

# Privacy Policy

## 1 – OUR COMMITMENTS

Your privacy is a priority for FDJ.

We are committed to building a relationship of trust with our clients and to protecting the privacy of visitors and users of our services, in accordance with the amended French Data Protection Act of 6 January 1978 and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR).

As such, we respect the following principles:

- We collect the data we need;
- We process your data for explicit, legitimate and determined purposes;
- We keep your data for the period necessary to carry out the processing for which it was collected or, where applicable, for the period determined by law;
- We only share your data with the companies of the FDJ® Group and service providers who need to know within the framework of our activities;
- We ensure that appropriate security measures are implemented to ensure a high level of protection for your data.

Our Privacy Policy aims to inform you transparently about how we collect and use your data, and about your rights.

Our Privacy Policy applies to all of our sites, applications, lottery and sports betting offers at point of sales (hereinafter referred to as "our Offers").

By using our Offers, you declare that you accept the terms of this Policy. This Policy is subject to change at any time, so we invite you to check this page regularly.

## 2 – WHAT DATA DO WE COLLECT?

When using or consulting our Offers, we are required to collect:

- The data you provide to us directly, in particular when you create your online account, complete a contact form or play our online games. This data may include your first name, last name, date of birth, email address, postal address, bank details, complaints, gaming history, etc.;
- The data we obtain indirectly, including through cookies or trackers (and subject to your choices) when you browse our websites and app or are exposed to one of our advertisements on third-party sites. This data may include, for example, your login and browsing details, IP address, preferences and interests, etc.

When you fill out a form, the data accompanied by an asterisk (\*) is mandatory and required for processing of your requests.

## 3 – HOW DO WE USE YOUR DATA?

### **3.1 Management of your online account and business relationship**

We use the information about you for the purposes of managing your player account and for monitoring our business relationship.

FDJ® is legally obliged to verify that the data provided by its players is accurate, complete and, if necessary, updated. We may therefore be required, at any time, to ask you to verify the conformity of your information and/or to complete it.

The banking information you provide to us is processed for the purposes of managing transactions for your online account. Your bank details (IBAN) are used for the sole purpose of allowing the payment of prizes won and the payment of the sums in your balance to your bank account. Subject to your prior consent, your credit card data may be stored in order to save you from have to re-enter this information for each payment you make to fund your player account. You can, at any time, view and delete your credit cards stored in your player account by going directly to the "*My Profile - My Personal Data - My Payment Methods*" section of your player account. Each transaction is processed by our PCI DSS-certified online payment service provider (international security standard to ensure the confidentiality, security and integrity of credit card and transaction data).

In order to ensure the best monitoring and quality of service, we also process your data as part of the management of your requests and complaints made to our Customer Service Department. In this context, we may also record your telephone communications with our advisors. We can also analyse the requests made by our clients on our different contact channels (for example, telephone, email, social media, application stores, etc.) in order to improve the operational processing of these requests and to enable us to have a more global vision of the reasons for satisfaction, dissatisfaction, contacts and complaints from our clients.

### **3.2 Information, commercial offers and newsletters**

Depending on your choices, you may receive communications relating to FDJ Offers and news or proposals to participate in studies relating to the development of our products and services. You may, at any time, decline receiving our offers and news or change your choices by visiting the "*My Profile - My Newsletters*" section of your player account or by using the unsubscribe link at the bottom of each of our communications.

Subject to your prior agreement, you may also receive offers and updates from our partners. You can change your choices at any time by going to the "*My Profile - My Newsletters*" section of your player account.

### **3.3 Instant messaging**

In order to support and improve the client relationship, we may implement – on all or part of our Offers – an instant messaging service allowing us to assist you, particularly during your registration process.

This service uses JavaScript cookies and scripts. These are files placed and run on your computer. They allow us to:

- obtain information about our visitors' activity regarding our Offers, and
- when you contact our client advisors via our instant messaging, to allow them to view your real-time browsing in order to provide you with appropriate assistance.

You can disable these cookies at any time by following the instructions in paragraph 7.3.1 "*How can you exercise your choices directly from our sites and apps?*" of the Privacy Policy. However, we hereby inform you that said disabling may prevent the use of certain functionalities related to our Offers.

The data collected, generated and stored as part of this service (notably, IP address and history of discussions with our advisors) is intended for FDJ for client relationship management, internet navigation support and registration support. Said data is retained for one year from its collection.

### **3.4 Social media**

We are able to collect some of your information when you browse our brand pages on social media or when you use social media services integrated in our Offers (for example, authentication functionality). We mainly use this data to provide you with personalised and social experience, to improve our quality of service and for advertising purposes.

However, we have no control over the use of your data by social media for their own purposes. We therefore invite you to consult the personal data protection policies of said social media.

### **3.5 FDJ® applications**

The data collected in connection with your use of our mobile applications is necessary for managing your online account and our business relationship, as well as for the customisation of our services, studies and statistics.

When you use our applications, some of your data may also be collected by the operating system publisher of your mobile device (iOS or Android). We invite you to consult the privacy policies of these publishers so that you are aware of how they use of your data for their own purposes.

We also offer you, in some of our apps, to option of connecting via Facebook Connect. In this context, permission to access certain information, such as your Facebook profile or list of friends, will be requested in order to provide you with a personalised and social experience.

Depending on the configuration of your mobile device and the permissions granted when downloading our applications (accepting or declining push notifications, geolocalization, etc.) you may benefit from personalised and possibly geo-adapted commercial services and offers. The geolocalization functionality may require the activation of other features such as Wi-Fi or Bluetooth for it to function correctly. You can disable these push notifications and/or access to your location data at any time, directly from our apps or through your mobile device settings.

In order to allow you to access some of our applications, we locate your mobile device from your IP address to determine your country of connection. This request follows the guidelines of some operating system publishers that only allow access to some of our applications from certain countries, namely mainland France, overseas departments, overseas territories (with the exception of Wallis and Futuna, and French Polynesia) and Monaco.

### **3.6 Personalisation of Services and Online Advertising:**

Subject to your choices, the data collected may also enable us to determine your player profile and offer you personalisation of your user experience, offers tailored to your interests or promotions and/or e-credits according to your gaming habits. You may, at any time, object to the personalisation of communications or promotions sent to you by visiting the "My Profile – My Newsletter – My Personalised

Recommendations" section or in the "My personal data – My Subscriptions – Offers and Personalised Services" section of your player account.

From data such as your age group or centres of interest, we can create profiles:

- in order to display advertisements on our site or on third-party sites that best match your interests.
- in order to be able to send advertisements, through partners, to people with a profile similar to yours (for example: identifying people who may be interested in the same categories of games or bets).

### **3.7 Studies and statistics**

We may process your data for statistical or study purposes in order to develop our products and services, and customise our relationships. In this context, your data may be combined with other statistical or aggregated data from different third-party sources (in compliance with the French Data Protection Act).

### **3.8 Fight against fraud, money laundering and terrorist financing**

In accordance with our legal obligations regarding the fight against fraud, money laundering and terrorist financing, we must carry out various checks on the personal data you provide to us when you register and/or win more than an amount defined by law. In addition, this process also allows us to ensure a high level of security for your data, particularly with regard to fraud, identity theft, and payment security. As such, we ask you to provide us with a copy of your ID and bank details in order to verify the consistency of the information entered in your player account with the information on these documents. This check allows us to set aside any discrepancy between the data and/or to limit any risk related to the documents (for example documents presenting a risk of tampering). Depending on the type of error and/or the level of risk identified by our services, different measures may be implemented (for example, we may suggest that you correct your data for a simple input error, or, where a risk of fraud appears likely or proven, we may block or close your online account).

### **3.9 Fight against excessive gambling**

In order to combat excessive gambling, we provide you with a tool to assess your gaming habits. Your gaming habits are then evaluated on the basis of risky game indicators, such as reinvestment of all prizes won, progressive increases in stakes and time spent gaming, etc. The information is provided in the form of a coloured dot (green, yellow, red) and a message concerning the evaluation of your gaming habits. If a "red" status is assigned, we suspend commercial prospecting that you have subscribed to.

In addition, in accordance with our legal obligations, we are required to verify that people subscribed to our gambling Offers are not included on the list of persons banned from gambling, managed by the French Ministry of the Interior.

Finally, as part of our responsible gaming actions, we may be asked by approved research organisations to carry out research on preventing excessive gambling. As such, we may be required to share gaming data relating to our Offers, in accordance with the ethics and regulations applicable to personal data. This may include completely anonymised data or personal data when you have given your consent for this. For more information on studies and research in progress, please visit our [responsible gaming space](#).

### 3.10 Data transfer

You are hereby informed that some of the data and information about you may be transmitted by FDJ® to countries outside the European Union.

These transfers are carried out in accordance with the legal requirements and recommendations of the French data protection agency, *Commission Nationale Informatique et Libertés (CNIL)*, and may in particular be subject to a specific legal framework in order to ensure a high level of protection and security for your data and information.

#### 4 – WHO ARE THE RECIPIENTS OF YOUR DATA?

The data collected on our offers is intended exclusively for FDJ®. However, they may be sent to FDJ® Group companies, sub-contractors (within the limits necessary for the performance of the tasks entrusted to them) or, subject to prior authorisation from you, to partner companies.

We require our subcontractors to apply strict rules vis-à-vis the protection of personal data in accordance with applicable laws and regulations, both French and European.

When you make a payment to the e-wallet for the FDJ® account via PayPal, the data related to the transaction is processed exclusively by PayPal under the conditions defined in its [Privacy Policy](#).

. FDJ® may transmit your data to PayPal in the following cases:

- at the time of payment: in order to pre-complete your email address on the connection screen to the PayPal website, and
- if you use the PayPal "Dispute Manager": to prove, if necessary, that you have made a payment to your wallet following a transfer via PayPal

We may also transmit your data to any competent authorities or bodies, including the French *Service Central des Courses et Jeux (SCCJ)* and the French gaming regulatory authority (ANJ).

In this context, we inform you that the ANJ, as the regulatory authority for gambling activities under exclusive rights, as well as online gaming or bets, is likely to process this data to carry out the tasks defined by law No. 2010-476 of 12 May 2010 relating to the opening to competition and regulation of the online gaming sector, particularly vis-à-vis the fight against excessive gambling, as described [here](#).

#### 5 – WHAT ARE THE DATA RETENTION PERIODS?

Purposes	Retention period
Data required for the management of your online account and the fight against fraud, money laundering and terrorist financing	6 years from the closure of your player account (legal obligation)
Data required for commercial prospecting	1 year from last contact
Data required for the management of promotional operations	5 years (legal time limit)
FDJ® cookies and trackers	Maximum of 13 months

In addition, certain financial data may be kept for a maximum period of 10 years from the end of the financial year, in accordance with the statutory limitation period applicable for accounting practices.

## **6 – IS YOUR DATA PROCESSED SECURELY?**

We ensure that appropriate technical, physical and organisational control measures are implemented to ensure the security and confidentiality of your data, including to protect said data against loss, accidental destruction, alteration and unauthorised access.

However, we recommend that you protect the password of your player account and that you do not communicate it to anyone. If you suspect that your account is being misused, please inform us as soon as possible by contacting our Customer Service Department.

Moreover, your payment information is managed by our PCI DSS-certified online payment service provider (international security standard to ensure the confidentiality, security and integrity of credit card and transaction data).

## **7 – WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

In accordance with the legal and regulatory provisions applicable to personal data, you have the right of restriction of processing, to object, access, amend or delete your personal data. You can exercise your rights upon simple written request by completing our form: [How can I exercise my personal data rights and freedoms?](#)

For more information on personal data and your rights, you can also visit the website of the French data protection agency, [Commission Nationale de l'Informatique et des Libertés](#):

## **8 – APPLICABLE LAW AND JURISDICTION**

This Privacy Policy is governed by French law and shall be interpreted and enforced in accordance with said law. Any dispute concerning its interpretation or performance shall be submitted to the Commercial Court of Nanterre.