

Information on the Processing of Personal Data of Scratch 2nd Chance promotional activity

Introduction

Our Company, with name “Hellenic Lotteries S.A.”, having its seat at 112 Athinon Ave., Athens (hereinafter “H.L. S.A.” or the “Company”), is, according to the applicable legislation, responsible for processing your personal data within the framework of the provision of gaming services through the Website of the Company www.scratch.gr and through the application OPAP Store App (hereinafter “Games of Chance”), as well as within the framework of your participation in “Scratch 2nd Chance” promotional activity.

The protection of your personal data is very important to us. We make every possible effort to protect your personal details at all times, by implementing the proper technical and organizational measures.

The present information aims at informing you on the type of personal data that we collect about you, on the way and the purposes for which we collect your data, on the third parties with which we share such data, as well as on your rights, in order for H.L. S.A. to comply with L. 4624/2019, as well as with EU Regulation no. 679/2016 “on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC”. [GDPR]

Categories of Personal Data we Process

Hellenic Lotteries S.A., through your browsing in website www.scratch.gr, the filling-in of the registration form for participation in the 2nd Chance draw that is offered through it, the participation of winners in the event of the final draw and the attribution of gifts, processes the following personal data of yours:

- Mobile phone number;
- Password;
- Full name;
- Confirmation that the user is an adult;
- Only for winners, H.L. S.A. shall further process:
 - ✓ video and photographic material from the event in which they will participate for the final draw and the attribution of the 2nd Chance gifts;
 - ✓ Identity Card Number, e-mail address and home address.

Throughout the duration of the activity, weekly draws shall be conducted (one per week) in which a winner following a draw shall win a specific monetary amount. At the same time, at the end of the activity all participants (even if they have won in a weekly draw) shall participate in the final draw in which the fifty **winners** and the fifty **runners-up** will be designated. The fifty **final winners** shall participate with physical presence at an event, in which participants may claim a prize of a value up to €1,000,000.

Only the electronic version of this document is considered to be valid and updated.

Why we Process Personal Data

The information above and the personal data processed by H.L. S.A. regarding its Players and/or third parties shall be stored in H.L. S.A.'s databases and servers, always in accordance with the provisions of the applicable legislation and, especially, with the provisions on the protection of persons against personal data processing. The legal basis, as well as the purposes of processing are the following:

- i. Necessary processing for the performance of the terms of the Agreement between us, and for the provision of the Games of Chance services to you. Within this context, we process your details for the following purposes:
 - For your registration and the entry of your participations, as well as for the purpose of winners' identification, according to the Terms of Participation.
 - To communicate with Account holders in case one of the participating codes thereof wins the draw.
 - To organize and conduct the event in which the 50 winners shall participate.
- ii. Necessary processing to comply with our legal obligations. Within this context, we shall process your details for the following reasons:
 - To conduct the necessary security controls and age confirmation of the Customers.
 - To comply with our legal obligations as Games of Chance providers (HGC Regulations, Legislation on Games of Chance, Legislation on money laundering).
- iii. Necessary processing for the purposes of the legal interests that we pursue, namely:
 - For the improvement of Games of Chance services provided through the Website, as well as for the best possible service of H.L. S.A.'s Customers.
 - For the provision of evidence as to the transactions effected, by processing recorded oral or written (in soft and/or hard copy) communication.
- iv. Processing based on your specific consent, which is provided by selecting the relevant field in the registration form or (for the winners and the runners-up) in the participation form of the event. More specifically:
 - if you wish so, the company will process your personal data and gaming behavior to understand your preferences and will contact you for advertising and promotional purposes. Our aim is to inform you on products and services that we believe match your selections and that may be of your interest. You may choose if the information will regard H.L. S.A., or OPAP S.A., or both of them.
 - The fifty final winners shall participate in an event which shall be broadcast live and/or in video recording, during which the draw for the attribution of gifts to the winners will be conducted. The said details shall constitute the content of each further information of the general public in all possible media for the completion of the event and the prize awarding process. For these purposes, each winner shall be informed accordingly, and provided that they wish to participate they shall provide their consent, in writing, for this purpose. In case the winner does not wish to participate in the event, their participation in the draws conducted during the event shall not be possible and another participant from the runners-up shall be asked to participate in their place.
 - Additionally, the Company may, following your explicit consent, publish some identifying details of your identity, in any case your first name and/or

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the first letter of your last name, for reasons of transparency to the general public of the said event and draw.

You hold the right to withdraw your specific consent to the processing of your personal data for the particular purposes and to request your data's deletion at any given moment. In this case, the Company shall stop any processing that is based on your consent, without this affecting the lawfulness of the processing that was based on your consent prior to its withdrawal or of the processing described under points (i) to (iii).

Recipients

The processing of your personal data, within the context of the provision of Games of Chance services, shall be carried out by the competent employees of H.L. S.A. who are duly authorized to this end. Recipients of the personal data are also third parties (external partners, such as call center services providers, technical infrastructure providers and advertising companies), to the extent that this is necessary for your optimum service, for the provision of our services, the organization and broadcast of the event. In this case, our Company undertakes that its partners are under its control and act only following its orders, that they have been specifically authorized for this purpose and that they are fully bound by the obligations set forth in the legislation on the collection and processing of the aforementioned data. Our Company may disclose your details to the competent administrative authorities, insofar as this is imposed by the applicable legislative and regulatory framework, following relevant request or when it ought to submit a report with the said details, without giving you any special prior notice.

Finally, the audio-visual material (videos/photographs) recorded during the event or excerpts thereof shall be published and shall be accessible to anyone interested via television, radio and the Internet.

Retention Time

Your personal data that refers to your identity verification, as well as the information referring to the transactions effected through the Website (including messages history) shall be kept for at least ten (10) years as of their drafting. Regarding the audio-visual material from the event, it shall be kept by the Company for a period on one (1) year, following its receipt.

Your Rights

According to the applicable legislation, you reserve, and you may exercise the following rights:

- right to access your personal data, as well as the information related to their processing;
- right to correct inaccurate or incomplete personal data of yours;
- right to erase;
- right to restrict the processing of your personal data, when explicitly provisioned by the legislation;

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- right to data portability in a structured, commonly used and machine-readable format (e.g. USB);
- right to have your data (directly) transmitted to another controller;
- right to object to the processing of your personal data for reasons set out by the legislation, as well as
- the right to withdraw any consent you may have given at any time and at no cost.

In case you exercise the right to correction, erasure or restriction of personal data, these requests shall be communicated to any third party recipients to whom these data have been disclosed.

You may exercise any of the aforementioned rights by submitting a written request to the Company. The relevant request/ application shall be accompanied by supporting documents verifying your identity.

You can expect a reply to such a request within one (1) month following its receipt by the Company. This period may be extended by two (2) additional months if the complexity of the request or the overall number of requests we receive so requires.

Disclaimer

Our services are not addressed to persons below eighteen (18) years of age. Any person who provides their details to us through any of our services warrants that they are above eighteen (18) years of age. We do not take on any obligation or liability for the practices, actions or policies that are beyond our control.

The present Information may be amended. We will make sure to relevantly inform you on any amendment but, in any case, we invite you to visit our website regularly, where the eventually applicable Information on Personal Data will be posted.

Our Commitments

We commit ourselves to keep your data updated and accurate, to securely store them and erase them, to not collect nor keep data that are not necessary to us, to protect your data from loss, malicious use, non-authorized access, or disclosure thereof and, in general, to ensure that appropriate technical and organizational measures are in place for their protection.

Contact details

For any request relevant to the processing of your data, as well as in case you ascertain that we have not observed the principles stipulated in the present Information on the Processing of Personal Data, we kindly ask you to address, the soonest possible, OPAP Group's Data Protection Officer, using the following contact details: Website: www.opap.gr/gdpr | Postal Address 112 Athinon Ave., 10442, Athens | Telephone: +30 210 5798888 | E-mail: dpo@opap.gr

In case you deem we did not sufficiently address your request and the protection of your personal data is affected in any way, you may submit a complaint via the [special online portal](#) to the Hellenic Data Protection Authority (Athens, 1- 3, Kifissias Ave., P.C. 115 23 | tel: +30 210 6475600). Detailed instructions on how to submit a complaint are provided on the Authority's [Website](#).