

Casinos Austria International Belgium NV / Viage Productions NV

Privacy statement Customers, suppliers and business partners

Last updated on: 21/11/2024

1. About this declaration

- 1.1 This privacy statement ("**Statement**") explains how we (as defined below) collect, share and use information which, alone or in combination with other information, relates to you ("**Personal Information**") in your capacity as a customer (or contact person with such entities) ("**you**" or "**your**") of Casinos Austria International Belgium / Viage Productions whose registered office is located at rue Grétry 16 - 1000 Brussels, registered under company numbers CAI Belgium NV 0502.785.246, Viage Productions NV 0474.725.225 ("**Casinos Austria International Belgium / Viage Productions**", "**we**", "**us**" and "**our**") collect, share and use.
- 1.2 This statement also contains information about your rights in relation to the personal data we process and how you can exercise them.
- 1.3 Casinos Austria International Belgium / Viage Productions takes its privacy obligations seriously. That is why we have drawn up this statement, which describes the standards applied by Casinos Austria International Belgium / Viage Productions to protect your personal data.
- 1.4 For the purposes of this Statement, Casinos Austria International Belgium / Viage Productions acts as the controller of your Personal Data. As controller, Casinos Austria International Belgium / Viage Productions is responsible for ensuring that the processing of Personal Data complies with applicable data protection laws, in particular the General Data Protection Regulation. In addition, Casino Austria International Holding GmbH may also act as data controller for certain processing activities relating to your personal data at group level.
- 1.5 Please take the time to read this statement carefully. If you have any questions or comments, please contact dataprotection@viage.be.

2. What personal data does Casinos Austria International Belgium / Viage Productions collect and why?

- 2.1 The categories of personal data we may collect, the purposes for which we process them, the legal basis and the retention period are set out below:

Why we collect them	Categories of personal data	Legal basis	Conservation period
Membership management	<ul style="list-style-type: none">NameAddressCustomer card numberCopy of identity cardNationalityPlace of birthDate of birth	Contractual need to manage our membership agreement with you.	For the duration of your membership and up to 10 years after your last visit.

	<ul style="list-style-type: none"> • Signature • Photo • Financial data • Transactions • Profession • Type • Casino registration date • Dates and times of customer visits • In some cases, the telephone number and e-mail address. • Number of visits / frequency of visits / time of visits. 		
Customer relationship management	<ul style="list-style-type: none"> • Name • Contact details • Information provided via web forms • Questions and comments about Grand Casino Bruxelles - Viage 	Legitimate interest in managing customer relations	This information is kept for 10 years in accordance with article 60 of the Money Laundering Act and article 62 of the Act on Gambling, Betting, Gaming Establishments and the Protection of Players (the "Gambling Act").
Compliance with anti-money laundering legislation	<ul style="list-style-type: none"> • Video surveillance images • Full name • Date of birth • Residential address • Identification number (passport, identity card, driving licence) • Photocopies of identity documents • Customer risk profile • Amount and nature of transactions: to determine the extent of gambling • Date and time of transactions • Method of payment: information on the methods of payment used (e.g. cash, credit card, bank transfer) can be a 	Legal obligation under applicable anti-money laundering legislation	<p>Camera images are kept for 56 days, unless they reveal a breach of the Gambling Act. In that case, they will be kept until the end of the investigation and any prosecution.</p> <p>Other information is kept for 10 years in accordance with article 60 of the Money Laundering Act and article 62 of the Act on Gambling, Betting, Gaming Establishments and the Protection of Players (the "Gambling Act").</p>

	<p>strong indicator of money laundering (e.g. if payments are made in cash).</p> <ul style="list-style-type: none"> • Source of funds • Reading frequency • Amount deployed over a given period • Suspicious Activity Reports • Sources of income • Correspondence: any communication with the customer (for example, in the case of a request for clarification of transactions). • Continuous monitoring of transactions and suspicious behaviour 		
	<ul style="list-style-type: none"> • Player address • Camera images • Player identity: verification of the player's age and identity, including a check of the national register to ensure that the player is not on the exclusion list. • Game history: includes bet amounts, winnings and losses. • Transaction data: All financial movements, including deposits, withdrawals and money transfers related to gambling activities. 	Legal obligation under gambling legislation	Camera images are kept for 56 days, unless they reveal a breach of gambling laws. In that case, they will be kept until the end of the investigation and any prosecution.
Managing the accounts	<ul style="list-style-type: none"> • Salaries (contracts) • Legal/advisory fees • Supplier invoices • Contracts with suppliers 	Legal obligation under applicable accounting requirements	<p>In accordance with Article 54ter of the VAT Code, records must be kept for ten years from the end of the year in which the transaction took place.</p> <p>In accordance with article 60 §3 of the VAT Code,</p>

			<p>the invoices and copies of invoices referred to in paragraph 1 must be kept for 10 years from 1 January of the year following the date of issue.</p> <p>Individual accounts and their appendices (individual identification forms, copies of pay slips, etc.) must be kept for 5 years from the annual account closing date.</p> <p>The tax form must be kept for 10 years from 1 January of the year following the taxable period.</p>
Sales objectives and commercial analysis - Loyalty programme management	<ul style="list-style-type: none"> Name Preferences and interests 	Authorisation	For the duration of your membership and up to 10 years after your last visit.
Sending out newsletters	<ul style="list-style-type: none"> Name E-mail address E-mail preferences and interests 	Legitimate interest in keeping data subjects informed about our activities, products and services.	
<p>Security casino and fraud management: we may work with lists of excluded persons (in this respect, see article 8 of the membership agreement available https://viage.be/en/legal/code-of-conduct).</p> <p>We also have audio and camera surveillance in and around the casino to control access, combat crime and protect customers.</p>	<ul style="list-style-type: none"> Compliance with the accession agreement Camera images and audio recordings 	Legitimate interest in combating breaches and protecting members and the company.	Camera images are kept for 56 days, unless they reveal a breach of gambling laws. In that case, they will be kept until the end of the investigation and any prosecution.
Access Control: It is in the interest of all other patrons and staff that correct action is taken in the event of a breach of the membership agreement. All excluded persons will be recorded for this purpose in an internal file which can only be	<ul style="list-style-type: none"> Name First name Date of birth Reason for exclusion Date and duration of exclusion Photo 	Legitimate interest in combating breaches and protecting members and companies.	For the duration of your membership and up to 10 years after your last visit.

<p>consulted by Grand Casino Brussels - Viage and which is used solely to manage access control.</p> <p>Access to the casino may be denied for a certain period of time.</p> <p>In the event of exclusion or withdrawal of membership card, personal data will be kept in a file and processed by the casino for the purposes of combating offences and ensuring the protection of clients and the casino.</p>			
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2.2 If we ask you to provide other personal data not described above, we will specify, at the time we collect such personal data, what personal data we are asking you to provide and why we are asking for it.

2.3 We may also automatically collect certain information from your device. Specifically, the information we collect automatically may include information such as your IP address, device type, unique identifiers for your device, browser type, broad geographic location (for example, your country or city location) and other technical information. We may also collect information about how your device has interacted with our website, including pages visited and links clicked.

Collecting this information allows us to better understand who our website visitors are, where they come from and what parts of our website they are interested in. We use this information for internal analysis and to improve the quality and relevance of our website for our visitors.

Certain information may be collected through the use of cookies or similar tracking technologies, as explained in more detail in our "Cookie Statement" available at [Cookie policy | VIAGE Brussels](#).

2.4 From time to time, we may receive personal data about you from third parties (including casinos affiliated to the Groupement des casinos belges and the Excluded Persons Information System (EPIS)), but only if we have verified that such third parties have your consent or are legally permitted or required to disclose your personal data to us.

The categories of personal data we collect from third parties include your identification information and we use the personal data we receive from these third parties to manage security and fraud compliance within the Casino.

3. To whom does Casinos Austria International Belgium / Viage Productions send your personal data?

3.1 We may disclose your personal data to the following categories of recipients:

- (a) to **our group companies** for purposes consistent with this statement. We take precautions to grant access to personal data only to employees who have a legitimate business reason for accessing it and who are contractually prohibited from using the personal data for other purposes.
- (b) to **our third party suppliers, service providers and partners** who provide services to us to process personal data, or who otherwise process personal data for the purposes described in this statement or which are disclosed to you at the time we collect your personal data. This may include disclosures to third party suppliers and other service providers that we use in connection with the services they provide to us, including to assist us in areas such as IT platform management or support services, infrastructure and application services, marketing or data analysis.
- (c) to **any authorized law enforcement agency, regulatory body, government agency, court or other third party** if we believe that disclosure is necessary (i) because of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of another person. This includes, but is not limited to, transfers to the Belgian Gaming Commission and the Financial Information Processing Unit.
- (d) to our **auditors, legal representatives and similar agents** as part of the consultancy services they provide to us for legitimate business purposes and as part of a contractual prohibition on the use of personal data for other purposes;
- (e) to **a prospective purchaser** (and its agents and advisers) in connection with a proposed purchase, merger or acquisition of part of our business, provided that we inform the purchaser that it may only use your personal data for the purposes described in this statement;
- (f) to any other person if we have obtained your prior consent to such communication.

4. How do we protect your privacy?

4.1 We will process your personal data in accordance with this declaration, as follows:

- (a) **Propriety:** we will process your personal data appropriately. This means that we will be transparent about how we process your personal data and that we will process it in accordance with applicable legislation.
- (b) **Purpose limitation:** we will process your personal data for specified and legitimate purposes and will not process it in a way incompatible with those purposes.
- (c) **Proportionality:** we will process your personal data in a way that is proportionate to the purposes of the processing.
- (d) **Accuracy of data:** We take appropriate steps to ensure that the personal data in our possession is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your personal data is as accurate, complete and up-to-date as possible by informing Casinos Austria International Belgium / Viage Productions immediately of any changes or errors. You must inform your local Casinos Austria International Belgium / Viage Productions office of any changes to the personal data we hold about you (for example, a change of address).

- (e) **Data security:** we use appropriate technical and organisational measures to protect the personal data we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. These measures include the use of :
- SSL (Secure Sockets Layer) protocol
 - SET (Secure Electronic Transaction) protocol
 - Access management - authorised persons
 - Network security software
 - Computer backup
 - Development of a PKI certificate
 - Login/password
 - Firewall
- (f) **Subcontractors:** We may use third parties to process your personal data on behalf of and for the account of Casinos Austria International Belgium / Viage Productions. We require these sub-contractors to process and act upon personal data only in accordance with our instructions and to take appropriate measures to ensure the protection of personal data.
- (g) **International data transfers:** Your personal data may be transferred to and processed in countries other than the one in which you reside. These countries may have different data protection laws to those in your country.

However, we have taken appropriate safeguards to ensure that your personal data continues to be protected in accordance with this notice. These measures include the implementation of the European Commission's Standard Contractual Clauses for the Transfer of Personal Data. Further details can be provided on request by contacting us at the following address: dataprotection@viage.be

5. Your data protection rights

5.1 You have the following data protection rights:

- (a) If you wish to access, **correct, update or** request the **deletion of** your personal data, you can do so at any time by contacting us at dataprotection@viage.be.
- (b) In addition, in certain circumstances provided for by the applicable data protection legislation, you may object to the processing of your personal data, ask us to **restrict the** processing of your personal data or request the **portability** of your personal data. You can exercise these rights by contacting us at dataprotection@viage.be.
- (c) If we have collected and processed your personal data with your consent, you may **withdraw it at** any time. Withdrawal of your consent will not affect the lawfulness of the processing we carried out prior to the withdrawal or the processing of your personal data carried out on legitimate grounds other than your consent.

- (d) You have the right to **unsubscribe from the marketing communications** we send you at **any time**. You can exercise this right by clicking on the "unsubscribe" or "unsubscribe" link in the marketing emails we send you. Please contact us using the details above to unsubscribe from other forms of marketing (such as postal marketing or telemarketing).
- (e) If you have a complaint or concern about how we process your personal data, we will endeavour to address it. If you feel that we have not responded adequately to your complaint or concern, you have the right to lodge a complaint **with a data protection authority** about our collection and use of your personal data. For more information, please contact your local data protection authority. The contact details for the Belgian data protection authority are as follows:

Data Protection Authority (GBA) / Autorité de la protection des données (APD)

Rue de la Presse 35, 1000 Brussels

Tel +32 2 274 48 00

Fax +32 2 274 48 35

E-mail: contact@apd-gba.be

Website: <https://www.autoriteprotectiondonnees.be>

5.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights, in accordance with the applicable legislation.

6. In some cases, you can also exercise your rights directly against third parties. This is the case, for example, with personal data held in the databases of the Belgian Gaming Commission (www.gamingcommission.be), such as the EPIS list.

7. **Amendments to this declaration**

7.1 This statement may be amended from time to time to take account of legal, technical or commercial changes. If we change our statement, we will take appropriate steps to inform you accordingly, depending on the significance of the changes. Where required by applicable data protection laws, we will seek your consent to any material changes to this statement.

7.2 You can find out when this declaration was last amended by consulting the "last updated on" date at the top of this declaration.