



PRIVACY POLICY of SISAL S.p.A.

PURPOSE	TO BUILD A MORE RESPONSIBLE FUTURE
MISSION	TO OFFER THE BEST RESPONSIBLE GAMING EXPERIENCE, GENERATING VALUE FOR SOCIETY AND INDIVIDUALS
VISION	TO BE THE LEADING INTERNATIONAL COMPANY IN RESPONSIBLE GAMING, DRIVING DIGITAL INNOVATION

VALUES



LIABILITY

Responsibility is at the heart of our actions
Guiding our strategy by ensuring conscious, sustainable and long-term development



PEOPLE

People are the heart of our company
A secure and user-friendly environment offering consumers the widest Sisal gaming offer



INNOVATION

Innovation drives our company
Stimulates creative capacity, supports evolution and growth and helps generate value over time

Sisal S.p.A and its subsidiaries (hereinafter Sisal) consider data care and privacy protection to be fundamental pillars of Sisal's Privacy and Data Ethics culture and strategy.

This Sisal Policy, applicable to its Italian and foreign subsidiaries, consistently with applicable regulations, defines the commitment that Sisal intends to pursue in order to guarantee the data protection, privacy management and the provision of transparent services.

The adoption of the Management System, in accordance with ISO 27701, and the implementation of this Policy support the achievement of strategic objectives and are the main drivers for staff involvement and process improvement.

Sisal, through the Risk Based Approach, also constantly analyses risks and identifies appropriate mitigation actions in order to reach an acceptable residual risk level.

Sisal considers the effective application of the Management System to be a commitment and responsibility of the entire organisation and calls upon all personnel, at every level and grade, to comply with the principles contained in this Policy within the scope of their respective competencies and responsibilities.



THE COMMITMENT OF SISAL S.p.A.

The Policy defines the commitment of Sisal S.p.A. and its Italian and foreign Subsidiaries to respecting the values of Privacy & Data Ethics by enhancing the following principles:

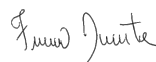
- ★ **Accountability:** Sisal adopts a governance model aimed at defining and monitoring supervision, commitment and accountability and to reinforce the ethics, compliance and sustainability of products and services, which are always designed and implemented in compliance with applicable requirements in a privacy by design and by default perspective, to ensure adequate measures in terms of personal data protection.
- ★ **Ethics & Fairness:** Sisal adopts fair and equitable practices, the aim of which is to minimise discrimination and detrimental or non-impartial processing.
- ★ **Privacy:** Sisal processes personal data in accordance with the principles and regulations on privacy, ensuring that it is kept to a minimum, used for specific, determined and transparent purposes and controlled at all times.
- ★ **Quality & Accuracy:** Sisal pursues a high level of data quality in terms of accuracy, correctness and timely updating, taking all measures to enable the deletion or prompt rectification of data.
- ★ **Transparency:** Sisal ensures a high level of transparency and clarity regarding the manner, type and purpose of the collection and processing of personal data on the channels, products and services provided to customers.
- ★ **Responsible Data Sharing:** Sisal ensures that the necessary technical and organisational measures are in place to protect the personal data processed also by third parties acting on its name and behalf. Indeed, responsible data sharing must be based on processes that actively consider, prioritise and protect the interests of individuals. To this end, Sisal conducts regular audits of third parties that process personal data in order to verify compliance with privacy and security requirements, and organises specific data protection training for third parties to ensure that they are adequately trained on the business processes and procedures to be followed, as well as on the applicable requirements.

This policy is updated periodically and is available to interested parties, the public and anyone who requests it, with a view to transparency and cooperation.

Milan, October 12, 2023

The Managing Director of Sisal S.p.A.

Francesco Durante



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