



Privacy Policy

Circus.be – Circus Sport mobile application

CIRCUS® BELGIUM is concerned about the protection of personal data. This is why we do everything we can to protect the privacy of the visitors and users (hereinafter the “Users”) of the gaming and sports betting website www.circus.be and the mobile sports betting application Circus Sport (hereinafter the “Site”).

The Users will find below all the provisions related to personal data processing that are applicable during all visits to or uses of the Site or the App by the Users (hereinafter the “Privacy Policy”).

1. General information

CIRCUS® BELGIUM processes the personal data of the Site's and the App's Users, for the purposes and within the limits of the Privacy Policy, during all visits to or uses of the Site or the App.

CIRCUS® BELGIUM ensures to comply, during the processing of this personal data, with the laws and regulations in force and, notably, to the European Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter "the Regulation").

Regarding this, and conforming to the aforementioned Regulation, CIRCUS® BELGIUM:

- Is legally obliged to process the personal data of Users; this processing is outlined in article 2.1 of the Privacy Policy;
- Processes personal data for the purposes of allowing Users to use the Site or the App and, furthermore, for the necessary and legitimate purposes outlined in article 2.2 of the Privacy Policy;
- Processes, subject to the User's prior, free and explicit consent, personal data for the purposes described in, and according to the purposes defined in article 3.
- By accessing and using the Site or the App, Users are deemed to have read and accepted the Privacy Policy. Furthermore, they guarantee that the data and information communicated to CIRCUS® BELGIUM is correct.

2. Processing of personal data not requiring Users' consent

2.1. The legal obligations of CIRCUS® BELGIUM and the processing necessary for the use of the Site and the App

CIRCUS®BELGIUM is bound, under the legal obligations and regulations that all online gaming and betting operators are subject to, on the one hand, and for the purposes of authenticating and allowing Users to use the Site and the App, on the other hand, to process the following personal data for the purposes outlined below.

This processing of personal data carried out by CIRCUS® BELGIUM does not require Users' consent under article 6.1.b) and c) of the Regulation.

The personal data communicated by the User is saved on a **register**, as is outlined in article 7.1, which is controlled and remains under the responsibility of CIRCUS® BELGIUM at all times.

a. What data is processed?

The personal data processed is the following:

- Last name, first name(s), place of birth, date of birth, language, sex, home/postal address, country of residence, nationality, National Registration Number (or identity card or passport number), email address, landline or mobile telephone number;
- Bank details used during deposits on the Site or the App and winnings withdrawals;
- Copies of personal documents for user authentication, such as a photo of an identity card, bank statement, proof of deposit or any other document proving the domicile and/or the residence of the User;

- The User's connection data, IP address, navigation and activity history on the Site or the App, including sports betting history and their transactions (winnings and losses, deposits, withdrawals), notably by using cookies;
- The data allowing the *device* to be identified (type of navigator, type and identification data of the telephone);
- All other information that can be exchanged between CIRCUS® BELGIUM and the User, as part of the User's registration or participation in the games and bets on the Site and/or in the online betting offered on the App.

b. What processing is carried out by CIRCUS® BELGIUM?

Processing consists of collection, recording, storage, consultation, organization, use, merging or any other necessary or useful action under the legal and regulatory provisions outlined in article 2.1.c). The processing can also consist of the transfer of personal data:

- To judiciary and administrative authorities, such as, notably, the Gaming Commission and Financial Intelligence Processing Unit (CTIF- CFI);
- CIRCUS® BELGIUM's suppliers, whose services are inseparable from the use of the Site or the App, a list of which is available on request from the Contact referred to in article 7.5.

c. What are the purposes of this processing?

1°) CIRCUS® BELGIUM is obliged to carry out the processing of the personal data described in article 2.1.a) and b) to fulfil the legal and regulatory obligations that they are under, notably, the following legal provisions:

- Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash;
- Act of 7 May 1999 on games of chance, bets, gaming establishments and the protection of players, in particular, the obligations it imposes on operators in terms of management and administration, and its decrees of implementation.

2°) CIRCUS® BELGIUM also processes the personal data referred to in article 2.1.a) for the purposes of authenticating Users to allow them to access and use the Site and the App; this processing is carried out to ensure:

- The management of the registrations and accounts of Users on the Site or the App;
- The management of Users' deposits and winnings and more generally the provision of online gaming and betting services;
- The User's information related to the services offered by CIRCUS® BELGIUM;
- Management of customer service, including service support, and risk and fraud.

2.2. Other processing not requiring Users' consent

CIRCUS® BELGIUM also processes personal data for the legitimate purposes outlined below. This processing of personal data carried out by CIRCUS® BELGIUM does not require Users' consent under article 6.1.f) of the Regulation.

The personal data communicated by the User is saved on a **register**, as is outlined in article 7.1, which is controlled and remains under the responsibility of CIRCUS® BELGIUM at all times.

a. What data is processed?

The personal data processed is the following:

- Last name, first name(s), place of birth, date of birth, language, sex, home/postal address, country of residence, nationality, National Registration Number (or identity card or passport number), email address, landline or mobile telephone number;
- Bank details used during deposits on the Site or the App and winnings withdrawals;
- Copies of personal documents for user authentication, such as a photo of an identity card, bank statement, proof of deposit or any other document proving the domicile and/or the residence of the User;
- The User's connection data, IP address, navigation and activity history on the Site or the App, including sports betting history and their transactions (winnings and losses, deposits, withdrawals), notably by using cookies;
- The data allowing the *device* to be identified (type of navigator, type and identification data of the telephone);
- All other information that can be exchanged between CIRCUS® BELGIUM and the User, as part of the User's registration or participation in the games and bets on the Site and/or in the online betting offered on the App.

b. What processing is carried out by CIRCUS® BELGIUM?

Processing consists of collection, recording, storage, consultation, organization, use, merging of the personal data outlined in article 2.2.a). It consists of transferring this personal data to third parties, the list of which is available upon request made to the Contact mentioned in article 7.5.

c. What are the legitimate purposes of this processing?

CIRCUS®BELGIUM processes the personal data referred to in article 2.2.a) for the following legitimate purposes:

- The protection of players, responsible gaming and the prevention of gaming addiction and dependency;
- The promotion, advertising and marketing related to the gaming and sports betting offer, including sending SMS, telephone calls, paper or electronic newsletters;
- Carrying out satisfaction surveys, statistical surveys, trend analyses and market studies, for the purpose of improving the sports betting services or informing Users.

3.

Processing of personal data subject to Users' consent

By using the CIRCUS® BELGIUM Site or the App, for whatever reason, the User expresses their free, specific, informed and unequivocal will to expressly authorize CIRCUS® BELGIUM to process personal data in accordance with the Regulation, within the limits and for the purposes defined below and without prejudice to the processing referred to in article 2.

The personal data communicated by the User is saved on a **register**, as is outlined in article 7.1, which is controlled and remains under the responsibility of CIRCUS® BELGIUM at all times.

The User also benefits from rights, including the right to withdraw their consent at any time, according to the terms and conditions defined in article 3.4.

3.1. Nature of the personal data processed

The personal data processed is the following:

- Last name, first name(s), place of birth, date of birth, language, sex, home/postal address, country of residence, nationality, National Registration Number (or identity card or passport number), email address, landline or mobile telephone number;
- Bank details used during deposits on the Site or the App and winnings withdrawals;
- Copies of personal documents for user authentication, such as a photo of an identity card, bank statement, proof of deposit or any other document proving the domicile and/or the residence of the User;
- The User's connection data, IP address, navigation and activity history on the Site or the App, including sports betting history and their transactions (winnings and losses, deposits, withdrawals), notably by using cookies;
- The data allowing the *device* to be identified (type of navigator, type and identification data of the telephone);
- All other information that can be exchanged between CIRCUS® BELGIUM and the User, as part of the User's registration or participation in the games and bets on the Site and/or in the online betting offered on the App.

3.2. The processing

Processing consists of collection, recording, storage, consultation, organization, use, merging of the personal data outlined in article 3.1.a). It consists of transferring this personal data to third parties, the list of which is available upon request made to the Contact mentioned in article 7.5.

3.3. Purposes of personal data processing

The personal data is collected and processed by CIRCUS® BELGIUM for the following purposes:

- Promotion, advertising and marketing, including affiliation and loyalty program management, relating to the offer of gaming services and online betting, including text messages, telephone calls, paper or electronic newsletters, not part of article 2.2.c), such as the offline casino, game of chance

and betting activity of CIRCUS®BELGIUM, including advertising, marketing and affiliation and loyalty program management related to it;

- Participation in competitions and promotional offers, including communications about winners;
- The development of new games and betting offers;
- Execution of satisfaction surveys, statistical studies, trend analysis and market studies, for the purposes of management, marketing and reporting, including profiling, not part of the purpose outlined in article 2.2.c).

4. User rights

Without prejudice to articles 2 and 5, Users have the right to exercise a right of rectification, opposition and restriction, according to the terms and within the following limits.

4.1. Right of access

a. CIRCUS® BELGIUM makes the following information available to Users:

- The identity and contact details of the data controller;
- The contact details of the Data Protection Officer;
- The personal data processed;
- The purposes of the personal data processing, as well as the legal base for processing;
- The recipients or categories of recipients of personal data, if applicable;
- If applicable, the fact that the data controller intends to transfer personal data to a country located outside the European Union and: either the existence (or absence) of an adequacy decision made by the European Commission, or, in the absence of such a decision, the guarantees offered by the third country and the measures implemented to get a copy of the personal data;
- The possibility of opposing automated processing of their data, such as profiling, unless proper reasons make this processing by CIRCUS® BELGIUM necessary, as well as the possibility of opposing all processing of their personal data for market research.

b. Users have the right to request, at any time, access to all the information stated in this article and in article 3.1, by getting in touch with the Contact referred to in article 7.5. CIRCUS® BELGIUM shall respond to these information requests within one month.

c. Users have the right to obtain a copy of the personal data being processed. CIRCUS® BELGIUM reserves the right to demand payment for the potential costs induced by this request; these costs will be calculated on the basis of administrative costs induced by the request; they will not exceed 20 euros.

d. Users have the right to obtain, in a structured format, this access or said copy, in such a way that the personal data they are provided is in a format that conforms to the technical standards in force when requesting access; this format will therefore allow it to be read by their device.

4.2. Right to rectification

CIRCUS® BELGIUM guarantees and obliges the Users to update and rectify the personal data concerning them, as soon as this data is incorrect or incomplete.

This right to rectification can be exercised by request to the Contact referred to in article 7.5.

4.3. Right to opposition

CIRCUS® BELGIUM authorizes Users to oppose the processing of all or part of personal data concerning them, for the following reasons:

- Their data is inaccurate;
- The processing is no long necessary for the purposes the data was collected for;
- The User withdraws their consent;
- The data has been subject to illegal processing.

CIRCUS® BELGIUM also authorizes Users to oppose to:

- Automated processing of their data, such as profiling, unless proper reasons make this treatment by CIRCUS® BELGIUM necessary;
- Any processing of their personal data for market research, including profiling, if it is linked to this market research.

This right to opposition can be exercised by request to the Contact referred to in article 7.5.

4.4. Right to be forgotten

CIRCUS® BELGIUM also ensures to respond to any request for deletion of personal data in the shortest possible period (right to be forgotten), when:

- The processing is no long necessary for the purposes the data was collected for;
- The User withdraws their consent;
- The data has been subject to illegal processing, or should be deleted under a legal obligation;
- The User opposes the automated processing of their data, such as profiling, and there are no proper reasons making this processing by CIRCUS® BELGIUM necessary;
- The User opposes processing of their personal data for market research, including profiling, if it is linked to this market research.

For legal purposes, and in particular in order to meet the obligations imposed by the Act of 7 May 1999 on games of chance and the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash, CIRCUS® BELGIUM is however required to keep personal data for a period of 10 years from the date of the last activity of the User on the Site or on the App.

4.5. Right to restriction

The Users also have the right to obtain from CIRCUS® BELGIUM the restriction of the processing of their personal data when:

- The User considers their personal data to be incorrect, for the time necessary for CIRCUS® BELGIUM to verify the accuracy of it;

- The processing is illegal but the User does not wish for their data to be deleted but requests a restriction of the data processing;
- The User opposes automated processing, including profiling or processing of their personal data for market research purposes and that it is necessary to verify the legitimate nature of the reasons for which CIRCUS® BELGIUM intends to maintain this processing;
- CIRCUS® BELGIUM no longer needs the personal data processed but the person concerned wants them to be saved for the observation, exercise or defense of rights in court.

This right to restriction can be exercised by request to the Contact referred to in article 7.5.

4.6. Transfer of data to a data controller

Users are authorized to transfer their personal data to another data controller without CIRCUS® BELGIUM being able to prevent this.

While such a transfer is technically possible, Users are authorized to request CIRCUS® BELGIUM to have this transfer carried out directly by their data controller.

4.7. Terms and conditions

The rights granted by CIRCUS® BELGIUM to the User must be exercised in accordance with the terms and conditions defined in article 7.5.

4.8. Notification

CIRCUS® BELGIUM will provide the User with a notification of any deletion or rectification of data carried out conforming to articles 4.2 and 4.4, unless such a notification proves to be impossible or imposes disproportionate effort.

This notification will be done by email or mail, based on the details communicated by the User.

5. Location, storage and duration of storage of personal data

5.1. CIRCUS® BELGIUM stores users' personal data in a form that allows their identification and availability and follows appropriate and secure methods.

The data is stored and hosted in Belgium at a Data Center; which offers all the necessary and useful security guarantees regarding the technical standards in force.

5.2. Users' personal data is stored by CIRCUS® BELGIUM for the purposes defined in articles 2 and 3. They are kept for a period of 10 years for all the purposes governed by article 2.a) and in particular in order to meet the obligations imposed by the Act of 7 May 1999 on games of chance and the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash.

In addition, personal data is kept for a period not exceeding that necessary for the execution of the purpose of processing for all the purposes defined in article 2.2 and 3. The data is then deleted from CIRCUS® BELGIUM's files upon request of the Users addressed to the Contact referred to in article 7.5.

6. Responsibility of CIRCUS® BELGIUM - Subcontractor

- 6.1.** CIRCUS® BELGIUM agrees to process Users' personal data in a legal, loyal and transparent way regarding the User concerned. Any data processing performed by CIRCUS® BELGIUM will comply with the requirements of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to personal data processing and to this Privacy Policy.

CIRCUS® BELGIUM implements all reasonable and appropriate methods to ensure confidentiality, integrity and availability of the personal data it processes. These technical and organizational measures are available from the Contact referred to in article 7.5.

The technical measures include notably anonymization and encryption of personal data, depending on the required purpose.

The organizational measures notably include the execution of internal audits, in addition to the audits CIRCUS® BELGIUM can be subject to from the Gaming Commission, notably.

If necessary, CIRCUS® BELGIUM carries out, with the help of the data protection officer, an impact analysis when processing is likely to cause a heightened risk for Users.

- 6.2.** Users' personal data is not transferred to third parties other than authorities, CIRCUS® BELGIUM's providers and partners, except for the purposes outlined in articles 2.1, 2.2 and 3 and, therefore, if:

- The transfer becomes compulsory by law, regulation or injunction of an administrative or judiciary authority;
- The transfer is necessary for the provision of online gaming and betting services or maintenance;
- The User gives their consent for such transfer.

The partner will not be considered as a subcontractor, unless they process Users' personal data on behalf of CIRCUS® BELGIUM. CIRCUS® BELGIUM declines all responsibility regarding the processing of Users' personal data by the partner that provides their own services in their own name and on their own behalf or if CIRCUS® BELGIUM proves they are not accountable for any damage caused. Similarly, CIRCUS® BELGIUM cannot be held liable under any circumstances if it proves that the fact that caused the damage is in no way attributable to it.

- 6.3.** CIRCUS® BELGIUM ensures that, when processing is carried out by a subcontractor, on behalf of CIRCUS® BELGIUM, they provide sufficient guarantees for the implementation of appropriate technical and organizational measures and, more generally, regarding compliance with the Regulation's demands. In particular, it requires the subcontractor to comply with the Regulation and, therefore, to keep a register.

- 6.4.** CIRCUS® BELGIUM undertakes that, in the event of a security problem related to the data processed, likely to affect their confidentiality, CIRCUS® BELGIUM will notify the incident to the data protection authority referred to in article 7.4 as soon as possible. CIRCUS® BELGIUM will also inform the Users concerned, insofar as the violation of personal data presents a heightened risk for Users' rights and freedoms; they will be informed by email or mail using the contact details communicated by the User.

7. Other

7.1. Personal data register

As the personal data controller, CIRCUS® BELGIUM has **a register** of all of their processing activities. This contains all information relating to the type of data processed, the people concerned by the processing of data, the potential recipients to whom the data is, if applicable, communicated, to which end the data is processed as well as the duration the data is stored and a general description of the technical and organizational security measures put in place.

The personal data communicated by the User is saved, as well as the processing carried out and its purposes, in **a register** that is controlled by and remains under the responsibility of CIRCUS® BELGIUM at all times. This **register** includes, in addition to the aforementioned information:

- A description of the purposes of the processing;
- A description of the categories of people concerned and the categories of personal data;
- The categories of recipients that the personal data has been or will be communicated to, including the recipients in third countries or international organizations;
- The periods expected for the deletion of various categories of data;
- A general description of the technical and organizational security measures to preserve the confidentiality and integrity of personal data.

7.2. Entirety - modification of the Privacy Policy

The Privacy Policy contains all contractual provisions enforceable against Users, without prejudice to the general provisions contained in the Terms of Use of the Site and the App, of which they form an integral part. The aforementioned Terms of Use therefore remain applicable for any matter not related to personal data protection.

CIRCUS® BELGIUM also reserves the right to modify the Privacy policy. Any update is enforceable against Users as soon as it is published on the Site or on the App. CIRCUS® BELGIUM ensures to mention the date of posting of the Privacy policy in force on the Site and on the App.

7.3. Probative value

The User acknowledges that by accessing the Site or the App and by accepting CIRCUS® BELGIUM's general conditions, they confirm they have read and accepted them as well as the privacy policy complying with the provisions of article XII. 15 and seq. of the Economic law code, articles 3.10 and 3.12 of the European Regulation no. 910/2014 of 23 July 2014 and article 8.1 and 8.12 of the Civil Code.

The User recognizes that the electronic documents exchanged and electronic data collected as part of their registration or use of the Site or the App have the same probative value as if the documents and data were communicated or collected on paper even if the said documents are not provided with an advanced electronic signature in the sense of article 26 of the European Regulation no. 910/2014 of 23 July 2014. They agree therefore to not contest their probative force or value because of their electronic medium.

7.4. Data protection authority

Conforming to Regulation (EU) 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 the law of 30 July 2018 on privacy, Users have the right to request extra information or make a complaint to the Data protection authority. The Supervisory Authority is the Commission for the Protection of Privacy; their contact details are:

Address: Rue de la Presse, 35, 1000 Brussels

Telephone: +32 (0)2 274 48 00

Fax: +32 (0)2 274 48 35

Email: commission@privacycommission.be

7.5. Contact — Information relating to the identity of the data controller and the data protection officer

CIRCUS®BELGIUM can be contacted for all questions regarding the protection of its Users' personal data as follows:

- By post: Rue des Guillemins 129, 4000 Liège, Belgium.
- By email: privacy@circus.be

The data controller is CIRCUS®BELGIUM

CIRCUS® BELGIUM has also appointed a **data protection officer** within the meaning of article 37 of the aforementioned Regulation, who can be contacted by email: dpo@circus.be. The officer is responsible for monitoring and ensuring compliance of CIRCUS® BELGIUM's processing of Users' personal data.