



PRIVACY POLICY, DATA PROTECTION AND COOKIES

The purpose of this privacy policy is to inform you of the ways in which data about you is processed by the Circus Group.

1- Definition - The terms listed below have the following definitions:

- “Account” within this privacy policy means the personal account that can be created by a User from the Site;
- “Personal Data” or “PD” means any information that could be used to directly or indirectly identify a natural person within the meaning of the applicable regulations;
- “DPO” means the Data Protection Officer who is responsible for advising and controlling the Data Controller’s compliance with the applicable regulations regarding the processing of PD;
- “Circus Group” means the CIRCUSBET company and the CIRCUS CASINO FRANCE (“CCF”) group to which it belongs, comprising the subsidiaries of CCF on French and Swiss territories as well as its parent company under Belgian law, Ardent Casino International SA, and/or the companies linked to it;
- “Service” means the various services accessible to the User from the Site;
- “Data Controller” means the legal entity which, alone or together with others, determines the purposes and the methods of PD processing;
- “Site” means CIRCUSBET’s internet site accessible from the URL <https://www.mycircus.net>;
- “User” means any person over the age of 18 who has registered on the Site. Emancipated minors cannot access the Services;
- “Visitor” means any natural person who consults the Site and does not necessarily have an Account.

2- On what occasions is data collected? - The Data Controller collects your personal data on the following occasions:

- When an Account is created;
- When the Services are used;

The Data Controller takes account of the principles of minimizing the amount of data collected and protecting data by design, as well as the principle of data protection by default. Consequently, the information processed is relevant, appropriate and limited to what is necessary for the purposes for which it is processed.

3 - Collection purposes - The information collected is saved in one or more computer files by the Data Controller, notably for the following purposes:

- The statistical evaluation of visits to the Site;
- Making content and Services available on the Site;
- Managing the Accounts of the Site’s Users;
- Managing the Data Controller’s communication and market research operations, irrespective of the communication methods used (telephone, SMS, mail, email according to the PD collected from the Users who have expressly consented to the processing of such PD).

The processing and storage of Personal Data related to consent given by Users and Visitors. In the event that a Personal Data collection form must be completed by a User, all fields in the form are mandatory.

- Failure to provide the required data, or the subsequent withdrawal of consent by the data subject, shall prevent the Data Controller from proceeding with their request. Every time processing is started based on the data subject’s consent, they have the ability to withdraw their



consent at any time by sending their request to the following address: dpo@circuscasino.fr.

4 - Retention period - In accordance with the regulations in force, the Data Controller only retains Personal Data for the duration strictly necessary to fulfill the purposes of the processing, unless the User gives their consent for such data to be retained for later use. The storage period of Personal Data varies depending on the purposes of the processing carried out. In particular, the following periods are applied for the various major categories of Personal Data:

- Data collected as part of the creation of your Account: the Data is retained for as long as the User is active, and at most three (3) years as from the last contact from them;
- Data collected as part of the use of the Services: the Data is retained for as long as the User is active, and at most three (3) years as from the last contact from them.

5 - Communication of Personal Data - The information the Data Controller has relating to Users and Visitors can be communicated to the following people:

- The Data Controller's staff, as well as the staff of sister or subsidiary companies, who are authorized to manage this processing due to their duties;
- The organizations responsible for carrying out a check or inspection in accordance with the applicable regulations;
- The external providers responsible for carrying out Personal Data processing operations on behalf of the Data Controller, who are contractually bound to an obligation of security and confidentiality with regard to this Personal Data (e.g., to secure online payments, prevent fraud, carry out site maintenance, collect customer opinions);
- Any person who has access to your Personal Data is bound by a strict obligation to confidentiality.

6 - Transferring Personal Data outside of the European Union - All of your Personal Data is processed exclusively on European Union territory. The Data Controller does not transfer your Personal Data outside of European territory, whether to companies controlled or owned by the Circus Group, or to external providers, who are bound to PD protection rules at least equivalent to those stipulated in this document. In the event that assistance is needed from providers outside of European Union territory, an express request will be made to the Users, and the Data Controller will ensure that appropriate measures are put in place to guarantee that the Personal Data is transferred within a contractual framework that respects their inherent confidentiality. A request will be made to you by the Data Controller so that the aforementioned transfer is subject to your acceptance or refusal without prejudice to the stipulations of point 7 below.

7 - Your rights regarding Personal Data - In accordance with the regulations in force, you have the right to object and the right to restrict the processing of your Personal Data, as well as the right of access, rectification, portability and deletion of this Data.

You also have the option to communicate your instructions to the Data Controller on what should happen to your Personal Data after your death. The Users and Visitors are informed that exercising the rights of objection, deletion and portability of the Data, as well as the right of restriction of processing, is subject to certain conditions and may be refused by the Data Controller if these requests do not correspond to the situations provided for in the regulations regarding Personal Data. You can exercise your rights by sending your request with a copy of your identity document via email to dpo@circuscasino.fr, or by post to the following address: MSC GAMING – 25A Route de Longwy, 4832 RODANGE (Luxembourg).



Such requests will be processed in the best possible timeframe, and at the latest within three months, e.g., in the event of a complex request or a high number of requests received. Finally, if the Data Controller does not fulfil your requests, you have the right to submit a complaint to a Personal Data protection authority, namely the CNIL. In accordance with the relevant requirements, the Data Controller has appointed a shared DPO with the Circus Group: dpo@circuscasino.fr. For any questions about the Data Controller's responsibilities concerning Personal Data protection, you can contact the DPO at the following address: MSC GAMING – 25A Route de Longwy, 4832 RODANGE (Luxembourg).

8 – Cookie Policy - The Site uses cookies to improve your online experience and offer you personalized content. You have the option to accept or refuse cookies that are non-essential to the functioning of the <https://www.mycircus.net> site at any time.

However, to continue navigating on our Site, you must either accept the cookies or refuse them by managing your preferences via the "Cookie settings" tab.

8.1 - What is a cookie?

A cookie is a set of information, generally small and identified by a name, which can be transferred to your browser by a website you are connected to. Your web browser will save it for a certain period of time and resend it to the web server each time you reconnect.

Certain cookies are necessary for the Site's functioning, for example, the cookies that allow you to log in to the Site and manage your winnings. Others are used to improve your gaming experience, for example, your choice of language; when you visit the Site again, this cookie will allow your browser to be recognized and therefore remember your preferred language. Others are used to give you personalized content or advertisements.

Section 8.2 below presents a list of the cookies that the Site and its partners use.

The retention period for cookies varies depending on the type of cookie. Certain cookies are automatically deleted when you leave the Site, while others are saved for longer; the retention period of cookies is indicated below (section 8.2).

8.2 – Why does the Site use cookies?

The Site and its partners use four (4) categories of cookies, namely:

- Essential cookies: cookies that are necessary for the functioning of the Site, notably for the purposes of allowing players to access the online gaming and betting offer, and allowing the Site to fulfill its legal and contractual obligations;
- Cookies to improve the user experience: cookies that improve the user's online experience (preferences, etc.);
- Performance cookies: cookies that measure the Site's performance and the advertisements displayed on it;
- Cookies for advertising purposes: cookies that allow you to receive personalized advertisements and create a personalized profile so that you are not shown advertisements that do not correspond to your profile.

The use of cookies by the Site and its partners requires your consent, with the exception of essential cookies. You will find the list of cookies below. This list is non-exhaustive and is subject to change, with



the understanding that the Site will request your consent for all non-functional cookies.

8.2.1. Essential cookies

Cookies	Function	Length of storage
ASP.NET_SessionId	Management of the player's session	Session

Third-party cookies	Third Party	Function	Length of storage
__cfduid	Cloudflare	Cybersecurity prevention	29 days
didomi_token euconsent-v2	Didomi	Remember cookie consent information	15 min 1 year

Local storage	Function
i18nextLng	Remember the user's language for the site's content
ZD-suid ZD-store ZD-arturos ZD-buid	Manage the livechat, help center and access to support

8.2.2. Cookies to improve user experience

Local storage	Function
lastVisit	Remember the user's last visit to the site
searchHistory	Remember the history of searches made within the site
hasUserAlreadyLoggedIn	Remember the user's previous log ins to the site

8.2.3. Performance cookies

Third-party cookies	Third Party	Function	Length of storage
fs_uid	Fullstory	Visualize the player's experience during their Site visit	1 year
_gid _ga	Google Analytics	Remember a unique username and visits for statistical purposes	2 years



_dd_s	Datadog	Measure performance in real time. Fault detection	1 day
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Local storage	Function
_fs_uid	Visualize the player's experience during their Site visit

8.2.4. Cookies for advertising purposes

Currently, no information or cookies are used for this purpose.

8.3 - How can I identify and manage the cookies used by the Site?

Whether on your computer or your mobile phone, you are free to manage your consent preferences for the cookies used by the Site and its partners by configuring your cookies via the “Cookie settings” tab.

Please note that most browsers are configured to automatically accept cookies. You are free to set your browser to send you a notification when a cookie is used so that you can decide whether to accept it or not.

Browser (computer)	
Firefox	https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox
Chrome	https://support.google.com/chrome/answer/95647?hl=en
Safari	https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac
Internet Explorer	https://support.microsoft.com/en-us/topic/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d
Browser (mobile phone)	
Firefox	https://support.mozilla.org/en-US/kb/clear-your-browsing-history-and-other-personal-data
Chrome	https://support.google.com/chrome/answer/95647?hl=en
Safari	https://support.apple.com/en-us/HT201265
Microsoft Edge	https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

Please note it is also possible that third parties may use cookies to generate traffic without CIRCUSBET's Privacy Policy February 2024 –



consent. You can delete these cookies by directly contacting these third parties: [Hotjar](#), [Google](#) , [Fullstory](#), [Adform](#), [Heap.io](#), etc.

8.4 – Contact

8.4.1 Contact details of the Site manager

The Site is operated by CIRCUSBET SAS, which can be contacted for any questions relating to cookies and personal data protection:

By post: MSC GAMING – 25A Route de Longwy, 4832 RODANGE

(Luxembourg) By email: dpo@circuscasino.fr

The Circus Casino France Data protection officer can be contacted at the same address.

8.4.2. Contact details of the Data protection authority

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the law of 30 July 2018, you have the right to request additional information or make a complaint to the Data protection authority. Their contact details are: CNIL - Service des Plaintes - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.