

Privacy Policy

Version 1.0 as of 01 December, 2025

This Privacy Policy (the “**Policy**”) explains how personal data is collected, used, stored, disclosed, and protected when you (“**You**”, “**User**”) access or interact with the platform <https://1win.cash/> (hereinafter referred to as the “**Platform**”).

This Policy applies to all users of the Platform and describes how personal data is handled in connection with Platform operations.

We the entity operating the Platform acts as the Data Controller (“**We**”, “**Company**”, “**Us**”, “**Our**”), meaning it determines the purposes and means of processing personal data in accordance with applicable data protection laws, including:

- Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR);
- Applicable national legislation on personal data protection;
- Other relevant privacy or data protection regulations.

By accessing or using the Platform, or by voluntarily providing personal data through registration or other available features, you acknowledge that you have read and understood this Policy. If you do not agree with this Policy, please refrain from using the Platform or providing personal information.

This Policy provides information regarding:

- The types of personal data collected;
- The purposes and legal bases for processing personal data;
- How personal data may be shared and with whom;
- Users’ privacy rights under applicable laws;
- Security measures implemented to safeguard personal data;
- Data retention, anonymization, and deletion practices;
- Handling of personal data in connection with Platform operations.

This Policy may be updated from time to time to reflect changes in legal obligations, technical developments, or data handling practices. The most recent version will always be available on the Platform, and users are encouraged to review it periodically.

This Policy is drafted in English. Translations into other languages are provided for convenience only. In the event of any conflict between the English version and a translation, the English version shall prevail.

1. PERSONAL DATA WE COLLECT

The Platform collects personal data depending on how you access our services, interact with the interface, communicate with our team. Data is obtained from three sources: information you

provide directly, data collected automatically, and data supplied by third-party partners who assist in delivering the Platform's services.

All data is processed strictly for the purposes outlined in this Policy and in line with applicable international data-protection standards.

1.1. Data You Provide Directly

You may choose to provide certain information when engaging with the Platform, submitting forms, or interacting with our support channels. This may include:

1.1.1. Identification and Contact Information

- Email address;
- Telephone number (if any)
- Username or display name (if provided);
- Telegram contact or other messenger profile details (if provided).

1.1.2. Player and Communication Data

- Any content voluntarily submitted through contact forms, support requests, or chat interactions;
- Information provided when requesting account-related assistance, clarifications through support channels.

1.1.3. Marketing and Messaging Consent

We send emails or messenger communications only to Users who have explicitly granted consent through a clearly marked, non-pre-selected checkbox ("single or double opt-in"). Each message includes:

- a link to this Policy;
- an unsubscribe option (except where messages are transactional or legally required). You may withdraw your consent at any time.

1.2. Data Collected Automatically

When you access or use the Platform, certain technical data is collected automatically to maintain service integrity, ensure security and optimize performance. This may include:

- **IP address**, network provider, and approximate geolocation;
- **Device and browser data**: operating system, language settings, device identifiers;
- **Cookies and similar technologies** used for analytics, session management, and performance tracking;
- **Usage information**: pages visited, navigation paths, time spent, and interaction logs;
- **System diagnostics**: crash logs, error reports, and performance statistics.

This data helps operate the Platform securely, prevent fraud, detect restricted-jurisdiction access attempts, and enhance user experience.

1.3. Data From Trusted Third Parties

Certain data may be supplied to us by external parties that assist in providing services. They do not access the Platform's internal analytics, technical usage data, or other personal data unrelated to the Platform-related inquiries. They act solely as intermediaries on behalf of the User and do not assume responsibility for the overall data processing of the Platform.

1.3.1. Technical and Anti-Fraud Providers

We may receive data from:

- hosting and CDN providers;
- analytics and security services;
- monitoring tools that detect irregular abnormal behaviour, or suspicious login activity.

These sources help maintain Platform stability and strengthen applicable controls.

2. PURPOSE OF PROCESSING

We collect and process personal data for specific, lawful purposes directly related to the operation, security, and regulatory compliance of the Platform. All data processing activities are limited to what is necessary to provide services and ensure the integrity of the Platform.

2.1. Service Provision and Account Management

- To create, maintain, and manage user Accounts on the Platform;
- To process registration information and verify identity where required;
- To respond to user inquiries and requests submitted through support channels or contact forms;
- To facilitate communication with Users regarding Platform updates, service information, or account notifications, in accordance with consent provided.

2.2. Security, Fraud Prevention, and Monitoring

- To detect, prevent, and mitigate unauthorized or suspicious activity on the Platform;
- To apply automated risk scoring and monitoring tools to identify abnormal system usage;
- To investigate potential fraud, abuse, or technical anomalies;
- To ensure the overall stability, performance, and security of the Platform.

2.3. Legal Compliance

- To comply with legal obligations;
- To verify the identity of Users and monitor for regulatory purposes;
- To protect the Platform's legitimate interests, including dispute resolution and risk management.

2.4. Platform Analytics and Optimization

- To analyze aggregated and anonymized usage data to improve Platform performance and user experience;
- To evaluate traffic patterns, and feature utilization;
- To support internal research for Platform enhancement;
- To generate statistical reports for internal decision-making, platform development, and trend analysis.

2.5. Prevention of Restricted Access

- To prevent access by minors or individuals located in prohibited jurisdictions;
- To block or suspend Accounts that attempt to bypass access controls or violate Platform rules;
- To maintain the Platform's compliance with applicable regulatory requirements.

3. LEGAL BASIS FOR PROCESSING

We process personal data on one or more of the following lawful bases, depending on the context and purpose:

3.1. Consent. Where you have given clear and informed consent, such as agreeing to receive non-transactional emails or other communications. Consent can be withdrawn at any time.

3.2. Contractual Necessity. To perform obligations under your agreement with the Platform, including account management and facilitation of the Platform.

3.3. Legal Obligation. To comply with applicable laws and regulations.

3.4. Legitimate Interests. To operate and improve the Platform, ensure security, prevent fraud, maintain system integrity, and conduct analytics, provided these interests do not override your fundamental rights and freedoms.

3.5. Automated Decision-Making. Some processing, such as automated risk scoring or fraud detection, may involve automated decision-making for security and regulatory purposes. You have rights to challenge or request review of such automated decisions, where applicable.

4. DATA SHARING AND DISCLOSURE

We may share your personal data in a limited and lawful manner to provide services, ensure security, comply with legal obligations, and maintain the integrity of the Platform. We may share your data with:

4.1. Our affiliated companies. We may share data with our affiliated companies for purposes related to the operation and support of the Platform.

4.2. Internal Processing. Authorized Platform personnel may access data for account management, support, security monitoring, analytics, and operational purposes.

4.3. External Service Providers. Data may be shared with trusted third-party providers supporting hosting, IT, analytics, payment processing, or security. Providers process data solely on the Platform's instructions and maintain adequate safeguards.

4.4. Authorities, Regulators, and Law Enforcement. We may disclose data to regulators or law enforcement where required by law, licensing obligations, or legal process.

4.5. Business Transfers. In mergers, acquisitions, or asset sales, personal data may be transferred as part of the transaction while maintaining protections consistent with this Policy.

4.6. In other cases, with your explicit consent. Personal data may be transferred to third parties in other cases only with your explicit consent.

5. INTERNATIONAL DATA TRANSFERS

5.1. Your personal data may be transferred and processed in countries outside your jurisdiction, including locations where data protection laws may differ from those in your country.

To ensure appropriate protection, the Platform implements safeguards such as:

- **Hosting Locations.** Data may be stored on servers located in multiple jurisdictions. All hosting providers are bound by contractual and technical measures to ensure data security.
- **Cross-Border Processing.** Transfers of personal data to service providers located abroad are conducted only for operational, security, or regulatory purposes.
- **Safeguards.** Where required, transfers are protected by legally recognized mechanisms, including:
 - Standard Contractual Clauses (SCCs) approved by competent authorities;
 - Transfers to jurisdictions recognized as providing adequate data protection;
 - Internal policies and agreements ensuring that data is used solely for the purposes outlined in this Policy.

5.2. All international transfers are conducted in compliance with applicable data protection laws and licensing obligations.

6. DATA RETENTION AND ERASURE

The Platform retains personal data only for as long as necessary to fulfill the purposes for which it was collected, including legal, regulatory, accounting, or reporting obligations, and to support legitimate business interests. Once these purposes no longer apply, and in the absence of legal or contractual requirements, data is securely deleted or irreversibly anonymized.

6.1. Standard Retention

- User account information, registration data, and communication records are retained for operational purposes only as long as the Account is active.
- Once the Account is closed or inactive, personal data is deleted or anonymized, unless other obligations require continued retention.

6.2. Regulatory Retention

- Certain data related may be retained beyond standard retention periods to comply with regulatory requirements.

- These retention periods are set in accordance with applicable laws, regardless of deletion requests.

6.3. Deletion and Anonymization Requests

- Users may request deletion or anonymization of their personal data, subject to legal or contractual limitations.
- Data may remain if:
 - Retention is necessary to protect the Platform's or third parties' legitimate interests, resolve disputes, investigate issues, or enforce agreements;
 - Data has been anonymized and can no longer be linked to a specific individual;
 - Continued retention is required for regulatory compliance.
- All deletion or anonymization actions are carried out securely in accordance with industry standards and applicable laws.

7. USERS' RIGHTS

7.1. You have the following rights regarding your personal data, enabling transparency and control over its processing:

- **Right to Access.** Request information about the data we hold, its purposes, categories, and recipients. You may receive a copy, subject to legal exceptions.
- **Right to Rectification.** Request correction of inaccurate, incomplete, or outdated data. We will update information where reasonable.
- **Right to Erasure.** Request deletion of data when no longer necessary for its collection purposes, when consent is withdrawn, or when required by law. Retention may continue if needed for AML/CTF, legal obligations, or legitimate interests.
- **Right to Restrict Processing.** Request limitation of processing where data accuracy is contested, processing is unlawful but you prefer restriction, or you object to processing pending assessment of legitimate interests.
- **Right to Object.** Object to processing based on legitimate interests or for direct marketing purposes. We will assess objections and cease processing unless compelling grounds exist to continue.
- **Opt-Out from Marketing.** You may withdraw consent or unsubscribe from marketing and non-transactional communications at any time via the links provided in messages or by contacting support. Transactional messages necessary for service provision are not subject to opt-out.
- **Right to Data Portability.** Request your data in a structured, machine-readable format, or have it transferred directly to another organization where feasible. Applies to data provided by you and processed via consent or contract.
- **Right to Lodge a Complaint.** If you believe that we have infringed your rights, you have the right to complain to the local Data Protection Authority.

7.2. To exercise any of these rights, contact us as described in Section 12. Requests will be handled promptly, in accordance with applicable laws.

8. COOKIES AND TRACKING TECHNOLOGIES

Cookies and similar tracking technologies are small text files stored on your device (computer, smartphone, or tablet) when you access the Platform. They help recognize your device, enhance functionality, and support operational, analytical, and security purposes.

8.1. Purpose of Cookies and Tracking

We use cookies and tracking technologies to:

- **Essential Cookies.** Enable core Platform functions, session management, and secure access;
- **Analytics Cookies.** Monitor Platform usage, traffic patterns, and performance metrics for optimization;
- **Anti-Fraud and Security Cookies.** Detects irregular activity, prevents unauthorized access, and supports compliance.

8.2. Cookie Control

- You may manage or disable cookies via your browser or device settings;
- Disabling certain cookies may affect Platform functionality or limit access to some features;
- Consent is required for cookies beyond essential operation, where applicable under local laws.

9. DATA SECURITY MEASURES

9.1. We implement technical and organizational measures to protect the confidentiality, integrity, and availability of your personal data, including:

- **Encryption and Secure Protocols.** Data is transmitted using industry-standard encryption and secure communication channels;
- **Access Control and Authentication.** Strict access rights, authentication procedures, and role-based permissions limit data access to authorized personnel only;
- **Monitoring and Security Assessments.** Continuous monitoring, vulnerability testing, and regular security reviews are conducted to detect and mitigate risks;
- **Staff Training and Confidentiality.** All personnel handling personal data undergo training and are bound by confidentiality obligations.

9.2. While we strive to protect your data, no internet transmission or storage method is completely secure. You are responsible for maintaining the confidentiality of your login credentials and any access details provided to you.

10. AGE AND JURISDICTION CONSIDERATIONS

10.1. The Platform does not knowingly collect or process personal data from users who have not reached the age of majority in accordance with applicable law.

10.2. Personal data of users attempting to circumvent age limits may be blocked or deleted in accordance with this Policy and applicable laws.

11. CHANGES TO THIS POLICY

11.1. The Platform may update this Policy from time to time to reflect changes in operations, legal requirements, or Platform functionality.

11.2. Updates take effect immediately upon posting on the Platform.

11.3. Users are encouraged to review the Policy periodically. Continued use of the Platform after updates constitutes acceptance of the revised Policy.

11.4. Changes may include updates to the types of data collected, processing purposes, data sharing practices, retention periods, or users' rights.

11.5. The Platform remains committed to transparency and compliance with applicable data protection laws at all times.

12. CONTACT INFORMATION AND DISPUTE RESOLUTION

12.1. If you have any questions, requests, or complaints regarding your personal data or this Policy, you may contact us via the email address **support@1win.cash** or through the communication tools available on the Platform.

12.2. Reasonable efforts will be made to respond to all requests or complaints promptly and in accordance with applicable data protection laws.

12.3. Any disputes related to the processing of personal data will, where possible, be resolved through informal communication and mutual agreement.

12.4. If informal resolution is not possible, disputes will be addressed in accordance with applicable laws of the Company's place of incorporation, as well as any regulatory requirements