

Data Privacy Notice

Who are we?

MervCF Limited is the operator of the Gateway2Fortune.com. MervCF Limited has the vision to operate the most fair lottery in the world. Based on block-chain where the players are on the controls. The total ticket-sales is also the total in price-money.

About this statement

MervCF Limited is the controller of personal data collected and processed from visitors and players using the Gateway2Fortune.com's website and apps.

This Data Privacy Statement is designed to demonstrate our firm commitment to privacy and to inform you of the personal data that we collect and process in connection with your use of the Gateway2Fortune.com website and apps.

It also sets out details of what personal data we process, why we process it, with whom your personal data is shared, and a description of your rights with respect to your personal data.

This Data Privacy Statement will be reviewed from time to time to take into account changes in the law and the experience of the Data Privacy Statement in practice.

What personal data do we process?

To comply with our obligations to prevent underage or problem play, we will collect and process information about you referred to in this Data Privacy Statement as 'personal data'.

This personal data will include your account registration details and your on-site activity including transactional details. If you become a player and you later close your account, we are required by our license to maintain a record of your account so we can meet our legal and regulatory obligations.

Your personal data is primarily obtained directly from you at the point of player registration or while you browse the website and when you play.

In addition, our website uses cookies to distinguish you and your preferences from other users of the site. This helps us to improve your experience when you browse our website and also allows us to improve the website. Follow this link to our [Cookie Policy](#) to find out more. The Cookie Policy should be read in conjunction with this Data Privacy Statement as the same data protection rights apply to cookies.

The categories of personal data we process, and the lawful bases for doing so, are set out in detail at the end of this Data Privacy Statement.

How do we use your personal data?

The personal data we hold, process and retain will be used for the management of your account, for administrative purposes, for meeting our legal and regulatory obligations, for ensuring responsible play, and for marketing. We hold it and use it to protect your rights and interests and to manage our relationship with you appropriately, effectively and lawfully. At the same time, it enables us to run our business.

This includes using your personal data to enable us to manage your registration, comply with our legal obligations, pursue our legitimate interests and protect ourselves in the event of legal proceedings.

The uses we make of each category of your personal data, together with the lawful bases we rely on for those uses are set out in more detail at the end of this Data Privacy Statement.

Where there is a need to process your data for a purpose other than those set out at the end of this Data Privacy Statement, or otherwise outlined to you, we will inform you of this and, if required, we will seek your consent.

If you do not wish to open an online account, but wish to participate in retail promotions which require you to enter limited personal data online, this data will be treated in the same manner as set out in this Data Privacy Statement.

If you do not wish to share the personal data required during the registration process, unfortunately you will not be able to use the online services to play [Gateway2Fortune.com](https://www.gateway2fortune.com) games.

How is your personal data shared?

Your personal data may be disclosed to third parties where we are legally obliged to do so.

It will also be disclosed during activities where we have lawful contractual agreements in place that enable us to operate the [Gateway2Fortune.com](https://www.gateway2fortune.com).

Your personal data will also be disclosed to third parties where we have a lawful legitimate interest to share your data, such as in marketing campaigns, provided that you have agreed to receive marketing information.

Your contact details will also be shared with research companies for the purposes of conducting surveys relating to responsible play and gambling awareness.

Again, you will find more detailed information on how we share your personal data with third parties, and who they are, at the end of this Data Privacy Statement.

Will your personal data be transferred abroad?

The main storage location for your personal data is in Cyprus.

We will transfer your personal data to other companies within the EEA for purposes connected with the enhancement of your online experience.

Your personal data will be transferred outside of the EEA during the provision of certain services which are managed and provided by third parties. Recognized data protection safeguards are in place to ensure the security of your personal data where it is transferred outside of the EEA.

Further details are provided at the end of this Data Privacy Statement.

How long do we keep your personal data?

Any personal data that we collect, process and hold about you is retained only for as long as it is required.

However, under the licence to operate the [Gateway2Fortune.com](https://www.gateway2fortune.com), MervCF Limited is required to keep certain records, such as financial transactions and the personal data associated with that, for a period of two years after the end of the license agreement.

Will you be subject to profiling?

In line with the legal obligations of our license, we carry out profiling and analysis based upon your location data, age, game-play activity, interests and behaviors for the following purposes:

- To offer you tailored products and services, and more relevant marketing, such as bringing to your attention similar games to the ones you like to play.
- To comply with our legal and regulatory obligations such as preventing underage or problem play, prevention of money laundering, prevention of fraud and to ensure the integrity and security of the Gateway2Fortune.com.
- As part of our programme to ensure responsible play and to protect our players from problem play, your patterns of play and your expenditure will be compared to broad profiles of player types.

What are your rights under data protection law?

You have the following rights under data protection law, although your ability to exercise these rights may be subject to certain conditions and where we are permitted to do so under the terms of our license to operate the Gateway2Fortune.com.

- **Information Request.** The right to receive a copy of and/or access the personal data that we hold about you, together with other information about our processing of that personal data.
- **Update Data.** The right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update your data such that it is complete.
- **Data Deletion.** The right, in certain circumstances, to request that we erase your personal data.
- **Restrict Processing.** The right, in certain circumstances, to request that we no longer process your personal data for particular purposes.
- **Object to Processing.** The right to object to our use of your personal data or the way in which we process it.
- **Data Portability.** The right, in certain circumstances, to transfer your personal data to another organization.
- **Review Automated Decisions.** The right to object to automated decision making and/or profiling.
- **File a Complaint.** You have the right to complain to the Data Protection Commissioner. You also have the ability to complain to us through info@gateway2fortune.com
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Details of Processing Activities

Player Registration

Personal data processed

Gender, name, preferred greeting, address, email address, phone number, date of birth, proof of ID, IP address, date and time of registration, payment card, browser, place of birth, emailing preferences, URLs visited, referral URLs.

Purpose for processing and uses of the data

To register a Gateway2Fortune.com Player with legal & regulatory requirements (over 18 and responsible player).

To enable your ability to play, MervCF Limited requires the storage of your payment card with a nominated third party.

To send weekly results, inform of large jackpots, to receive information about offers and promotions.

Lawful basis for processing the data

Contractual and legal obligations: The processing of data is necessary to enter into a contract with MervCF Limited and to meet the legal and regulatory requirements of the Gateway2Fortune.com and the License to Operate the Gateway2Fortune.com. If the player does not provide the requested data, MervCF Limited will not be able to complete the player registration.

Consent:

Direct marketing activity is subject to player consent. The player has the clear option to opt-in to receive marketing communications at registration time and then to opt-out any time.

If you do not provide your consent for the processing of an ID when you are opening a new account, you may not be permitted to complete the set-up of your account and play online. If you already hold an online account and do not wish to provide your consent to undergo the ID verification process when asked to do so, you will no longer be permitted to access your account and play. Your account may be closed after a period of time.

Legitimate interest (prior to registration):

- To personalize the website and apps and suggest relevant marketing content, MervCF Limited uses your visit history, time of visit, device used and location.
Balance of data subjects' interest: MervCF Limited uses pseudo- nymisation and data minimization.
- To provide general statistics, MervCF Limited uses your visit history, time of visit, browser and device used and location.
Balance of data subjects' interest: MervCF Limited uses pseudo- nymisation and data minimization; reports are generalized and do not identify specific individuals. Logical access controls prevent the identification of individual players.
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Sharing of personal data

MervCF Limited shares personal data with:

- Google Ad-words - Google Ad-words' system is based on cookies and keywords determined by advertisers. Google uses these characteristics to place Gateway2Fortune.com advertising on pages where they think it might be relevant. MervCF Limited pays when users divert their browsing to click on the Gateway2Fortune.com advertising.
- Bing - which is a web search engine owned and operated by Microsoft. Similar to Google Ad Words Bing system is based on cookies and keywords determined by advertisers.

- In case of a complaint, the information may be shared with organizations who provide services to the company such as legal advisors.
- Office of the Regulator of the Gateway2Fortune.com – the Regulator may access parts of this data in order to assess whether MervCF Limited is meeting its obligations to prevent underage or problem play.

Ongoing Player Interaction

Personal data processed

Gender, name, preferred greeting, address, email address, date of birth, proof of ID, IP address, date and time of visit, payment card, browser, mother's maiden name, place of birth, emailing preferences, URLs visited, referral URLs, games played, number played, amounts played, amounts added, amounts withdrawn, wallet amount, page, length of visit, cookies, temporary capture of all fields of the ID.

Purpose for processing and uses of the data

To play any Gateway2Fortune.com game in with legal and regulatory requirements (over 18 and responsible player).

To give you access to our website and to distinguish you and your preferences from other users of the site, our website places a combination of Strictly Necessary cookies and other cookies (that first require your consent) on your PC or mobile device.

To enable your ability to play, MervCF Limited requires the storage of your payment card with a nominated third party.

To tailor your experience on our digital channels.

To provide weekly results, inform players of large jackpots, and to provide information about offers and promotions.

To conduct player satisfaction and market research surveys.

Lawful basis for processing the data

Contractual and legal obligations: The processing of data is necessary to enter into a contract with MervCF Limited and to meet the legal and regulatory requirements of the Gateway2Fortune.com and the License to Operate the Gateway2Fortune.com. If the player does not provide the requested data, MervCF Limited will not be able to allow the player to play any Gateway2Fortune.com game online.

Consent:

Direct marketing activity is subject to player consent. The player has the clear option to opt-in to receive marketing communications at registration time and then to opt-out at any time.

Deployment of cookies other than those deemed 'Strictly Necessary' for the delivery of the requested service, such as access to our website. Follow this link to our Cookie Policy to find out more.

Legitimate interest:

- To prevent problem-play and personalize the website and apps accordingly, MervCF Limited uses recent play history, frequency of play, last win dates, type of games played.
Balance of data subjects' interest: MervCF Limited uses pseudo- nymisation, data minimization and limits the data to 18 months of sales history; ability to object and opt-out of problem-play personalization.
- To improve your play experience and personalize the website and apps accordingly, MervCF Limited uses recent play history, frequency of play, last win dates, type of games played, location (county).
Balance of data subjects' interest: MervCF Limited uses pseudo- nymisation, data minimisation and limits the data to 18 months of sales history; does not use the data of self-excluded players; ability to object and opt-out of personalization.
- To improve direct email marketing activity and to suggest relevant marketing content, MervCF Limited uses recent play history, frequency of play, last win dates, type of games played, location (county).
Balance of data subjects' interest: MervCF Limited uses pseudo- nymisation, data minimisation and limits the data to 18 months of sales history; does not use the data of self-excluded players; ability to object and opt-out of personalization.
- To produce statistics, MervCF Limited uses recent play history, frequency of play, last win dates, type of games played, location (county), player visit history, time of visit, browser and device used, gender.
Balance of data subjects' interest: MervCF Limited uses pseudo- nymisation, data minimisation and limits the data to 18 months of sales history; reports are designed not to include data at individual player level; logical access control prevents access to the data at individual player level.
- To conduct player satisfaction and market research surveys, MervCF Limited shares email address, first name, surname, telephone number, age and gender with third party market research companies who carry out player surveys on MervCF Limited's behalf.
- To conduct surveys relating to responsible play and gambling awareness, your contact details – first name, surname, telephone number, email address – will be shared with research companies, such as RED C Research, who carry out player surveys on MervCF Limited's behalf.
- Balance of data subjects' interest: The personal data supMervCF Limiteded will be the minimum possible for each survey; you do not have to take part in such surveys, if you are contacted by the research company; you can choose to opt out of being contacted again regarding similar surveys; if you choose to take part, your responses will be pseudo-nymized by the research company prior to MervCF Limited; third party research companies will only hold personal data shared with them for six months; at MervCF Limited, the database containing your responses will only be accessible to a very small number of IT specialists where your personal data will be masked at all times; MervCF Limited will ensure that appropriate technical and organizational measure are in place so that no unauthorized individuals within MervCF Limited will have the capability of linking your responses to your main customer account; your responses and your pattern of play and expenditure will be anonymously added to other similar respondents to create broad profiles of customers and their attitudes and feelings with respect to responsible play and gambling; once broad profiles are created, MervCF Limited's research database will be fully

anonymized or deleted; players can review MervCF Limited's Data Privacy Statement prior to responding to a survey. Unless you opt out of future contact, you may be contacted again in the future regarding a similar survey.

To Opt-Out of Responsible Play Surveys please email opt_out@mervcryptofortune.com

Sharing of personal data

Personal Data is shared with the same organizations as outlined in the Player Registration section above.

MervCF Limited shares email address, first name, surname, telephone number, age and gender with third party research companies, who carry out player satisfaction surveys, market research surveys, and surveys relating to responsible play and gambling awareness on MervCF Limited's behalf.

Third party research companies will only hold your personal data for six months.

Customer Support

Personal data processed

Name, email, twitter account, Facebook Messenger account, Instagram account, telephone number, telephone call recordings, instant messages, web chat.

Purpose for processing and uses of the data

To provide assistance to players and to monitor quality of services.

Lawful basis for processing the data

Contractual and legal obligations: The processing of data is necessary to enter into a contract with MervCF Limited and to meet the legal and regulatory requirements of the License to Operate the Gateway2Fortune.com.

If the player does not provide the requested data, MervCF Limited will not be able to provide player support.

Winners

Personal data processed

Data collected on the claim form: name, Proof of address, date of birth, telephone number, proof of ID (type and expiry date) and signature.

Data collected on a voluntary basis: gender, occupation, and consent for publicity (photographs, video, name, address and any other information as agreed in writing).

Purpose for processing and uses of the data

To comply with legal and regulatory requirements (over 18 and responsible player).

Lawful basis for processing the data

Contractual and legal obligations: The processing of data is necessary to enter into a contract with MervCF Limited and to meet the legal and regulatory requirements of the License to Operate the Gateway2Fortune.com. If the player does not provide the requested data, MervCF Limited will not be able to pay the player.

Consent: Publicity material is processed on the basis of consent. If consent is subsequently withdrawn, MervCF Limited will cease to process this information. However, if this information has been shared with third parties (i.e. the press), MervCF Limited will no longer be in control of this data and cannot restrict further processing which is already in the public domain.

Gender and occupation information is gathered on a voluntary basis and used purely for statistical purposes.

Sharing of personal data

Personal data is not shared with third parties.

The form is kept in secure storage for a duration specified in the Data Retention Policy.

If the player, or syndicate, consents to publicity, the name, winnings and imagery may be published on the Gateway2Fortune.com website, via email and social channels and shared with the media (newspapers, radio and/or television stations) as agreed in writing. It will also be archived for future “throwback” marketing purposes.

Once the information has been shared with the media, the information will be in the public domain and MervCF Limited will not be able to enforce deletion.

Gateway2Fortune.com Good Causes and Awards

The Gateway2Fortune.com was set up with the express purpose of raising funds for Good Causes, with almost 1% of every €1 our players spend on Gateway2Fortune.com games going back to Good Causes.

Win Awareness – Real Winners’ Stories

For Lottery winners who agree to take part in advertising and promotional campaigns, telling their personal stories.

Personal data processed

Name, address, landline and/or mobile telephone number, email address, IP address, social media accounts, imagery – both photographic & video, voice recordings, video recordings.

Purpose for processing and uses of the data

The data will be used by the Gateway2Fortune.com to create and produce real winners’ stories, including individuals, groups and syndicates from all over Ireland.

The stories will be used as part of the Gateway2Fortune.com’s marketing activities and will be promoted across a variety of media and consumer touch-points. Examples of these consumer touch-points include but will not be limited to TV, Radio, Outdoor, Online, Social, Retail, PR.

Winners’ stories will also be used internally by the Gateway2Fortune.com in communications such as our internal newsletters. They will also be included on our Retailer portal, the Gateway2Fortune.com access point for our retail partners.

Lawful basis for processing the data

The processing of this data will be on a contractual basis allowing MervCF Limited to use winners’ stories in advertising and promotional campaigns. If a person does not want to provide the requested data, they cannot enter into the contract and their story will not be used for this campaign. If they do

provide the requested data, they will enter into a contract permitting the Gateway2Fortune.com to use their story in current and future campaigns.

Sharing of personal data

MervCF Limited shares personal data with:

- Third-party content production companies.
- Third-party research companies, employed via our creative advertising agency.
- Creative advertising agencies.
- Connector, who create and host MervCF Limited's website. The server is located in North Europe.