTS OF THE DATA SUBJECT

According to the General Data Processing Regulation (GDPR) you are entitled to:

- at any time revoke consent to the processing of your personal data;
- request from TWHE at any time information on how your personal data is processed;
- require TWHE to access, correct or delete personal data, or limit processing of such data;
- raise objections to the processing of your personal data;
- request personal data portability;
- lodge a complaint about the processing of your personal data with the Office for Personal Data Protection in the Czech Republic.
- You can exercise your rights under GDPR by applying to TWHE through the following contact details:  
Email: [info@acc.cz](mailto:info@acc.cz)  
Telephone number: +420 379 792011  
Postal address: Česká Kubice 64, 345 32 Česká Kubice, Czech Republic

If, under GDPR, there are no conditions to comply with your application under this Article, in particular where a minimum period for the retention of personal data is set by law, your application under this Article cannot be upheld.

## 7. FINAL PROVISIONS

This information on the processing of personal data has been processed to provide information on the purpose, manner and legal reasons of the processing of personal data provided by TWHE gambling participants. It is available at all American Chance Casinos' establishments, as well as online at [www.american-chance-casinos.com](http://www.american-chance-casinos.com).

This information on the processing of personal data becomes effective on 25 May 2018.