

DATA PROTECTION

1 Scope

As the operator of LV CASINO (hereinafter “LV CASINO”; “we”; “us”), LV INVESTMENTS AG is very concerned about the responsible and legally compliant handling of personal data. This data protection declaration applies to the use of our gaming offerings. It shows you which of your personal data we use and for what purpose it is processed when you use our gaming offerings.

2 Applicability of data protection laws / General Data Protection Regulation “GDPR”

When carrying out its activities and in relation to your personal data, LV CASINO fully adheres to the legal provisions of the General Data Protection Regulation (EU) 2016/679 (hereinafter “GDPR”), the Liechtenstein Data Protection Act (DSG – LR 235.1) and the Data Protection Regulation (DSV – LR 235.11).

3 This data protection declaration regulates:

- Who is responsible for data processing?
- The purpose, scope, and justification of the processing.
- What types of personal data are collected?
- Passing on personal data to third parties.
- Cross-border processing.
- The storage period.
- The rights to which you are entitled under the GDPR (Articles 12-23 GDPR).
- The provision of the website.
- Data protection for applications.
- The camera surveillance system and the use of camera recordings.
- The handling of data regarding gaming bans.
- Data security.
- The period of validity.
- Changes.

4 Who is responsible for your data?

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Telefon: +423 390 09 99
Webseite: www.lvcasino.li

Data protection inquiries must be submitted in writing by post to the address given above or electronically to the following email address: datenschutz@lvcasino.li

5 Purpose, scope, and justification of processing

We process your personal data exclusively to fulfill our legal obligations, in particular in accordance with the Liechtenstein Gambling Act (GSG - LR 935.51, the Casino Ordinance (SPBV - LR 935.511.1), the Due Diligence Act (SPG - LR 952.1) and the Due Diligence Ordinance (SPV – 952.11), which provides a justification for the processing of data on the basis of Art. 6 para. 1 letter c GDPR “to fulfill a legal obligation”. Data processing in accordance with these regulations serves to identify the guest when entering the game, to prevent and eliminate socially harmful effects of the game, and to combat money laundering, organized crime, and terrorist financing.

Data may also be processed in connection with the fulfillment of a contract to which the data subject is a party, e.g. in contractual relationships with suppliers of LV CASINOS (Article 6 (1) (b) GDPR) or if you have given your consent to the processing for one or more specific purposes (Art. 6 Para. 1 Letter a GDPR). Only such personal data is collected that is actually and legally necessary for the implementation and processing of our tasks and services or that you have provided to us voluntarily.

6 What types of personal data are collected?

When you enter the LV CASINO for the first time, the following data will be processed:

- Last name, first name
- Date of birth
- Address, zip code/city, country of residence
- Nationality

- Number and expiry date of the identification document
- Your electronic signature
- Statement of Beneficial Ownership

We save a scan of your identification document on our electronic system. To check your economic

eligibility, we may process additional data about you:

- Origin of your contributed assets,
- Origin of funds used in our casino,
- Your professional and business activities,

We may also process other data about you in a transaction repository, such as for occasional transactions that reach certain thresholds:

- Transaction type (GSA payout, jackpot payout, token exchange, denomination and currency exchange, token purchase, check issuance, etc.)
- Gameday
- Amount in Swiss francs

As part of the social concept (Art. 12 GSG; Art. 54 SPBV), the following data is processed for the purpose of early detection and the prevention and elimination of socially harmful effects of the game:

- Number of casino visits and bets placed,
- Information to prove your financial situation, which you submit to us as part of the early identification process, such as pay slips, proof of assets, garnishment register extract, bank statements, tax returns, etc.,
- If participation in gaming operations is limited and a visit agreement is concluded, the weekly or monthly stake limits,
- As soon as such a ban has been issued, the type, scope, reason and start and end of the gaming ban as well as all facts that led to such a gaming ban, such as reports and information from third parties as well as measures that the casino took before the gaming ban. After the gaming ban has been issued, further data will be processed, such as the measures taken, such as discussions, recommendations, financial support, the provision of advice and support programs, and the result of these measures.

The data processed as part of the social concept is, to a certain extent, health data in accordance with Art. 9 GDPR. The LV CASINO is responsible for processing health data (Art. 9 para. 1 let. g GDPR) is legally required as part of the social concept. The legal basis for the processing is Article 6 Paragraph 1 Letter. c GDPR in conjunction with Art. 12 GSG and Art. 55 SPBV.

If you do not agree to the processing of data as part of the social concept, you will be denied access to the casino and gaming operations.

7 Disclosure of personal data to third parties

Within our company, LV CASINOS employees may only process your data to the extent that they need it to fulfill our contractual, legal, and supervisory obligations.

Under the same conditions, the data may also be passed on to third parties if this is necessary to provide our service and/or is required by law. These can in particular include:

- Service companies, e.g. banks and asset management companies;
- External auditors;
- External due diligence auditors and compliance officers;
- Authorities, state institutions, courts;
- In connection with the SUPRO competence center in Götzis, Clean in Feldkirch and therapy facilities at the Maria Ebene Foundation in Frastanz. These institutions are obliged to process personal data only in accordance with the requirements of data protection laws and to ensure the protection of the rights of the data subject;
- Notification of gaming bans to all domestic casinos and organizers of online gaming (Art. 83 GSG);
- Forwarding written protocols of the camera recording to the Office of National Economy in the event of criminal acts or the discovery of illegal play (Art. 47 Para. 5 SPBV);
- Service providers, suppliers and auxiliary persons (e.g. hosting providers, IT service providers, etc.)

A corresponding data transfer is based either on the fulfillment of a legal obligation of the LV CASINOS, e.g. when transmitting data to the external due diligence officer for the fulfillment of the legal requirements of the SPG (Art. 6 Para. 1 Letter c GDPR), a contract fulfillment (Art. 6 Paragraph 1 Letter b GDPR), your consent (Article 6 Paragraph 1 Letter a GDPR), or based on a legitimate interest on our part (Article 6 Paragraph 1 Letter f GDPR), unless the interests are or your fundamental rights and freedoms with regard to the protection of personal data prevail.

8 Cross-border processing

The recipients can be located at home or abroad. We would like to point out that we can transfer personal data to countries in which service companies from which we obtain services are based (e.g. software suppliers, IT service providers). In the case of recipients outside our company in the EU/EEA area or in countries with recognized data protection adequacy, such as Switzerland, we ensure data protection by - if necessary and appropriate - concluding so-called order processing agreements with the service provider.

If we transfer personal data to third countries without adequate legal data protection, we will ensure an appropriate level of protection in accordance with legal requirements by carrying out a

risk assessment in each case based on the rule of law principles of the country in which the personal data is to be transferred and in the presence of Corresponding risks supplement the standard data protection clauses with additional clauses or guarantees in order to effectively ensure the protection of data in the target country.

9 storage period

We process and store your personal data only for as long as is necessary to achieve the purpose of the contract, for evidentiary and security purposes and permitted by law, and to fulfill legal retention obligations.

The storage period for data collected based on the Due Diligence Act (SPG) and the Due Diligence Ordinance (SPV) is 10 years. Data in connection with gaming bans must be retained for a further 5 years after the gaming ban has been lifted by LV CASINO. The recordings from the camera surveillance system are stored in a secure location for 45 days and then deleted (see section 0).

Application data will be retained for a further 3 months after notification of the rejection of the position and then deleted (Art. 8 Equal Opportunities Act [GIG] – LR 105.1).

We reserve the right to store personal data until the end of any legal disputes in which the data is required as evidence.

10 According to the GDPR you have the following rights (Articles 12-23 GDPR):

10.1 Right to information

You have the right at any time to receive information free of charge about the origin, the categories, the recipients to whom your data is disclosed, the storage period, the existence of automated decision-making including profiling and the processing purposes of your personal data.

There is no right to information about the camera recordings, nor the right to receive a copy of the camera recordings. The right of the person concerned to information about the camera recordings is completely excluded in this regard. The right to information about data processed within the framework of the social concept is restricted where the rights and freedoms of other people, e.g. those of LV CASINOS employees, are impaired (Art. 15 Para. 4 GDPR). LV CASINO does not currently use your data for direct mail or other marketing purposes, otherwise we would inform you and obtain your explicit consent for these data uses. It also does not make any automated decision-making, including profiling.

10.2 Right to rectification

You have the right to have incorrect personal data corrected. This also includes the requirement to complete incomplete personal data.

10.3 Right to deletion (“THE RIGHT TO BE FORGOTTEN”)

You have the right to request that we delete personal data relating to you immediately, provided that there are no legal retention obligations to the contrary and the processing does not serve to assert, exercise or defend legal claims (Art. 17 Para. 3 lit. e GDPR).

10.4 Right to restrict processing

Under certain circumstances (see requirements Art. 18 GDPR) you have the right to request that the processing of your personal data be restricted, provided that there are no legal obligations to the contrary and the processing does not serve to assert, exercise or defend legal claims.

10.5 Right to data portability

This is the right to receive your personal data in a machine-readable format, which you can have transmitted to another company. The right to data portability is completely excluded with regard to camera recordings.

10.6 Right to revoke the consent given

This allows you to withdraw consent to the processing of your personal data. The revocation of consent does not affect the lawfulness of the processing carried out up to the revocation. At this point we would like to point out that such a revocation may result in LV CASINO no longer being able to fulfill the contract or offer any further services.

10.7 Right to object

If your personal data is based on legitimate interests in accordance with Art. 6 Para. 1 Let. f DSGVO are processed, you have the right in accordance with Art. 21 DSGVO to object to the processing of your personal data, provided there are reasons for this that arise from your particular situation.

You can exercise your right of withdrawal or objection by sending us an email using the following contact details: datenschutz@lvcasino.li

10.8 Right to complain

You have the right to lodge a complaint with the Liechtenstein Data Protection Office as the supervisory authority. See www.datenschutzstelle.li.

Please note that the said rights can only be granted to the extent that there are no legal obligations for storage and retention and/or other supervisory obligations of authorities or offices.

11 Data protection for applications

LV CASINO processes personal data of applicants in the recruitment process. For further information, please note the data protection information for the application process on the LV CASINOS website.

12 Data analysis on the website

LV CASINO is the operator of the website www.lvcasino.li. We do not carry out any web analyzes on the website and do not use any web analysis tools. The above-mentioned visitors and usage data are therefore not evaluated. For more information about how we process personal data on our website please read our Privacy Policy for website visitors.

13 Camera surveillance system and use of camera recordings

The LV CASINO is legally obliged to operate a camera surveillance system. For the purpose of monitoring gaming operations, it continuously records the following areas by video from the opening 24 hours a day:

- the access area of the casino
- the gaming rooms with each individual gaming table
- the cash registers
- the cash withdrawal machines
- the premises in which money, chips and gaming plaques or gaming paraphernalia are kept, stored, transported or counted
- the rooms in which the EAKS and the jackpot system (jackpot controller) are located

The lounges for employees in the LV CASINO as well as the workplaces for activities without contact with customers and assets are excluded from camera surveillance. The employees of the LV CASINOS and their customers will be appropriately informed about the camera surveillance.

If criminal acts or illegal play are discovered and recorded, they will be recorded in a written protocol. The minutes will be sent to the Office of Economic Affairs immediately (Art. 47 Para. 5 SPBV).

There is neither a right to inspect the camera recordings nor the right to receive a copy of the camera recordings.

If you do not agree that your personal data will be processed via the camera recordings, you will be denied access to the LV CASINO and the game distribution; In such a case, you will also not be able to work there as an employee of LV CASINO.

14 live stream

The LV CASINO has installed a live stream and broadcasts performances on stage live via various channels (social media etc.). Guests will be informed about the live stream with clearly visible markings on the floor and information boards. Visitors who pass through the marked area of the live stream implicitly give LV CASINO their consent that their personal data may be used for the live stream.

15 Marketing campaigns

At LV Casino premises there can be organised some marketing campaigns, promotions, and

programs, which might require data processing. Taking part in such marketing activities is always voluntary and based on your freely given consent, which may be withdrawn at any time by sending an email to datenschutz@lvcasino.li. Details of each campaign, including information about the scope, purposes, and legal basis of data processing will be described separately for each campaign and available on our website.

16 Handling of data regarding gaming bans

The LV CASINO undertakes to impose or lift a gaming ban in accordance with Art. 22 Paragraph 1 Letter. b GSG must be notified immediately to all other domestic casinos and organizers of online gambling games. The notification contains the information according to Art. 22 Para. 3 GSG.

17 Data Security

The LV CASINO takes technical and organizational measures to ensure data security, in particular the protection of your personal data from dangers during data transmission as well as from unauthorized access by third parties, against accidental or intentional manipulation, partial or complete loss and destruction. These are regularly adapted to the current state of the art.

Regardless of this, we would like to point out that data transmission over the Internet (e.g. when communicating via email) can have security gaps. Complete protection against access by third parties is not possible.

As part of the storage of personal data and camera recordings, LV CASINO ensures that unauthorized third parties do not gain access, access or insight into personal data and camera recordings. Premises in which personal data and camera recordings are stored are secured against access by unauthorized persons. If this is not possible, personal data and camera recordings will be kept secret.

When disposing of paper, care is taken to ensure that personal data is neither disposed of in the usual trash nor in the paper collection. The papers are shredded or destroyed under supervision. When disposing of electronic data carriers, care is taken to ensure that all information cannot be restored in a readable manner after deletion.

18 Period of validity and changes

The legal provisions of this data protection declaration apply from the time you enter the casino or from the time when you confirm electronically on your tablet as part of your entry identification that you have been sufficiently informed about data protection by LV CASINO and that you have taken note of the data protection regulations of LV CASINO have. This data protection declaration is valid until it is revoked or changed by LV CASINO. The current version of the data protection declaration published on the LV CASINOS website applies.

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