PRIVACY POLICY

Last Updated: November 7, 2026

1. GENERAL

As a data controller, We have a legal obligation under gambling regulations to process personal data from players in order to allow them to participate in games and provide them with ancillary services. This Privacy Policy explains what personal data We collect from players, why We collect it, how We process it, as well as your data privacy rights.

The website www.giraboom.bet ("Website", "Company", "We", "Us", "Our") is owned and operated by GT7 LTD, a limited liability company registered in Beliz with company registration number 000044449, and its registered address at 123 Barrack Road, Belize City, Belize District of Belize ("Company"). Giraboom.bet is licensed and regulated by the Government of the Autonomous Island of Anjouan, Union of Comoros and operates under License No. ALSI-202504041-FI2.

With respect to this Privacy Policy and Your data privacy rights, please contact Us at support@giraboom.bet.

By registering a Player Account with the Website you confirm your consent with this Privacy Policy. If you do not agree with the terms of this Privacy Policy and do not wish to provide us with the personal information We require, please do not use this Website.

Please note that this Privacy Policy constitutes an agreement between you and the Company, along with the Terms and Conditions and any other legal documents listed on our Website, as may be amended from time to time. Your continued use of the Website and/or its services will constitute your consent to the Privacy Policy.

2. INFORMATION WE COLLECT

We collect information from you in two distinct categories:

- Personal Information

The first category of information We collect is referred to as Personal Information, which identifies or can reasonably identify an individual with reasonable effort ("Personal Information").

The Personal Information collected and processed may consist of the following categories:

a) Identity Data: This encompasses the first name, middle name, last name, username or similar identifiers, date of birth, and gender.

b) Contact Data: This includes residential address, email address, telephone numbers, and other available communication methods.

c) Financial Data: Details regarding salary, wealth, sources of deposited funds, bank account information, payment card details, and relevant documentation collected for KYC (Know Your Customer) purposes.

d) Transaction Data: Information regarding deposits, withdrawals, wagers, and game details.

e) Technical Data: This encompasses IP addresses, login data, device technology details, and platform usage.

f) Marketing and Communications Data: Preferences for receiving marketing materials from both the platform and third parties, as well as communication preferences.

- Non-personal Information

The second category of information is termed Non-Personal Information, which refers to data that cannot be used to identify an individual user ("Non-Personal Information"). This includes technical details and

aggregated usage data, such as the user's operating system, browser type, screen resolution, language settings, browsing activities, duration of visit, and related timestamps.

Here are the types of Non-Personal Information we collect from or about you:

a) Log-in history and technical information: To improve the Services and enhance your user experience, We gather technical details transmitted by your device. This includes software and hardware information such as browser type, operating system, language preference, access time, and the referring Website domain.

b) Gameplay information: We record details of your gameplay, including deposits, bets, bonuses, session duration, and high scores. Some of this information may be shared or published on the Website.

c) Device and connection information: For security and fraud prevention purposes, We collect data from your device. This includes detecting concurrent software activities, identifying potential fraudulent behavior (e.g., bots, malware), and verifying the use of VPNs or proxies.

d) Analytics information: We collect data about your usage of the Services, such as application usage, log files, user activity (e.g., page views, time spent on pages), clicks, and timestamps. This information helps us troubleshoot errors, conduct research, and analyze user behavior.

e) Anonymous information: We may anonymize or de-identify collected information so that it cannot personally identify you. This aggregated or de-identified data is not restricted by this Privacy Policy and may be disclosed to others for various purposes, including advertising and marketing.

3. HOW WE USE YOUR INFORMATION

We process the Personal Information We collect from you in order to deliver our services. In particular, We will use your data for the following purposes:

a) Processing your bets and transactions. This includes your use of credit card and online payment systems;

b) Providing you with gaming and other ancillary services that you seek from our Website;

c) Rendering customer support, such as assistance with setting up and managing your account;

d) Identifying and performing the necessary verification checks;

e) Providing registered players with information about our promotional offers, or providing promotional information from our selected business partners, associates and affiliates (unless players specifically opted out of receiving such marketing material);

f) Complying with legal responsibilities, including complying with anti-money laundering (AML) and combating the financing of terrorism (CFT) laws;

g) Monitoring and investigating transactions for the purposes of preventing fraud, terms abuse, money laundering and other illegal or irregular gaming activities;

h) Analysing customer trends through market study assessments (participation in surveys is not obligatory and you can always choose not to take part);

i) Conducting research and statistical analysis of aggregated data.

4. MARKETING COMMUNICATION

If you have consented to receive promotional materials, we may use your Personal Information, including your email address and phone number, to send you marketing communications regarding products, services and promotions. This may include information about bonuses schemes, products and services from our business partners, such as casino game providers.

Whenever you decide to stop receiving such marketing and advertising material, you may opt out of this in your Player Account settings or by contacting our customer support at support@giraboom.bet

Additionally, note that by accepting any contest prize or winnings from us, you consent to the use of your name and/or nickname for advertising and promotional purposes without additional compensation, except where prohibited by law.

5. OBTAINING PERSONAL INFORMATION

We shall not collect any Personal Information about you without your knowledge. We may, however, automatically collect certain data about you where you would have provided such information through the use of our services and through your interactions with us.

We may also lawfully receive certain Personal Information from online vendors and service providers, such as fraud prevention companies. In addition, We retain the right to engage the services of third-party providers to render technical support, so as to process your online transactions and source gaming content.

Please understand that We may be granted access to any information you may provide to such vendors, service providers and third-party e-commerce services. Rest assured that We will use and safeguard any Personal Information so obtained, as set out in this Policy. Any information that you provide will only be disclosed to third parties outside the Company in accordance with this Privacy Policy, and We shall take any necessary steps to ensure that our agreements with third-party service providers always protect your private information.

The Website is not designed or directed to persons under the age of 18 ("Legally of Age"). If you are not Legally of Age, you should refrain from downloading or using the Website and avoid providing any Personal Information to Us.

We retain the right to access and verify any Personal Information collected from you. Should we become aware that a user who is not Legally of Age has shared any information, We may discard such information unless it is necessary to comply with any legal or statutory obligations imposed on us. If you suspect that a minor has shared information with us, please contact Us.

6. DATA RECIPIENTS

We may pass information that you have given us to other entities within our group of companies and to our business partners. These companies may include our parent companies, their parent companies and all of the subsidiaries of these respective companies, as well as other companies with whom We carry out business and hold necessary agreements. Data processing of your information may be undertaken by the Company or by another entity in our group of companies, which may use a third party to fulfill such data processing needs, subject to confidentiality undertakings and data processing regulations.

We aim to provide your data a need-to-know basis only and in line with the data processing regulations.

In order to provide you with an efficient service, We and/or our service providers might require transferring your personal data from one country to another in the European Union (EU) and European Free Trade Association (EFTA) regions and also to some data processors that may be based outside of the European Economic Area (EEA). Therefore, by browsing the Website and communicating electronically with us, you acknowledge and agree to our (or our suppliers or sub-contractors) processing of your data in these countries. We shall always use our best efforts to ensure that your information and data is treated securely and in accordance with this Privacy Policy. If such transfer of personal data is to be undertaken on our behalf, We will outline the details of those third parties that process user data and the particular categories of user data in this policy.

7. RELEASING DATA TO THIRD PARTIES

We do not sell or rent your personal data to third parties.

We may disclose your personal information if required by law, regulation, or other legal regulation or warrant. We may also disclose your personal information to a regulatory or law enforcement agency if We believe it to be necessary to protect the legitimate interests of the Company, its customers or any third party.

Personal data will only be disclosed to third parties in the following cases:

a) Where We are required to do so by law;

b) If the Website needs to share data with its payment processors to facilitate payment transactions in accordance with their privacy policies;

c) To comply with our legal and regulatory duties and responsibilities to the relevant licensing and regulatory authorities as well as all duties and responsibilities owed under any other applicable legislation and to any other applicable regulators in other jurisdictions;

d) When the Company believes that disclosure is necessary to protect the Company's or the player's safety, or the safety of others, investigate fraud, or respond to a government request.

We use third-party data processors to process limited personal data on our behalf. Such service providers support the Website, especially relating to hosting and operating the websites, marketing, analytics, improving the websites, and sending email newsletters. Where you give us your consent to send you marketing and promotions, We may share your contact details (such as email address or mailing address) with our marketing partners who take care of sending out all our marketing material to you including promotional emails and SMS, direct mail. We shall ensure that the transfer of the Personal Data to the recipient is compliant with applicable Data Protection Legislation and that the same obligations are imposed on the processor as is imposed on us under the respective Services Agreement.

Our Website may also include social media features (e.g. "share" or "like" buttons). Such features are provided by third-party social media platforms such as Facebook. Where data is collected this way, its processing is governed by the privacy policy of the respective social media platforms.

In addition to the above, We may also release personal data if We acquire any new businesses. Should the Company undergo any changes to its structure such as a merger, acquisition by another company or a partial acquisition, it is most likely that our customers' personal data will be included within the sale or transfer. We will, as part of our Policy, inform our players by email prior to affecting such transfer of personal data.

Please note our content may link to third party websites to provide relevant references. We are not responsible for such external content, which may contain separate privacy policies and data processing disclosures.

8. DATA RETENTION

As stated under our Terms and Conditions both, you and the We can decide to have your Player Account closed at any time. Following closure of your account, We will retain your personal data on record for as long as required by law. This data shall only be used should it be required by competent authorities in cases of enquiries regarding financial and fiscal records, fraud, money laundering or investigations into any other illegal activity.

We may also keep anonymized derivatives of your data to improve our content and marketing communications where no automated decision making is involved.

In addition, the We may retain your personal information for longer periods, provided that retaining such information is strictly necessary for the Company's legitimate interests, such as fraud prevention and record keeping, responsible gaming reasons, resolving or exercising claims regarding potential disputes, and where the Company is guided to do so by the applicable supervisory authority.

9. SECURITY OF YOUR DATA

We hereby acknowledge that in collecting and processing your Personal Information for the purposes of managing your Player Account, We are bound by strict legal provisions on the protection of personal data.

Consequently, We endeavour to protect your personal information and respect your privacy in accordance with best business practices and applicable regulations. Being committed to providing secure services to players, and We will take all reasonable precautions to ensure that all the data that you have submitted to Us remains safe.

Right to withdraw consent. In cases where We rely on your consent for the processing of personal data, you have a right to withdraw your consent at any time.

Player Accounts can only be accessed with the player's unique ID and password. You may also set up two-factor authentication (2FA) as additional protection from unauthorised use of your account. You are responsible for keeping your login information confidential and making sure it cannot be accessed by another person.

10. YOUR RIGHTS

Data protection law gives you, as a data subject, certain rights in certain circumstances. In accordance with law, you have a right to:

– Request access to your personal data: This means that you have a right to request, free of charge, a copy of the personal data We hold about you;

– Request the correction of your personal data: This means that if any personal data We hold about you is incomplete or incorrect, you have a right to have this corrected. Keep in mind, however, that We may need you to provide evidence and documentation (such as your ID documentation or proof of address) to support your request. It can be declined due to our legal obligations

– Request the erasure of your personal data: This means that you may request the erasure of your personal data where We no longer have a legal basis to continue processing it or retaining it. Please be aware that this right is not absolute – meaning that We are not able to satisfy your request where We are obliged under a legal obligation to retain the data, or where We have reason that the retention of data is necessary for us to defend ourselves in a legal dispute;

– Object to the processing of your personal data where We rely on our legitimate interests (or those of a third party) to process your data and you feel that our processing of your data in such a manner impacts your fundamental rights and freedoms. However, in some cases, We may be able to demonstrate that We have a compelling legitimate ground to process your data which may override your rights and freedoms. You may submit your objections to processing of your personal data on the grounds of the above-mentioned legitimate company interests by contacting our DPO;

– Request the restriction of the processing of your personal data: You may ask us to temporarily suspend the processing of your personal data in one of the following scenarios: (a) where you want us to establish the accuracy of the data, (b) where our use of the data is unlawful but you do not wish for us to delete it, (c) where you need us to retain your data even when We no longer need it in order for you to establish, exercise, or defend legal claims, or (d) where you have objected the use of your data but We need to verify whether We have overriding legitimate grounds to use it;

– Request the transfer of your personal data (i.e. data portability): This means you may request us to provide you with certain data We process about you so you may transfer it to another controller. This right only applies to data acquired through automated means which you initially provided consent for us to use, or where We used the data to perform our obligations under a contract with you;

– Withdraw your consent at any time where We rely on your consent to process the data: 'Opting out' or withdrawing your consent will not affect the lawfulness of the processing carried out by us up until the time you withdraw your consent. Withdrawing your consent means that, going forward, you no longer wish for us to process your data in such a manner. This means that you may no longer consent for us to provide you with certain services (such as marketing). You may withdraw your consent at any time through the account profile settings on the Website;

- Lodge a complaint with a supervisory authority.

In order to exercise your rights as explained above, We may need to request specific information about you to help us verify your identity. This is a security measure to ensure that We are certain that the person to whom We disclose your personal data is really you.

We will do our utmost to respond to all legitimate requests within a one-month timeframe from the submission of a request. If your request is particularly complex, or if you have made multiple requests in a certain time period, it may take us a little longer. In such a case, we will notify you of this extension.

11. CONTACTING US

You may always contact us in regards to this Policy should you wish to:

a) Confirm the accuracy of the personal information We have collected about you;

b) Enquire about our use of your personal information;

c) Prohibit future use of your data for direct marketing purposes;

d) Update or rectify any information that you have provided us (in such cases you shall provide any evidence We may reasonably require to effect such changes). Note it is illegal to provide Us with false information about you and it is your responsibility to ensure that We are always updated with your correct data.

If you have any questions about this privacy policy, please contact us at support@giraboom.bet

The rights outlined in this Policy are not exhaustive and this Policy does not restrict any other rights that might be granted by virtue of laws or any other regulations.

12. CHANGES TO THE PRIVACY POLICY

We retain the right to modify this Privacy Policy at any time, so We encourage you to revisit this page regularly. We will make reasonable efforts to notify you in advance of any significant alterations to this Privacy Policy. These substantial changes will take effect within a reasonable timeframe after such notice has been provided, as outlined in the proposed amendment. Otherwise, all other adjustments to this Privacy Policy are effective as of the indicated "Last Updated" date, and your ongoing use of the Services following the Last Updated date will signify acceptance of, and agreement to adhere to, those modifications.

The Privacy Policy has been drafted in the English language. In the event of any discrepancy between the meanings of any translated versions of the Privacy Policy and the English language version, the meaning of the English language version shall prevail.