

# Group Personal Data Protection Policy

## Introduction

For the Entities of the FDJ United Group, acting either as data controllers or data processors, the protection of personal data constitutes the cornerstone of the trust relationship we maintain with our players, customers, employees, partners, and applicants. We undertake to comply with all applicable regulations, including the General Data Protection Regulation (GDPR) where relevant, and to implement all necessary measures to ensure the security and confidentiality of personal data.

Each Entity within the FDJ United Group acts as an independent data controller for the personal data it processes during its activities. This independence does not diminish the shared commitment to applying the principles and standards established by the Group, ensuring consistency and a high level of compliance in personal data protection.

The FDJ United Group Entities rely on a structured and expert governance framework to ensure compliance with data protection laws.

A Data Protection Officer (DPO) is appointed and duly registered with the competent supervisory authorities, in accordance with legal requirements. In France and abroad, the DPO is supported by a multidisciplinary team of experts responsible for ensuring the lawfulness of personal data processing within the organization, including for specific activities such as gaming, financial services, and strategic partnerships.

This team is entrusted with:

- Participation in various committees to support projects, define and monitor protection measures and actions.
- Disseminating operational tools (guidelines, codes of conduct, practical sheets, procedures, thematic policies on projects, contracts, cookies, artificial intelligence, data subject rights, legal bases, etc.).
- Conducting regulatory and technical monitoring to ensure continuous alignment with supervisory authorities' recommendations, audit priorities, and potential sanctions.

Through this proactive approach, FDJ United Group Entities promote a genuine understanding of data protection issues among all employees and strengthens the culture of compliance within the organization.

## Commitments and Principles

FDJ United Group Entities adhere to the following principles when processing personal data:

- **Lawfulness:** Personal data is collected for legitimate purposes and on an appropriate legal basis,
- **Transparency:** Data subjects are provided with clear and accessible information regarding processing activities,
- **Data Minimization:** Only personal data strictly necessary for the intended purpose is collected and processed,
- **Privacy by Design and by Default:** Security measures are embedded from the design stage of projects,
- **Storage Limitation:** Personal data is retained only for the period necessary to achieve the processing purpose.

## Obligations of Data Processors and Partners

Data processors and partners of FDJ United Group Entities are selected with due diligence and are contractually bound to:

- Ensure a level of personal data protection equivalent to that implemented by FDJ United Group Entities,
- Use personal data solely for the performance of the entrusted services,
- Strictly comply with all applicable data protection laws and regulations.

## Data Security: Integrity, Confidentiality, and Availability

FDJ United Group Entities implement appropriate technical and organizational appropriate measures appropriate to ensure a level of security suited to the risks. These measures are subject to regular assessments.

In the event of a personal data breach, an internal procedure is activated to assess the incident, mitigate its impact, and prevent recurrence. Where required, notification is sent to the competent authority and affected individuals. This procedure includes risk evaluation, implementation of corrective measures, and comprehensive documentation of all actions taken.

Where required, Data Protection Impact Assessments (DPIAs) are conducted to identify and mitigate potential risks and safeguard the rights and freedoms of data subjects.

## Transparency on Data Collection and Use

We guarantee clear, accessible, and intelligible information on the use of personal data. Legal notices and privacy policies are made available on our websites and collection points, enabling individuals to understand their rights and how their data is processed.

## Data Subject Rights

In accordance with applicable law, each data subject has the following rights regarding their personal data:

- Right of access,
- Right to rectification,
- Right to erasure,
- Right to object,
- Right to restriction of processing,
- Right to data portability,
- Right to define post-mortem instructions.

These rights may be exercised through each data collection platform, subject to and within the limits of applicable law.

## Awareness and Training

FDJ United Group Entities foster a culture of data protection through awareness programs and role-specific training (marketing, HR, data, legal, etc.), enabling employees to understand the stakes and adopt best practices relevant to their functions.

## Controls and Audits

Internal audits and regular checks are carried out to assess the effectiveness of implemented measures and identify areas for improvement. FDJ United Group Entities are committed to continuous improvement in strengthening personal data protection.