

Privacy Policy

1. Introduction

This Privacy Notice provides information on how Wicked Games Ltd collects and processes your personal data through your use of this website, including any data you may provide when you apply for a vacant role with the business. We recommend that you read this Policy in full to ensure you are fully informed.

In this Privacy Policy, any use of the words “you”, “yours” or similar expressions shall mean any user of this website. Terms such as “we”, “us”, “our”, “Wicked Games”, “the organisation” or similar expressions shall mean the Wicked Games Ltd company.

This website is only intended for adults over the age of 18, and we do not knowingly collect data from anyone under this age.

2. Data Controller

Wicked Games Ltd is the controller of personal data in terms of EU General Data Protection Regulation (EU Regulation 679/2016) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and the Data Protection Act (Chapter 586 of the Laws of Malta – “the DPA”).

The business ensures that personal data is processed in accordance with the GDPR, the DPA and all other relevant European Union (“EU”) and national law/s. The business further ensures *inter alia* the confidentiality and security of such personal data.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Website Privacy Notice. If you have any questions about this Website Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details: Data Protection Officer, Wicked Games Ltd, is situated at SiGMA, Judge Paolo Debono Street, Msida MSD 2032, Malta.

Email - dpo@wicked.games

3. Personal information we collect, and how we use your personal data

‘Personal Data’ means any information from which you can be personally identified, including your name, email address, home or business address and telephone number.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary to provide services to you under the performance of a contract entered into;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;

- Where you have given us your consent to use your data; and
- Where we need to comply with a legal or regulatory obligation.

3.1. Purposes for which we will use your personal data

In accordance with data protection laws, the organisation will only process your personal data where we have a lawful basis for doing so. Below is a description of how we plan to use your personal data, and which of the legal bases we rely on to do so.

3.2. Career Opportunities

When you apply for an open role with Wicked Games Ltd, the business collects information about you. This includes:

- Your name, address and contact details, including copies of your Identity Card, Driving License and/or Passport, email address and telephone/mobile numbers;
- details of your qualifications, skills, experience and employment history;
- Proof of your identity and qualifications, criminal records if relevant, referees, health information (if applicable);
- Bank details and emergency contact details (if applicable);
- whether or not you have a disability, for which the organisation may need to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in Malta;
- social security information, including your social security number and any other information necessary for tax purposes.
- other personal information you voluntarily provide during job interviews or phone screenings.

We may collect this information in a variety of ways, including when this is sent to us from Recruitment Agencies. We may also collect your personal data from other third parties, such as the references supplied by former employers. We will seek such information from third parties only once a job offer has been made to you and only after we inform you about this final stage of the application process. At the outset we can assure you that we will not use your data for any purpose other than the recruitment process of which you are a part; and as part of the onboarding process if you are successful in your application.

3.2.1. Who has access to your personal data and how is it processed?

Your personal data may be shared internally during the recruitment process. This includes sharing with members of the HR team, the interviewers involved in the recruitment process, and other staff members working in the business vertical that is recruiting for a given role.

Your data may also be shared with recruitment specialists within approved third parties, if their access to your data is necessary for the recruitment process at Wicked Games Ltd.

In addition, we may need to share your personal information with a regulator or otherwise to comply with the law of a given jurisdiction.

Data will be stored in secure places, including in our HR management system and our email system.

The business has a legitimate interest in processing personal data during the recruitment process and for keeping records of this process. As you will appreciate, processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide who is best placed for a given role.

We may also need to process data from job applicants to respond to and defend against legal claims. In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work before employment starts.

3.3 Website Users

The personal data we collect from you will depend upon the services that you sign up to on our site. The personal data we collect may include:

- your name,
- company/organisation name;
- email address;
- phone number;
- address;
- username;
- your preferences in relation to the Site and our services;
- any communication you have with us; and
- any other data that you may submit to us via the Site from time-to-time.

You are not required to provide any of this information, but if you do not, we may not be able to provide you the requested services.

3.3.1 Who has access to your personal data and how is it processed?

Senior members of our Commercial and Technology teams tasked with managing or fulfilling the services offered by this website will be given access to your personal data. How we use the personal data you provide to us will depend on the services that you request, but may include:

- to contact you and manage our relationship with you;
- to provide you with personalised visits to our site;
- to provide you with services which you have signed up for;
- to provide you with access to our corporate documentation and information about our offerings and products;
- to comply with legal and regulatory obligations and/or for the establishment, exercise and defence of our legal rights;

- to assist with the management of queries and complaints; and
- to assess the quality of our service and provide staff training.

4. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at dpo@wicked.games.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

To provide the best service we can, we use some external companies to hold data. We do use service providers that only hold the data within the EU and require all third parties to respect the security of your personal data and to treat it in accordance with the law.

These companies include:

- [Microsoft](#)
- [AWS](#)

6. International transfers

We may need to transfer your data outside of the European Economic Area (EEA), for example to third party companies directly associated with Wicked Games Ltd. Where we need to do this, we will put in place adequate measures to ensure that your Personal Information is kept secure. Such measures shall include: (i) transferring to a jurisdiction which the European Commission recognises as providing adequate protection for the rights and freedoms of data subjects in connection with the processing of their personal data; and (ii) transfers pursuant to standard contractual clauses in accordance with European Commission decisions on transferring personal data.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They are subject to a duty of confidentiality and will only process your personal data on our instructions.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

The personal details of unsuccessful job applicants is retained for one (1) year from the date of application. Personal data of our customers and business partners are retained for six (6) years from the end of the business relationship.

9. Your legal rights

Under certain circumstances you have rights under data protection laws in relation to your personal data:

- a right to access your Personal Information as held by us (also known as a subject access request);
- a right to receive certain Personal Information in machine-readable format;
- a right to object to processing where the lawful basis is that it is in our legitimate interests, but please note that we may still process your Personal Information where there are other relevant lawful bases or where we have compelling grounds to continue processing your Personal Information in our interests which are not overridden by your rights, interests or freedoms;
- a right to have inaccurate Personal Information rectified;
- a right to have certain Personal Information erased where it is no longer necessary for us to process it;
- where we have specifically requested your consent to process your Personal Information and have no other lawful conditions to rely on, you have the right to withdraw this consent; and
- a right to complain to the Information Commissioners Office (<https://idpc.org.mt/raise-a-concern/>). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner so, please contact us in the first instance.

Please be informed that certain rights might not be fulfilled entirely due to legal or regulatory requirements. If you have queries about your rights or wish to exercise any of the rights set out above, please contact us via dpo@wicked.games.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security

measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Please be aware that while we will try to accommodate any request you make in respect of your rights, they are not absolute rights. This means that we may have to refuse your request or may only be able to comply with it in part.

We will aim to respond to any request within one month of verifying your identity. If we receive repeated requests or have reason to believe requests are being made unreasonably, we reserve the right not to respond.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

If you are unsure about your rights or are concerned about how your Personal Information may be processed, you should contact your national data protection regulator.

This version was last updated on 11th January 2024

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.