



## **Privacy Policy**

Welcome to our website privacy notice (Website Privacy Notice). We are Apricot Investments Limited (“Apricot”) of Ground Floor, Evergreen House, 43 Circular Road, Douglas, Isle of Man, IM1 1AD.

We are committed to being fully compliant with all applicable data protection legislation and the General Data Protection Regulation (GDPR) as applied in respect of your personal data, as well to safeguarding the rights and freedoms of natural persons whose information we collect.

This Website Privacy Notice is broken down into segments that cover specific areas, below are the categories covered, please scroll down to read the whole notice in detail. Please also use the Glossary to understand the meaning of some of the terms used in this Website Privacy Notice.

1. Important information and who we are
2. How we use your personal data
3. Disclosures of your personal data
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### **1. Important information and who we are**

Purpose of this Website Privacy Notice

This Website Privacy Notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you sign up to our vacancy notifications.

This website is only intended for adults over the age of 18, and we do not knowingly collect data from anyone under this age.

It is important that you read this Website Privacy Notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy notice supplements the other notices and is not intended to override them.

### **Controller**

We are the Controller of all personal data relating to our personnel and personal data used in our business for our own commercial purpose.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Website Privacy Notice. If you have any questions about this Website Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.



### **Contact details**

The Data Protection Officer [dpo@microgaming.co.uk](mailto:dpo@microgaming.co.uk) , Ground Floor, Evergreen House, 43 Circular Road, Douglas, Isle of Man, IM1 1AD

You have the right to make a complaint at any time to the Information Commissioner, the Isle of Man supervisory authority for data protection issues ([www.inforights.im](http://www.inforights.im)). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner so please contact us in the first instance.

### **Changes to the Website Privacy Notice and your duty to inform us of changes**

This version was last updated on 02 May 2024.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. Personal data we collect, and how we use your personal data**

- We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- Where we need to perform the contract we are about to enter into, or have entered into, with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where you have given us consent to use your data
- Where we need to comply with a legal or regulatory obligation. These are explained further in section 8 (Glossary) below.

### **Purposes for which we will use your personal data**

We have set out below a description of how we plan to use your personal data, and which of the legal bases we rely on to do so.



## A. Contacting Us

By visiting our Site and by submitting personal data to us through our Site then this Privacy Policy will apply.

What information does the company collect and how?

The personal data that we collect from you will depend upon the services that you sign up to. The personal data we collect may include:

- your name,
- email address;
- any communication you have with us; and
- any other data that you may submit to us via the Site from time-to-time.

*Why do we process the data?*

How we use the personal data you provide to us to will depend on the services that you request, and we may:

- contact you and respond to your query from the website.

*Who will have access to the data?*

- Members of our team who are tasked with managing or fulfilling the services offered by this website.
- We may disclose depersonalised data (such as aggregated statistics) about the users of our Site in order to describe our sales, customers, traffic patterns and other site information to prospective partners, advertisers, investors and other reputable third parties and for other lawful purposes, but these statistics will include no personally identifying information.
- Third party distributors include but not limited to Microgaming Ground Floor, Evergreen House, 43 Circular Road, Douglas, Isle of Man and Neon Solutions Limited 3<sup>rd</sup> Floor, Evergreen House, 43 Circular Road, Douglas, Isle of Man.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [dpo@microgaming.co.uk](mailto:dpo@microgaming.co.uk).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.



Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### 3. Disclosures of your personal data

To provide the best service we can, we use some external companies to hold data. We do use service providers that only hold the data within the EU and require all third parties to respect the security of your personal data and to treat it in accordance with the law.

These companies include:

Microsoft – We use O365 and Azure cloud capabilities for our productivity and other services we require. <https://www.microsoft.com>

### 4. International transfers

We may need to transfer your data outside of the European Economic Area (EEA). Where we need to do this, we will ensure that the recipient applies data protection standards that will ensure the security of your data.

### 5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### 6. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can



achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by [contacting](#) the DPO

In some circumstances you can ask us to delete your personal data: see the Glossary below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 7. Your legal rights

- Under certain circumstances you have rights under data protection laws in relation to your personal data:
  - Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

These rights are explained further in section 8 (Glossary) below. If you wish to exercise any of the rights set out above, please [contact](#) the DPO.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **8. Glossary**

#### **LAWFUL BASIS**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting](#) the DPO.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Consent means processing your data where you have given a clear indication that you agree to the processing of your personal data.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### **YOUR LEGAL RIGHTS**

You have the right to:

Request access to your personal data (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected, though we may need to verify the accuracy of the new personal data you provide to us.



Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the personal data's accuracy; (b) where our use of the personal data is unlawful but you do not want us to erase it; (c) where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the personal information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.