

Panda.bet Affiliate Program Privacy Policy

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Elysium Interactive S.R.L. ("Panda.bet", "we", "our", or "us") is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, share, and safeguard your personal information when you interact with us as:

- a user of our platform (casino, sports, live games),
- an affiliate partner, or
- a visitor of our website or related systems.

This policy applies to our web, mobile, and affiliate platforms, as well as all forms of contact with Panda.bet. By using our services, you confirm that you have read and understood the practices described in this Privacy Policy.

1. Who We Are Panda.bet is operated by Elysium Interactive S.R.L., registered in Costa Rica (No. 3-102-915212), licensed and regulated by the Government of the Autonomous Island of Anjouan (License No. ALSJ-202502033-FI2). We offer interactive gambling services worldwide and ensure that our operations comply with relevant international standards and local regulatory obligations.

Payment services may be provided by Elypay Ltd (HE 467463), a Cyprus-based company regulated for payment facilitation. Panda.bet maintains contractual relationships with various third-party service providers to ensure seamless operations, fraud prevention, payment processing, and compliance management.

- **2. What Information We Collect** We collect and process personal data from players, affiliates, and visitors to deliver our services and ensure compliance. Data may include:
 - **Identity Data**: Full name, date of birth, nationality, gender, identity verification documents, user IDs, social security numbers (where applicable)
 - Contact Info: Email address, residential address, phone number, Telegram/Skype (for affiliates)
 - **Gaming and Account Data**: Login credentials, account activity, bonus participation, betting history, win/loss records, responsible gambling settings, account limits
 - **Affiliate Data**: Company details, traffic sources, promotional methods, payment wallet details, tax identification number, performance data, login IPs
 - **Financial and Transactional Data**: Deposit and withdrawal history, payment method details, payout preferences, account balances, transaction IDs, bonus redemptions
 - **Technical Data**: IP address, device information, browser type, location data, usage logs, timestamps, language preferences

- **KYC and Compliance Documentation**: Government-issued IDs, proof of address (e.g., utility bill or bank statement), source of wealth documentation, occupation, business registration
- **Communications**: Live chat logs, support emails, recorded calls (if applicable), feedback, complaints, marketing email interactions

We may also collect non-personal data for analytical and statistical purposes to enhance the user experience and protect system integrity.

3. How We Use Your Information We use your personal data to:

- Facilitate user registration and secure account access
- Deliver core platform services, including gameplay, wagering, and affiliate tracking
- Fulfill KYC (Know Your Customer) and AML (Anti-Money Laundering) obligations
- Process payments, withdrawals, commissions, and chargebacks
- Monitor and analyze user activity to detect fraud, collusion, arbitrage, or abuse of bonus systems
- Provide tailored content and promotional offers based on user behavior and preferences
- Support customer service and dispute resolution processes
- Maintain platform security and prevent unauthorized access
- Meet contractual, legal, and regulatory requirements, including responsible gambling mandates
- Perform internal audits, statistical analysis, and system maintenance

Marketing communications will only be sent where legally permitted or based on explicit consent. Users may opt-out at any time.

4. Legal Basis for Processing Our processing activities rely on one or more of the following legal bases:

- Performance of a contract: When providing our services or paying affiliate commissions
- **Compliance with legal obligations**: Such as financial reporting, AML checks, and responsible gaming measures
- Legitimate interests: Platform integrity, fraud detection, business analytics, and customer support
- **Consent**: For optional data uses like email marketing, affiliate newsletters, or promotional surveys

We ensure that data collected on the basis of legitimate interest does not override user rights.

- **5. Sharing of Data** We only share your data when necessary and always with adequate protection. Typical data recipients include:
 - Payment gateways, processors, and financial institutions
 - Affiliate tracking platforms (e.g., Cellxpert or others used by Panda.bet)
 - KYC and AML verification vendors
 - Customer support software providers and CRM systems
 - Data analytics, email marketing, and cloud hosting providers
 - Legal, compliance, or regulatory authorities as required by law or license conditions
 - Professional advisers including auditors, lawyers, and tax consultants

Data is only shared with third parties who comply with applicable privacy standards and data processing agreements.

- **6. Data Retention** We store personal data for as long as necessary to:
 - Provide services and maintain active accounts
 - Meet AML and gambling license retention obligations (usually 5 to 10 years)
 - Resolve disputes, enforce our rights, or respond to regulatory investigations
 - Maintain accurate financial and transactional records

Data that is no longer required will be securely deleted or anonymized.

- 7. Your Rights You have the following rights under data protection laws:
 - Access: Obtain confirmation and a copy of your data
 - **Correction**: Rectify inaccurate or incomplete information
 - **Erasure**: Request deletion of data (under certain conditions)
 - **Restriction**: Limit the processing of your data in specific circumstances
 - Objection: Oppose processing based on legitimate interest
 - Portability: Request to transfer your data to another provider
 - Withdraw consent: Opt-out of marketing or other consent-based processing

To exercise your rights, email us at **support@panda.bet**. We aim to respond within 30 days, subject to verification.

- **8. Security Measures** We employ technical and organizational measures to protect personal data, including:
 - End-to-end encryption (SSL/TLS)

- Secure password hashing and two-factor authentication
- Firewalls and network monitoring tools
- Role-based access and minimal privilege policies
- Staff training in data protection and fraud prevention
- Regular penetration testing and vulnerability scanning

Although no system is impenetrable, we continuously assess and improve our security posture.

- **9. International Transfers** Your data may be processed in or transferred to countries outside your jurisdiction, including outside the EEA. In such cases, Panda.bet ensures that appropriate safeguards are implemented, such as:
 - Binding corporate rules or contractual clauses
 - Third-party certification or adequacy decisions
 - Technical encryption, access restrictions, and pseudonymization

These measures ensure the protection of your data, regardless of location.

- 10. Cookies and Tracking We use cookies, pixels, and tracking scripts to:
 - Maintain user sessions and affiliate referral tracking
 - Remember language, region, and display preferences
 - · Measure site traffic, conversions, and ad effectiveness
 - Personalize content, offers, and bonus notifications

By using our site, you consent to our cookie policy. You can disable non-essential cookies via browser settings or our cookie banner.

- **11. Updates to this Policy** We may update this Privacy Policy from time to time due to:
 - Changes in legal or regulatory obligations
 - Updates to our services or technology
 - Changes in partnerships or data processors

We will notify you of material changes via email, account notifications, or banners on the website. Continued use of our services after updates constitutes acceptance.

12. Contact If you have questions, complaints, or requests regarding this Privacy Policy, contact:

Data Protection Officer

Elysium Interactive S.R.L. support@panda.bet

We are committed to resolving privacy concerns fairly and promptly.