

## **Introduction**

This Privacy Policy provides important information which are integral part to the Terms of Use of VICI Marketing Ltd (hereinafter the “VICI”) services. Data protection is important to us and this Privacy Policy provides important information about how VICI and its worldwide affiliate companies and subsidiaries (“VICI”, “we” or “us”) handle personal information.

This Privacy Policy applies to any VICI website, application, product, software or service that links to it (collectively, our “Services”).

Please read this Privacy Policy carefully and contact us in case you have any questions about our privacy practices or your personal information choices. We reserve the right to amend this Privacy Policy at any time by posting the new version. It is important that you check back for updates to this Privacy Policy. If we make changes we consider to be important, we will let you know by placing a notice on the relevant Services.

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### **1. Use Site and Personal Information**

VICI is committed to the responsible handling and protection of personal information.

Personal information means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

To use our Services, you must register and thus save your personal information (name, email address, etc.). We collect, use, disclose, transfer and store personal information when needed to provide our Services and for our operational and business purposes. The registration form shall include a statement allowing you to accept or reject that your personal data is used for marketing or commercial purposes by VICI Services or by third parties, and / or sold to third parties. If you use the services of partner sites and choose to disclose your personal data, you are informed that the collection and use of your data by these sites is subject to their own conditions on the processing of personal data. We are not responsible for how partner’s sites use personal data.

We process and distribute, i.e. share or disclose, personal data where necessary to provide our Services or conduct our business operations as described below.

Regulators. We may disclose your personal data to governmental and public authorities as required and as permitted by, or in order to comply with, applicable Laws and Regulations. This may include disclosing personal information in order to cooperate with regulatory authorities and law enforcement agencies, as may be necessary to protect our rights and/or property.

Internal. We may process and distribute personal data internally in order to conduct its business operations, always in line with its internal privacy policies and procedures. In addition, we may distribute information to our intra-group related businesses (within or outside the EEA) if necessary for the provision of the Services, e.g. administration, customer and technical support and marketing. All of our employees and related companies are bound to follow our personal data privacy policies and procedures when processing such personal data.

Third Parties. Third party disclosures may include sharing such personal data with third party companies that provide us services, which include, inter alia, professional, legal, marketing and/or accounting services to us and/or service providers. Third Party companies that assist us in providing services are required to maintain the confidentiality of such data to the extent they receive it and to use the personal data only in the course of providing such services and only for the purposes dictated by us. Our Third Party providers are not permitted to share or use personal data we distribute to them for any other purpose than their contractual obligation with the us.

## **2. Cookies**

Cookies. Cookies are a kind of short-term memory which is stored in a visitor's and/or client's browser and enables Services to 'remember' little bits of information between pages or visits. Some of the purposes of installation of Cookies or similar applications may also require the separate consent from you.

Use of Cookies. Use of cookies and other tracking technologies are standard across the Services through which personal data is collected. You can control and manage the use of cookies through the Services and more information is provided below.

We use cookies to enable it to provide you with a better experience in using our Services. If you do not wish to receive cookies, you may be able to change the settings of the browser or mobile device to refuse all cookies or to receive notification each time a cookie is sent, thereby giving the choice whether to accept it or not. However, this may impair the quality of the Services that are being provided in relation to the trading account.

We shall not be liable for misuse or loss of personal data resulting from cookies for Services that we do not have access to and/or control over.

Consent to Cookies. Consent to our cookie policy is obtained through the cookie permission settings in your internet browser or mobile device and throughout your acceptance for the use of our Services. If you do not wish to receive cookies, you can change the settings of the internet browser or mobile device to refuse all cookies or contact us.

Types of Cookies. There are various types of cookies needed to be used in order to enable the provision of the Services, which include, inter alia, absolutely necessary cookies essential to enable navigation through the Services, performance cookies which are used to improve use of the Services, functionality cookies which are used to remember changes in choices a User requested and marketing cookies used to evaluate performance of advertisements and visits on the Services.

Technical Cookies and Cookies serving aggregated statistical purposes. Activity strictly necessary for the functioning of the service: Use of cookies to save your session and to carry out other activities that are strictly necessary for the operation of the same, for example in relation to the distribution of traffic.

Activity regarding the saving of preferences, optimization and statistics: Use of cookies to save browsing preferences and to optimize your browsing experience; among these cookies are, for

example, those to set the language and the currency or for the management of first party statistics employed directly by the owner of the site.

#### Other types of Cookies or third-party tools

Some of the services listed below collect statistics in aggregated form and may not require your consent or may be managed directly by you – depending on how they are described – without the help of third parties.

If any third-party-operated services are listed among the tools below, these may be used to track your browsing habits, in addition to the information specified herein and without the owner's knowledge.

Interaction with external social networks and platforms: These services allow interaction with social networks or other external platforms directly from the pages of the Services; the interaction and information obtained are always subject to your privacy settings for each social network; if a service enabling interaction with social networks is installed it may still collect traffic data for the pages where the service is installed, even when you do not use it.

Google +1 button and social widgets (Google Inc.): The Google button and social widgets are services allowing interaction with the Google+ social network, provided by Google, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Facebook Like button and social widgets (Facebook, Inc.): The Facebook Like button and social widgets are services allowing interaction with the Facebook social network, provided by Facebook, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Tweet button and social widgets (Twitter, Inc.): The Tweet button and social widgets are services allowing interaction with the Twitter social network, provided by Twitter, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Linkedin button and social widgets (LinkedIn Corporation): The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network, provided by LinkedIn Corporation.

Personal data collected: Cookie and Usage data.

Place of processing: USA

YouTube button and social widgets (YouTube Corporation): The YouTube button, video and social widgets are services allowing interaction with the Youtube social network, provided by YouTube, LLC.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Statistics. The services contained in this section are used to monitor and analyse traffic data and are used to keep track of your behaviour.

Google Analytics with anonymized IP (Google Inc.): Google Analytics is a web analytics service provided by Google Inc. Google uses personal data collected for the purpose of evaluating the use of this application, compile reports and share them with other services developed by Google. Google may use this personal information to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics makes anonymous your IP address. The anonymization shortening work within the confines of the EU Member States or other countries participating in the agreement on the European Economic Area, the IP address of the Users. Only in exceptional cases, the IP address will be sent to Google's servers and statements within the United States.

Personal data collected: Cookie and Usage data.

Place of treatment: USA

### **3. Links and connections to third-party services**

Our Services may contain links to and may be used by you in conjunction with third-party apps, services, tools, and websites that are not affiliated with, controlled, or managed by us. Examples include "Facebook", "LinkedIn", "Twitter®" and, third-party apps and voice software and readers. The privacy practices of these third parties will be governed by the parties' own privacy statements. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy statements or policies applicable to these third-party services.

### **4. Connecting via social networks**

Some of our Services may include social networking features, advertising and interactive mini-programs. Additionally, you may choose to use your own social networking logins to log into some of our Services. By doing so we may receive and store authentication information from that service so as to enable you to log in and other information you will choose to share when you connect through these services. We are not responsible for the security or privacy of any information collected by these third parties. You should review the privacy statements or policies applicable to these third-party services. If you don't want your personal information to be shared through your social media account provider please do not connect through your social media and/or manage your privacy settings.

### **5. Use of personal data**

In addition to the personal data collected from the registration form that you filled out, we may use information about you from your activities on the Services offered to resolve any disputes or resolve any issues that may arise in the opportunity to use our services. We recommend that you accept that we may use your personal data (email address, phone number) as part of our marketing and promotional campaigns, but also for statistical purposes on the use of the Services. Our marketing and statistical studies are designed to improve and personalize the services offered. You acknowledge and agree that your data may optionally be transmitted to third-party subcontractors involved in providing marketing and / or services offered. If you use the services of a partner site or advertiser, it may be required to provide us with information about its transactions with you. In addition, by using the Services, you agree to abide by the provisions of the Data Protection Laws, as applicable.

### **6. Security**

We take personal information security seriously and achieve protection through use of appropriate technologies and procedures. Our policies and procedures are aligned with international standards and are reviewed regularly and updated as necessary in order to meet changes in business needs, technology and regulatory requirements.

We regularly train employees and contractors, who have access to personal information, on privacy of information and security issues. We ensure that our employees or contractors are operating in accordance with our privacy policies and procedures and also require any vendors and providers to protect equally any personal information which they are entrusted.

We inform you that your personal information is hosted by godday.com on servers located in USA. Appropriate measures are implemented to ensure optimum safety of your data. However, we cannot ensure that your communications and other personal data will not be intercepted or published by third parties.

## **7. How long we keep personal information**

We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods we take into consideration local applicable laws, contractual obligations and the expectations and requirements of our customers. When information is no longer needed, we proceed with destruction procedures.

## **8. Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

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. We hereby reserve our right to charge a relevant fee for providing such record of personal data to a client, except where this is not allowed under local legislation.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new 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 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 data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the 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 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 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 or that is needed further to regulatory or legal requirements. 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.

## **9. How to contact us**

We understand that you may have questions or concerns about this Privacy Policy or our privacy practices or may wish to file a complaint and in case you are not satisfied you have the right to make a complaint to a data protections regulator accordingly. For any requests related to your personal information please feel free to contact us:

**Email:** [info@marketingvici.com](mailto:info@marketingvici.com)

*This Privacy Policy was last updated on May 2018.*