

PRIVACY POLICY

1. Introduction

Boulevard Success E.E. – Marketing & Advertising Services, having its registered office at 254 Petrou Ralli Street, 18454 Nikaia, Attica, Greece (hereinafter the “Company”), is committed to protecting personal data and processing it in accordance with Regulation (EU) 2016/679 (the “GDPR”), Greek Law 4624/2019, and applicable Greek and European legislation.

This Privacy Policy (hereinafter the “Policy”) explains what personal data may be collected or processed through the Company’s online gaming and contest platform (hereinafter the “Platform”), the purposes for which such data are processed, the legal bases for processing, the applicable retention periods, and the rights of data subjects.

This Policy is supplemented by the Company’s **Cookie Policy**, which specifically governs the use of cookies and similar technologies.

2. Data Controller

The Data Controller is:

Boulevard Success E.E. – Marketing & Advertising Services

254 Petrou Ralli Street, 18454 Nikaia, Attica, Greece.

For matters relating to personal data protection, users may contact the Company through the contact details published on the Platform.

3. Scope

This Policy applies to the processing of personal data in connection with:

- the use of the Platform and its games;
- participation in contests;
- the submission and recording of scores;
- communication with participants;
- the selection and communication of winners;
- the awarding and delivery of prizes;
- the prevention of fraud and abusive activities;
- the security and technical operation of the Platform;

- the handling of user requests and communications; and
 - compliance with legal obligations.
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4. Basic Principles of Processing

The Company applies the principles set out in the GDPR, including the principles of lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

The Company processes only data that are necessary and appropriate for the specific and legitimate purposes for which they are collected.

5. Categories of Personal Data

5.1 Participation Data

Users may **start and complete the game without first providing any contact information.**

After completing the game, if a user wishes to record and submit their score for participation in the relevant contest, they will be asked to enter their email address and select the relevant submission button or command.

Providing an email address is not a prerequisite for starting or simply playing the game. It may, however, be necessary for submitting a score, registering participation in the contest and communicating with the participant in connection with the contest.

The Platform does not currently require users to create a permanent user account or password.

5.2 Contest Data

In connection with the conduct of a contest, the following data may be recorded:

- score;
- ranking;
- date and time of participation;
- information relating to completion of the game;
- information required for the application of the contest rules; and
- information required for the selection and verification of winners.

5.3 Technical and Security Data

For the operation, security and technical support of the Platform, the following information may be collected or recorded, to the extent necessary:

- User Agent;
- technical log files;
- connection information;
- device and browser information;
- IP address or technical data derived from it, including technical identifiers that may be generated through appropriate technical processes, such as hashing; and
- other technical data necessary for the security, integrity and proper operation of the Platform.

Such data may be used to detect suspicious activity, technical problems, abusive activities and attempts to compromise the security or integrity of the contest.

5.4 Fraud Prevention and Abusive Participation

The Company may process technical and other strictly necessary data to detect or prevent:

- multiple or abusive participation;
- the use of bots, scripts, macros or other unauthorised automated means;
- alteration or manipulation of scores;
- the use of unauthorised software;
- unauthorised access;
- cyberattacks;
- exploitation of technical errors or vulnerabilities; and
- other actions that may compromise the proper and secure conduct of a contest.

In the event of a violation of the applicable rules, the Company may, in accordance with the applicable Terms of Participation, cancel a participation or score, exclude a participant, revoke winner status, or take other necessary and proportionate measures.

5.5 Participant Eligibility Checks

In order to safeguard the integrity and proper conduct of contests, the Company may process strictly necessary data for verifying the eligibility of participants and winners.

Persons who, under the applicable Terms of Participation, are excluded from participation or from receiving a prize are not eligible. Such persons may include employees, collaborators, representatives or other persons involved in the organisation, operation, management or promotion of the contest, as well as persons directly connected with them, as further specified in the applicable Terms of Participation.

Such data may be used to verify eligibility, prevent conflicts of interest and safeguard the integrity of the contest.

5.6 Winner and Prize Data

For the awarding of cash prizes, identification information and information necessary to make the payment or comply with tax, accounting or other legal obligations may be requested.

The Company may request proof of ownership of a bank account or an equivalent document. The winner may redact information that is not necessary for the specific purpose.

For digital gifts, prepaid cards or vouchers, only the information strictly necessary for their delivery or transmission may be collected.

5.7 Communications

When a user contacts the Company, the Company may process the user's email address, the content of the communication and any other information that the user chooses to provide.

5.8 Promotional Activities and Partners

As part of promotional activities, the Company may use distinct URLs for individual partners or influencers, which lead to the same Platform content, in order to measure, on an aggregate basis, traffic originating from each collaboration.

This measurement may be carried out through an aggregate numerical visit counter and is used exclusively for the Company's internal evaluation of the effectiveness of the relevant promotional activity.

At the time of issuance of this Policy, this mechanism:

- is not linked to a specific user;
- is not linked to a specific device;
- is not linked to a specific user session;
- is not linked to participation in a contest;
- is not linked to a score or ranking;
- is not used to identify or profile individual users; and
- does not require the storage of or access to information on the user's device.

This functionality does not constitute a mechanism for personalised user tracking.

For further information regarding the use of cookies and similar technologies, the Company's **Cookie Policy** applies.

If, in the future, a different mechanism is introduced that enables visits, devices, participation or other data to be associated with a specific partner or influencer, the Company will update this Policy and, where required by applicable law, implement the necessary information and consent procedures.

5.9 Minors and Special Categories of Data

Participation in contests is permitted exclusively to persons aged 18 or over.

The Company does not intentionally seek to collect special categories of personal data within the meaning of Article 9 GDPR.

6. Purposes of Processing

Personal data are processed for the following purposes:

1. operating and providing the services of the Platform;
 2. conducting games and contests;
 3. submitting and recording scores;
 4. communicating with participants and winners;
 5. selecting and verifying winners;
 6. awarding cash prizes and digital gifts;
 7. verifying eligibility;
 8. preventing fraud and abusive participation;
 9. maintaining the security and integrity of the Platform and contests;
 10. internally evaluating promotional activities through aggregate measurement of traffic sources;
 11. complying with legal obligations; and
 12. providing technical support and, where necessary, improving the Platform.
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7. Legal Bases for Processing

7.1 Performance of a Contract

Processing may be necessary for the provision of the Platform's services and for participation in a contest in accordance with the applicable Terms of Use and Terms of Participation.

7.2 Legitimate Interests

The Company may rely on its legitimate interests as a legal basis for processing, in particular for:

- the security of the Platform;
- the prevention of fraud and abusive activities;
- safeguarding the integrity of contests;
- addressing technical or malicious incidents; and

- where applicable, internally evaluating promotional activities through aggregate measurement of traffic sources.

The Company assesses and balances its legitimate interests against the rights and freedoms of data subjects.

7.3 Legal Obligation

Where required by applicable law, personal data are processed for compliance with the Company's tax, accounting or other legal obligations.

7.4 Consent

Where required by applicable law, the Company requests prior consent, in particular for optional cookies or other technologies requiring prior consent, as well as for optional marketing communications.

Consent is voluntary and may be withdrawn at any time, without affecting the lawfulness of processing carried out before its withdrawal.

8. Recipients of Personal Data

Personal data may be disclosed, to the extent necessary for the purposes described above, to:

- authorised employees and collaborators of the Company;
- hosting and technical support providers;
- email service providers;
- cloud service providers;
- cybersecurity and technical service providers;
- providers supporting the conduct of contests or the awarding of prizes;
- public or administrative authorities where there is a legal obligation to disclose the data;
- professional advisers or service providers where necessary for the establishment, exercise or defence of legal claims or compliance with legal obligations; and
- third parties in connection with corporate restructuring, merger or transfer of business activities, where permitted and required.

Third parties processing personal data on behalf of the Company shall, where applicable, act as processors in accordance with Article 28 GDPR.

9. International Transfers

Where the transfer of personal data outside the European Economic Area is necessary, the Company will take appropriate measures and implement the safeguards provided for under the GDPR to ensure that such transfers are carried out lawfully.

10. Data Retention

Personal data are retained only for as long as necessary for the purpose for which they were collected or for as long as required by applicable law.

Participation and contest data are retained for as long as necessary for the conduct and completion of the contest, verification of the results and handling of any disputes or challenges.

Winner data are retained for as long as necessary for the awarding of the prize and compliance with applicable tax, accounting or other legal obligations.

Technical and security data are retained for the period necessary for the relevant security, fraud-prevention and proper-operation purposes.

When data are no longer necessary, they are deleted or anonymised, unless further retention is required by law.

11. Security

The Company implements appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, alteration or other unlawful processing.

Such measures are implemented taking into account the nature of the data, the risks associated with the processing and the available technical and organisational means.

12. Data Subject Rights

Data subjects may, subject to the conditions and limitations provided for under the GDPR, exercise the following rights:

- the right of access to their personal data;
- the right to rectification of inaccurate or incomplete data;
- the right to erasure;
- the right to restriction of processing;
- the right to object to processing;

- the right to data portability, where applicable; and
- the right to withdraw consent, where processing is based on consent.

The exercise of these rights may be subject to the conditions and exemptions provided for under applicable law.

13. Cookies and Similar Technologies

At the time of issuance of this Policy, the Platform uses **only strictly necessary cookies**, which are necessary for its secure and proper operation and, where applicable, for the management and maintenance of the user session.

At the same time, the Platform does not use optional cookies for statistical analysis, commercial or advertising targeting purposes.

For further information regarding the use of cookies and similar technologies, please refer to the Company's separate **Cookie Policy**.

14. Automated Decision-Making and Profiling

The Company does not make decisions that produce legal effects or similarly significantly affect users solely by automated means within the meaning of Article 22 GDPR.

Automated technical tools may be used to detect suspicious activity, fraud, abuse or violations of contest rules.

The use of such technical mechanisms for security purposes and for safeguarding the integrity of a contest is not intended to create user profiles for advertising or commercial purposes.

15. Changes to the Policy

The Company may amend or update this Policy, in particular where there are changes to applicable legislation, the services or functionality of the Platform, or the manner in which personal data are processed.

In the event of material changes, the Company will take appropriate measures to inform users, where required.

The current version of this Policy will be published on the Platform.

16. Contact and Right to Lodge a Complaint

For any matter concerning the processing of personal data or the exercise of their rights, data subjects may contact the Company through the contact details published on the Platform.

Without prejudice to any other administrative or judicial remedy, data subjects also have the right to lodge a complaint with the competent supervisory authority, in particular the **Hellenic Data Protection Authority (HDPa)**, if they consider that the processing of their personal data infringes applicable law.

17. Relationship with the Platform Terms

The use of the Platform and participation in contests are governed by the applicable Terms of Use and Terms of Participation, which supplement this Policy.

Where a particular contest is subject to specific terms, such specific terms shall apply in addition, to the extent that they are consistent with applicable law and this Policy.