

PRIVACY POLICY CONCERNING THE LISTENING AND RECORDING OF CALL CENTER'S CALLS

Last updated and effective date: April 2023

Pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter, the "**Regulation**") and Article 131 paragraph 3 of Legislative Decree 20 June 2003, no. 196, we wish to inform customers, potential customers and in general third parties who come into contact with our call center (hereinafter, the "**Data Subjects**") that, as part of customer care activities and outbound campaigns, devices are used that allow the recording of incoming and outgoing telephone calls, as well as the live and deferred listening of conversations between the user and the operator by other parties specifically authorized to do so.

1. Data Controller

The Data Controller (the "**Data Controller**") differs depending on the service requested by the Data Subject to the call center or for which the call center makes the call, in particular

- for national totalizer numerical games and MySisal, the organization, operation and collection of lawful gaming through amusement machines, betting competitions and bets, both in the physical channel and online, the Data Controller is **Sisal Italia S.p.A.**;
- for the rental and management of amusement machines, the Data Controller is **Sisal Gaming S.r.l.**.

All the aforementioned companies have their registered office in 20159 Milan, Via Ugo Bassi 6 and can be contacted at privacy_sisal@legalmail.it.

2. Data Protection Officer

The aforementioned companies have appointed a Data Protection Officer or "DPO". The DPO can be contacted at the following email address: dpo@sisal.it.

3. Source of personal data

The personal data and the content of the calls subject to processing are acquired by the Data Subject directly and/or through third parties specifically appointed for this purpose, at the time of the telephone call.

4. Purpose and legal basis of processing

The recording of inbound and outbound calls and the live listening of conversations between operator and user are carried out in order to monitor the quality of the service rendered to the Data Subjects, also as part of the coaching and training activities specifically aimed at the call center operator. The legal basis is the legitimate interest of the Data Controller, taking into account the balancing of the rights of the latter and of the Data Subject.

5. Methods of processing

Live listening and recording of calls take place by means of automated systems that allow incoming and outgoing calls to be listened and recorded. The related processing takes place by means of manual, computerized and telematic tools, with logics strictly related to the aforementioned purposes and, in any case, in compliance with the necessary precautions, guarantees and measures prescribed by the reference legislation, aimed at ensuring the confidentiality, integrity and availability of the processed data, as well as at preventing damage, whether material or immaterial.

6. Communication and Dissemination

For the pursuit of the purposes described in paragraph 4, the Data Controller reserves the right to allow the conversation to be listened and to communicate the content of calls and audio files, including the relevant personal data, to recipients belonging to the following categories

- a) other companies in the group to which the Data Controller belongs, or in any case parent companies, subsidiaries or associated companies, pursuant to art. 2359 of the Italian Civil Code also located abroad, as part of existing intra-group agreements for the management of the activities referred to in the purposes in question
- b) subjects that perform assistance activities for the data subject (e.g. call centers);
- c) parties that perform control, audit and certification of the activities carried out by the Data Controller;
- d) subjects that perform data acquisition, processing, processing and storage services;
- e) professional firms or companies in the context of assistance and consultancy relationships (e.g. law firms).

The subjects belonging to the categories listed above operate independently as separate Data Controllers, or as Managers appointed for this purpose by the Data Controller. The updated list of such third parties is available by sending a request to privacy_sisal@legalmail.it. The content of calls and audio files, including the relevant personal data, may also be known, in connection with the performance of assigned tasks, by the Owner's staff, specifically authorized to process them. The content of calls and audio files, including the relevant personal data, shall in any case not be disseminated and, therefore, shall not be brought to the knowledge of unspecified persons, in any form whatsoever, for instance by making them available or consulting them, without the express consent of the data subject, when requested.

7. Extra-EU transfer

The Data Controller acknowledges that, for the pursuit of the above purposes, the content of the calls and audio files of the Data Subjects, including the relevant personal data, may be transferred to entities located in countries outside the European Union, which cooperate with the Data Controller in the pursuit of the above purposes. Such transfer will only take place against the existence of international agreements or decisions of adequacy by the Commission (ex art. 45 of the Regulation) or against the stipulation of binding corporate rules ("Binding Corporate Rules" or "BCR" ex art. 47 of the Regulation) or in any case on the basis of other appropriate guarantees that ensure the content of the calls and audio files communicated or transferred, as well as the relevant personal data, an adequate level of protection. A copy of the audio files and of any related personal data transferred abroad, as well as the list of third countries/international organizations to which the audio files and related personal data have been transferred, may be requested from the Controller at the following email address privacy_sisal@legalmail.it.

8. Retention period

Recordings of calls made for the aforementioned purposes are retained for 3 months after acquisition. In the case of processing carried out for the handling of complaints or grievances, for the exercise of a right in a court of law or to fulfil further legal obligations, this period may be extended until the end of the handling of the complaint or grievance, the exhaustion of any legal proceedings instituted, or the end of the obligation provided for by law. Once these periods have expired, the Data Controller shall automatically delete the records, or irreversibly transform them into anonymous form.

9. Data Subjects Rights

The rights referred to in Articles from 15 to 22 of the Regulations are guaranteed. In particular, the Data Subject can obtain: a) confirmation of the existence of personal data processing concerning him and, in this case, access to such data; b) the correction of inaccurate personal data and the integration of incomplete personal data; c) the deletion of personal data concerning him, in cases where this is permitted by the Regulation; d) the limitation of processing, in the cases provided for by the Regulation; e) the communication, to the recipients to whom the personal data have been transmitted, of requests for rectification / cancellation of personal data and for the limitation of processing received by the Data Subject, unless this proves impossible or involves a disproportionate effort; f) the receipt, in a structured format, commonly used and readable by an automatic device, of the personal data provided to the Data Controller, as well as the transmission of the same to another data controller. The Data Subject also has the right to object at any time, for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection, without prejudice to the case in which the Data Controller demonstrates the presence of overriding legitimate reasons or the exercise or defense of a right pursuant to art. 21 of the Regulation. The Data Subject also has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way, unless this decision: a) is necessary for the conclusion or execution of a contract between the Data Subject and the Data Controller; b) is authorized by the law of the Union or of the Member State to which the Owner is subject; c) is based on the explicit consent of the Data Subject. In the cases referred to in the aforementioned letters a) and c), the Data Subject has the right to obtain human intervention from the Data Controller, to express their opinion and to contest the decision. The Data Subject may submit requests to the address privacy_sisal@legalmail.it indicating in the subject "Privacy - exercise of privacy rights", detailing which right he intends to exercise and providing the Data Controller with the information needed to identify him pursuant to articles 11 and 12 of the Regulation. The Data Subject also has the right to lodge a complaint with the supervisory authority, in particular in the Member State in which he habitually resides, works or in the place where the alleged violation for which the complaint is submitted has occurred (e.g., the Garante per la protezione dei dati personali in Italy), as required by art. 77 of the Regulation, as well as to take the appropriate judicial offices pursuant to art. 78 and 79 of the Regulation.

10. Nature and obligation of the conferment

Processing for the purposes described above is not mandatory and the Data Subject may object to such processing in the manner indicated in the "Data Subject Rights" section of this notice, and should the Data Subject object to such processing, his or her data may not be used for that purpose, unless the Data Controller demonstrates the presence of compelling legitimate grounds or the exercise or defence of a right pursuant to Article 21 of the Regulation.

11. Updating of privacy policy

The Controller reserves the right to periodically update the content of this page. The Data Subject is therefore invited to periodically consult the information contained here in order to remain up-to-date with respect to any changes that may have occurred since the last consultation.