

I. Introduction

This privacy policy (hereinafter “Policy”) applies to the Zillion website, accessible via the URL <https://zillion.games/>.

This Policy details the methods by which we collect, share, and utilize your personal information, and outlines your privacy rights. We recommend that you read this Policy carefully and thoroughly to be fully informed about how your data is handled.

We commit to collecting, safeguarding, and processing your personal data with the utmost care and responsibility, ensuring full compliance with applicable laws including, but not limited to, the Data Protection Act 2018 and Regulation (EU) 2016/679 of the European Parliament and Council dated 27 April 2016 — the General Data Protection Regulation (GDPR). This Policy is intended to complement, not replace, other notices and privacy policies that may apply.

II. How do we collect your personal data?

When using the Zillion website, Ziplay Limited collects personal data from you either through your active provision or passively.

Based on your preferences and choices, we may gather information via cookies and similar tracking technologies. Such data may include details like your IP address or online activity, some of which qualify as personal data.

For further details on our use of cookies, please refer to our Cookie Policy.

III. What personal data do we collect and for what purpose?

The personal data we collect, and process may vary based on the choices you make in the privacy settings while using the Zillion website. Additionally, it depends on the services, features, or experiences you utilize, your geographical location, and the applicable legal requirements.

We will only process your personal data when we have a lawful basis for doing so. The lawful basis might be:

- a) you have agreed to data processing by giving your consent;
- b) it is necessary to provide services to you under the performance of the contract we have with you;
- c) we are required to do so in accordance with legal or regulatory obligations; or it is in our legitimate interests to process your personal data, if none of these interests prejudice your own rights, freedoms, and interests.

In the table below we indicate the business purposes where we may use your personal data:

Purpose	Personal data	Legal basis
To communicate with you and handle your inquiries, requests, comments, and feedback etc.	First name, Last name, Country of residence, E-mail address, Feedback and comments made by you	Legitimate interests to handle your inquiries, complaints, and suggestions regarding the services we provide in our site.
To establish, exercise and defend legal claims.	First name, Last name, E-mail address, Other information as necessary for the purpose.	Legitimate interests to defend ourselves in legal claims.
To allow participation in promotions, contests and to administer these activities.	IP address, Log data, Device information, User activity	Your freely given consent.
To detect, prevent, or investigate potential security incidents or fraud.	IP address, Log data, Other data that is necessary for the purpose.	Legitimate interests to ensure security for our systems and services provided.
To perform analytics, quality control, market research, and determine the effectiveness of Zillion website, promotional campaigns, and	IP address, Location, Device information, User activity	Legitimate interests to perform marketing and research activities to develop our products and provide you better service.

Purpose	Personal data	Legal basis
develop new products and services		
To comply with our obligations under applicable laws.	First name, Last name, Company name, Other information as necessary for the purpose.	Necessary to comply with legal or regulatory obligations.

Please note that the processes and lawful bases described above are primarily applicable and are not exhaustive. They may be subject to change or supplementation over time to address evolving business requirements and ensure compliance with applicable legal obligations.

IV. Where may we disclose and/or transfer your personal data?

Ziplay Limited may share your personal data with third-party service providers acting on its behalf. Such data transfers are conducted on lawful grounds, including legitimate interests or mutually agreed contractual obligations necessary to deliver the services.

In certain circumstances, personal data may be transferred to parties located outside the EU/EEA. In these instances, Ziplay Limited ensures the execution of Standard Contractual Clauses or other legally required safeguards to guarantee an adequate level of data protection prior to any international transfer.

For all personal data transfers, Ziplay Limited maintains a sufficient security standard and complies fully with all applicable legal requirements to protect your information.

Data transfer purposes may be relevant to:

- a) provide accurate information regarding our provided services (based on necessity to comply with a legal/regulatory requirement);

- b) identify fraud and other criminal activities including anti money-laundering (based on necessity to comply with a legal/regulatory requirement);
- c) provide you with customer support including the obligation to ensure that information is up-to-date and accurate (based on necessity to comply with a legal/regulatory obligation);
- d) comply with legal requirements towards identification of responsible gaming measures (based on necessity to comply with a legal/regulatory requirement); and/or
- e) provide you with your services agreed, ensuring the implementation of security measures (based on necessity to comply with a legal/regulatory requirement).

Data Processors Acting on Behalf of Ziplay Limited

Ziplay Limited may disclose personal data to external parties, such as vendors and service providers. Third parties might process personal data on behalf of and under the instructions of Ziplay Limited. The personal data may be transferred only if an adequate security level is ensured, and all legal requirements are met.

Ziplay Limited engages data processors (incl. sub-processors) to deliver services and to comply with legal and regulatory requirements. The data processors might vary from cloud services for data storage purposes, marketing companies in preparing and delivering marketing related materials, and external advisors and auditors. In the case of engagement of processors, we inform you as far as it is required by legal and regulatory requirements.

V. What security measures are implemented?

We ensure that all necessary appropriate security measures are in place to keep and process your personal data securely. In support of this commitment, we have implemented appropriate technical, physical, and organizational measures to protect your personal data against unauthorized or accidental destruction, alteration or disclosure, misuse, damage, theft or accidental loss, or unauthorized access.

VI. What is the data retention period?

Personal data is retained for a duration that complies with applicable legal and regulatory requirements or for as long as necessary to achieve the purpose for which the data was collected. The retention period may vary depending on the jurisdiction and the specific services you receive.

VII. What rights do you have?

You have several rights towards your personal data. You have the right to request access, rectify, erase, object, restrict personal data processing, withdraw consent if given and transfer your personal data. In addition, you have the right to contact the Data Protection Supervisory authority in the country where you are located.

We will respond to all individual requests wishing to exercise data protection rights. We may request to verify your identity and/or ask for additional information to help us respond efficiently to your request, and to protect personal data from unauthorized disclosure.

If you wish to exercise your data protection rights, please contact our DPO at info@zillion.games

If you wish to exercise your rights concerning our developed games, please contact the Operator with which you played. We do not process personally identifiable information of players directly. This responsibility lies with the online casinos/operators, who act as the Data Controllers of player personal data.

Right to access your personal data

You may request at any time confirmation whether we process your personal data. If we process your personal data, you can request a copy of your personal data.

Right to rectify your personal data

You have the right at any time request to correct your personal data that is inaccurate, as well as supplement your personal data that is incomplete. For example: if you are a Ziplay Limited business partner and your contact information such as telephone number or email address have been changed, you can request to edit this data.

Right to erase your personal data

You may request to erase your personal data under certain circumstances such as when your personal data is no longer needed for the purposes for which it was collected.

It is important to note 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. These may include instances where the retention of your personal data is necessary to:

- a) comply with a legal or regulatory obligation to which we are subject; or
- b) establish, exercise, or defend a legal claim.

Right to object to certain personal data processing

You may object to the processing of your personal data if you have a particular situation, your data is being used for direct marketing purposes, and the legal grounds of data processing are legitimate interests. For example: If you receive any marketing-related materials that you have not agreed to, you can object and request to stop receiving them.

Right to restrict the processing of personal data

You may ask us to restrict the processing of your personal data under certain circumstances, such as when the processing is unlawful, but you do not wish your personal data erased. Additionally, in case you have concerns about your data accuracy, you can ask us to restrict data usage until we verify the accuracy of your data.

Right to withdraw your consent

If you have agreed on data processing based on your consent, you have the right at any time to withdraw your consent. The consent withdrawal will not affect the legality of the previous processing.

Right to transfer your personal data

You may ask Ziplay Limited to provide you with a copy of your personal data and if technically possible can request to transfer this data to another Data Controller (Company or Institution, where possible). This is only applicable if personal data is processed on the legal basis of your consent or in necessity to comply with the agreement concluded with you, and only for the data that is provided by you.

Right to complain to the data protection supervisory authority

You have the right to lodge complaints regarding your personal data processing to the relevant data protection supervisory authority. The list of national supervisory authorities can be found here: https://edpb.europa.eu/about-edpb/board/members_en

VIII. Need more information?

If you have any additional questions or concerns regarding the processing of your personal data, the Zillion website, or applications, please contact us by email info@zillion.games

Our contact details:

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