



## Privacy Policy

### “Circus.pe ”

RESHUFFLE is concerned about the protection of personal data. That is why we make every effort to protect the privacy of all visitors and users (hereinafter the “the Users”) of the online gambling and betting site [www.circus.pe](http://www.circus.pe) (hereinafter “the Site”).

Users will find below all the provisions relating to the processing of personal data that are applicable during all visits or uses of the Site by Users (hereinafter the “Privacy policy”)<sup>5</sup>

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## **1. General**

RESHUFFLE processes the personal data of Users of the Site, for the purposes and within the limits of the Privacy Policy, during any visit or use thereof.

RESHUFFLE makes sure that it complies, during the processing of these personal data, with the laws and regulations in force, and in particular European Regulation (EU) 2016/679 of 27 April 2016 concerning the protection of individuals with regard to the processing of personal data (hereinafter “the Regulation”).

In this regard, and in accordance with said regulation, RESHUFFLE :

- Is legally bound to process the personal data of Users. This treatment is described in Article 2.1 of the Privacy Policy;
- Also processes the personal data for the purpose of allowing the Users to use the Site and, in addition, for the necessary and legitimate purposes described in Article 2.2 of the Privacy Policy;
- Processes, with the prior, free and explicit consent of the Users, the personal data described in - and according to the purposes set out in Article 3.

Users are deemed, by accessing the Site and using the Site, to have read and accept the Privacy Policy. They also guarantee that the data and information provided to RESHUFFLE are accurate.

## **2 Definitions:**

### **2.1. The Data Controller**

‘The Data controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

### **2.2. The Data Processor**

‘The Data Processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### **2.3. Security**

circus.pe uses 256-bit SSL (Secure Socket Layer) Digital Encryption to protect your online transactions. It's one of the most sophisticated security systems that exist today for the Internet. This is the same unbreakable technology used by all major banks and financial institutions, so your security and privacy is assured. To ensure

that the protection we offer is completely up-to-date, we revise and update these systems on a regular basis.

When you transact with circus.pe, only reputable electronic cash merchants are used and your account number and password are required to validate any transaction. This is an additional form of verification since it will not be possible to carry out a transaction on your behalf without your personal data.

#### **2.4. Personal Data Protection**

Personal Data held by us is protected using the highest industry standards. Our commitment to protect personal data is not merely through quality and high standards but also through the best and most efficient application of the law. We are bound to only process personal data if such processing is based on a genuine and legitimate reason to do so on the basis of one of the following criteria as set out in the regulation:

- 1) To be able to perform a contract
- 2) On the basis of a legal obligation which binds the company to collect and/or process personal data
- 3) On the basis of consent provided by you
- 4) When the company has a legitimate interest to obtain and/or process personal data
- 5) When it is in the public interest
- 6) When it is in your vital interest for us to obtain and/or process your personal data

#### **2.5. Legitimate Interests**

A legitimate interests exists when we have a business or commercial reason upon which personal data will be processed. In such a case we undertake to protect any and all of your personal data and the manner in which such data is processed and to ensure that such processing would not be unfair to you or to your interest.

If and when we decide to process your personal data on the basis of legitimate interest, we will inform you of such, what said legitimate interest are and provide a process whereby you will be able to raise any questions and/or objections which you way have in relation to such processing. It is important to note that the company is not obliged to stop processing if the grounds for processing over-ride your right to object.

#### **2.6. Data Retention Policy**

Any and all data the company will keep will be protected in the best way possible and will only be used for purposes which are compatible with the applicable regulations. During the period within which you remain a customer of the company, the company will keep your data. Once you are no longer a customer of the company, your personal data will be kept for the periods necessary to comply with the relevant legal and regulatory obligations including complying with the purposes set out in this policy.

Failure to provide your Personal Data may prevent the company from meeting its legal and regulatory obligations, fulfilling its contractual obligations and rendering and/or performing

the necessary services needed to satisfactorily manage and maintain your account. Therefore, failure to provide the necessary personal data may lead to the company being unable to provide its products and/or services.

### **3 Processing of personal data that does not require the consent of the Users**

#### **3.1. The legal obligations of RESHUFFLE and the processing necessary for the use of the Site**

RESHUFFLE is bound, by virtue of the legal and regulatory obligations to which any online gambling and betting operator is subject, on the one hand, and for the purposes of authenticating and allowing Users to use the Site, on the other to process the following personal data for the purposes described below. This processing of personal data by RESHUFFLE does not require the consent of Users pursuant to Article 6.1.b) and c) of the Regulation.

The personal data communicated by the User are recorded in **a register**, as described in Article 7.1, which is controlled and remains at all times under the responsibility of RESHUFFLE .

#### **a. What data are processed?**

The personal data processed are as follows:

- the last name, first name(s), date of birth, language, gender, place of residence/postal address, National Registry number (or passport or identity card), e-mail address, landline or mobile telephone number;
- the banking data used during deposit operations on the Site, and withdrawals of winnings;
- copies of personal documents enabling the authentication of the Users, such as a photo of the identity card, an account statement, proof of deposit or any other document proving the domicile and/or residence of the User;
- the browsing and activity history of the User on the Site, including game history (casino and sport bets), his/her transactions (winnings and losses, deposits, withdrawals, bonuses, gifts and other forms of reward), connections (browser data, IP address), including cookies;
- any other information that may be exchanged between RESHUFFLE and the User, in particular by email or live chat, as part of his/her registration or the use by the User of the online games and bets offered on the Site.

#### **b. What processing is performed by RESHUFFLE ?**

The processing consists of the collection, recording, storage, consultation, organisation, use, reconciliation or any other operation made necessary or useful under the legal and regulatory provisions described in article 2.1.c). The processing may also include the transfer of personal data:

- to the judicial and administrative authorities, such as, in particular, the Malta Gaming Association and/or the Malta Communications Authority;
- to the suppliers of RESHUFFLE, whose services are inseparable from the use of the Site and whose list is available on request from the Contact referred to in article 7.6;

**c. What are the purposes of this processing?**

1) RESHUFFLE is required to process the personal data described in articles 3.1.a) and b) in order to meet the legal and regulatory obligations it is subject to, in particular, the following legal provisions:

- The Prevention of Money Laundering Act (Chapter 373 of the laws of Malta) (“PMLA”) and its subsidiary legislation, the Prevention of Money Laundering and Funding of Terrorism, Regulations (Subsidiary Legislation 373.01 of the Laws of Malta) (“PMLFTR”).
- Legislative Decree N° 1106 of April 19,2012 to fight against Money Laundering and other crimes linked with illegal Mining and Organized Crime.
- The Gaming Act XVI of 2018 as amended by Legal Notice 204 of 2018, regulating of gaming services and products from and within Malta, together with all such activities and matters that are ancillary or incidental thereto or connected therewith, and for the establishment and functions of the Malta Gaming Authority.

2) RESHUFFLE also processes the personal data referred to in article 3.1.a) for the purpose of authenticating Users and enabling them to access and use the Site; this processing is therefore performed to ensure:

- the management of registrations and User accounts;
- the management of the deposits and earnings of Users and more generally the provision of online gambling and betting services;
- informing the User concerning the services offered by RESHUFFLE
- customer service management, including support and risk and fraud.

**3.2. Other processing that does not require the consent of the Users**

RESHUFFLE also processes the following personal data for the legitimate purposes described below. This processing of personal data by RESHUFFLE does not require the consent of Users pursuant to article 6.1.f) of the Regulation.

The personal data communicated by the User are recorded in a **register**, as described in article 8.1, which is controlled and remains at all times under the responsibility of RESHUFFLE .

**a. What data are processed?**

The personal data processed are as follows:

- the last name, first name(s), date of birth, language, gender, home address, postal address, language, email address, landline or mobile phone number;
- the banking data used during deposit transactions on the Site, and withdrawals of earnings;
- copies of personal documents enabling the authentication of Users, such as a photo of the identity card, an account statement, proof of deposit or any other document proving the domicile and/or residence of the User;
- the browsing and activity history of the User on the Site, including game history (casino and sport bets), his/her transactions (winnings and losses, deposits, withdrawals, bonuses, gifts and other forms of reward), connections (browser data, IP address), including cookies;
- any other information that may be exchanged between RESHUFFLE and the User, in particular by email or live chat, as part of his/her registration or the use by the User of the online games and bets offered on the Site.

**b. What processing is performed by RESHUFFLE ?**

The processing consists of the collection, recording, storage, consultation, organisation, use, reconciliation of the personal data described in article 2.2.a). It also consists of the transfer of such personal data to third parties, the list of which is available on request from the Contact referred to in article 7.6.

**c. What are the legitimate purposes of the processing?**

RESHUFFLE processes the personal data referred to in article 2.2.a) for the following legitimate purposes:

- the development of new games and betting offers;
- the promotion, advertising and marketing, including the management of affiliation and related loyalty programs, relating to online gambling and betting services, including the sending of SMS, telephone calls, paper or electronic newsletters;
- participation in contests and promotional offers, including communication about winners;
- conducting satisfaction surveys, statistical studies, trend analyses and market research, for the purpose of improving online gambling and betting services or User information or User protection services and gambling addiction prevention as well as for management, marketing and reporting purposes, including profiling.

## **4 The processing of personal data requiring the consent of the Users**

By using the RESHUFFLE Site, for any reason whatsoever, the User expresses his/her specific, informed and unambiguous free will to expressly authorise RESHUFFLE to process personal data in accordance with the Regulation, within the limits and for the purposes defined below and without prejudice to the processing referred to in article 3.

The personal data communicated by the User are recorded in a **register**, as described in article 8.1, which is controlled and remains at all times under the responsibility of RESHUFFLE.

The User also benefits from the rights, including the right to withdraw his/her consent at any time, in accordance with the terms and conditions set out in article 4.4.

### **4.1. Nature of the personal data processed**

The data processed by RESHUFFLE are as follows:

- the surname, first name(s), date of birth, language, gender, home address/postal address, National Register Number (or identity card or passport number), email address, landline or mobile phone number;
- the browsing and activity history of the User on the Site, including game history (casino and sport bets), his/her transactions (winnings and losses, deposits, withdrawals, bonuses, gifts and other forms of reward), connections (browser data, IP address), including cookies;
- any other information that may be exchanged between RESHUFFLE and the User, in particular by email or live chat, as part of his/her registration or the use by the User of the online games and bets offered on the Site.

The personal data communicated by the User are recorded in a **register**, as described in article 8.1, which is controlled and remains at all times under the responsibility of RESHUFFLE.

### **4.2. The processing**

The processing consists of the collection, recording, storage, consultation, organisation, use, reconciliation of the personal data described in article 4.1. It also consists of the transfer of such personal data to third parties, the list of which is available on request from the Contact referred to in article 8.6.

### **4.3. Purposes of the processing of personal data**

Personal data is collected and processed by RESHUFFLE for the purposes of promotion, advertising and marketing, including affiliation and management of loyalty programs, relating to the provision of gaming and betting services online, (including sending SMS, phone calls, paper or electronic newsletter), involving third-party processing of personal data.

## 5. Rights of Users

Without prejudice to articles 3 and 6, Users are entitled to exercise a right of rectification, objection and limitation, subject to the following terms and limitations.

### 5.1. Right of access

- a. RESHUFFLE holds at the disposal of the Users all of the following information:
  - the identity and contact details of the controller;
  - the contact details of the data protection officer;
  - the personal data processed;
  - the purposes of the processing for which the personal data are intended and the legal basis of the processing;
  - the recipients or categories of recipients of the personal data, where appropriate;
  - and, where appropriate, the fact that the controller intends to transfer personal data to a country outside the European Union and: either the existence (or absence) of a decision of adequacy issued by the European Commission, i.e., in the absence of such a decision, the guarantees offered by the third country and the means implemented to obtain a copy of the personal data.
  - the possibility to object to automated processing of their data, such as profiling, unless there are just reasons that make this treatment by RESHUFFLE necessary, as well as the possibility of objecting to any processing of their data for purposes of prospecting.
- b. Users have the right to request, at any time, access to all the information set out in this article and article 3.1, by contacting the Contact referred to in article 7.6.
- c. Users are entitled to obtain a copy of the personal data being processed. RESHUFFLE reserves the right to claim the payment of any costs incurred by this request; these costs will be calculated on the basis of the administrative costs incurred by the request; they will not exceed 20 euros.
- d. Users are entitled to obtain, in a structured format, this access or copy, in such a way that personal data are provided to them in a format that complies with the technical standards in force during the access request; this format will therefore enable its readability by machine.

### 5.2. Right of rectification

RESHUFFLE guarantees and obliges the Users to update and rectify the personal data concerning them, as long as the data is incorrect or incomplete.



This right of rectification may be exercised upon request to the Contact referred to in article 8.6.

### **5.3. Right of objection**

RESHUFFLE authorises Users to object to the processing of all or part of their personal data, for the following reasons:

- their data are inaccurate;
- the processing is no longer necessary for the purposes for which the data was collected;
- the User withdraws his/her consent;
- the data have been subject to unlawful processing.

RESHUFFLE also authorises Users to object to:

- automated processing of their data, such as profiling, unless for justified reasons, do not make this processing by RESHUFFLE necessary;
- any processing of their personal data for prospecting purposes, including profiling, if it is linked to this prospecting.

This right of objection may be exercised upon request to the Contact referred to in article 8.6.

### **5.4. Right to be forgotten**

RESHUFFLE also undertakes to respond to any request for the deletion of personal data as soon as possible (right to be forgotten), when:

- the processing is no longer necessary for the purposes for which the data was collected;
- the User withdraws his/her consent;
- the data have been unlawfully processed or must be deleted under a legal obligation.
- the User objects to the automated processing of his/her data, such as profiling and that there are no justifiable reasons making this processing by RESHUFFLE necessary;
- the User objects to the processing of his/her personal data for prospecting purposes, including profiling, if it is linked to this prospecting.

## **5.5. Right of limitation**

Users also have the right to obtain limitation of the processing of their personal data from RESHUFFLE when:

- the User considers that his/her personal data are inaccurate, and for the time necessary for RESHUFFLE to verify the accuracy of these;
- the processing is illegal but that the User does not want the deletion of the data but requires a limitation of processing thereof;
- the User objects to automated processing, including profiling or processing of his/her personal data for prospecting purposes and it is necessary to verify the legitimacy of the reasons for which RESHUFFLE intends to maintain this processing;
- RESHUFFLE no longer needs the personal data processed, but the person concerned wants them to be kept for the purpose of ascertaining, exercising or defending legal rights;

This right of limitation may be exercised upon request to the Contact referred to in article 8.6.

## **5.6. Transfer of data to another controller**

Users are authorised to transfer the personal data processed by RESHUFFLE under articles 3.2 and 4 to another controller without RESHUFFLE obstructing it.

As far as such a transfer is technically possible, Users are entitled to request RESHUFFLE for this transfer to be carried out directly by its controller.

## **5.7. Methods**

The rights recognised by RESHUFFLE to the User must be exercised according to the methods defined in article 8.6.

RESHUFFLE will respond to these requests from Users within one month and will keep a register to this effect.

## **5.8. Notification**

RESHUFFLE shall provide the User with notification of any erasure or correction of data made in accordance with articles 5.2 and 5.4, unless such notification proves impossible or imposes disproportionate efforts.

This notification will be made by email or mail, based on the contact information provided by the User.

## **6. Location, retention and retention period of personal data**

- 6.1.** RESHUFFLE retains the personal data of Users in a form enabling their identification and their availability and following appropriate and secure means.

The data are stored and hosted in Malta by Data Center; these have all the security guarantees necessary and useful with regard to the applicable technical standards.

- 6.2.** The personal data of Users are stored by RESHUFFLE for the purposes defined in articles 3 and 4. They are kept for a period of 10 years for all the purposes governed by article 2.a); RESHUFFLE therefore reserves the right to keep Users' personal data for all purposes that would be imposed by the law due to its online gaming and gambling activities.

The personal data shall, for the remainder, be kept for a period not exceeding that necessary for the achievement of the purpose of the processing for all the purposes governed by article 3.2 and 4, it being understood that the duration, in view of the specific nature of the services offered by RESHUFFLE, the conservation authorities must take into account the assumption where, on the initiative of the Gaming Commission, a judicial authority or a third party, RESHUFFLE would be obliged to establish or exercise a legal claim, in connection with the personal data of Users.

## **7. Liability of RESHUFFLE – Subcontractor**

- 7.1.** RESHUFFLE undertakes that the processing of Users' personal data is lawful, fair, and transparent to the User concerned. Any processing by RESHUFFLE will comply with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and this Privacy Policy.

RESHUFFLE implements all reasonable and appropriate means to ensure the confidentiality, integrity and availability of the personal data it processes. These technical and organisational measures, in particular, are described in the Information Security Manual available from the Contact referred to in article 7.6.

The technical measures include the anonymisation and encryption of personal data, depending on the purpose.

The organisational measures include the conduct of internal audits, in addition to audits to which RESHUFFLE may be submitted by the Gaming Commission, in particular.

If necessary, RESHUFFLE carries out, with the help of the data protection officer, an impact analysis when processing is likely to create a high risk for Users.

- 7.2.** The personal data of Users are not transmitted to third parties other than the suppliers and partners of RESHUFFLE, except for the purposes described in articles 3.1, 3.2, 4 and 8.2 and, therefore, if:
- The transfer is made obligatory by law, regulation or injunction of an administrative or judicial authority;

- The transfer is necessary for the provision of online gambling and betting services, or for maintenance service;
- The User has signed his/her consent for such a transfer;

The partner will not be considered to be a subcontractor unless it processes the Users' personal data on behalf of RESHUFFLE. RESHUFFLE declines all responsibility for the processing of the User's personal data by the partner who provides its own services in its own name and on its own account or if it proves that the act that caused the damage is not attributable to it; this will be particularly the case if the partner has not acted in accordance with RESHUFFLE 's instructions.

In the event that RESHUFFLE acts as a subcontractor of the partner, it is agreed that RESHUFFLE will not be held responsible for the damage caused by the processing of personal data contrary to the Regulation or this Privacy Policy if it has not complied with the obligations provided for in the Regulation which are specifically incumbent on the subcontractors or that it has acted outside or contrary to the lawful instructions of the partner. Similarly, the liability of RESHUFFLE cannot in any case be engaged if it proves that the fact that caused the damage is not attributable to it.

- 7.3. RESHUFFLE ensures that, when the processing is carried out by a subcontractor on behalf of RESHUFFLE , it provides sufficient guarantees as to the implementation of appropriate technical and organisational measures and, more generally, compliance with the requirements of the Regulation. In particular, it obliges the subcontractor to comply with the Regulation and, consequently, to maintain a register.
- 7.4. RESHUFFLE undertakes to notify security incidents related to the data processed, which may create a risk to the rights and freedoms of the individuals concerned, to the data protection authority referred to in article 8.4 as soon as possible and, if possible, within 72 hours, at the latest, from the date of becoming aware of the incident.

RESHUFFLE will register any security incident and take the necessary organisational and technical measures to resolve it as soon as possible.

RESHUFFLE will also inform the Users concerned, provided that the violation of personal data poses a high risk for the rights and freedoms of the User; this information will be sent by email or mail to the contact details provided by the User.

## **8. Miscellaneous**

### **8.1. Register of Personal Data and Information Security Manual**

As the data controller, RESHUFFLE keeps a record of all its processing activities. This contains all the information relating to the type of data processed, to the persons involved in the processing of the data, to the possible recipients to whom these data are, if any, communicated, for which purposes the data are processed as well as the retention period of the data and a general description of the technical and organisational security measures put in place.

The personal data communicated by the User are recorded, as well as the processing and their purposes, in a **register**, which is controlled and remains at all times under the responsibility of RESHUFFLE . This **register** includes, in addition to the above information:

- a description of the purposes of the processing;
- a description of the categories of persons concerned and categories of personal data;
- the categories of recipients to whom the personal data have been or will be communicated, including recipients in third-party countries or international organisations;
- the deadlines for deleting the different categories of data;
- a general description of the technical security measures.

RESHUFFLE is also in the process of obtaining ISO 27001 certification. On this occasion, it has published an Information Security Manual which contains all the technical and organisational measures ensuring the security of information within RESHUFFLE , including with regard to the protection of personal data; it is available from the Contact referred to in article 8.6.

## **8.2. Policy concerning cookies and trackers (analytical data)**

- a. A “cookie” is a set of data that the Site registers temporarily or permanently on the User's equipment via his/her internet browser.

The Site uses cookies to make navigation more efficient, useful and reliable. Some of these cookies are essential to the functioning of the website; others are intended to improve the gaming and betting experience and navigation on the Site.

A “tracker” is a set of data collected when browsing the Site and centralised on a partner server.

- b. By accessing and using the Website, Users expressly agree with RESHUFFLE 's cookie and tracker policy.
- c. The Site uses the following data (cookies and trackers):
  - Cookies necessary for the use of the Site: these cookies are technically essential for the operation of the website, in that they ensure good communication with the User and facilitate navigation;
  - Functional cookies: they make it possible to improve navigation and to give Users easier access to their search. They enable specific features on the Site to be activated and improve the usability and experience of the User, including by remembering his/her preference choices (e.g. language);
  - Trackers: the Site uses tracking data via Google Analytics to measure the ways in which Users interact with the content of the Site; they enable Users to be

recognised, the number of Users to be counted, their browsing behaviour on the website to be seen and visit statistics to be generated anonymously or not. These statistics continuously improve the Site and offer the User relevant content.

The Site uses Google Analytics to get an overview of the traffic on the Site, the origin of this traffic and the pages visited. This means that Google is acting as a subcontractor of RESHUFFLE . The information collected by Google Analytics is generated in such a way that only RESHUFFLE and its partners can use it in accordance with the Privacy Policy. For example, it is not possible to identify the people who visit the website. For more information, Users are invited to consult Google's data protection policy, available at the following address: [http://www.google.nl/intl/en\\_uk/policies/privacy/](http://www.google.nl/intl/en_uk/policies/privacy/).

#### d. How to disable cookies and trackers

Most web browsers are configured to automatically accept cookies. Therefore, if the Users wishes, within the limits defined in article 4, to refuse the use of cookies, to personalise their management, it is necessary to modify their browser settings.

In the event that the User deactivates certain cookies, it is possible that certain parts of the website are not searchable and/or usable, or only partially.

It is also possible to program the browser to send a notice when it uses a cookie and so decide to accept it or not.

If the User wants to block cookies, they must use the link associated with their browser:

- Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Chrome: <https://support.google.com/accounts/answer/61416?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Safari: <http://support.apple.com/kb/PH5042>

To no longer be traced by Google Analytics on any website, you can visit the following website: <http://tools.google.com/dlpage/gaoptout>

### **8.3. Integrity - modification of the Privacy Policy**

The Privacy Policy contains all the contractual provisions enforceable against Users, without prejudice to the general provisions contained in the Terms of Use of the Site of which they form an integral part. The Terms of Use of the Site therefore remain applicable for any matters not related to the protection of personal data.

RESHUFFLE also reserves the right to modify the Privacy Policy. Any update is binding on Users as soon as it is published on the Site. RESHUFFLE will make sure to mention the date on which the Privacy Policy in force is posted on the Site.

#### 8.4. Probative value

The User acknowledges that the electronic documents exchanged and the electronic data collected as part of hi/hers registration or use of the Site have the same probative value as if these documents and data had been communicated or collected in paper form. He/she therefore undertakes not to dispute their power or probative value because of their electronic media.

#### 8.5. Data protection authority

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the law of 8 December 1992, the User is entitled to request additional information or to lodge a complaint with the Data Protection Authority. The Supervisory Authority is Malta Communications Authority; its contact details are:

Malta Communications Authority

Address : Valletta Waterfront, Pinto Wharf, Floriana FRN 1913

Telephone : +(356) 21336840

Email : [dataprotection.mca@mca.org.mt](mailto:dataprotection.mca@mca.org.mt)

#### 8.6. Contact – Information concerning the identity of the controller and the data protection officer

RESHUFFLE can be contacted for any questions relating to the protection of Users' personal data, as follows:

- By mail: SmartCity Malta, SCM1001 Unit 507, Ricasoli Malta
- By email: [privacy@circus.pe](mailto:privacy@circus.pe)

The controller at RESHUFFLE is Mr. Sylvain BONIVER.

Any request relating to the exercise of the rights referred to in article 4 must be sent by email to the address [privacy@circus.pe](mailto:privacy@circus.pe).

RESHUFFLE has also appointed a **Data Protection Officer** within the meaning of article 37 of the aforementioned Regulation; he/she can be contacted by e-mail: [dpo@circus.pe](mailto:dpo@circus.pe) He/she is in charge of monitoring and the compliance of RESHUFFLE 's processing of Users' personal data.