

Privacy Policy

Last updated: [15/02/2026]

1. Introduction

As part of its activity and for the purpose of providing its Services, **Winalia collects and processes personal data relating to the users of its platform** (hereinafter the “**Users**” or “**you**”).

This Privacy Policy (the “**Policy**”), implemented by **Avenis SAS** (publisher of Winalia.gg), is intended to provide Users with **clear, comprehensive, and concise information** on how Winalia processes their personal data in connection with:

- Access to and use of the Winalia website and platform (the “**Platform**”);
- Participation in **Ranked mode, Tournaments, and WinaMatch**;
- Use of **W-Coins** and associated deposits and withdrawals;
- Security, moderation, anti-fraud and anti-cheat systems;
- Identity verification (KYC) and anti-money-laundering / counter-terrorist-financing checks (AML/CFT).

Winalia attaches particular importance to the **protection of your privacy** and the **confidentiality** of your personal data and is committed to processing such data in strict compliance with applicable laws and regulations, in particular:

- French Data Protection Act – Law n° 78-17 of 6 January 1978 on information technology, files and civil liberties;
- **Regulation (EU) 2016/679** 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 (the “**GDPR**”).

Winalia implements appropriate **technical and organizational measures** to ensure the security, integrity, and confidentiality of your personal data, including in relation to fraud prevention, competitive integrity, identity verification and financial compliance.

2. Who is the data controller for the processing of your personal data?

The data controller responsible for the processing of your personal data described in this Policy is: **Avenis SAS – Winalia**, 60 Rue François 1er, 75008 Paris, France

When this Policy refers to “**Winalia**”, “**we**”, “**us**” or “**our**”, it refers to Avenis SAS acting as **data controller** within the meaning of the GDPR.

3. What is the scope of this Policy?

This Policy applies to all processing of personal data carried out by Winalia in its capacity as data controller, in particular for:

- **Players/Users** of the Platform (accounts, Ranked, Tournaments, WinaMatch, W-Coins, support, moderation);
- **Visitors** to the website winalia.gg (browsing, cookies, contact forms);
- **Prospective Users** who interact with Winalia (e.g., newsletter subscribers, demo requests).

When Winalia processes personal data purely **on behalf of a third-party service** (for example, if you connect external services such as Google, Discord, or a game account), those third-party services remain responsible for their own processing and apply their own privacy policies.

4. For what purposes is your personal data collected and processed?

Winalia only collects and processes personal data that is **relevant, adequate and limited** to what is necessary for the purposes described below.

4.1 Categories of personal data we process

We may process the following categories of data:

1. Account & profile data

- Email address
- Username / display name
- Password (hashed)
- Date of birth / confirmation of age of majority
- Preferred language and interface preferences

2. Gameplay & competition data

- Game platform identifiers (e.g., game tags, IDs)
- Match histories and statistics (Ranked, Tournaments, WinaMatch)
- Rankings and leaderboards
- Sanctions and disciplinary measures
- Evidence submitted in case of dispute (screenshots, links, videos)
- Reports filed and arbitration outcomes

3. Currency, payments & withdrawals

- Winalia balances and earnings
- Winalia balances earning and spending history
- Deposit and withdrawal requests and statuses
- Transaction references

- Payment method identifiers as handled by our payment providers
- Identity documents and supporting documents where required for KYC/AML (e.g., ID, proof of address, proof of payment means)

4. Security & anti-fraud data

- IP address and approximate location
- Device and browser information (user-agent, OS)
- Session identifiers and connection logs
- Technical and behavioral signals used to detect multi-accounting, unusual patterns, cheating or fraud

5. Support & moderation

- Contents of support requests and complaints
- Attachments you send us
- Timestamps and processing history of tickets
- Internal notes and moderation/arbitration decisions

6. Browsing & cookies

- Cookies and similar trackers strictly necessary for the operation of the site
- Analytics, functional and marketing trackers (only if you consent), as described in our Cookie Policy

7. Integrations and third-party services (optional)

- Identifiers required to link your account with third-party services (e.g. Google, Discord, game accounts)
- Public information that is made available by those services or that you consent to share

4.2 Purposes, legal bases and retention periods

The table below summarises the main purposes, categories of data, legal bases and indicative retention periods. It complements, and should be read consistently with, your existing retention rules.

a) Operation of the Platform and Services

Purpose:

- Creating and managing your account
- Allowing you to access and participate in Ranked mode, Tournaments and WinaMatch
- Displaying rankings and leaderboards
- Managing Winalia balances, W-Coins and rewards

Data:

- Account & profile data
- Gameplay & competition data
- Currency & earnings data

Legal basis:

- **Performance of a contract** (Terms of Service)

Retention:

- Duration of the contractual relationship, then generally **3 years** from account closure for evidence and limitation periods.

b) Payments, withdrawals and accounting

Purpose:

- Processing deposits and withdrawals
- Maintaining accounting and financial records
- Complying with financial and tax obligations

Data:

- Currency & earnings data
- Payment and withdrawal data
- Identity documents and payment proofs when required

Legal basis:

- **Performance of a contract**
- **Legal obligation** (accounting, AML/CTF, tax law)

Retention:

- Up to **10 years** for accounting records, in line with applicable law.

c) KYC / AML / CFT and financial security**Purpose:**

- Identity verification (KYC) prior to certain withdrawals or from specific earnings thresholds
- Monitoring and preventing money laundering and terrorist financing
- Detecting suspicious or atypical transactions and reporting to competent authorities where required

Data:

- Identity documents, proof of address, proof of payment means
- Transaction history and W-Coins movements
- Security and anti-fraud data

Legal basis:

- **Legal obligation** (AML/CFT regulations)

Retention:

- KYC data: up to **5 years after the end of the relationship**
- Transaction and AML logs: up to **10 years**, in accordance with AML law and your internal AML policy.

d) Security, fraud prevention, anti-cheat and moderation**Purpose:**

- Maintaining the integrity of competitive play
- Detecting cheating, collusion, multi-accounting and rule violations
- Ensuring the security of accounts and infrastructure
- Handling reports, disputes and sanctions

Data:

- Gameplay & competition data
- Security & anti-fraud data
- Support & moderation data

Legal basis:

- **Legitimate interests** of Winalia to protect the Platform, other Users and its business

Retention:

- Security logs: up to **12 months** (longer if an incident or investigation requires it)
- Moderation data: duration of the sanction + limitation period for potential disputes.

e) Customer support and communication

Purpose:

- Responding to your requests (support, claims, dispute resolution, information)
- Informing you about Service changes, incidents and mandatory notifications (e.g., withdrawal status)

Data:

- Account & profile data
- Support & moderation data

Legal basis:

- **Performance of a contract** (if related to your account/use of the Platform)
- **Legitimate interests** (to respond to general enquiries and maintain the service)

Retention:

- Support tickets: generally **3 years** after closure.

f) Analytics, product improvement and statistics

Purpose:

- Understanding how the Platform is used
- Improving features, balancing Ranked and WinaMatch, and developing new services
- Producing aggregated statistics (non-identifying)

Data:

- Gameplay & competition data
- Browsing & cookies data (analytics cookies only if consented)

Legal basis:

- **Legitimate interests** (service improvement) for aggregated/strictly necessary analytics
- **Consent** for optional analytics cookies

Retention:

- As long as necessary for analysis, then anonymised or aggregated; cookies as per Cookie Policy.

g) Marketing and newsletters

Purpose:

- Sending you newsletters, promotional offers, or product updates (e.g., new game modes, events, VIP offers)

Data:

- Email address, username, usage indicators (if allowed)

Legal basis:

- **Consent** (where required)
- Or **legitimate interests** where allowed by law (with the possibility to opt out at any time)

Retention:

- Up to **2 years** from the last contact or until you withdraw consent / object.

h) Legal defence and compliance

Purpose:

- Establishing, exercising or defending legal claims
- Managing pre-litigation and litigation
- Responding to lawful requests from authorities

Data:

- Any relevant category depending on the dispute or request

Legal basis:

- **Legitimate interests** (defence of Winalia's rights)
- **Legal obligation**

Retention:

- For the duration of the dispute and for the applicable statutory limitation periods under French law.

5. Source of collection

We collect personal data from the following main sources:

1. Directly from you
 - When you create an account
 - When you participate in Ranked, Tournaments or WinaMatch
 - When you make deposits or withdrawal requests
 - When you contact support or submit evidence/reports
2. Automatically when you use the Platform
 - Through logs, cookies and similar technologies
 - Through game and match data generated during your use of the Platform
3. From third-party providers
 - Payment service providers (for transaction references and anti-fraud signals)
 - KYC/AML providers (for identity verification)
 - Anti-cheat and security tools
4. From services you choose to connect
 - If you link your account with external services (e.g., Google, Discord, game publishers), we receive the minimum data needed to enable the integration.

6. Which personal data can you provide in free text/optional fields?

Winalia only seeks to collect personal data that is relevant and necessary for the purposes described above.

When using free text fields (for example in support tickets or dispute descriptions), you should only provide information that is:

- Strictly necessary to explain your situation or request;
- Related to the Platform, your account, your matches or your payments.

You should avoid including sensitive personal data (e.g., health data, political opinions, information about third parties) unless expressly required and requested by Winalia for a specific legal reason.

Where certain fields are marked as mandatory, failure to provide the requested data may prevent us from creating your account, processing your request or providing the relevant Service.

7. To whom do we disclose your personal data?

Winalia will only share your personal data with identified and authorised recipients, and only where necessary and justified.

7.1 Internal recipients

Your personal data are accessible, within Winalia, only to departments that need it to perform their tasks, such as:

- Customer support and moderation
- Technical and security teams
- Compliance / AML / KYC teams
- Finance and accounting
- Product and analytics (for aggregated, pseudonymised data)

All internal staff are subject to confidentiality obligations.

7.2 External recipients

We may disclose personal data to:

1. Service providers (processors)

- Hosting and infrastructure providers
- Payment and e-wallet providers
- KYC/AML verification providers
- Anti-fraud and anti-cheat tools
- Email and notification services
- Ticketing and customer support tools
These providers act on our instructions and must implement appropriate security and confidentiality measures.

2. Authorities and public bodies

- When required by law or regulation
- In response to judicial or administrative requests
- For the purposes of AML/CFT reporting obligations (e.g., TRACFIN), where applicable.

3. Corporate transactions

- In the context of a merger, acquisition, restructuring or asset sale, your data may be transferred in compliance with the GDPR and subject to appropriate safeguards.

We do not sell your personal data.

8. Does Winalia transfer your personal data outside the European Economic Area?

Some of our service providers or partners may be located outside the European Economic Area (EEA), in countries that may not provide the same level of data protection.

Where such transfers occur, Winalia will ensure that appropriate safeguards are in place, such as:

- An adequacy decision from the European Commission; or
- Standard Contractual Clauses approved by the European Commission; and, where needed,
- Additional technical and organisational measures.

You may obtain more information or a copy of applicable safeguards by contacting us (see Section 10).

9. What are your rights with respect to the processing of your personal data?

In accordance with the GDPR and applicable data protection laws, you have the following rights:

1. Right of access

- Obtain confirmation that we process your personal data and receive a copy of it.

2. Right to rectification

- Request correction of inaccurate or incomplete personal data.

3. Right to erasure (“right to be forgotten”)

- Request deletion of your personal data in certain cases (e.g., when data are no longer necessary, when you have withdrawn consent where applicable, or when you have validly objected to processing).
- We may be required to retain some data for legal or legitimate reasons.

4. Right to restriction of processing

- Request that we temporarily restrict the processing of your data in certain situations (e.g., when you contest the accuracy of data or object to processing based on legitimate interests).

5. Right to object

- Object at any time, on grounds relating to your particular situation, to processing based on our legitimate interests (including certain profiling), unless we demonstrate compelling legitimate grounds overriding your interests, or where processing is necessary for legal claims.
- Object at any time to processing for direct marketing purposes (including profiling related to such marketing).

6. Right to data portability

- Receive the personal data you provided to us, in a structured, commonly used and machine-readable format, and transmit it to another controller where processing is based on your consent or a contract and carried out by automated means.

7. Right to withdraw consent

- Where processing is based on your consent, you may withdraw it at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

8. Right to lodge a complaint

- You may lodge a complaint with your local supervisory authority. In France, this is the **CNIL** (Commission Nationale de l'Informatique et des Libertés).

To exercise your rights, see Section 10 below.

10. How to contact our data protection contact / GDPR contact?

For any question regarding this Policy or to exercise your rights, you can contact us at:

Winalia – Data Protection Service

Email: support@winalia.gg

Postal address: 60 Rue François 1er, 75008 Paris, France

We may ask you for additional information or proof of identity if necessary to verify your request. We will respond within **one (1) month**, extendable by two (2) additional months for complex or numerous requests.

11. Children's privacy

The Winalia Platform is **strictly reserved for Users who are 18 years of age or older**. We do not knowingly allow minors to create accounts or participate in WinaMatch, Ranked mode or Tournaments.

If we become aware that we have collected personal data from a person under 18, we will take appropriate steps to delete the data and close the account.

If you believe that a minor has provided personal data to Winalia, please contact us immediately at support@winalia.gg.

12. Data security

Winalia implements appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful access, accidental loss, destruction or damage, including:

- Encrypted communications (TLS)
- Strict access control and authentication
- Environment segmentation and hardened infrastructure
- Logging, monitoring and alerts
- Encrypted backups
- Regular security reviews and audits
- Data minimisation and strict internal procedures

Despite these efforts, no online service can guarantee absolute security. You also play a role in protecting your account (e.g., choosing a strong password, keeping it confidential, enabling available security options).

13. Cookies and similar technologies

We use cookies and similar technologies on the Winalia website and Platform:

- **Strictly necessary cookies:** essential for the operation, security and access control of the Platform.
- **Analytics cookies:** help us understand how the site and Platform are used (only activated if you consent).
- **Functional cookies:** improve your user experience (e.g., remembering preferences, language).
- **Marketing / partnership cookies:** used to measure and optimise the performance of our campaigns (only with your consent).

On your first visit, a banner allows you to **accept all**, **reject all** or **customise** your choices. You can change your preferences at any time via the cookie settings link in the footer.

For more details, please refer to our **Cookie Policy**.

14. Automated decisions and profiling

Winalia uses automated systems in particular for:

- Calculating and updating **Ranked leaderboards** and statistics based on your gameplay performance;
- Detecting suspicious or abnormal behaviour (anti-fraud and anti-cheat);
- Applying anti-abuse rules (e.g., temporary restrictions), subject to human review.

No decision producing legal effects or similarly significant effects on you is taken **solely** on the basis of automated processing, without the possibility of human review.

You may request explanations about such processing and ask for human intervention via support@winalia.gg.

15. Third-party websites and integrations

The Platform may contain links to third-party websites or services (e.g., payment providers, social networks, game publishers). These third parties have their own privacy and cookie policies, which we do not control.

We recommend that you review their policies before providing them with personal data.

When you choose to connect third-party services to your Winalia account, those services may share some of your data with us. Such sharing is governed by the third-party's terms and your settings on their service.

16. Changes to this Privacy Policy

We may update this Policy from time to time, in particular to reflect legal, technical or operational changes.

When changes are significant, we will take appropriate steps to inform you, such as:

- Updating the "Last updated" date at the top of this page;
- Displaying a notice on the Platform;
- Or, where appropriate, notifying you by email.

Your continued use of the Platform after the effective date of the updated Policy will constitute your acknowledgement and acceptance of the changes.

17. Definitions

For the purpose of this Policy:

- **"Personal data"** means any information relating to an identified or identifiable natural person.

- **“Processing”** means any operation performed on personal data (collection, storage, use, transmission, etc.).
- **“Controller”** means the entity which determines the purposes and means of processing personal data (here, Avenir SAS – Winalia).
- **“Processor”** means an entity that processes personal data on behalf of the controller.
- **“Services”** or **“Platform”** means the Winalia.gg competitive gaming platform and associated features (Ranked, WinaMatch, Tournaments, W-Coins, shop, etc.).
- **“Cookies”** refers to small files or similar technologies stored on your device to collect certain information when you visit the website or use the Platform.