

This is an automated translation, its purpose is merely informative. Only the documents in the official languages of the State are legal.

PRIVACY POLICY

The company WEDGE GROUP SARL processes personal data ("Data") as part of its activity, which includes the Data of people who use the services of the WEDGE application "the Application".

Concerned about the rights of individuals, particularly with regard to automated processing, and in a desire for transparency with Users of the Application and its Partners, the company WEDGE GROUP SARL has implemented a confidentiality policy ("Policy") covering the all of these processing operations, the purposes pursued by them as well as the means of action available to individuals so that they can best exercise their rights.

The company WEDGE GROUP SARL may modify or supplement its Policy at any time, in particular with a view to complying with any legislative, regulatory, jurisprudential or technological developments.

1. Definitions

"Personal data" or personal data is any information relating to an identified natural person who can be identified directly or indirectly from this data.

The term "Processing" means operations or sets of operations relating to Personal Data, regardless of the process used.

The "Service" describes the services offered by the company WEDGE GROUP SARL.

2. Data controller - Data Protection Officer

The company WEDGE GROUP SARL is responsible for processing Data collected directly or indirectly from Customers of the Service, Users of the Site and its Partners.

To benefit from the Application Services, the communication of certain information is mandatory. Failure to communicate this data will result in it being impossible for the company WEDGE GROUP SARL to process the request for the provision of a Service or information on this Service.

Customer and User Data:

Customer, User and Partner Data are collected:

- via the Application.

As part of the collection activities mentioned, the company WEDGE GROUP SARL collects the following data:

- identification data (for users of the Application): last name, first name, email address, date of birth, date of registration of the User, email address, pseudonym, encrypted password, gender, visibility of user bets/bids in bids, user-created bets, bids placed, number of bids and tokens, internet protocol, IP address, device type, including screen resolution, size and density, name, operating system version and language of the device, marketing ID (IDFA or GAID), whether authorization has been granted, store identification (e.g. Game Center ID or Google Play ID), date and time of access to the application, amount of data transmitted, access status (e.g. success or loading error), duration and frequency of use of the app.

The company WEDGE GROUP SARL collects User Data for:

- **Processing n°1 – Execution of the contract:** Main purpose of the processing: carrying out processing relating to the provision of the Services and their security.

Personal data: surname, first name, email address, date of birth, date of registration of the User, email address, ID and username, encrypted password, gender, visibility of bets/auctions of users in bids, user-created bets, bids placed, number of bids and tokens, internet protocol, IP address, device type including resolution, screen size and density, system name, version and language operating status of the device, marketing ID (IDFA or GAID), whether authorization has been granted, store identification (e.g. Game Center ID or Google Play ID), date and time the application was accessed, amount of data transmitted, status of access (e.g. success or loading error), duration and frequency of use of the app.

- **Processing n°2 - Billing:** Main purpose of processing: management of payments benefiting the company WEDGE GROUP SARL.

Personal data: name, first name, date and place of birth, email address, correspondence with the customer.

- **Processing No. 3 – Legal obligations:** Main purpose of processing: compliance with applicable legal obligations and compliance.

Personal data: first name, last name, ID and username, country of registration, details of the bets you use, full name, age and date of birth (if given), email address, order history and payment information , all communications with support, team, ban history and reasons.

- **Processing No. 4 – Messaging - Complaints management:** Main purpose of processing: management of complaints and after-sales service, and management of unpaid debts and disputes.

Personal data: Name, first name, address, email address, IP address, message content, date and time of sending.

- **Processing no. 5 - Newsletter:** Main purpose of processing: timely information on new developments concerning the WEDGE Application
Personal data: Name, first name, email address.

- **Processing n°6 – Promotion of WEDGE GROUP SARL services:** Main purpose of processing: promotion of WEDGE GROUP SARL services to its users.

Personal data: Name, first name, address, email address.

3. What are the security and confidentiality measures put in place by the company WEDGE GROUP SARL?

The company WEDGE GROUP SARL is concerned with preserving the quality, confidentiality and integrity of the personal and confidential Data of its Users. It implements all technical and organizational measures to ensure the security of the processing of personal data and the confidentiality of personal data.

As such, the company WEDGE GROUP SARL takes all necessary precautions, taking into account the nature of the data and the risks presented by the processing, in order to prevent them from being modified, damaged, or from unauthorized third parties having access to them. access (physical protection of premises, authentication processes with personal and secure access via confidential identifiers and passwords, logging of connections, encryption of certain data, etc.).

WEDGE GROUP SARL maintains physical, electronic, software security measures and procedures relating to the collection, storage and communication of Users' personal information. Security procedures could lead WEDGE GROUP SARL to ask the User to prove their identity before being able to communicate their personal information. Persons with access to Personal Data are bound by a duty of confidentiality.

However, despite its best efforts to protect Personal Data, the company WEDGE GROUP SARL cannot guarantee the infallibility of this protection against any error that may occur during the transmission of Personal Data, given the inevitable risks of transmission by Internet and which escape any reasonable possibility of control.

4. Communication of Data to Third Parties

The Data will never be communicated to third parties other than in the cases provided for in this Policy. Personal data may be disclosed to a third party if the company WEDGE GROUP SARL is obliged to do so by law or by a regulatory provision or if this disclosure is necessary in the context of a legal request or litigation procedure.

5. Who is the Data intended for?

Within the limits of their respective responsibilities and for the purposes mentioned above, the main people likely to have access to User data are the employees of the company WEDGE GROUP SARL in charge of carrying out the services. To carry out these missions and facilitate the processing of Data, particularly in terms of carrying out analyses, the company WEDGE GROUP SARL uses several subcontractors, including the companies Google Ads, Google Pay InApp, RevenueCat, SendGrid.

These subcontractors are required to process requests in accordance with this Policy. They are neither authorized to sell them nor to disclose them to other third parties.

6. Transfer of Data outside the European Union?

The company WEDGE GROUP SARL undertakes to comply with the applicable regulations relating to data transfers to foreign countries and in particular according to the following terms:

- the company WEDGE GROUP SARL transfers the personal data of its Users to countries recognized by the CNIL as offering an equivalent level of protection.
- the company WEDGE GROUP SARL transfers the personal data of its Users outside countries recognized by the CNIL as having a sufficient level of protection: In this case, the company WEDGE GROUP SARL acts in accordance with the standards required by the General Protection Regulations data and the Data Protection Act.

7. How long is the Data kept?

The company WEDGE GROUP SARL retains the Data, for each of the processing operations set out in this Policy, only for the duration necessary in view of the purpose pursued by the corresponding processing.

- Processing n°1 – Execution of the contract - Retention period: for the duration of the contractual relationship then 5 years from the termination of the relationship with the Client or User.
- Processing n°2 – Invoicing - Retention period: 10 years from the close of the financial year to which the invoices relate.
- Processing no. 3 – Legal obligations - Retention period: conversation for the period provided for by applicable law or regulation.
- Processing n°4 - Claims management - Messaging - Duration of retention: conversation for the time necessary for the management of the dispute after knowledge of a dispute, until the action is prescribed.
- Processing n°5 - Newsletter - Retention period: for customers for the duration of the contractual relationship to which is added a period of three years (or until unsubscription from the Newsletter), for people who are not customers for three years (or until they unsubscribe from the Newsletter)
- Processing n°6 – Promotion of WEDGE GROUP SARL services - Retention period: for WEDGE GROUP SARL customers for the duration of the contractual relationship to which is added a period of three years, for people who are not WEDGE customers GROUP SARL for three years.

8. Use of cookies exclusively during the visit to the site

To allow Users of the site to benefit from the services offered, the site uses Cookies. The User must have previously given their consent by a clear positive act before any cookies are placed. You can deactivate these cookies at any time, free of charge, using the deactivation options offered and recalled below.

What are cookies and what are they used for?

When consulting the site, information relating to the navigation of the customer's terminal (computer, tablet, smartphone, etc.) on the site may be recorded in text files called "Cookies", installed on their browser. Cookies will be used to recognize your browser during the validity period of the cookie concerned. Only the issuer of the cookie concerned is likely to read or modify the information contained therein.

Cookies allow:

- To measure and analyze attendance and use of the site, its sections and services offered, allowing WEDGE SARL to carry out studies and improve the interest and ergonomics of the site and services,
- To memorize the browser's display preferences (language used, display parameters, operating system used, etc.) and to adapt the presentation of the site during visits, depending on the viewing or reading hardware and software that the terminal contains and which are used for navigation on the site.
- To memorize information relating, for example, to a form completed by the User or to a service (registration, access to their account) or selected information (subscribed services).
- To allow access to reserved and personal areas of the site or Services, such as the personal account, using identifiers or personal data concerning the User and previously communicated,
- To put in place security measures.

Cookies placed by a third party on spaces?

The website of the company WEDGE GROUP SARL may contain Cookies issued by third parties (performance measurement tool, audience measurement company, etc.) allowing the latter, during the validity period of their Cookies to collect navigation information relating to browsers visiting the site. At any time, the User can prevent the collection of information concerning him via these third-party cookies, by clicking on the corresponding links (see the chapter "Management and use of cookies"). The issuance and use of Cookies by these companies are subject to their own conditions of use.

Sharing the use of your device with others

If the customer's terminal is used by several people and when the same terminal has several navigation software, the company WEDGE GROUP SARL cannot ensure with certainty that the services intended for this terminal correspond to the own use of the customer and not that of another User of this terminal. Sharing with other people the use of the terminal and the configuration of browser settings with regard to Cookies is the free choice and responsibility of the customer.

Management and use of website cookies

The User can manage and modify the use of cookies at any time according to the possibilities mentioned below.

Management of cookies from the browser software: The User can configure their browser software so that Cookies are saved in their terminal or rejected, either systematically or depending on their issuer. In accordance with applicable regulations, any prospecting by email, SMS or MMS will only be carried out with the prior consent of the customer to receive prospecting via the paper or electronic registration form on the Site. Each of the prospecting emails will offer the possibility of objecting to the processing of data for prospecting purposes by clicking on a link allowing you to unsubscribe. At any time and free of charge, the User may object to any prospecting by other means by contacting the company WEDGE GROUP SARL via the email address: [support@wedge.vip].

9. Use of third-party programs when visiting the site

9.1. GOOGLE ADS: WEDGE GROUP SARL uses Google Ads to offer you personalized advertising. These advertisements allow you to collect tokens, which you can use within the application. Our goal is not only to provide a friendly user experience, but also to expand the functionality of the p Application for our users.

Purpose and method of data processing: Google Ads shows you advertisements based on your past interactions, usage behavior and preferences.

This personalized advertising aims to provide you with relevant and interesting offers, which makes using the application more attractive for you.

Processing your data allows us to present you with advertisements that are better suited to your needs and thus offer you more effective tokens for using the application.

Protection of minors: We take the protection of minors very seriously and take steps to ensure that advertisements served by Google Ads are appropriate for minors and their ages.

Our application is not intended for children and adolescents under the age of 18 and we do not authorize or instruct the use of the application to persons under the age of 18. We have not verified the age of users, but we do not knowingly collect personal information from children.

We recommend that parents and guardians monitor their children's online activities...

Google privacy information: For detailed information on data collection, processing and use of data by Google Ads, we refer you to Google's privacy policy, which you can consult at <https://policies.google.com/privacy>

Google offers various options for managing your data protection settings that allow you to control how your data is used for advertising purposes.

Legal basis for data processing: Data processing by Google Ads is based on a legitimate interest in accordance with Article 6(1)(f) GDPR. This interest lies in the effective provision of our services and paragraph 1 letter f of the GDPR. This interest lies in the effective provision of our services and the possibility of making additional tokens available to you through advertising. Your consent to the processing of your data is implied by the continued use of the application and by viewing advertising.

Duration of retention and processing of data: The data collected by Google Ads will be retained for the period necessary for the provision of advertising services and the achievement of the objectives associated therewith.

We are committed to protecting the data collected and ensuring that it is only used for the purposes specified.

Your rights and control: As a user of our application, you have different rights regarding the processing of your data. These include the right of access, rectification, erasure and restriction of data, as well as the right to cancellation, rectification, deletion and restriction of the processing of your personal data.

You also have the right to object to the processing of your data at any time, in particular if you do not agree with the type of advertising or the use of your data for advertising purposes.

9.2. GOOGLE PAY INAPP—PURCHASES: WEDGE GROUP SARL offers the possibility of purchasing tokens via Google Play In", This function allows additional purchases.

Processing of in-app purchase data: Purchase data: When you make an in-app purchase through Google Play, certain information is transmitted to us by Google Play in order to complete the purchase.

This information includes your username, purchase act, user name, date of purchase, amount of purchase, and the specific content or tokens purchased.

Purpose of data processing: The data transmitted is used exclusively for the execution of the purchase, the provision of the purchased content or tokens and invoicing.

We also use this information to ensure that you have access to the content or tokens you have purchased and to respond to support requests regarding your purchases of content or tokens and to process support requests regarding your purchases.

Legal basis: The processing of this data is based on the execution of a contract in accordance with Article 6(1) of the Data Protection Act.

The processing of this data takes place on the basis of the execution of the contract in accordance with Article 6(1)(b) GDPR, given that the processing of the data is necessary for the provision of the purchased services.

Retention period: The data is kept for as long as necessary for the execution of the purchase and the provision of the purchased services.

In addition, the data is stored in accordance with legal retention obligations and current legislation.

Data protection and security: We take all necessary measures to ensure the security and protection of your data in connection with the security and protection of your data in connection with the purchase of applications.

Your data will be treated confidentially and will not be passed on to third parties, unless this is necessary for the execution of the purchase or pursuant to legal provisions.

User rights: You have the right to obtain information about the data stored about you and to correct, erase or limit the processing.

You also have the right to object to the processing of your data at any time.

Cooperation with Google Play: We would like to inform you that Google Play has its own data protection regulations which apply to the processing of your data during the purchase procedure.

For more information, we recommend that you review the Google Play privacy statement.

By using the in-app purchase option in our application, you declare that you accept the processing of your data within the framework described. Our aim is to offer you a safe and comfortable purchasing opportunity while respecting your data protection rights.

9.3. USING REVENUECAT: Our app uses RevenueCat as powerful middleware for optimizing and managing purchases and subscriptions through Google Play. These purchases and subscriptions are made through Google Play. This integration allows us to provide a seamless shopping experience while simplifying the management of subscriptions and user transactions.

Extensive data processing by RevenueCat: RevenueCat not only collects and processes transaction data, but may also collect information on usage behavior in connection with purchases made, as well as information on usage behavior in relation to purchases made. This may include tracking statistics and patterns of usage and utility in order to evaluate and improve the effectiveness of our offerings.

Adaptation and personalization: The data collected by RevenueCat allows us to personalize and adapt the in-app shopping experience. We can thus offer offers and content that are personalized and adapted. This allows us to provide offers and content that better match your interests and needs.

RevenueCat Privacy Statement: RevenueCat has its own data protection policy which describes how the company collects, processes and protects data.

RevenueCat's data protection declaration is available at <https://www.revenuecat.com/privacy>. This statement gives you detailed information about RevenueCat's data processing procedures.

Data Use and Disclosure: RevenueCat uses collected data to help us manage in-app purchases. RevenueCat may use this data for internal analysis purposes to improve its services. The data will not be communicated to third parties, unless this is necessary for the provision of the service or if required by law.

Security Measures and Data Protection Obligations: RevenueCat is committed to taking reasonable security measures to protect your data against loss, misuse and unauthorized access.

We work closely with RevenueCat to ensure that your data is processed in accordance with applicable data protection laws and data protection standards.

Collaboration with Users: We recognize that you may have questions about RevenueCat's processing of data. We strive to communicate transparently and respond to all your requests in this context.

You can exercise your data protection rights at any time, including the right to access, rectify, erase your data or object to certain rectifications, deletions of your data or certain processing activities.

Work Activities: The integration of RevenueCat into our application is an essential part of our commitment to providing you with an efficient and enjoyable shopping experience. We always strive to protect your privacy and offer your data securely. We always strive to protect your privacy and treat your data securely and responsibly.

9.4. USING SENDGRID FOR EMAIL COMMUNICATION: For sending emails as part of our "XXXX" services, we use SendGrid, a renowned provider of email communications and marketing solutions. SendGrid helps us develop marketing and communication. SendGrid helps us ensure effective and reliable electronic communication with our users and ensure effective and reliable communication with our users.

Processing of email data by SendGrid: SendGrid processes email addresses and other relevant information, addresses and other relevant information necessary for sending and handling emails on our behalf. This concerns in particular the content of the messages. This includes the content of the email, the date and time of sending, recipient interaction data, the date and time of sending, as well as Recipient interaction data with emails (such as opens and clicks).

Data processing includes the technical execution of sending e-mails, the analysis of sending, the analysis of user behavior as well as the optimization of our relations with users and the optimization of our communication by emails.

Purpose of data processing: Using SendGrid allows us to send you personalized and relevant information, whether in the form of newsletters, notifications or specific service communications.

It is also used to analyze and optimize our email campaigns in order to improve and make our communication with you more relevant.

Legal basis: The processing of your email data via SendGrid is done on the basis of your consent (article 6, paragraph 1, point a) GDPR) or our legitimate interest in efficient and effective communication (art. 6, para. 1, let. to GDPR)).

SendGrid privacy statement: For information on how SendGrid processes and protects your data, we refer you to the SendGrid data protection statement, which you can view at [https://www.twilio.com /legal/privacy](https://www.twilio.com/legal/privacy)

SendGrid strives to maintain high standards of data protection and is committed to protecting data.

Retention period and distribution: Data processed via SendGrid is retained for as long as necessary to achieve the stated purposes or until you revoke your consent.

Your data will be used exclusively for the aforementioned purposes and will not be passed on to third parties without your express consent.

Your rights: You have the right to obtain information about the data you have stored with us, to correct it or to delete it. You also have the right to rectify or delete the processing of your data. You also have the right to object to the processing of your data and to revoke your consent to data processing.

To exercise your rights or for any other questions regarding data processing by SendGrid, you can contact us at any time.

The use of SendGrid in our "XXXX" application reflects our commitment to providing you with professional and secure email communication. We are committed to protecting your communication. We take the protection of your personal data seriously and take all necessary measures to protect this impersonal data and to process it in accordance with current legislation.

10. What are the rights of Users?

Each time WEDGE GROUP SARL processes Personal Data, all reasonable measures are taken to ensure the accuracy and relevance of the Personal Data with regard to the purposes pursued by the processing.

In accordance with Law 78-17 of January 6, 1978 as amended and the general Data Protection Regulation (EU) of April 27, 2016, the User and more generally the person whose data is collected also has the following rights:

Right of access (article 15 of the GDPR)	In all cases
Right of rectification (article 16 of the GDPR)	In all cases
Right to erasure (article 17 of the GDPR)	Solely for processing which is not based on compliance with a legal obligation, the execution of a mission in the public interest, a mission for archival purposes, or necessary for the establishment, exercise or to defend a right in court.
Right to limit processing (article 18 of the GDPR)	In all cases
Right to object to processing (article 21 of the GDPR).	Solely for processing operations which do not have as legal basis the execution of the contract or the exercise of a legal obligation.
Right to data portability (article 20 of the GDPR)	Only for processing based on consent, on the performance of a contract or if the processing is carried out using automated processes
Right to lodge a complaint with the CNIL	In all cases
Right to withdraw consent at any time, without affecting the lawfulness of processing based on consent given before withdrawal of consent	Only when the processing is based on the consent of the data subject to the processing of their personal data for one or more specified purposes

The exercise of these rights, to which a copy of the identity document has been attached, can be carried out by writing to the Data Controller at the following e-mail address: [support@wedge.vip] or by post to address: WEDGE GROUP SARL, 20 rue du Vully, in Neuchâtel (2000), SWITZERLAND.