American Luck

Privacy Policy

Version 1.4

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Scope of Privacy Policy

This Privacy Policy describes and governs the manner in which SGSE LLC ("American Luck") collects, uses, shares, disclose and stores customer personal information through its website https://americanluck.com (the "American Luck Website", "Our Website"), Mobile Application and any related domains, subdomains, related parties websites, webpages, and third party websites or applications. This Privacy Policy applies to the American Luck Website, Mobile Application and all products and services offered through Our Website. Please read this Privacy Policy carefully before using Our Website.

This Privacy Policy explains how your personal information is collected, used and stored during and after your use of Our Website and/or Mobile Application. We comply with all applicable privacy laws and regulations, including applicable U.S. federal and state privacy and biometric privacy laws and regulations.

1. **Definitions**

1.1 The following definitions apply to this Privacy Policy:

1.1.1. "Account" means your user account with us, which you sign up for at http://americanluck.com;

1.1.2. "Covered Information" means information which allows a specific person to be contacted either physically or online, including, without limitation, first and last name, address, email address, phone number, AI-Generated Communication consent records and an identifier which allows a specific person to be contacted either physically or online;

1.1.3. "Confidentiality Incident" means any access, use, loss or communication of a User's personal information, including any information relating to a User which can directly or indirectly allow them to be identified, which is not authorized by law, or any loss or other breach of the protection of such information;

1.1.4. “Data Protection Officer” means a role within a company or organization whose responsibility is to ensure that the company or organization is correctly protecting individuals' personal data according to current legislation;

1.1.5. “Event Tagging” means tags that allow us to monitor certain events completed through our Website and/or Mobile Application (e.g., purchases);

1.1.6. “Virtual Coins” means the in-game currency used to play Games;

1.1.7. “Marketing Pixels” means pieces of code that allow us to gather information about anyone who visits our Website and/or Mobile Application, including their engagement with our webpage;

1.1.8. “Mobile Device Identifiers” means the unique customer identifier on every mobile device which is used to distinguish a mobile device. This unique identifier can be used for the purposes of internet-based advertising;

1.1.9. “Participant” means a User who obtains Virtual Coins and/or participates in games using Virtual Coins;

1.1.10. “Service” means any of the services available through our Website or Mobile applications;

1.1.11. “Website” means our website at https://americanluck.com;

1.1.12. “User” means a person who uses the Service.

1.1.13. "Affiliate" means SGSE LLC and its related brands, including but not limited to Fortune Coins, Sportzino, Zula Casino, Win Bonanza, Luck Party, and Yay Casino and any other related brands;

1.1.14. "AI-Generated Communication" means any promotional call, voicemail, or SMS message sent to you that is created, initiated, or delivered using artificial intelligence, automated systems, predictive dialers, or pre-recorded voice technology, whether or not a live human agent is involved;

1.1.15. "Promotional Communications" means any call, SMS message, email, voicemail, or other electronic communication sent for the purpose of marketing, advertising, or promoting products, services, offers, bonuses, sweepstakes, or events offered by us or our Affiliates.

1.1.16. “Biometric Data” has the meaning given in Section 10.3;

1.1.17. “Selfie Image” means a still photograph of your face that you take and submit for identity verification;

1.1.18. “Verification Information” has the meaning given in Section 10.1.

2. What We Collect

2.1 We collect information about you in a number of ways. For example, we collect directly identifiable information - information that you provide to us and it includes:

2.1.1. Your email address, physical mailing address, mobile phone number (and any other phone number(s) provided).

2.1.2. Personal information such as your first name, last name, age.

2.1.3. Account login details, including your unique username, unique password and any photos associated with your account.

2.1.4. Transaction information such as your mailing address, phone number, information collected at the time of payment and/or redemption, such as, financial institution information, credit card information and bank account statements.

2.1.5. Information sent as part of live chat, email, or any other method of customer support (see also section 4.6 below).

2.1.6. Information we obtain from a third-party (such as, Facebook, Google) regarding your connection to our services.

2.1.7. Your location information, including information provided by a device interacting with our platform.

2.1.8. Activity and device information about your use of our products or services, including which content you view/use, when and for how long you access our products or services, how often you use our services, how you heard about our services, the specific hardware model you are using, the device type you are using, other unique device identifiers, operating system, browser type and IP address; and

2.1.9. Identity verification information, including your government-issued photo identification, a Selfie Image, proof of address, bank statements and the information contained in them, as described in Section 10.

2.1.10. Consent and Communications Records. We collect and store records of your consents, including:

(a) Your consents captured at the time of account registration; and (b) Where separately and optionally provided, your consent to receive Promotional Communications via automated or AI-Generated calls and SMS messages from us and our Affiliates.

For each consent, we record the date, time, method of consent, the specific consent language agreed to, and any subsequent opt-out or revocation requests made by you. These records are maintained for compliance with applicable laws.

2.2 We may also collect information which does not directly identify you, as well as information about groups of customers which does not directly identify you, including, but not limited to, your patterns of use of the Website, Mobile Application or the zip code/postal code associated with your device.

3. Your Representations

3.1 By providing your information to us, you represent that any information you provide is true and accurate. You acknowledge that your contact information, including but not limited to your phone number and email address, are true and accurate. You confirm that you are the subscriber or customary user of any telephone number you provide to us. By accepting this Privacy Policy, you agree to receive marketing and promotional emails from us and our Affiliates. You understand that this consent is not a condition of purchase or use of our Services, and that you may withdraw your consent at any time as described in Section 4.2.8 of this Privacy Policy

3.2 Separately, and on a wholly optional basis, you may consent to receive Promotional Communications via automated or AI-Generated calls and SMS messages from us and our Affiliates by ticking the following optional consent box at registration:

"I consent to receive promotional calls and SMS messages, including automated or AI-generated calls, from American Luck and its Affiliated websites. I understand I can revoke my consent at any time."

This consent is entirely optional. You will not be denied access to our Services, nor will you receive a modified version of our Services, if you choose not to provide this consent. This consent is recorded separately from your acceptance of this Privacy Policy. If you do provide this consent, you may revoke it at any time using the methods described in Section 4.2.8.

4. How We Collect Information

4.1 User information is collected in a number of ways, including when a User accesses our Service, registers an Account, makes a purchase, completes identity verification,

answers a survey (including those sent from a related third-party), and in connection with any other service, feature or resource offered by us.

4.2 Telephone, SMS, and AI-Generated Communication

4.2.1 By providing your telephone number(s) to us and separately and optionally ticking the AI/SMS consent box described in Section 3.2, you expressly consent to being contacted at the number(s) provided by or on behalf of us and our Affiliates using any of the following methods:

(a) Pre-recorded or artificial voice messages; (b) Calls made using an automatic telephone dialing system (autodialer); (c) AI-Generated Communications, including calls and SMS messages created or initiated using artificial intelligence or automated technology; and (d) SMS or text messages, including promotional texts.

4.2.2. Separately, by accepting this Privacy Policy, you consent to receive marketing and promotional emails from us and our Affiliates as described in Section 3.1.

4.2.3. AI-Generated Communications and automated calls/SMS may relate to:

(a) Account-related documentation and verification; (b) Any purchases, deposits, or redemptions related to your Account; and (c) Promotional matters, including offers, bonuses, and special events offered by us or our Affiliates.

4.2.4. Where you have provided the optional consent described in Section 3.2, you acknowledge that we may contact you even if your telephone number is registered on a state or federal Do Not Call ("DNC") registry.

4.2.5. You acknowledge and agree that AI-Generated Communications may use synthetic or AI-generated voices. At the beginning of any AI-generated call, we will identify that the call is automated or AI-generated, as required under applicable law.

4.2.6. Your consent to receive AI-Generated Communications and automated calls/SMS (Section 3.2) is entirely optional and is not a condition of purchasing any goods or services or using our platform.

4.2.7. We are not responsible for any charges incurred by you from your telephone or mobile service provider for texts, calls, or data received from or on behalf of us.

4.2.8. How to Opt-Out / Revoke Consent. You may withdraw your consent to receive any or all Promotional Communications at any time using any of the following methods:

(a) AI Calls/SMS: Reply STOP to any SMS message received from us, or contact us at support@americanluck.com; (b) Marketing Emails: Click the "Unsubscribe" link in any marketing email received from us or our Affiliates, or contact us at support@americanluck.com; (c) All Communications: Submit a written revocation

request to support@americanluck.com with your name, email address, and the phone number(s) and/or email address(es) to be removed. Please include "Communication Opt-Out" in the subject line.

4.3 We may also collect information from Users through telephone, video or correspondence, including email, instant messaging, physical mail, SMS and/or social media platforms. Telephone and video calls with us may be recorded for the purposes of training, quality control and compliance. By partaking in any such call with us as described above, your express consent will be taken and you will be informed prior to your call being recorded.

4.4 We use a variety of technologies embedded in our Website, Mobile Application or in our applications on third party sites and platforms including cookies, pixels, tags and application program interfaces (“API”). For example:

4.4.1. In order to enhance your user experience, we use industry standard identifiers, such as cookies or similar technologies. A cookie is a small text file saved locally on your computer or mobile device when you visit our Website. This small text file may include a unique identifier, making it possible to distinguish your device from another device.

4.4.2. Examples of similar identifying technologies that we may use are:

4.4.2.1. Marketing pixels;

4.4.2.2. Mobile device identifiers. We may, at times, share your Mobile device identifiers with advertisers; and

4.4.2.3. Event tagging.

4.5 Analytical tools may also be used to collect information, including when you visit our Website, Mobile Application or use our applications or services on third party sites or platforms.

4.6 When you interact with our chatbot, we may collect and process information that you voluntarily provide through your interactions with the chatbot, including chat messages, any files or attachments you submit, and technical data such as IP address, device identifiers, browser type, operating system, and timestamps related to the interaction. Where you choose to initiate identity or verification processes through the chatbot, you may be requested to submit identity or verification documents, which will be used solely to verify your identity and eligibility. You should not include sensitive personal

information in chatbot interactions, except where specifically requested for verification purposes.

5. **How We Use Your Information**

5.1 We may use your information for the purposes set out in this Privacy Policy. Your information may also be accessed by other companies within our group of companies when acting on behalf of us as a data processor as outlined in this Privacy Policy.

5.2 We retain all customer information collected by means described in this Privacy Policy as long as required by this Privacy Policy or as long as is permitted by law. We may share your information collected with our group of companies or third-party companies, including but not limited to payment providers, Virtual Card Provider, providing a service to customers directly or indirectly through us. We may use and/or share your information with third parties, in accordance with applicable law, to offer the best possible experience for you or to offer additional services. Some reasons for which your information may be collected and used/shared are:

5.2.1. To provide services as requested by you, including the establishment and maintenance of your Account and routine security checks to ensure the security of your information.

5.2.2. To provide you with the best customer service experience possible. Information provided and/or collected from you will help us in responding to any customer service requests. Feedback provided by you may be used to improve our products and services.

5.2.3. In the processing of payments, we may use information provided by you in order to comply with various due diligence requirements, including as related to anti-money laundering and to verify payment details. We do not share any payment information with third party payment processors except to the extent necessary in providing transactional services.

5.2.4. Aggregated information may be used to best understand our users in order to deliver the most tailored user experience possible.

5.2.5. To contact you about our Services and those of our Affiliates, we may contact you by email, live chat, telephone, SMS, physical mail, or social media. Specifically:

(a) Where you have accepted this Privacy Policy, we may send you marketing and promotional emails from us and our Affiliates; and

(b) Where you have separately and optionally provided consent under Section 3.2, we may contact you by automated or AI-Generated calls and SMS messages. This

includes managing promotions that you enter. Please refer to Section 4.2 for details on how these communications are made and how you may opt out

5.2.6. In sending you important notices regarding matters such as purchases you have made or changes to any of our policies.

5.2.7. In complying with all our legal and/or regulatory obligations, we may use the information we collect to ensure compliance with the Documentation and our regulatory obligations.

5.2.8. To verify your identity, age, residence and eligibility, to confirm ownership of the payment or redemption method you use, and to detect and prevent fraud, as described in Section 10.

When you use our chatbot, interactions may be stored and reviewed for the purposes of customer support, security, fraud prevention, and compliance. We may use information collected through the chatbot solely to operate, maintain, and improve the chatbot functionality made available on our website.

6. Your Rights Over Your Information

6.1 By law, you have a number of rights concerning the information about you that we collect and store securely. Please contact our Data Protection Officer if you wish to exercise any of the rights outlined in this Section 6.

6.2 You have the right to access personal information about you that we securely store, the right to object to the processing of your personal information and the right to withdraw any consent given through this Privacy Policy. You also have the right to withdraw your consent to receive marketing emails or Promotional Communications, including AI-Generated Communications, at any time. Withdrawal of consent will not affect the lawfulness of any communications made prior to your withdrawal. To exercise this right, please refer to Section 4.2.8. You may withdraw your consent to identity verification as described in Section 10.4.

6.3 Depending on where you live, you may also have the right to: (a) access or obtain a copy of your personal information; (b) delete your personal information; (c) correct inaccurate personal information; (d) object to or restrict the processing of your personal information; and (e) withdraw any consent you have given. To exercise these rights, please email legal@americanluck.com. We may need to verify your identity first.

7. How We Protect Your Information

Keeping your personal information secure is our top priority. Through the use of physical, electronic and operational protocols we are able to protect your personal information. We use industry-standard practices for data collection, data storage, and data processing to protect your information against unauthorized access, manipulation, disclosure or destruction. We regularly review our security protocols and make sure that they meet industry-standards. However, no data transmission or storage system is 100 percent secure from unauthorized access or use. If you have reason to believe that your personal information has been compromised while in our care, please immediately notify us at support@americanluck.com.

8. **How Long Do We Keep Your Information**

8.1 We retain your information, including Verification Information, for as long as necessary to provide our Services to you and to fulfill the purposes outlined in this Privacy Policy. How long we keep your information depends on:

(a) how long we need it to provide our Services, verify your identity and process redemptions;

(b) any legal, accounting, tax, reporting or regulatory requirements that apply to it, including anti-money laundering obligations;

(c) the need to detect and prevent fraud; and

(d) any actual or anticipated investigation, dispute or legal claim.

8.2 We may retain your information after your Account is closed or after we stop providing Services to you, for as long as necessary for the purposes described in Section 8.1 or as otherwise required or permitted by law, unless a shorter retention period is required by applicable law.

8.3 When we no longer need your information for these purposes, and we are not required by law, regulation or court order to keep it, we will take reasonable steps to permanently delete it or de-identify it so that it can no longer be associated with you.

8.4 If you request that your personal information be permanently deleted, we will require your written authorization and may need to verify your identity. We may retain information that we are required to keep by law, including for audit purposes, and information that has been de-identified or aggregated.

9. **Sharing Your Information**

9.1 We may share your information within our group of companies or with a third party who will provide services to you for us. We may also share your information with other third parties in order to stay compliant with our legal obligations. We will only share the minimum amount of your information required to fulfil these purposes.

9.2 We reserve the right to use a User's information to announce the winning through use of our products or services, including username or your partial name, the amount of won Virtual Coins, state, zip code, or any other Personal Information collected as described in this Privacy Policy for marketing purposes including on social media platforms, affiliated marketing channels and through physical media channels (radio, television, print media). This does not include Verification Information, such as identity documents, Selfie Images or bank statements. We may also share your personal information in connection with the sale, merger, acquisition (or similar transaction) of the company to a third party and/or the transfer of substantially all of the assets of the company to a third party.

9.3 The artificial intelligence technology powering our chatbot is provided by third-party service providers, who process chatbot interactions on our behalf and strictly in accordance with our instructions. Such third-party providers are permitted to process chatbot data only for the purpose of providing and supporting the chatbot services, in compliance with applicable data protection laws and contractual obligations. We do not authorize third-party AI providers to use chatbot interactions for their own independent purposes.

9.4 **Sharing with Affiliates for Marketing Purposes.** We may share your personal information, including your name, email address, and telephone number, with our Affiliates (as defined in Section 1.1.13) strictly for the following consented purposes: (a) Sending you marketing and promotional emails, where you have accepted this Privacy Policy; and (b) Sending you automated or AI-Generated calls and SMS messages, where you have separately and optionally provided consent under Section 3.2. Each Affiliate that receives your personal information is required to: (i) use it only for the consented purpose; (ii) maintain appropriate security measures; and (iii) honor any opt-out or revocation requests made by you promptly.

10. Identity Verification

10.1 **What we collect.** Before you can redeem prizes, and at any other time where we reasonably consider it necessary to prevent fraud or comply with our legal obligations,

we will ask you to verify your identity. For this purpose, we may collect information including: images of your government-issued photo identification (front and back) and the information shown on it, such as your name, date of birth, address, document number, photograph and physical characteristics; a Selfie Image; proof of address, such as a recent utility bill; a recent bank statement or other proof of ownership of your payment or redemption method; proof of income or source of funds; and any other documents described in our Sweepstakes Rules or that we reasonably require to verify your identity or eligibility (together, "Verification Information"). If you do not complete verification, we will not be able to process redemptions.

10.2 **How verification works.** Our verification system checks that your identity document is genuine and legible, reads the information on it, and compares your Selfie Image with the photograph on your identity document to confirm that you are the person pictured. We collect still images only and do not record video or audio.

10.3 **Biometric Data.** Our collection of Verification Information may include data that may be considered biometric data in some jurisdictions ("Biometric Data"). We collect it using facial recognition technology from your Selfie Image and from the image of your face on your identity document. We use Biometric Data only to verify your identity and prevent fraud. We do not sell, lease or trade Biometric Data or use it for marketing. We disclose it only to service providers acting on our behalf where necessary for verification, or where required or permitted by law. We permanently destroy Biometric Data once it is no longer needed for these purposes, in accordance with Section 8.

10.4 **Your consent.** Before you begin verification, we will ask for your consent to the collection and use of your Verification Information, including Biometric Data, as described in this Section 10. You may withdraw your consent at any time by contacting support@americanluck.com. Withdrawal does not affect processing carried out before it, but we will then be unable to complete verification or process redemptions.

11. Information for Specific Groups located in the United States

11.1 Our Services are restricted to individuals who have attained the age of majority in their jurisdictions. Accordingly, we will never knowingly collect or maintain information from minors. If you believe that a minor may have provided us with personal information and you would like for us to delete that information, please contact us at support@americanluck.com.

11.2 **For Nevada Residents**

11.2.1. Under Nevada law, Nevada residents who have made purchases related to the Services may opt out of the "sale" of "Covered Information" (as such terms are defined under Nevada law) for financial consideration to a person for that person to license or sell such information to additional persons. While we may share your information with third parties we believe can provide you with offers and promotions for goods and services of interest to you, we do not believe this sharing would qualify as a sale under Nevada law. Regardless, if you are a Nevada resident who has made purchases related to the Services, you may submit a request to record your preference to opt out by emailing the Data Protection Officer at support@americanluck.com. We may take reasonable steps to verify your identity and that the request came from you.

mailto:support@americanluck.commailto:support@americanluck.com

We will maintain records of all Confidentiality Incidents in the form and for as long as required by applicable law.

12. **Changes To This Privacy Policy**

12.1 This Privacy Policy may be updated from time to time to reflect changes in the law and changes to our customer data handling practices and internal policies. We will notify you of any material changes and, where required by law, we will obtain your consent. Notice for any material change (or changes) to this Privacy Policy may be made by posting of such change (or changes) to the American Luck website or by other means in accordance with the applicable laws.

12.2 Any changes to the Privacy Policy will become effective when the updated Privacy Policy is posted on our Website.

12.3 Users are responsible for staying up to date on the changes to our Privacy Policy posted on our Website. We recommend checking this page regularly for updates. We will post the "date updated" at the top of the Privacy Policy.

12.4 This Privacy Policy is effective as of the 'date updated' which appears at the top of this webpage, and supersedes and replaces any and all privacy policies previously in effect.

13. Contacting Us

13.1 If you have questions regarding this privacy policy, how we use or handle your personal information, please contact our privacy team at legal@americanluck.com. Alternatively, you may also contact our customer service department at support@americanluck.com.