Privacy at Fireball Opinie and Fireball Casino

Personal data and privacy

Retained information — Privacy Policy. Controller Betelgeuse Entertainment B.V. No. 161954, the policy text states the address Emancipatie Boulevard Dominico F. "Don" Martina 31, contact dpo@fireball.casino. The policy also covers sensitive and user-provided non-personal information. It should be read together with the general terms. It links use of the services to consent to the collection, storage, processing and transfer of data. §27 of the agreement links acceptance of the terms also to familiarization with and consent to Privacy Policy. In case of disagreement, the policy suggests refraining from accessing the services. The following are indicated: Landsverordening bescherming persoonsgegevens (National Gazette 2010, Consolidated text no. 84) and EU Regulation 2016/679 of 27 April 2016, which replaced Directive 95/46/EC.

- **What is collected.** First and last name, email, nickname, IP, phone number, information about devices and when, how and where the service is used, registration, profile, settings, purchase, deposit and withdrawal data, support data, other information voluntarily provided through the service, and additional information for Customer Due Diligence. If a social network is linked, the friends list and anonymized analytics may be used within the terms of that platform and for the service's features.
- **Purposes.** Operation of the site and account, personalized communication, advertising and profiling, communication with the player, tournaments, promotions, evaluation of competition entries, distribution of prizes and taxes, notifications of changes, improvement of the service/policies, invoicing, online payments, age and identity verification, compliance with tax, supervisory and AML obligations, transaction monitoring, security and fraud detection. Combined data may be used to personalize email, pop-up messages, offers and advertising on the operator's own site and third-party services. The operator states that the profile is not used for automated decisions affecting individual/contractual rights, and for automatic assignment of gaming offers. The algorithm assesses the probability of problem gambling in order to contact and help. Decisions on the forecast are made by a human.
- **Retention and recipients.** Data is kept for as long as needed for the stated purposes, legal and licensing obligations, including the period after account closure. It is then deleted or anonymized. Backups are isolated until deletion is possible. Under documented agreements, data may be transferred to site/app developers, game, hosting, maintenance, backup, storage, virtual infrastructure, payment, analytics, marketing and support providers. When accessing data in the operator's interest, contractors follow its instructions, policies and protection procedures. They

disclose data as required by law, including IP and information about suspicions, to the police or public authorities.

- **Marketing.** With consent and/or another lawful basis, data is used by partners for calls, email, push, SMS, notifications about prizes and gifts. Settings are available in My Account. Marketing consent can be changed in full or in part. Each message contains a way to opt out of the corresponding type of mailing; applying the opt-out may take up to **48 hours**. Transfer to unrelated third parties for promoting their own products requires the user's prior consent. Support calls may be recorded for training, security and resolving requests.
- **Cookies and pixels.** Strictly necessary (language, search, login), analytical (navigation, experience and marketing), advertising (visited sites, transfer to advertising and technology partners) and social (buttons, linked account, interactions for targeting) are used. Pixels and similar technologies support authorization, analytics, determining email opens and relevant advertising. In the browser, cookies can be disabled, the consent request configured and local storages deleted. Some features are unavailable in that case. For strictly necessary technologies, the policy excludes refusal.
- **Rights.** Withdrawal of consent without canceling prior lawful processing, information about the purposes and method of processing, access and a copy, correction/supplementation, deletion in the absence of a mandatory retention basis, objection or restriction where applicable, receiving in a structured commonly used machine-readable format and transfer to another party for automated processing based on consent, human review of a significant automated decision, expressing a position and contesting it, withdrawal of consent to marketing. If there is a compelling legal basis or obligation, processing may continue.
- **Changes.** Changes are published on the policy page. Material changes are communicated on the home page, at login or by email. The policy promises an archive of previous versions and recommends checking the current text when using the service. Those who disagree are advised to stop using it and deactivate their account.

Editorial site, authorship and visitor data / Editorial team, contacts and data handling

Field	Value and scope
32-03 · Personal data contact	Michael.Zielinski@gmail.com — the route for contacting the editorial team regarding data; dpo@fireball.casino relates to the casino operator.
32-07 · Consent	In a configuration without analytics and advertising, separate consent for these services is not requested; the email is sent at the reader's initiative.
32-10 · Analytics	Client-side analytics is disabled; the hosting technical log is not called behavioral analytics.
32-11 · Cookies	The editorial team does not assign advertising or analytical cookies; the display setting may be stored locally without being transferred to the server.
32-12 · Email copies	Correspondence is stored in the mailbox; no copy is created on the site.
32-13 · Retention of requests	Approved editorial rule: up to 180 days after closing the request, then deletion of the working correspondence, except for a separately justified dispute.
32-14 · Logs	Confirmed technical logs: IP, time, URL, response code, 14 days from the event, administrator access; the content of emails is not included in them.
32-15 · Backups	Backup of static content once a day, rotation 30 days; it does not contain the user database or emails.
32-16 · AI assistant	The AI assistant on the site is not enabled; the use of tools in preparing materials does not mean transferring readers' messages to the AI service.
32-17 · History of AI on the site side	No history of AI dialogues is created on the site.
32-30 · Advertising pixels	Advertising pixels are disabled; visitor data is not sent to advertising networks from the adopted configuration.
32-31 · Categories of cookies	Necessary: only when a technical function arises; analytical: disabled; advertising: disabled. The categories are not combined into a single consent.
32-32 · Provider and hosting location	Approved architecture: static files on a server in the EU; the provider and its role as processor are defined by the hosting agreement.
32-33 · Personal data controller	Michał Zieliński is responsible for editorial processing; the casino operator is responsible for its own gaming data.
32-34 · Data category and recipient	Email and the text of the request — to the author via the mail service; IP/time/URL — to the server administrator in the technical log; the editorial team does not request gaming documents.
32-35 · Retention period start event	Mail: date the request is closed; logs: time of the request; backups: date of the snapshot.
32-36 · Deletion of the working record	Working correspondence is deleted upon expiry of the editorial period; separate retention for a dispute is documented by purpose and term, not automatically indefinitely.
32-37 · Deletion from backup	Static backups are removed under a 30-day rotation; deleting a file from the site does not mean it disappears from all copies in the same second.

Field	Value and scope
32-38 · AI provider, model and region	No AI provider, model or region is assigned for the site: there is no AI function on the site.
32-39 · Storage configuration at the AI provider	Requests to the AI provider containing reader data are not created; the parameter store=false is taken into account separately in the technical settings.