



Betika Zambia Website and Mobile App Privacy Policy

1. Introduction and general terms

This privacy policy is used to inform visitors of our website and all variants thereof, including our mobile app (our **Channels**) of our policies on the collection, use, and disclosure of Personal Information and data collected from visitors of our website. At Betika we are committed to protecting and respecting your privacy and maintaining the confidence and trust of our customers and visitors to our Channels.

This Policy explains how and why your Personal Information is collected, through the use of our Channels, why it is collected and how it is kept secure.

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which are accessible at www.betika.co.zm, unless otherwise defined in this Privacy Policy.

This policy should be read and applied together with our General Terms and Conditions which are available at www.betika.co.zm

2. Collection of Information

We collect your personally identifiable information when you interact with us or use our services in any of the following ways (this list is not exhaustive):

- i. visit, access or use any of Betika's services, events, business premises and our Channels;
- ii. subscribing or registering for our services and products, including but not limited to; betting and gaming services offered at www.betika.co.zm, promotional offers, tournaments and competitions;
- iii. participating in any of Betika's platforms, for example; discussion boards on our site or social media platforms, entering a promotion or survey organized by us, reporting a problem with our mobile app, site, service or product or asking for more information on a service or product;
- iv. when you interact with us as a supplier, agent, merchant or dealer of Betika's services; and
- v. we may also collect your information from third party sources, including but not limited to fraud prevention agencies and marketing agencies. The collection of data from third parties shall be notified to you beforehand or as soon as practicable after the collection of the data.

3. Information we collect

The information we collect and store about you when you interact with us, as described, above may include, but is not limited to, the following:

- i. **Personal Information** - we may collect personal information when you register for or use our services, which information may include; your name, ID number, age, mobile number, address, date of birth, email address, username, password, or CCTV images when you visit our premises, social media profiles, personal preferences collected in surveys and recordings;
- ii. **Technical information**; including the type of mobile device you use, unique device identifiers such as internet protocol (IP) address of your computer or smart phone, or your device's IMEI or serial number or SIM card number of your non-smart phone or feature phone, your login information, browser type and version, time zone settings, browser plug-in types and versions, operating system and platform, information about the SIM card used by your device and mobile network information;
- iii. **Financial information**; including your transaction information when you withdraw from or deposit into your Betika account, information we obtain from fraud prevention agencies, Anti-Money Laundering agencies and any government regulator;
- iv. **Log information** including details of your use of any of our Channels; including, but not limited to, traffic data, location data, weblogs and other communication data;
- v. Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our App, system and network (including date and time); services or products you viewed or searched for or requested; page response times, download errors, length of visits to certain pages, page interaction information and any phone number used to request a service or call our customer service number; and
- vi. **Location information** using GPS technology or other location finding services to determine your current location.

4. Use of your Information?

We recognize the trust and confidence our customers and our Channels' visitors place in us as a service provider. In return, Betika is open about why we collect your information. We may use your information for the following purposes (this list is not exhaustive):

- i. to carry out our obligations arising from any agreements entered into between you

- and Betika and to provide you with the information, products and services that you request or agree to receive from us;
- ii. marketing activities to notify you about changes to our services and products, keeping you informed about new products and services, unless you opt out of receiving marketing messages;
 - iii. to comply with any legal or regulatory requirements;
 - iv. understanding your use of our services to ensure that content from our Channels is presented in the most effective manner for you and for your computer, your mobile phone or other device you use to access our Channels;
 - v. to respond to any of your queries;
 - vi. to administer our Channels and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - vii. to improve our Channels;
 - viii. to allow you to participate in interactive features of our services and products, when you choose to do so;
 - ix. in business practices like quality control and training;
 - x. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver (with your consent), relevant advertising to you;
 - xi. providing aggregated data (this data is anonymized) to third parties for research and scientific purposes; and
 - xii. the information we collect from third parties enables us to offer you the services under any agreement entered into with Betika.

5. Lawful Basis for processing your information

In compliance with the Data Protection Act No 3 of 2021 (the “**DPA**”) as amended from time to time and international data protection laws, we will only process your information in accordance with any of the lawful basis provided for under these laws, which include:

- i. the performance of an agreement with you;
- ii. Betika’s legitimate business interests or that of a third party, except where our interests are overridden by your interests or fundamental rights and freedoms, which require protection of your personal data;
- iii. compliance with any mandatory legal obligations;
- iv. your consent;
- v. your vital interests or that of another natural person; and
- vi. public interest or in the exercise of official authority that is vested in Betika as a data controller.

6. Retention of Information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements or any obligations to you under an agreement with Betika. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, the need to comply with our internal policy and the applicable legal, regulatory, tax, accounting or other requirements.

Anonymized information that can no longer be associated with you may be held indefinitely.

7. Disclosure of Information

Any disclosure of your information shall be in accordance with the provisions of the DPA and attendant regulations enacted under the DPA.

We may disclose your information to:

- i. law-enforcement agencies, regulatory authorities, courts or other statutory authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the law;
- ii. our subsidiaries, associates, partners, merchants or agents who are involved in delivering Betika products and services you subscribe to or use;
- iii. fraud prevention and anti-money laundering agencies;
- iv. publicly available and/or restricted government databases to verify your identity information in order to comply with regulatory requirements;
- v. survey agencies that conduct surveys on behalf of Betika; and
- vi. any other person that we deem legitimately necessary to share the data with.

We will obtain your express consent before we share your personal data with any third party for direct marketing purposes.

8. Direct Marketing

- i. You may be required to opt in or give any other form of explicit consent before receiving marketing messages from us.
- ii. You can ask us to stop sending you marketing messages at any time by writing to us or checking or unchecking relevant boxes to adjust your marketing preferences or by

following the opt out links on any marketing message sent to you or by contacting us through the provided contacts.

- iii. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product, service already taken up, product or service experience or other transactions.

9. Cookies

Cookies are files with a small amount of data that are commonly used by an anonymous unique identifier. These are sent to your browser from our Channels that you visit and are stored on your phone/computer. We use cookies for the following purposes:

- i. to identify the user's preferred language, so it can be automatically selected when the user returns to our Channels;
- ii. to ensure that bets placed by the customer are associated with the customer's bet slip and account;
- iii. to ensure that the customer receives any bonuses for which they are eligible, and
- iv. for analysis of our Channels' traffic, so as to allow us to make suitable improvements.

You have the option to either accept or refuse these cookies, and know when a cookie is being sent to your phone/computer. If you choose to refuse our cookies, you may not be able to use some features of our Channels.

10. Access to and Updating your Information

To access, correct or update your information, send an email to support.zm@betika.com.

11. Safeguarding and Protection of Information

Betika has appropriate measures in place to help ensure that our users' Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction, cyber-crime and accidental loss. Although we make reasonable efforts as a service provider to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the internet. Betika shall take reasonable and appropriate technical and organizational measures against the unauthorised or unlawful deliberate interference to a Customers' personal data, and endeavor to notify the user of any security compromise, as soon as reasonably practical.

12. International Data Transfers

From time to time, we may need to transfer your personal information outside Zambia.

Where we send your information outside Zambia, we will make sure that your information is properly protected and the transfer is undertaken in accordance with the requirements of the applicable Data Protection Laws including the DPA and the E.U. GDPR.

13. Your Rights

Subject to legal and contractual exceptions, you have rights under data protection laws in relation to your personal data. These are listed below:

- i. right to be informed that we are collecting personal data about you;
- ii. right to access personal data that we hold about you and request for information about how we process it;
- iii. right to request that we correct your personal data where it is inaccurate or incomplete;
- iv. right to request that we erase your personal data noting that we may continue to retain your information if obligated by the law or entitled to do so;
- v. right to object and withdraw your consent to processing of your personal data. We may however continue to process your personal data if we have a legitimate or legal reason to do so;
- vi. right to request restricted processing of your personal data noting that we may be entitled or legally obligated to continue processing your data and refuse your request; and
- vii. Right to request transfer of your personal data in an electronic format.

If you wish to exercise any of the rights set out above, please contact us on support.zm@betika.com.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within a reasonable time. Occasionally it could take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. Help Contribute to the protection of your Information

You can help maintain the security of your personal information by:

- i. not sharing your phone number, ID number, account password or betting patterns (such as amounts and time) with anyone;
- ii. changing your account password regularly;

- iii. remembering to sign off after visiting our Channels;
- iv. helping Betika maintain accurate and updated records by letting Betika know when changes occur in your situation, so that Betika can update its records accordingly;
- v. not sending any confidential information via non-encrypted e-mail; and
- vi. not supplying your personal information to any site you do not know or trust.

15. Right to Lodge Complaint

You have the right to lodge a complaint with the relevant supervisory authority that is tasked with personal data protection within Zambia.

16. Non-Compliance with this Statement

Betika shall have the right to terminate any agreement with you for failure to comply with the provisions of this Privacy Policy and its Terms and Conditions and reject any application for information contrary to this Privacy Policy.

17. Amendments to this Statement

You should check our Channels frequently to see our recent changes to this policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of user information collected in the past without the consent of affected customers.