

PRIVACY POLICY

1. INTRODUCTION

The Company recognises that personal data must not be retained for longer than is necessary for the purposes for which it is processed. This Policy reflects the storage limitation principle and ensures that retention periods are clearly defined, justified, and consistently applied across the organisation.

- all games developed and/or published by us;
- all apps published by us (REVELTRY);
- our site, Reveltry;
- other services, such as in App purchasing services or rewards marketplaces provided via our App;
- all interactive features, services and communications provided or facilitated by us;
- all email newsletters published or distributed by us.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This App is intended for users aged 18 and above. We do not knowingly collect personal data from anyone under 18.

If we become aware that we have collected such data, we will delete it. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

2. COLLECTION OF DATA

We may collect, use, store and transfer different kinds of personal data about you, including, identity data, contact data, financial data, transaction data, device data, content data, profile data, usage data, gameplay and account data, and marketing and communications data and location data. We may collect data relating to your use of the platform, including gameplay activity, scores, contest participation, rankings, and winnings. We also process data relating to in-app account balances and user wallet activity. This includes records of deposits made by users, participation in paid contests, entry fees, winnings, rewards, bonuses, withdrawals, and any other credits or debits associated with a user's account on the platform.

Such data forms part of transaction data and gameplay/account data and is used to operate and administer user accounts, facilitate gameplay, manage balances, process payments, detect fraud, and comply with legal and regulatory obligations.

Identity data includes government-issued identification documents, photographs/selfies, and related information, for the purposes of account verification, age verification, fraud prevention, and compliance with legal and regulatory obligations.

Financial data includes payment method details (processed via secure third-party providers), user account balance information, and transaction records (including deposits, contest entry fees, winnings, rewards, and withdrawals), together with related billing information.

We use this data to process payments, manage user balances, prevent fraud, and comply with legal obligations. We also collect, use and share statistical and demographic data for analytics, service improvement, and business insights. It could be derived from your personal data but is not considered personal data as it will not directly or indirectly reveal your identity. The usage data is used to calculate the percentage of users accessing a specific App feature.

However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy. We do not intentionally collect special categories of personal data. Where identity verification involves photographs or similar data, such data is processed by third-party providers for verification and compliance purposes.

3. How we collect and use your personal data

We may process your personal data for the purpose of detecting, investigating, and preventing fraudulent activities, unauthorized use or misuse of the platform, collusive behavior, or any manipulation of gameplay. Such processing is carried out on the basis of our legitimate interests in ensuring the security, integrity, and proper functioning of our Services. This may include monitoring user activity, analyzing behavioral patterns, and taking appropriate actions, including restricting or suspending accounts, where necessary to protect the platform and its users.

4. Information you give us:

This is information including identity, contact, financial, and marketing and communications data, you consent to giving us about you by filling in forms on the App site and the Services sites, or by corresponding with us by email or chat. It includes information you provide when you register to use the App, download or register an App, subscribe to any of our Services, search for an App or Service, make an in-App purchase, share data via an App's social media functions, enter a competition, promotion or survey, and when you report a problem with an App, our Services, or any of our sites. If you contact us, we will keep a record of that correspondence.

This also includes processing transaction and account balance data to ensure accurate allocation of winnings, prevent misuse of funds, and maintain the integrity of gameplay and reward mechanisms. We will collect and process the following data about you:

5. Information you give us: This is information including identity, contact, financial, and marketing and communications data, you consent to giving us about you by filling in forms on the App site and the Services sites, or by corresponding with us by email or chat. It includes information you provide when you register to use the App, download or register an App, subscribe to any of our Services, search for an App or Service, make an in-App purchase, share data via an App's social media functions, enter a competition, promotion or survey, and when you report a problem with an App, our Services, or any of our sites. If you contact us, we will keep a record of that correspondence.

6. Information we collect about you and your device

Each time you visit one of our sites or use one of our Apps we will automatically collect personal data including device, content and usage data. We collect this data using cookies and other similar technologies. Please see our cookie policy here for further details.

7. Location Data

We also use geo-location information to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. We use location data for users to make deposits or play in live tournaments. If the user turns off their device location, the user will not be able to use these features on the app. We do not share personal data or any related information to any third party. We do not sell your personal data. However, we may share your personal data with trusted third-party service providers as described below:

8. Device Data from the following parties:

- i. Analytics providers such as Clevertap, Firebase and Appsflyer based outside the UK;
- ii. Advertising networks such as Google, Meta, Tiktok and Youtube based inside or outside the UK.
- iii. Contact, financial and transaction data from providers of technical, payment and delivery services.
- iv. Identity and contact data from publicly available sources such as Didit and The SMS Works and the electoral register based inside the UK.
- v. Any other third-party service providers, partners or vendors engaged by us from time to time that provide analytics, advertising, identity verification, payment, delivery, or other similar services, whether based inside or outside the UK, from whom we may receive device data or other relevant personal data.

9. Unique application numbers:

When you want to install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us. All such third parties and vendors are required to process personal data in accordance with applicable data protection laws.

10. Cookies

We use cookies and other tracking technologies to distinguish you from other users of the site, the distribution platform or Services and to remember your preferences. This helps us to provide you with a good experience when you browse any of our sites and also allows us to improve our sites. For detailed information on the cookies we use, the purposes for which we use them and how you can exercise your choices regarding our use of your cookies, see our cookie policy [here](#).

Where required by law, we will obtain your consent before placing non-essential cookies on your device. You can manage your cookie preferences at any time through your browser settings or via our cookie consent tool. These may include essential cookies required for the operation of our Services, as well as analytics and advertising cookies used to improve performance and user experience.

11. Purposes for use of personal data

Sr No.	Purpose	Type of data	Lawful basis for processing
1	To install the App and register you as a new App user	Identity, contact, device	Performance of contract
2	To process in-app purchases, administer user account balances, facilitate participation in paid contests, allocate winnings and rewards, and manage payments including deposits and withdrawals	Identity, contact, financial, transaction, device, marketing and communications, location	Performance of a contract. Furthermore, issues such as fraud prevention and financial record keeping falls under the scope of legitimate interests and legal obligation, respectively.
3	To manage our relationship with you including notifying you of changes to the App or any Services	Identity, contact, transactions profile, marketing and communications	While service-related communications may be attributed to legal obligations, any product improvement or analytics shall qualify as legitimate interests.
4	To enable you to participate in a prize draw, competition or complete a survey	Identity, contact, transaction data, profile, location data, marketing and communications	This may be split as: • Running competitions ◦ Performance of a contract • Surveys / optional engagement ◦ Consent • Analytics from participation ◦ Legitimate interests
5	To administer and protect our business and this App including troubleshooting, data analysis and system testing	Identity, contact and device	Legitimate interests (covering IT security, fraud prevention, system testing)
6	To deliver content and advertisements, make recommendations about goods and services which may interest you to measure and analyse the effectiveness of the advertising we serve to you, and to monitor trends to improve the App.	Identity, contact, device, content, profile, usage, marketing and communications, location	This may be split as: • Personalised advertising – ◦ Consent (especially for tracking technologies) • Basic service recommendations (non-intrusive) ◦ Legitimate interests • Analytics to improve services ◦ Legitimate interests

12. Disclosure of personal data

We may share your personal data with the third parties set out below for the purposes specified in the table, where such sharing is necessary for the performance of a contract, compliance with legal obligations, or for our legitimate business interests, in accordance with applicable law. For the avoidance of doubt, we do not sell your personal data to any third parties. Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy. We may share your personal data with:

- a. Payment processors and financial service providers;
- b. Identity verification and KYC service providers;
- c. Cloud hosting and infrastructure providers;
- d. Analytics and advertising partners; and
- e. Fraud prevention and security service providers.

All such third parties are subject to appropriate data protection obligations.

13. International transfers

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- i. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- ii. Where we use certain service providers, we may use specific contracts approved by the UK which give personal data the same protection it has in the UK.
- iii. We ensure appropriate safeguards are in place, including the use of the UK International Data Transfer Agreement (IDTA) or other approved mechanisms. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

14. Information security

All information you provide to us is stored on our secure servers as per the [Information Security Policy](#)

15 Data retention

Details of retention periods for different aspects of your personal data are available in our [Data Retention Policy](#)

16. Rights of the data subject

Under certain circumstances you have the following rights under data protection laws in relation to your personal data:

- i. Request access to your personal data.
- ii. Request correction of your personal data.
- iii. Request erasure of your personal data.
- iv. Object to processing of your personal data.
- v. Request restriction of processing your personal data.
- vi. Request transfer of your personal data.
- vii. Right to withdraw consent.
- viii. Right to lodge a complaint to the Information Commissioner's Office.

You also have the right to ask us not to continue to process your personal data for marketing purposes.

17. Data Protection Officer

The Services are managed by Wondr Technologies UK Limited, Data Controller.

If you wish, you can also contact our Data Protection Officer (DPO) by writing to: support@reveltry.co.uk

If you want to submit any kind of request regarding your data rights please submit it by writing to support@reveltry.co.uk

For all privacy requests, we will need to obtain personal information from you to ensure that we know who is making the request. If we are unable to find you in our records, or match the data you provide with what we have in our records, we will notify you.