VANTAGE PRIVACY POLICY

Last Updated: August 18, 2026

1. Introduction

VANTAGE ("VANTAGE," "we," "our," or "us") respects the privacy of the individuals and businesses that use our platform.

This Privacy Policy explains how we collect, use, process, disclose, retain, and safeguard information when you access or use the VANTAGE platform, including our websites, player portals, operator dashboards, administrative tools, automation systems, APIs, software integrations, reporting services, loyalty tools, promotional tools, support services, and other products and services that reference this Privacy Policy (collectively, the "Services").

VANTAGE is designed to provide software, automation, reporting, account-management, and technology services to authorized operators and their users.

This Privacy Policy may apply to:

- Operators and agents using VANTAGE;
- Employees and authorized users of an operator;
- Players whose accounts are managed through VANTAGE;
- Individuals visiting VANTAGE websites;
- Individuals contacting VANTAGE for support;
- Affiliates and referral partners;
- Business contacts;
- Prospective customers; and
- Other individuals whose information is processed through the Services.

By using the Services, you acknowledge the data practices described in this Privacy Policy.

Where required by applicable law, we will request separate consent before collecting or using information for particular purposes.

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2. OUR ROLE IN PROCESSING PERSONAL INFORMATION

Depending on the circumstances, VANTAGE may process personal information in different capacities.

For information collected directly from VANTAGE customers, administrators, website visitors, or business contacts, VANTAGE may determine the purposes and means of processing that information.

For player information submitted to VANTAGE by an independent operator, VANTAGE may process that information on behalf of the operator as a service provider, processor, contractor, or similar role under applicable privacy law.

In those situations, the operator may independently determine:

- What player information is collected;
- Why the information is collected;
- How player accounts are managed;
- Player eligibility requirements;
- Promotional eligibility;
- Redemption decisions;
- Loyalty-program participation; and
- Other aspects of the operator-player relationship.

Players may therefore need to contact the applicable operator directly to exercise certain privacy rights regarding information controlled by that operator.

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3. INFORMATION WE COLLECT

We may collect the following categories of information.

A. Identification and Contact Information

This may include:

- First name;
- Last name;
- Username;
- Email address;
- Telephone number;
- Mailing address;
- Date of birth;
- Account number;
- Internal player ID;
- Legacy account ID;
- Referral ID;
- Agent or operator affiliation; and
- Other similar identifiers.

B. Account Information

When you create or maintain a VANTAGE account, we may collect:

- Username;
- Password or encrypted authentication credentials;
- Account status;
- Account creation date;
- Login history;
- Security settings;
- Multifactor-authentication settings;
- Account preferences;
- Role and permission information; and
- Password-reset activity.

Passwords should be stored using appropriate cryptographic protections rather than in readable plaintext.

C. Existing Third-Party Platform Account Information

VANTAGE may allow operators to associate a player with a pre-existing account on a supported third-party platform.

Information associated with these accounts may include:

- Platform name;
- External username;
- External player ID;
- Account status;
- Existing platform credentials where authorized and operationally necessary;
- Last successful account lookup;
- Last successful connection;
- Last successful transaction;
- Verification status;
- Account mapping information; and
- Platform-related account metadata.

Where credentials are stored, VANTAGE may use encryption, secret-management technology, access restrictions, tokenization, or similar safeguards.

D. Transaction and Account Activity Information

Depending on the Services used, we may process information relating to:

- Deposits;

- Credit allocations;
- Redemption requests;
- Redemption approvals;
- Redemption rejections;
- Bonuses;
- Adjustments;
- Account balances;
- Transaction amounts;
- Transaction dates;
- Payment status;
- Transaction reference numbers;
- Platform transactions;
- Promotional credits;
- Loyalty rewards;
- Referral earnings; and
- Transaction history.

VANTAGE may process information about a transaction even where VANTAGE itself does not directly custody or transmit the underlying funds.

E. Payment Information

Where payment functionality is offered, information may include:

- Payment method;
- Billing address;
- Transaction amount;
- Payment status;
- Payment processor reference number;
- Partial payment-card information;
- Bank-payment information;
- Digital-wallet information; and
- Other payment-related information.

Full payment-card numbers may be processed directly by third-party payment processors rather than stored by VANTAGE.

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4. IDENTITY AND VERIFICATION INFORMATION

Where identity or eligibility verification is required, VANTAGE or an authorized third-party verification provider may process information such as:

- Date of birth;
- Government-issued identification information;

- Verification status;
- Address;
- Telephone number;
- Email address;
- Fraud-risk indicators;
- Identity-verification results; and
- Other information needed to verify identity, eligibility, or account ownership.

We seek to limit the information retained by VANTAGE when a third-party verification provider can perform the verification without requiring VANTAGE to store the underlying identification document.

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5. DEVICE AND TECHNICAL INFORMATION

When an individual accesses VANTAGE, certain information may be collected automatically, including:

- IP address;
- Browser type;
- Browser version;
- Device type;
- Operating system;
- Device identifiers;
- Approximate location derived from IP address;
- Language settings;
- Referring website;
- Pages visited;
- Session duration;
- Login timestamps;
- Error logs;
- Network information; and
- Other technical information.

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6. AUTOMATION AND BOT ACTIVITY INFORMATION

Because VANTAGE includes automated functionality, we may collect and maintain technical records associated with automation jobs.

These records may include:

- Automation-job ID;
- Action requested;
- Player account involved;
- External platform involved;
- Account lookup status;

- Transaction status;
- Connection status;
- Successful and failed login attempts;
- Time an automated action began;
- Time an automated action completed;
- Error messages;
- Retry information;
- Platform responses;
- Transaction-verification information; and
- Audit records.

We may use this information to operate, troubleshoot, secure, and improve the Services.

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7. OPERATOR AND ADMINISTRATIVE INFORMATION

For customers operating the VANTAGE administrative platform, we may collect:

- Business name;
- Business contact information;
- Administrator name;
- Employee information;
- Account permissions;
- User roles;
- Login activity;
- Administrative actions;
- Customer-support history;
- Billing records; and
- Audit logs.

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8. PROMOTIONS, LOYALTY, VIP, AND REFERRAL DATA

When these features are enabled, VANTAGE may process information relating to:

- Promotions entered;
- Promotions redeemed;
- Bonus eligibility;
- VIP status;
- Loyalty tier;
- Loyalty points;
- Reward history;
- Referral codes;

- Referring player;
- Referred player;
- Referral earnings;
- Cashback eligibility;
- Promotional history; and
- Player engagement.

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9. SUPPORT AND COMMUNICATION INFORMATION

If you contact VANTAGE or an operator through functionality provided by VANTAGE, we may collect:

- Support messages;
- Chat communications;
- Email correspondence;
- Support-ticket history;
- Complaint information;
- Issue descriptions;
- Attachments; and
- Resolution history.

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10. INFORMATION COLLECTED THROUGH COOKIES AND SIMILAR TECHNOLOGIES

VANTAGE may use:

- Cookies;
- Local storage;
- Session storage;
- Pixels;
- Analytics tools;
- Software development kits;
- Device identifiers; and
- Similar technologies.

These technologies may be used for:

- Authentication;
- Security;
- Session management;
- Remembering preferences;
- Fraud prevention;
- Performance monitoring;

- Analytics;
- Feature improvement; and
- Marketing where permitted.

You may be able to control certain cookies through your browser settings or through cookie-management tools provided on the Services.

Blocking certain essential cookies may prevent parts of VANTAGE from functioning correctly.

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11. HOW WE USE INFORMATION

We may use personal information for the following purposes.

A. Providing the Services

Including to:

- Create and manage accounts;
- Authenticate users;
- Provide dashboards;
- Connect external platform accounts;
- Locate authorized player accounts;
- Execute authorized automated actions;
- Display balances;
- Manage transactions;
- Process redemption workflows;
- Provide reports;
- Operate promotions;
- Operate loyalty programs;
- Operate referral programs; and
- Provide administrative tools.

B. Account Migration and Matching

We may use information to:

- Import pre-existing player accounts;
- Match VANTAGE player records with existing third-party platform accounts;
- Verify external usernames or player identifiers;
- Detect duplicate mappings;
- Maintain account associations; and
- Reduce unnecessary creation of duplicate accounts.

C. Security and Fraud Prevention

We may use information to:

- Detect unauthorized access;
- Detect unusual login activity;
- Prevent fraudulent transactions;
- Detect duplicate accounts;
- Prevent credential abuse;
- Investigate suspicious activity;
- Protect VANTAGE systems;
- Protect operators;
- Protect players; and
- Maintain audit trails.

D. Customer Support

We may use information to:

- Respond to questions;
- Diagnose technical issues;
- Investigate transaction problems;
- Resolve account-access problems;
- Provide technical assistance; and
- Improve support processes.

E. Analytics and Product Improvement

We may analyze information to:

- Understand platform usage;
- Identify popular features;
- Measure system performance;
- Identify errors;
- Improve automation;
- Improve interfaces;
- Develop new products;
- Optimize workflows; and
- Improve reliability.

Where reasonably possible, we may aggregate or de-identify information for analytics and product development.

F. Communications

We may use information to send:

- Service notifications;
- Security alerts;
- Account notices;
- Transaction notifications;
- Redemption updates;
- Platform-status messages;
- Administrative notices;
- Policy updates;
- Support communications; and
- Other operational communications.

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12. MARKETING AND PROMOTIONAL COMMUNICATIONS

Where permitted by law, VANTAGE or an applicable operator may send marketing communications regarding:

- Promotions;
- New features;
- Product updates;
- Loyalty opportunities;
- VIP benefits;
- Referral programs;
- New game platforms;
- Special offers; and
- Other relevant products or services.

Depending on the communication method and applicable law, separate consent may be required.

Commercial email recipients may unsubscribe using the unsubscribe mechanism included in applicable emails. VANTAGE will process legally required opt-out requests in accordance with applicable law.

Opting out of promotional communications does not prevent us from sending non-marketing communications such as:

- Security notifications;
- Password-reset messages;
- Transaction notices;
- Account notices;
- Terms updates; and

• Other service-related messages.

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13. SMS AND TEXT MESSAGES

Where SMS functionality is offered, marketing text messages will be sent only where the sender has an appropriate lawful basis or consent as required by applicable law.

Message and data rates may apply.

Users may be able to opt out by following the instructions contained in the applicable message.

Service-related or security communications may be handled separately from marketing preferences where permitted by law.

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14. HOW WE DISCLOSE INFORMATION

We may disclose information to the following categories of recipients.

A. Operators and Agents

Where VANTAGE processes player information on behalf of an operator, relevant information may be accessible to that operator and its authorized personnel.

B. Service Providers

We may engage third-party companies to provide services including:

• Cloud hosting;
• Database hosting;
• Cybersecurity;
• Email delivery;
• SMS delivery;
• Customer support;
• Analytics;
• Payment processing;
• Identity verification;
• Fraud prevention;
• Error monitoring;
• Data storage;
• Backup services; and
• Technical infrastructure.

These providers may process information only as reasonably necessary to perform services for us and subject to applicable contractual restrictions.

C. Third-Party Platforms

Where an operator instructs VANTAGE to connect to an external game or entertainment platform, VANTAGE may exchange information with that platform as necessary to:

- Locate an account;
- Verify account ownership;
- Retrieve account information;
- Perform an authorized transaction;
- Synchronize records; or
- Complete other requested functions.

D. Payment and Financial-Service Providers

Where payments are processed, relevant information may be shared with:

- Payment processors;
- Banks;
- Digital-wallet providers;
- Fraud-prevention providers; and
- Related financial-service providers.

Their handling of information may be governed by their own privacy policies.

E. Legal and Regulatory Disclosures

We may disclose information when reasonably necessary to:

- Comply with law;
- Respond to a subpoena;
- Respond to a court order;
- Respond to governmental or regulatory requests;
- Enforce our agreements;
- Investigate fraud;
- Protect our rights;
- Protect users;
- Protect the public; or
- Respond to emergencies.

F. Business Transactions

Information may be disclosed in connection with:

- A merger;
- Acquisition;
- Financing;
- Corporate restructuring;
- Bankruptcy;
- Sale of assets; or
- Transfer of all or part of the VANTAGE business.

G. With Your Direction or Consent

We may disclose information when an individual or customer specifically directs or authorizes us to do so.

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15. SALE OR SHARING OF PERSONAL INFORMATION

VANTAGE does not intend to sell personal information for money as part of its ordinary business model.

However, certain state privacy laws use broad definitions of “sale” or “sharing” that may include some advertising, analytics, or cross-context behavioral advertising activities.

If VANTAGE engages in an activity legally considered a sale or sharing of personal information, eligible consumers will be provided applicable rights and opt-out mechanisms as required by law.

VANTAGE will not knowingly sell or share personal information of minors where prohibited by law.

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16. DATA RETENTION

VANTAGE retains personal information only for as long as reasonably necessary for the purposes described in this Privacy Policy, including to:

- Provide the Services;
- Maintain business records;
- Complete transactions;
- Resolve disputes;
- Detect fraud;
- Maintain audit logs;

- Comply with legal obligations;
- Enforce agreements;
- Maintain security; and
- Protect legal rights.

Different categories of information may have different retention periods.

For example, transaction records, audit logs, or legal records may need to be retained longer than ordinary account-profile information.

When information is no longer reasonably required, we may delete, anonymize, aggregate, or otherwise securely dispose of it.

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17. DATA SECURITY

VANTAGE uses administrative, technical, and organizational safeguards designed to protect personal information.

Depending on the nature of the information and system, safeguards may include:

- Encryption in transit;
- Encryption at rest;
- Password hashing;
- Credential vaulting;
- Role-based access controls;
- Multifactor authentication;
- Logging and monitoring;
- Restricted administrative access;
- Firewalls;
- Network controls;
- Secure development practices;
- Security testing;
- Backup systems;
- Incident-response procedures;
- Credential rotation; and
- Employee or contractor access controls.

Despite these measures, no electronic system can be guaranteed to be completely secure.

Accordingly, VANTAGE cannot guarantee absolute security.

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18. CREDENTIAL SECURITY

Because VANTAGE may interact with authorized third-party accounts, certain credentials may be particularly sensitive.

Where VANTAGE stores third-party platform credentials, we seek to implement safeguards appropriate for sensitive authentication information.

VANTAGE personnel should not have unrestricted access to readable credentials.

VANTAGE may use technical controls designed to allow authorized automation systems to access credentials without exposing those credentials unnecessarily to human administrators.

Users and operators remain responsible for protecting their own account credentials and promptly reporting suspected unauthorized access.

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19. DATA BREACHES AND SECURITY INCIDENTS

If VANTAGE identifies a security incident involving personal information, we may:

- Investigate the incident;
- Contain the incident;
- Preserve relevant evidence;
- Mitigate potential harm;
- Notify affected customers;
- Notify affected individuals where required;
- Notify regulators where required; and
- Take steps designed to reduce the likelihood of recurrence.

Notification obligations may vary based on the nature of the information involved and applicable law.

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20. PRIVACY RIGHTS

Depending on where you live and whether applicable privacy law covers VANTAGE's processing, you may have certain rights concerning your personal information.

These may include the right to:

- Know whether we process your information;
- Access personal information;
- Request correction;
- Request deletion;

- Obtain a portable copy of certain information;
- Request information about categories of data collected;
- Request information about disclosures;
- Opt out of certain sales or sharing;
- Opt out of certain targeted advertising;
- Withdraw consent where processing is based on consent;
- Appeal certain privacy-request decisions; and
- Not be unlawfully discriminated against for exercising privacy rights.

These rights are not absolute.

Applicable law may permit us to retain information despite a request where necessary for purposes such as:

- Completing transactions;
- Security;
- Fraud prevention;
- Legal compliance;
- Recordkeeping;
- Establishing or defending legal claims; or
- Other legally permitted purposes.

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21. SUBMITTING A PRIVACY REQUEST

To submit an eligible privacy request, contact:

[INSERT PRIVACY EMAIL ADDRESS]

or use any privacy-request mechanism VANTAGE makes available.

We may need to verify your identity before processing a request.

Depending on the request, verification may require information sufficient to reasonably confirm that the requester is the person to whom the relevant data relates.

Authorized agents may submit requests where permitted by applicable law, subject to verification requirements.

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22. PLAYER REQUESTS WHERE VANTAGE ACTS FOR AN OPERATOR

In some cases, VANTAGE processes player information solely on behalf of an independent operator.

If VANTAGE receives a privacy request concerning information controlled by an operator, we may:

- Refer the requester to the operator;
- Forward the request to the operator;
- Assist the operator in responding; or
- Take another action permitted or required under applicable law or contract.

The operator may be responsible for determining whether the request must be fulfilled.

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23. CALIFORNIA PRIVACY RIGHTS

Where the California Consumer Privacy Act, as amended, applies, eligible California residents may have rights relating to their personal information, which may include:

- The right to know;
- The right to access;
- The right to delete;
- The right to correct;
- The right to opt out of sale or sharing;
- The right to limit certain uses or disclosures of sensitive personal information, where applicable; and
- The right to be free from unlawful retaliation for exercising applicable rights.

Where legally required, VANTAGE will provide additional California-specific disclosures concerning the categories of personal information collected, purposes of collection, sources of information, and categories of recipients.

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24. OTHER U.S. STATE PRIVACY RIGHTS

Residents of certain U.S. states may have additional privacy rights under applicable state law.

VANTAGE will honor applicable rights where legally required.

Requirements differ by state and may depend on factors such as:

- VANTAGE's annual revenue;
- Number of consumers whose information is processed;
- Nature of the information processed;
- Relationship with the consumer;
- Whether information is sold or shared; and
- Other statutory thresholds.

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25. AGE RESTRICTIONS AND CHILDREN'S PRIVACY

VANTAGE is not intended for use by children.

The Services are intended only for individuals who meet the applicable minimum age requirements established by VANTAGE and the applicable operator.

Where the platform requires users to be at least eighteen (18) years old, individuals under eighteen may not create an account or use the player-facing Services.

VANTAGE does not knowingly intend to collect personal information from children through Services that are restricted to adults.

If we become aware that information has been collected from a child in violation of applicable law or our eligibility requirements, we may take steps to delete the information and terminate the account.

Parents or guardians who believe a child has improperly provided information may contact us at:

[INSERT PRIVACY EMAIL ADDRESS]

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26. THIRD-PARTY LINKS AND SERVICES

The Services may contain links to or integrations with third-party websites, applications, or services.

VANTAGE does not control the privacy practices of independent third parties.

This Privacy Policy does not govern information independently collected by those third parties.

Users should review the privacy policies of external services before providing information to them.

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27. INTERNATIONAL DATA TRANSFERS

VANTAGE, its infrastructure providers, and its service providers may process information in jurisdictions different from the jurisdiction in which the information was originally collected.

Where applicable law requires specific protections for international transfers, VANTAGE may use approved contractual or legal mechanisms.

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28. AGGREGATED AND DE-IDENTIFIED INFORMATION

VANTAGE may create aggregated or de-identified information that is not reasonably capable of being associated with a particular individual.

We may use such information for:

- Analytics;
- Product development;
- Business intelligence;
- Security;
- Research;
- Performance monitoring; and
- Other lawful business purposes.

Where required by applicable law, we will not attempt to re-identify data that has been formally maintained as de-identified information except as permitted for testing whether de-identification methods are effective.

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29. AUTOMATED PROCESSING

VANTAGE uses automated technology to perform operational functions such as:

- Account matching;
- Account synchronization;
- Transaction processing;
- Fraud detection;
- Platform-status monitoring;
- Account verification;
- Reporting;
- Notifications; and
- Workflow automation.

Automated processing is generally designed to execute instructions configured by operators or users.

Where applicable law grants rights concerning certain forms of automated decision-making, VANTAGE will address such rights as legally required.

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30. FRAUD AND RISK MONITORING

VANTAGE may analyze information to identify suspicious or potentially unauthorized activity.

Relevant indicators may include:

- Login behavior;
- Account changes;
- Duplicate accounts;
- Transaction patterns;
- IP-address activity;
- Device information;
- Failed authentication;
- Abnormal automation activity; and
- Other risk indicators.

These activities are intended to protect VANTAGE, operators, players, and connected services.

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31. DO NOT TRACK AND GLOBAL PRIVACY SIGNALS

Some browsers and devices provide privacy controls such as “Do Not Track” or legally recognized opt-out preference signals.

The legal requirements associated with these signals differ by jurisdiction.

Where applicable law requires VANTAGE to recognize a particular browser-based opt-out preference signal, we will seek to process the signal in accordance with applicable requirements.

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32. BUSINESS USERS AND EMPLOYEE ACCESS

Operators are responsible for ensuring that only authorized employees, contractors, or representatives receive access to their VANTAGE accounts.

Operator administrators may be able to view information concerning their own personnel, including:

- Name;
- Email;
- Role;
- Permissions;
- Login activity;
- Administrative actions; and
- Security events.

Operators are responsible for complying with applicable employment and workplace privacy requirements relating to such monitoring.

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33. USER-GENERATED CONTENT AND NOTES

Operators may enter notes or other information relating to players or accounts.

Operators are responsible for ensuring such information:

- Is accurate where required;
- Is relevant to legitimate business purposes;
- Does not unlawfully discriminate;
- Does not contain prohibited information;
- Does not violate privacy laws; and
- Does not violate third-party rights.

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34. INFORMATION ABOUT OTHER PEOPLE

If you provide information about another person, you represent that you have lawful authority to provide that information where required.

Examples may include:

- Employee information;
- Player information;
- Referral information;
- Business-contact information; and
- Legacy account records.

You should not provide information to VANTAGE if you are not authorized to do so.

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35. DATA ACCURACY

Operators and users are responsible for keeping their information accurate and current.

Inaccurate information may affect:

- Account matching;
- Transactions;
- Redemptions;
- Reporting;
- Account access;
- Notifications; and
- Automation.

VANTAGE may provide tools allowing authorized users to update information.

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36. ACCOUNT CLOSURE

If an account is closed, some associated information may remain in VANTAGE systems for a period of time where reasonably necessary for:

- Transaction history;
- Fraud prevention;
- Audit requirements;
- Dispute resolution;
- Legal compliance;
- Financial reporting; or
- Security.

Closing an account therefore may not result in immediate deletion of every related record.

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37. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically.

Changes may be made to reflect:

- New features;
- New data practices;
- New integrations;
- Changes in law;
- Security improvements;
- Operational changes; or
- Other business developments.

When we make material changes, we may provide notice by:

- Posting the revised policy;
- Updating the “Last Updated” date;
- Displaying a notice in VANTAGE;
- Sending an email; or
- Using another reasonable notification method.

Where applicable law requires consent to a material change, we will seek that consent.

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38. CONTACT US

Questions, concerns, or requests concerning this Privacy Policy or VANTAGE privacy practices may be directed to:

VANTAGE Privacy Team
[INSERT LEGAL COMPANY NAME]
[INSERT BUSINESS ADDRESS]
[INSERT CITY, STATE, ZIP CODE]

Privacy Email: [INSERT PRIVACY EMAIL]

Support Email: [INSERT SUPPORT EMAIL]

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39. ADDITIONAL PRIVACY NOTICES

Certain VANTAGE products, jurisdictions, features, or relationships may be governed by additional privacy notices.

Where an additional notice conflicts with this Privacy Policy, the more specific notice will govern for the information and activity it covers.

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40. ACKNOWLEDGMENT

By accessing or using VANTAGE, you acknowledge that you have been provided access to this Privacy Policy and understand that personal information may be collected, processed, disclosed, and retained as described above and as otherwise permitted by applicable law.

Where consent is legally required for a particular processing activity, VANTAGE will obtain that consent separately as appropriate.