

PRIVACY POLICY

MISSION	DELIGHT OUR PLAYERS, POWER OUR BRANDS AND EMPOWER OUR PEOPLE
VISION	SHAPE THE FUTURE OF ENTERTAINMENT

VALUES



We lead with ambition and create sustainable impact



We invest in our growth and take opportunities to make a difference



We take responsibility, innovate with purpose and move at pace



We value every voice and combine our strengths as one team

Flutter SEA considers data care and privacy protection as fundamental pillars of the Group's Privacy and Data Ethics culture and strategy.

This Flutter SEA Policy, applicable to all Italian and international legal entities, in compliance with applicable regulations, defines the commitment that Flutter SEA intends to pursue in order to ensure 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 represent key drivers for employee engagement and process improvement.

Through a Risk-Based Approach, Flutter SEA continuously analyzes risks and identifies appropriate mitigation actions in order to achieve an acceptable residual risk level.

Flutter SEA considers the effective application of the Management System as a commitment and responsibility of the entire organization and requires all personnel, at every level, to comply with the principles set out in this Policy within the scope of their respective roles and responsibilities.

THE COMMITMENT OF FLUTTER SEA

This Policy defines the commitment of Flutter SEA to respect Privacy & Data Ethics values through the promotion of the following principles:

- **Accountability:** Flutter SEA 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:** Flutter SEA adopts fair and equitable practices, the aim of which is to minimise discrimination and detrimental or non-impartial processing.
- **Privacy:** Flutter SEA 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:** Flutter SEA 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:** Flutter SEA 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:** Flutter SEA 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.

Flutter SEA is also committed to ensuring compliance with these principles in the adoption and implementation of increasingly advanced solutions – including models based on Artificial Intelligence (AI) – that enable the automation of business processes. This makes compliance with privacy and data protection regulations essential to safeguard the rights and freedoms of our users, as well as guarantees users' right to know and understand the processes and functioning of the AI models with which they interact.

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 12/06/2026

Chief Executive Officer Flutter SEA

Roberto Di Fonzo

Firma elettronica apposta

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