



**PRIVACY STATEMENT –
INTERNET SALES**

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We, Tipwin Ltd., thank you for your visit to our homepage. Safe handling of your data is especially important to us as betting operator. We would therefore like to inform you herewith in detail about the using of your data during your visit to our web presentation.

1. DEFINITIONS

The Tipwin Ltd. Data Privacy Statement is based on the terminology, which was used by the European legislative and regulatory authority in adopting the basic data protection rules (GDPR). Our data Privacy Statement should be easily readable and comprehensible both for the public and for our clients and business partners. To make this possible, we would like to explain the notions used in advance.

In this Data Privacy Statement, we are using these terms, among others:

- **Personal Data:** Personal Data mean all the information related to an identified or identifiable natural person (hereinafter: „the Person Concerned“). A natural person is considered as identifiable, when it can be identified, directly or indirectly, especially by assignment to an identifier, such as a name, to an identification number, to location information, to online identification data, or to one or more special features, the expression of physical, physiological, genetic, psychical, commercial, cultural or social identity of that natural person.
- **Person Concerned:** Person Concerned is any identified or identifiable natural person, whose individual-related data are processed by the person responsible for processing.
- **Processing:** Processing is any operation performed with the help or without help of an automated procedure, or any of such operation sequence in connection with individual-related data, such as collecting, registering, organisation, classifying, storing, adjustment, or amendment, reading, retrieving, use, disclosure by transmission, distribution or any other form of provision, comparison or linking, restriction, deletion, or destruction.
- **Restriction of Processing:** Restriction of Processing is tagging of the stored personal data with the aim to restrict their future processing.

- **Profiling:** Profiling is any type of automated processing of individual-related data, which actually means that such personal data are used to evaluate certain personal aspects that are related to a natural person, especially to analyse or to predict aspects related to work performance, economic position, health, personal preferences, interests, reliability, behaviour, usual residence or change of location for this natural person.
- **Pseudonymization:** Pseudonymization is processing of individual-related data in such a manner that the individual-related data cannot be assigned to specific affected person any more without consulting of some additional information, if such additional information are kept separately and are subject to technical and organizational measures, which guarantee that the individual-related data are not assigned to on identified or identifiable natural person.
- **The Responsible Person or the person responsible for processing:** The responsible person or the person responsible for processing is a natural or legal person, authority, institution, or other instance, that are making decisions, alone or jointly with other instances on the purpose and means of processing of personal data. If the purpose and the means of this processing are proscribed by Union legislation or the law of member states, the responsible person, i.e. certain criteria for his/her appointment can be provided for by the Union legislation of the law of the member states.
- **The Processor:** The Processor is a natural or legal person, authority, institution or other instance that processes personal data by order of the responsible person.
- **The Recipient:** The Recipient is a natural or legal person, authority, institution or another instance, to whom individual-related data are disclosed, whether or not it is the matter of a third party. The authorities, which might receive personal data under a certain investigation order in line with the Union legislative or the law of member states, are not considered as recipients
- **Third Party:** A Third Party is a natural or legal person, authority, institution or other instance, except for the person concerned, the responsible person, the processor and the persons which are authorized, under direct responsibility of the responsible person or the processor, to process the individual-related data.

- Approval: The Approval is the declaration of intention, which is given by each of the persons concerned, voluntarily for the given case, in an informed manner and unambiguously in form of a statement or another clearly confirming activity, by which the person concerned indicates that he/she agrees with the processing of the data that concern him/her.

2. DATA COLLECTION

The internet site of Tipwin Ltd. collects with each invoking of the internet site, by a person concerned or an automated system, a range of general data and information. Such general data and information are stored in log files of the server. The following can be collected:

- a) Applied browser types and versions;
- b) The operating system of the accessing computer;
- c) The internet site, from which the accessing computer arrives at our internet site (the so called Referrer);
- d) Subsites, which are accessed via an accessing system on our internet site
- e) The date and time of access to the internet site
- f) The internet protocol address (IP-Address),
- g) The Internet Service Provider of the accessing system and
- h) Other similar data and information used in the event of attacks on our information technology systems.

In using these general data and information, Tipwin Ltd. makes no assessment of the person concerned. Rather, this information is required to

- a) deliver the contents of our internet site correctly,
- b) optimize the contents of our internet site as well as advertising on it,

- c) ensure permanent functioning of our information technology systems and our internet site techniques, as well as
- d) provide law enforcement authorities with the information necessary for law enforcement in the event of a cyberattack.

These anonymously collected data and information are, on the one hand, statistically evaluated by Tipwin Ltd. and moreover with the intent to increase the level of data protection and data security in our enterprise and eventually to ensure optimum level of protection for the personal data processed by us. The anonymous data of the server log files are stored separately from all personal data provided by the person concerned.

3. LEGAL OR CONTRACTUAL RULES FOR THE PROVISION OF PERSONAL DATA: CONTRACT CONCLUSION REQUIREMENT; OBLIGATION BY THE PERSON CONCERNED TO PROVIDE PERSONAL DATA; POSSIBLE CONSEQUENCES OF THE NON-PROVISION; COLLECTION AND PROCESSING OFFICES

Please be informed that the provision of personal data is partly required by law (Gambling laws of a country e.g. GlüStV in Germany; money laundering regulations of a country e.g. GWG in Germany) or is the result of contractual stipulations (Conclusion of a betting contract by registration of a bet on our homepage). Occasionally, contract conclusion may prove necessary when a person concerned provides us with personal data which subsequently must be processed by us. The person concerned is, for example, obliged to provide us with personal data when entering into a contract with our enterprise. Failure to provide personal data would entail that the contract with the person concerned could not be entered into. The provision by the person concerned of the personal data for the conclusion of a betting contract is prescribed both legally and contractually and is required for the conclusion of the contract. If these data are not provided, no customer account may be created.

Personal data processe when creating a Tipwin account:

When you create a Tipwin account, you will be asked to provide your e-mail address and full name, your address and bank account details, as well as additional information given below:

- Place of birth
- Citizenship
- Phone
- E-Mail address
- Date of birth (minimum age 18 years)

PURPOSES AND LEGAL BASES

(a) Tipwin processes your e-mail address as you log in to your account with this e-mail address and password. The legal basis for processing the e-mail address for these purposes is based on Tipwin's legitimate interest in protecting the security of your account and assigning this account to you. This obligation results from the legally required principle that each registered player may have only one account.

(b) Tipwin also processes the e-mail address to send you important information about Tipwin products, apps or accounts, including important security information or important amendments to this privacy policy. Name provided by you will be combined with your account profile and displayed when you, on a Tipwin internet site, or Tipwin App make comments. The legal basis for processing your e-mail address and name for these purposes is Tipwin's legitimate interest in providing you with important security and other information about your Tipwin products, apps, or accounts, or important amendments to this privacy policy.

(c) Tipwin will also process your e-mail address to associate it with your Tipwin account when you contact our support. The legal basis for this processing is our legitimate interest in providing high quality support.

For determination and verification of identity, a valid identity document (passport or identity card) is required for submission. To verify the address, an invoice will be requested addressed to you, with your home address.

PURPOSES AND LEGAL BASES

Through the requested documents, the accuracy of the data is proved and documented. This is in the legitimate interest of Tipwin and is also required by law due to gambling law requirements. After all, this also protects your interest in that no one can log in to Tipwin under a false name.

The requested and processed data remain within Tipwin and are passed on to Tipwin's departments that need them to fulfil purposes described above.

4. USE OF DATA WHEN REGISTERING FOR THE E-MAIL NEWSLETTER

On the internet site of Tipwin Ltd., users are given the opportunity to subscribe to our company newsletter. What personal data have been transmitted to the person responsible for processing when the newsletter is ordered is the result of input mask used for this purpose.

Tipwin Ltd. periodically informs its customers and business partners about company offers by way of a newsletter. In principal, a person concerned can receive the newsletter of our company only provided that:

- a) the person concerned has a valid e-mail address, and
- b) the person concerned has registered for the newsletter.

For legal reasons, a confirmation e-mail will be sent to the e-mail address entered by the person concerned for the first time for newsletter mailing by way of a double-opt-in process. This confirmation e-mail is used to verify whether the owner of the e-mail address as a person concerned authorized the receipt of the newsletter.

When subscribing to the newsletter, we also store the IP address of the computer system used by the person concerned at the time of registration, as well as the date and time of registration, as assigned by the Internet Service Provider (ISP). The collection of these data is necessary to understand (potential) misuse of the e-mail address of the person concerned at a later date and therefore serves as legal safeguard for the person responsible for processing.

Personal data collected during the process of registration for the newsletter will be used exclusively to send our newsletter. In addition, subscribers to the newsletter may be notified by e-mail – if this is necessary for the operation of the newsletter or corresponding registration, as the case may be – in the event of changes in the newsletter offer or technical changes. There is no transfer of the collected personal data as part of the newsletter service to third parties. Subscription to our newsletter may be terminated by the person concerned at any time. The approval for the storage of personal data, which the person concerned has given us for newsletter dispatch, can be revoked at any time. For the purpose of revoking the approval, there is a corresponding link in each newsletter. It is also possible to unsubscribe from the newsletter at any time, directly on the internet site of the person responsible for processing, or to inform the person responsible for processing otherwise.

5. NEWSLETTER TRACKING

Newsletters of Tipwin Ltd. contain the so-called counting pixels. A counting pixel is a miniature graphic that is embedded in such emails that are sent in HTML format to enable log file recording and log file analysis. This allows a statistical evaluation of the success or failure of online marketing campaigns. Based on the embedded pixel, Tipwin Ltd. can see if and when an e-mail was opened by the person concerned, and which links in the e-mail were accessed by the person concerned.

Such personal data collected via the counting pixels contained in the newsletters are stored and evaluated by the person responsible for processing in order to optimize the delivery of the newsletter and to better adapt the contents of future newsletters to the interests of the person concerned. These personal data will not be disclosed to third

parties. Persons concerned are at any time entitled to revoke the corresponding separate approval given by way of the double-opt-in process. After revocation, these personal data will be deleted by the person responsible for processing. The Tipwin Ltd. interprets a deregistration from the receipt of the newsletter automatically as a revocation.

6. CONTACT VIA THE INTERNET SITE

The Tipwin Ltd. internet site (www.tipwin.com or correspondingly approved country page) contains information, as required by law, enabling rapid electronic contact with our company as well as direct communication with us, which is also a general address of the so-called electronic mail (e-mail address). When the person concerned contacts the person responsible for processing by e-mail or through a contact form, the personal data provided by the person concerned will be automatically saved. Such personal data, voluntarily transmitted by an individual to the controller, is stored for the purpose of processing or contacting the person concerned. There is no disclosure of these personal data to third parties.

7. USE OF COOKIES

In order to make the visit of our internet site attractive and to enable the use of certain functions, we use so-called cookies on various pages. These are small text files that are stored on your device. Some of the cookies we use are deleted after the end of the browser session, i.e. after closing your browser (so-called session cookies). Other cookies remain on your device and allow us to recognize your browser upon your next visit (persistent cookies). You can set your browser so that you are informed about the setting of cookies and individually decide on their acceptance or exclusion in individual cases or in general. The non-acceptance of cookies may limit the functionality of our internet site.

8. USE OF GOOGLE (UNIVERSAL) ANALYTICS FOR INTERNET ANALYSIS

This internet site uses Google (Universal) Analytics, an internet analytics service provided by Google Inc. (www.google.com). Google (Universal) Analytics uses methods that allow the analysis of the use of the internet site by you, such as "cookies", text files stored on your computer. The generated information about your use of this internet site is normally transferred to a Google server in the US and stored there. By activating IP anonymization on this internet site, the IP address will be shortened prior to transmission within the member states of the European Union or in other countries which are contracting parties to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there. The anonymized IP address provided by Google Analytics within the scope of Google Analytics will not be merged with other data provided by Google.

You can prevent the collection by Google of the data (including your IP address), generated by the cookie and related to your use of the internet site, as well as the processing of these data by Google by downloading and installing the browser plug-in available under the following link: <http://wbs.is/rom89>.

As an alternative to the browser plug-in, you can click this link to prevent future Google Analytics data collection on this internet site. An opt-out cookie is stored on your device. If you delete your cookies, you must click the link again.

9. USING SOCIAL PLUG-INS FROM FACEBOOK BY APPLYING "2 CLICK SOLUTION"

On our internet site, the so-called social plug-ins ("plug-ins") of the social network Facebook can be used. This service is offered by the companies Facebook Inc. ("Provider").

Facebook is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). An overview of Facebook's plug-ins and their appearances can be found here: <http://wbs.is/rom90>.

In order to increase the protection of your data when you visit our internet site, the plug-ins are integrated into the site by means of the so-called "2-click solution". This integration ensures that when you visit a page on our internet site containing such plug-ins, no connection is established with the Facebook servers. Only when you activate the plug-ins thus giving your consent to the data transfer, your browser establishes a direct connection to the servers of Facebook. The contents of the respective plug-in are transmitted directly to your browser and integrated into the page. By integrating the plug-ins, Facebook receives the information that your browser has accessed the corresponding page of our internet site, even if you do not have a profile on Facebook or are currently not logged in. This information (including your IP address) is transmitted from your browser directly to a Facebook server in the US and stored there. When you interact with the plug-ins, e.g. Press the "Like" button, the corresponding information is also transmitted directly to a server of Facebook and stored there. The information will also be posted on Facebook and displayed there to your contacts. For the purpose and scope of the data collection and the further processing and use of data by Facebook, as well as your rights and options to protect your privacy, please refer to the privacy policy of Facebook at <http://wbs.is/rom91>.

10. NOTICE OF CHANGES

Changes to the law or changes to our internal processes may necessitate an adaptation of this privacy policy.

In the event of such a change, we will notify you of this no later than six weeks prior to entry into force. You are generally entitled (No. 11) to revoke your approval.

Please note that (as long as you have made no use of your right of withdrawal) it is always the current version of the privacy policy that is the valid one.

11.UPDATING / DELETING YOUR PERSONAL DATA

You have at any time the possibility of reviewing, changing or deleting the personal data provided to us by sending us an e-mail to the e-mail address

support@tipwin.com

If you are a customer with us, you can also exclude the receipt of further information for the future there.

Likewise, you have the right to withdraw your approval once given with future effect at any time. However, due to legal requirements, this, however, is accompanied only by the deletion of the customer account. The data stored until then must be stored permanently due to gambler blocking rules. This means that the duration of the stored data is determined by the respective legal regulations. Once the retention periods have expired, the data in deleted customer accounts and revoked approvals will be irretrievably deleted.

The person responsible for processing shall process and store the personal data of the person concerned only for the period necessary to achieve the purpose of the storage or, if provided for by the laws and provisions of the European legislative or regulatory authority or by any other legislator that the person responsible for processing is subject to.

If the storage purpose is omitted or if a storage period prescribed by the European legislative or regulatory authority, or any other relevant legislator, expires, the personal data will be routinely blocked or deleted in accordance with the statutory provisions.

12.RIGHTS OF A PERSON CONCERNED

Each person concerned has the right, as granted by the European legislative and regulatory authority, to seek confirmation from persons responsible for processing whether they will process his/her respective personal data. If a person concerned wishes

to make use of this confirmation right, he/she can contact our privacy officer or another employee of the person responsible for processing at any time.

Any person affected by the processing of personal data shall have the right, granted by the European legislative and regulatory authority, to obtain stored information from the person responsible for processing on the personal data about him and a copy of that information free of charge at any time. Furthermore, the European legislative and regulatory authority has entitled the person concerned to the receipt of the following information:

- Processing purposes
- Categories of personal data being processed
- Recipients or categories of recipients to whom the personal data have been disclosed or are still being disclosed, in particular to recipients in third countries or to international organizations
- If possible, planned duration of personal data storage or, if this is not possible, the criteria for determination of such duration.
- The right of rectification or erasure of personal data relating to you, or the restriction of the processing or the right to object to such processing by the person responsible for processing
- The right to lodge an appeal with a supervisory authority
- If the personal data are not collected from the person concerned: all available information on the source of the data
- The existence of automated decision-making including profiling pursuant to Articles 22 (1) and (4) DSGVO and, at least in these cases, meaningful information about the logic involved and the scope and intended impact of such processing on the person concerned

In addition, the person concerned is entitled to the information on whether the personal data have been transmitted to a third country or to an international organization. If that is the case, then the person concerned has the right, apart from that, to obtain information about the appropriate guarantees in connection with the transfer.

If the person concerned wishes to exercise this right to information, he/she can contact our privacy officer or another employee of the person responsible for processing at any time.

Any person affected by the processing of personal data has the right granted by the European legislative and regulatory authority to demand immediate correction of inaccurate personal data relating to them. Furthermore, the person concerned has the right to demand - in consideration of the purposes of the processing - the completion of incomplete personal data, also by way of a supplementary note.

If a person concerned wishes to exercise this right of rectification, he/she can contact our privacy officer or another associate of the person responsible for processing at any time.

Any person affected by the processing of personal data shall have the right granted by the European legislative and regulatory authority to request from the person responsible for processing to immediately delete personal data related to him/her, provided that one of the following conditions applies and the processing is not required:

- The personal data have been collected for such purposes, or otherwise processed, for which they are no longer necessary.
- The person concerned revokes his/her approval, on which the processing pursuant to Article 6 (1) (a) DSGVO or Article 9 (2) (a) DSGVO was based and there is no other legal basis for the processing.
- Pursuant to Art. 21 para. 1 GDPR, the person concerned raises an objection to the processing and there are no imperative legitimate reasons for the processing, or the person concerned raises an objection to processing pursuant to Art. 21 para. 2 GDPR.
- The personal data were processed unlawfully.

- The deletion of personal data is required so legal obligation under the Union Law or the law of the European member states, to which the person responsible for processing is subject, is met.
- The personal data have been collected in relation to information society services provided pursuant to Art. 8 para. 1 GDPR.

As long as one of the conditions listed above have been met and the person concerned wants to see personal data stored with Tipwin Ltd. deleted, he/she can contact our privacy officer or some other employee of the person responsible for processing at any time. The privacy officer of Tipwin Ltd., or some other employee, will see to it that the demand for deletion is immediately met.

If Tipwin Ltd. has made the personal data public and if our company, as person responsible for processing pursuant to Art. 17, para. 1 GDPR is obliged to delete the personal data, then the Tipwin Ltd. will apply, taking into account available technology and implementation costs, appropriate measures, including technical means, to inform other persons responsible for processing, who process the published personal data, that the person concerned has requested from those other persons responsible for data processing deletion of all links to these personal data, or copies, or replications of such personal data, as long as the processing is not required. The privacy officer of Tipwin Ltd. or another employee will attend to it as the case may be.

Any person affected by the processing of personal data has the right, granted by the European legislative and regulatory authority, to request restriction of processing from the person responsible for processing if one of the following conditions applies:

- The accuracy of the personal data is contested by the person concerned for a period of time that allows the person responsible for processing to verify the accuracy of the personal data.
- The processing is unlawful, the person concerned refuses to delete the personal data and instead requests the restriction of the use of personal data.

- The person responsible for processing no longer needs the personal data for processing purposes, but the person concerned needs them to assert, exercise or defend his/her legal claims
- The person concerned has objected to the processing pursuant to Art. 21 para. 1 GDPR and it is not yet clear whether the legitimate reasons of the person responsible for processing outweigh those of the person concerned.

Should at least one precondition among those listed above apply and the person concerned request restriction of personal data stored with Tipwin Ltd., he/she can contact our privacy officer or any other employee of the person responsible for processing at any time. The privacy officer of Tipwin Ltd. or another employee will attend to the restriction of processing.

Any person affected by the processing of personal data shall have the right granted by the European legislative and regulatory authority to receive personal data related to him/her, and provided to the person responsible for processing, in a structured, common and machine-readable format. He/she also has the right to transfer these data to another person responsible for processing without hindrance by the person responsible for processing to whom the personal data were provided, provided the processing is based on the approval pursuant to Art. 6 (1) (a) DSGVO or Art. 9 (2) (a) DSGVO or on a contract pursuant to Art. 6 (1) (b) of the DSGVO and processing by means of automated procedures, unless the processing is necessary for the performance of a task which is in the public interest or in the exercise of official authority vested in the person responsible for processing.

Furthermore, in exercising his/her right to data portability, the person concerned has the right, pursuant to Art. 20 para. 1 GDPR, to see the personal data transmitted directly from one person responsible for processing to another person responsible for processing, as far as this is technically feasible and provided that the rights and freedoms of other persons are not affected thereby.

In order to assert the right to data portability, the person concerned can, at any time, contact privacy officer or another employee as appointed by Tipwin Ltd.

Any person affected by the processing of personal data shall have the right granted by the European legislative and regulatory authority, for reasons arising from his/her particular situation, to raise objection to the processing of personal data relating to him/her pursuant to Article 6 (1) e) or f) DSGVO, at any time. This also applies to profiling based on these provisions.

The Tipwin Ltd. will, In the event of an objection, no longer process the personal data unless we can demonstrate compelling grounds for processing, worthy of protection, which outweigh the interests, rights and freedoms of the person concerned or serve to process, assert, exercise or defend legal claims.

If Tipwin Ltd. processes personal data to do direct marketing, the person concerned has the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to the profiling, as long as it is associated with such direct marketing. If the person concerned objects to Tipwin Ltd. processing for direct marketing purposes, Tipwin Ltd. will no longer process the personal data for these purposes.

In addition, the person concerned has the right, for reasons arising from his/her particular situation, to raise objection to the processing of personal data relating to him/her, which is carried out by Tipwin Ltd. for scientific or historical research purposes or for statistical purposes pursuant to Art. 89 para. 1 DSGVO, unless such processing is required for the performance of a task in the public interest.

To exercise the right to object, the person concerned can contact the privacy officer of Tipwin Ltd. or another employee directly. The person concerned is also free, in the context of the use of information society services, notwithstanding Directive 2002/58 / EC, to exercise his right to object by means of automated procedures, where technical specifications are used.

Any person affected by the processing of personal data shall have the right granted by the European legislative and regulatory authority, not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on him/her or, in a similar manner, significantly affects him/her; provided the decision

- a) is not required for the conclusion or performance of the contract between the person concerned and the person responsible for processing, or
- b) is, pursuant to legal provisions of the Union or the member countries the person responsible for processing is subject to, allowed and these legal provisions contain appropriate measures for safeguarding rights and freedoms as well as legitimate interests of the person concerned, or
- c) has been made with express approval by the person concerned.

If the decision

- a) about conclusion or performance of a contract between the person concerned and the person responsible for processing is necessary, or
- b) if it is made with the express approval by the person concerned, Tipwin Ltd. will take appropriate measures to safeguard the rights and freedoms and legitimate interests of the person concerned, including at least the right to obtain an intervention by a person of the person responsible for processing, to present his/her own points and to contest the decision.

If the person concerned wishes to enforce automated decision-making rights, he/she can contact our privacy officer or another employee of the person responsible for processing at any time.

Any person affected by the processing of personal data has the right, granted by the European legislative and regulatory authority, to revoke an approval for the processing of personal data at any time.

If the person concerned wishes to assert his/her right to withdraw the approval, he/she can contact our privacy officer or another employee of the person responsible for processing at any time.

13. LEGAL BASIS OF PROCESSING

Article 6 (1) (a) and (b) of the DSGVO serves our enterprise as a legal basis for processing operations, where we obtain an approval for a specific processing purpose i.e. a contract exists between you as a betting customer and us. If the processing of personal data is required for the performance of a contract of which the person concerned is a party, as is the case, for example, with processing operations required for the supply of goods or the provision of any other service or consideration, processing shall be based on Art. 6 (1) (b) DSGVO. The same applies to processing operations necessary to carry out pre-contractual measures, for example in cases of inquiries about our products or services. If our company is subject to a legal obligation requiring the processing of personal data, such as the fulfilment of tax obligations, the processing is based on Article 6 (1) (c) DSGVO. In rare cases, the processing of personal data may be required to protect the vital interests of the person concerned or another natural person. Such case would be, for example, if a visitor to our premises were injured and his or her name, age, health insurance or other vital information had to be passed on to a doctor, hospital or other third party. In that case, the processing would be based on Article 6 (1) (d) DSGVO. Ultimately, processing operations could be based on Article 6 (1) (f) DSGVO. Processing operations that are not covered by any of the above legal bases, shall rely on this legal basis if processing is necessary to safeguard the legitimate interests of our company or a third party, unless the interests, fundamental rights and fundamental freedoms of the person concerned prevail. To such processing operations we are particularly entitled because they have been specifically mentioned by the European legislator. In his opinion, a legitimate interest could be assumed if the person concerned is a client of the person responsible for processing (recital 47, second sentence, GDPR).

14.LEGITIMATE INTERESTS IN THE PROCESSING PURSUED BY THE PERSON RESPONSIBLE FOR PROCESSING OR A THIRD PARTY

If the processing of personal data is based on Article 6 (1) (f) DSGVO, our legitimate interest is the performance of our business operations for the benefit of all our employees and our shareholders.

15.THE PERSON RESPONSIBLE FOR PROCESSING OR YOUR CONTACT PERSON

When enquiring about the collection, processing or use of your personal data, when seeking information, correction, blockage or deletion of data as well as revoking granted approvals or objecting to a particular use of data, please contact:

Tipwin Ltd.
3rd Floor,
126, Pjazza Antoine De Paule,
Paola PLA 1264

The contact can be established by way of our contact form. The corresponding department (such as the privacy officer) will contact you by return.

As of: April, 2018