

## PRIVACY POLICY

### 1. Introduction

This Privacy Policy explains how Williams d.o.o. ("WWin") collects, uses, stores, and protects users' personal data when using the internet platform and the services of the organizer of games of chance. The processing of personal data is carried out in accordance with the Law on the Protection of Personal Data of Bosnia and Herzegovina ("Official Gazette of Bosnia and Herzegovina", No. 12/25).

By using WWin services, it is deemed that the user is familiar with this *Policy* and accepts it.

### 2. Data Controller

Williams d.o.o. Bosnia and Herzegovina  
Svetozara Markovića 5e, 78000 Banja Luka,  
ID No. (JIB): 4402125230003  
E-mail: support@wwin.com

### 3. Categories of personal data processed

WWin collects the following types of data:

- Identification data: first name, last name, personal identification number, date of birth, scanned identification document, address, gender of the user
- Contact data: mobile phone number, e-mail address
- Financial data: deposits, withdrawals, payment methods, bank account number, and all internal financial transactions related to participation in games of chance
- User data: accounts, gaming history, verification
- Technical data: IP address from which the user accessed the website and the time of access
- Data collected via video surveillance: video recording or image, date, place, and time of visit
- Biometric data (e.g. facial image) are processed exclusively for the purpose of identification and verification of the user's identity, prevention of participation by minors and abuse, in accordance with the law and license conditions, with the application of enhanced protection measures.

### 4. When we collect your data

By merely accessing the WWin's website, you accept the terms and conditions of the *General Terms and Conditions of Business*, confirm that you have been informed thereof, understood them, and undertake to comply with them.

Our business premises are secured by video surveillance. Data processed through the video surveillance system include: image, movement, location, time, and date of the video recording.



## 5. Purpose of processing

Personal data are processed for the purpose of:

- user registration,
- identity (KYC) and age verification,
- implementation of AML/CTF procedures,
- execution of deposits and withdrawals,
- prevention of fraud, abuse, and illegal activities,
- communication with users,
- technical protection of the platform.

## 6. Legal basis for processing

WWin processes personal data lawfully and transparently, in accordance with the laws of the Republic of Srpska and Bosnia and Herzegovina, based on the following legal grounds:

- Fulfilment of legal obligations

Processing is necessary in order to act in accordance with applicable regulations of the Republic of Srpska and Bosnia and Herzegovina, including regulations on games of chance, license conditions for organizing games of chance, regulations on the prevention of money laundering and terrorist financing, and tax and accounting regulations.

- Conclusion and performance of a contract

Processing is necessary for user registration, management of the user account, enabling participation in games of chance, including online games, deposits of funds, payment of winnings, as well as communication with users.

- Legitimate interest

WWin processes personal data for the purpose of preventing fraud and abuse, protecting the integrity of games and systems, risk management, protection of persons and property (including video surveillance), and ensuring the security of information systems.

- Consent of the data subject

When processing is based on the consent of the data subject, consent may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to its withdrawal. Withdrawal of consent or a request for deletion of personal data does not affect the obligation of the controller to retain certain personal data in accordance with applicable laws, including regulations on the prevention of money laundering and terrorist financing, and regulations on games of chance.





In such a case, WWin will delete or anonymize data for which there is no legal obligation to retain, while data that it is obliged to retain will be kept for the period prescribed by law.

## 7. Profiling and cookies

### *Cookies*

WWin uses various types of cookies:

- **Necessary cookies** – Essential for the basic functionality and security of the website and cannot be disabled.
- **Functional cookies** – Enable enhanced functions and personalization on the website.
- **Analytical cookies** – Allow us to monitor and analyze the use of the website in order to improve performance.
- **Performance cookies** – Help us measure site performance and improve the user experience.
- **Advertising cookies** – Used to display personalized advertisements based on your interests.

### *Profiling*

For user profiling, we use only analytical cookies via *Google Analytics*. In order to monitor user interactions with our website, which enables us to improve the content and functionality of the site, we use the following cookies:

- **\_ga** – This cookie is used to distinguish users and has a duration of 2 years.
- **ga<measurement\_id>** – This cookie is used to track user interactions with the website and has a duration of 2 years.

## 8. Data processors

Personal data may be transferred to:

- banks for the purpose of executing financial transactions,
- competent investigative authorities such as: police, prosecutors' offices, courts, and other investigative or law enforcement agencies,
- authorities competent for the prevention of money laundering and terrorist financing,
- tax authorities and the gambling regulator,
- external data processors (authorized partners – providers of technical services with whom the controller has concluded data confidentiality agreements).

## 9. Place of processing of personal data and transfer of personal data

Personal data are stored on local servers of the data controller, on various data storage media, as well as at other locations where data processing or storage is carried out (Amazon AWS and Microsoft Azure Cloud), whose owners apply appropriate procedures and practices necessary for the protection of personal data.



Data are transferred to Amazon AWS locations within the EU, Microsoft Azure Cloud locations within the EU, and DataBox Zagreb, with the application of appropriate protective measures.

#### **10. How long we retain data**

For the purpose of complying with regulations on the prevention of money laundering and terrorist financing, WWin is obliged to retain all information, data, and documentation related to the established business relationship with the user for a period of 10 years from the date of termination of the business relationship, execution of a transaction, or the moment of user identification.

Data collected through video surveillance are retained in accordance with technical capabilities, and for at least seven days, after which they are deleted, unless they are separated for the purpose of protecting rights and acting upon requests of competent authorities.

Marketing data are retained until the withdrawal of consent.

#### **11. Security measures**

WWin applies technical and organizational data protection measures.

Technical measures applied include: account access control, access logging, antivirus protection, firewall network protection, anti-burglary protection, and physical access control.

Organizational measures applied include: granting only necessary authorizations and levels of access to data, employee training, and application of statutory measures and procedures.

#### **12. User rights**

Each registered user has the right to:

- access to and insight into personal data,
- rectification or completion of incomplete personal data, inter alia by providing an additional statement,
- erasure and the right to be forgotten, where possible due to laws obliging data retention,
- restriction of processing,
- objection to processing.

For all questions, requests, and objections, users may contact our customer support via e-mail: [support@wwin.com](mailto:support@wwin.com)

Requests related to the protection and processing of personal data shall be submitted to the Personal Data Protection Officer's e-mail address: [szzp@wwin.com](mailto:szzp@wwin.com).

WWIN will respond to the request within 30 days, with the possibility of an extension. After receipt of the request and before providing the data, WWin will verify the identity of the user in order to prevent unauthorized data processing.



### 13. Policy changes

The Policy may be amended in order to align with laws or technical requirements. The updated version will be published on the organizer's website.

In Banja Luka, on 06 October 2025

Director, Srđan Dubočanin

I hereby certify that the above translation is a faithful and complete translation of the original document written in Serbian language	
Registry No.:	<u>015926</u>
Date, place:	<u>23.01.2026. Banja Luka</u>
<b>Tamara Pavlović</b>	
Permanent Court Interpreter for English and German Language	

