Privacy Policy

Version 1.2

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Scope of Privacy Policy

This Privacy Policy describes and governs the manner in which SPSE LLC ("Luck Party") collects, uses, shares, disclose and stores customer personal information through its website https://www.luckparty.com (the "Luck Party Website", "Our Website") and any related domains, subdomains, related parties websites, webpages, and third-party websites or applications. This Privacy Policy applies to the Luck Party Website 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. We comply with all applicable privacy laws and regulations, including but not limited to the Virginia Consumer Data Protection Act ("VCDPA"), and any other applicable privacy laws and privacy 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 www.luckparty.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 (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, 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://www.luckparty.com;

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

1.1.13. "Affiliate" means SPSE LLC and its related brands, including but not limited to Fortune Wins, Sportzino, American Luck, Win Bonanza, Zula Casino, 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.

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. Any documentation which we request to verify that you are eligible to have an account and redemption.

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 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 Luck Party Casino 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, 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@luckparty.com; (b) Marketing Emails: Click the "Unsubscribe" link in any marketing email received from us or our Affiliates, or contact us at support@luckparty.com; (c) All Communications: Submit a written revocation request to support@luckparty.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 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 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 and may be shared with us and our authorised third-party verification providers for this purpose. 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 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

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, including for the training and fine-tuning of the chatbot's performance.

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.

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@luckparty.com.

8. How Long Do We Keep Your Information

8.1. We may retain your information as long as we require in order to fulfill the practices outlined in this Privacy Policy, in accordance with our commercial needs, or as permitted by law.

8.2. In the event that you or we close your Account, we may retain your Account information in order to resolve any further disputes or provide clarifications in regards to your Account or as long as permitted by law. If you request your Personal Information to be permanently deleted or erased, we will require your written authorization to do so.

Notwithstanding the foregoing, we may be required by law to maintain some or all of your Personal Information for audit purposes.

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, profile picture 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).

9.3. 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. 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.

9.4 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

10. Information for Specific Groups located in the United States

10.1. 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@luckparty.com.

11. Changes To This Privacy Policy

11.1. 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 Luck Party website or by other means in accordance with the applicable laws.

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

11.3. 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.

11.4. 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.

12. Facebook data deletion

If you have connected your Facebook account to your Account (either during registration or thereafter), we may have received limited information from Facebook, such as your Facebook ID, email address, first and last name, profile picture link, profile URL, and date of birth.

You may request the deletion of this data by unlinking your Facebook account from your Account. To do so, please follow these steps:

1. Log in to your Facebook account.
2. Go to Settings & Privacy > Settings.
3. Click on Security and Login.
4. Navigate to Apps and Websites.
5. Locate and search for “Luck Party” in the list of linked apps.

6. Select Luck Party, then click Remove.

This action will revoke Facebook's permission to share your information with us and will initiate the deletion of Facebook-derived data from our system.

If your Account was accessed exclusively through "Log in with Facebook", unlinking your Facebook account and deleting your Facebook-derived data may prevent future access to your Account unless you once again provide consent to Facebook to share your information with us. In such case, we strongly recommend that you register a valid email address with us prior to unlinking your Facebook account. This will allow continued access to your Account using email-based login credentials.

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@luckparty.com. Alternatively, you may also contact our customer service department at support@luckparty.com.