

## Betsson Group's Commitment to Data Privacy

Betsson operates within a framework of various privacy laws, including but not limited to the General Data Protection Regulation (EU) 2016/679. In an era where digital interactions and data exchange are integral components of the business landscape, safeguarding user privacy has become a paramount concern for organisations across industries. Betsson Group, a leading player in the iGaming sector, recognises the critical importance of protecting personal data and maintaining the trust of our customers, stakeholders, and partners. This summary explains Betsson Group's work within the data privacy area.

- **Groupwide Data Protection and Privacy Framework ('GDPPF'):** The GDPPF is designed to provide extensive guidance on privacy and data protection matters across all operations by laying down responsibilities and governing principles that need to be adhered to in the course of business by all Betsson Group employees. Moreover, the GDPPF, together with the relevant information security policies, sets out a minimum level of data protection principles that should be adhered to by all parties wishing to engage in personal data processing/sharing operations with Betsson Group.
- **Responsibility for Privacy:** The Group's operational management has designated a Group Data Protection Officer (DPO) as a specific function responsible for the Group's data privacy strategy and performance. Operational management are ultimately responsible for the implementation of privacy principles and compliance with the respective areas. This ensures a clear chain of accountability, demonstrating Betsson Group's commitment to upholding privacy standards at the highest organisational levels.
- **Privacy by design:** Betsson Group leverages advanced technologies to protect customer data throughout the entire data lifecycle, including end-to-end encryption and automated monitoring systems. Access to systems processing personal data is governed by role-based access controls. The Group deploys data loss prevention tools, continuous security monitoring solutions, and conducts regular vulnerability assessments and penetration testing to proactively identify and remediate risks to personal data. Privacy is embedded into Betsson Group's product and service development processes through a structured privacy-by-design and privacy-by-default approach. New products, features, and material system changes are subject to documented privacy risk assessments. These assessments ensure that data minimisation, purpose limitation, security safeguards, and user rights are considered before solutions are deployed into production. Betsson Group also leverages technology-enabled tools to enhance transparency and customer control over personal data, including self-service functionalities that allow customers to manage their personal data, privacy preferences, and the exercise of data subject rights.
- **Data Subject Rights:** Betsson Group has established clear and effective mechanisms to ensure that individuals can exercise their data protection rights in practice, including the rights of access, rectification, deletion, restriction of processing, objection, and data

portability, where applicable under law. Data subject rights requests can be submitted through dedicated and easily accessible channels, and are handled in accordance with documented internal procedures designed to ensure timely, consistent, and lawful responses. Requests are assessed and managed by trained internal teams under the oversight of the Group Data Protection Officer, ensuring that each request is properly verified, logged, and responded to within applicable statutory timeframes. Betsson Group applies structured workflows to manage data subject requests across systems and business units, enabling the identification, retrieval, correction, deletion, or anonymisation of personal data, as appropriate. In addition, Betsson Group empowers individuals to exercise their right of access through secure self-service solutions, where available, enabling customers to view and manage their personal information directly.

- **Personal Data Breach remediation:** Betsson Group has implemented a data breach remediation process that encompasses both reactive and proactive measures. The plan is designed to respond to any personal data breaches in a timely manner, considering also any reporting requirements to the competent authorities and/or affected data subjects, while also proactively identifying and addressing potential vulnerabilities.
- **Non-Sale of personal data to third parties:** Betsson Group adheres to a strict policy of not selling or providing personal data to third parties for purposes other than completing transactions or services, unless it has an appropriate legal basis at law. This commitment reflects Betsson's dedication to safeguarding user information and maintaining trust.
- **Data retention and deletion practices:** Betsson Group has established a data retention and deletion policy which defines clear protocols to anonymize data after a defined amount of time, aligning with best practices for data minimisation. In line with the principle of data minimisation, the Group routinely reviews data collection practices, system functionalities, and retention periods to ensure that personal data processed remains proportionate, relevant, and justified for clearly defined purposes. Systems and internal workflows are designed to restrict access to personal data based on role-based need-to-know principles, reducing both the volume and sensitivity of data accessible to employees and service providers.
- **Data Protection for suppliers and business partners:** The Group extends its commitment to data protection to suppliers and business partners to ensure a holistic approach to data protection across the entire supply chain. As a safeguard, Betsson incorporates explicit warranties in its agreements with suppliers ensuring they adhere to rigorous data privacy and information security standards, which are assessed through due diligence processes.
- **Employee training:** Betsson Group recognises the importance of employee awareness and education in maintaining high privacy standards. All employees, including contractors, are provided with annual training, in addition to ad-hoc subject specific training, ensuring that they are well-informed about privacy policies, regulations, and best practices.

At Betsson, we are dedicated to protecting our customers' and stakeholders' privacy while providing an exceptional gambling and betting experience. Our players' trust is paramount;

therefore, we have a strong commitment to maintaining the confidentiality and security of their personal information. As our supply of gaming services evolve and improve, so might our policies. Consequently, our GDPPF and its policies, processes and routines are regularly reviewed, developed and re-approved to align with external requirements and expectations on safe handling of personal data.