



Privacy Policy

25-November-2018. WinBet555

Privacy Statement

- Who are we?
- The information we collect about you
- How we use your personal data?
- Who we may pass your data on to?
- Location that we may transfer your personal data to
- Your rights
- How to contact us / Our Data Protection Officer
- Business Partners (Inc, Partners & Sole Traders)
- Changes to this Policy

Who we are

WinBet555 is committed to protecting your privacy.

This policy explains what your personal data will be used for.

Where we use the term “we” or “us”, this includes the entity mentioned.

We are committed to protecting your personal data and take the security of your information very seriously. We have strict security measures in place to protect your personal data which includes robust security procedures which are regularly tested and reviewed. If you have any concerns about the way in which we process or protect your personal data or would like to contact us about any aspect of this policy, please get in touch through the contact details at the bottom of this statement.

This privacy policy should be read in conjunction with our cookies policy, any notices or terms located within the stores and our site terms of use / terms and conditions.



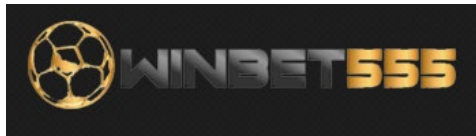
The information we collect about you

We will collect personal data about you from the following sources:

- When you visit us in our betting shops
- When you visit our website or our social media sites
- Through surveys you complete
- When you communicate with us (by email, mail, phone or in store or through social media)
- When we undertake analysis of your interaction with us
- From public sources of information such as public records or social media postings
- From cookies and tracking devices on your devices where you have permitted their use.

We will collect the following types of information:

Type of Data	Description
Your personal and contact details	Such as your name, home or email address, telephone number or online identity
Account information	Such as information about your account with us, including your login details for our websites and mobile applications, age, gender, date of birth, unique account number, unique customer identification, marketing preferences, complaints details and notes added to your account
Visual Images	Such as photographs or CCTV recordings and records of shops you have visited
Financial information	Such as information that allows us to understand your creditworthiness and financial position or your bank account or payment card details
Transactions, bets and account history	Such as records relating to the products and services which you have purchased or used
Lifestyle and demographic insight information	Such as how you use our services and other information about your demography, your preferences and habits
Responses to surveys, competitions and promotions	Such as records of any surveys you respond to or your entry into any competitions we run
Records of your discussions with our customer services teams,	Including call recordings, webchat and emails. Such as when you share comments and opinions with us, ask us questions or make a complaint
How you use mobile applications and websites	We use technology such as cookies (subject to your cookie preferences) when you use our applications or websites, we collect information about the pages you look at and how you use them



Location information	Your smartphone or computer's IP address may tell us an approximate location when you connect to our websites but this will be no more precise than the city, state or country you are using your device in
Device and machine information	Such as information about the computer hardware and software on your computers and smartphones that is used to connect or communicate with us
Advertising and direct marketing preferences and responses	Such as information about how you respond, or interact with, any direct marketing or advertising communications directed to you, including any requests for these communications to stop
Nom-de-plume:	We may hold a physical description or profile of you where your personal details are unknown to us to help us meet our regulatory obligations and business initiatives

Much of the information we collect about you is required to meet our legal and regulatory obligations, however, where we ask for your consent to process your personal data, you are not required to provide it, however, if you do not do so, you may not be able to take advantage of our services.

We may also store more sensitive personal data about you (often referred to as “special categories of personal data”) which may come directly from you, from other sources as described above or from decisions we have made about you:

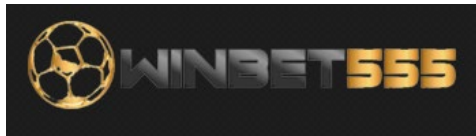
Type of Data	Description
Health Information	Information about a gambling addiction or specific vulnerability or disability
Biometric data	Derived from your image (e.g. photography or CCTV image)
Offences or suspected Offences	Where we know or suspect a fraud or theft or other offence

This personal data is required to ensure we meet our legal obligations or for the prevention or detection of crime.

How we use your personal data

We will use your personal data for the following reasons

What we use your personal data for	How we justify the use of your personal data
To meet our obligations arising from any agreements entered into between you and us and provide you with the information, products and services that you request from us	We need to process this data to meet our contractual obligations
To provide you with customer services, answer your questions or address your complaints or concerns	We need to process this data to meet our contractual obligations



<p>To discharge our legal and regulatory obligations and duties which include (but are not limited to) Gambling, Anti-money Laundering, Anti-fraud & Anti-terrorism laws. This may include electronic methods of identifying you, such as through the use of cookies or biometric facial recognition procedures</p>	<p>We need to process this data to meet our legal and regulatory obligations</p>
<p>To meet our Social Gambling obligations (such as recording self-excluders and where we believe a customer has a gambling problem). This may include electronic methods of identifying you, such as through the use of cookies or biometric facial recognition procedures</p>	<p>We need to process this data to meet our legal and regulatory obligations</p>
<p>To check your or validate your identity and protect your information</p>	<p>We need to process this data to meet our contractual obligations</p>
<p>To invite you to take part in competitions or take up promotions or to keep you informed about products of services which may be of interest to you To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you. You may opt out of receiving direct marketing communications at any time</p>	<p>This is in our legitimate business interest to engage with you in this way and measure that such communications are relevant to you We may also ask for your consent to share your information with 3rd parties for marketing purposes</p>
<p>To build a profile of you, your preferences and your habits to better understand your interests</p>	<p>It is in our legitimate business interest to better understand your needs and interests</p>
<p>To ensure that content from the site is presented in the most effective manner for you and for your computer, maintain and improve our products and services, optimise business processes, quality assurance purposes, support efficient management of our staff, analyse performance of webpages and provide relevant content to you</p>	<p>It is in our legitimate business interest to ensure our business operates efficiently and that our websites content is relevant to our customers</p>
<p>To prevent or detect fraud, theft or loss to our business and our customers To protect our staff and other individuals from harm or loss This may include CCTV, monitoring online activity, electronic methods of identifying you, such as through the use of cookies or biometric facial recognition procedures</p>	<p>We need to process this data to meet our legal and regulatory obligations In addition, it is in our legitimate business interest to protect ourselves from loss</p>
<p>To exercise or defend legal claims or acquiring or selling a business</p>	<p>It is in our legitimate business interest to protect ourselves by exercising our legal rights, defending against claims and acquiring or selling parts of our business</p>



Whom we may pass your data on to

We may need to share personal information with other organizations to ensure that we meet our legal obligations or where we need support in meeting your needs or our contractual obligations. These other parties are typically:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- our affiliates and selected third parties, where you have expressly opted-out of receiving marketing from us / third parties, have been barred or self-excluded, in which case we may share suppression lists with our affiliates and selected third parties, to ensure you do not receive unsolicited marketing;
- third party suppliers and service providers to the extent they assist us with its legal / regulatory obligations e.g. providers of services in respect of anti-money laundering, fraud, verification etc.;
- selected third parties so that they can contact you with details of the services that they provide, where you have expressly opted-in/consented to the disclosure of your personal data for these purposes;
- analytics and search engine providers that assist us in the improvement and optimization of our site and other selected third parties;
- other gambling operators, banks, credit card companies, ESP's (defined below) and appropriate agencies for the purpose of investigating and safeguarding against underage, fraudulent, criminal or suspicious activity (or other activities we are bound by law, regulation or guidance to investigate and safeguard against) or if we have reason to believe that you have undertaken such activity; and
- our regulators, law enforcement or fraud prevention agencies, as well as our legal advisers, courts, applicable independent adjudication services, sports' governing bodies and betting integrity organizations and any other authorized bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters

We may share your personal information with other members of the WINBET555 Group for marketing purposes. We will not share it with other 3rd party organizations however unless you have expressly opted-in/consented to the disclosure of your personal data for these purposes.

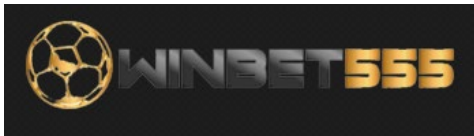


We may also disclose your personal information to third parties in the following circumstances:

- in the event that we consider selling or buying any business or assets, in which case we will disclose your personal data to any prospective sellers or buyers of such business or assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of WINBET555 Group plc, or a data controller or any of its group entities;
- if we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- in order to enforce or apply our website terms of use;
- to protect the rights, property, or safety of us, our staff, our customers, or others. This includes exchanging information with other companies and organizations (including without limitation, other gambling operators and the local police or other local law enforcement agencies) for the purposes of staff and customer safety, crime prevention, fraud protection and credit risk reduction;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements, or otherwise for the prevention or detection of fraud or crime; and
- Where you have self-excluded yourself from gambling, we may share this information with our regulators or other companies in our field where we believe it is important to support your exclusion

How long we retain your personal data

Type of Data	Typical Retention Time	Information
Marketing consents	24 months	Unless consent is refreshed
Customer Call recordings	9 months	An extended retention may be applied on a case by case basis
CCTV	3 months	An extended retention may be applied on a case by case basis
Business Contacts	At end of business relationship	



Customer Data	A seven year retention period which starts to run from the date your account is closed	We will only continue to hold personal data relating to your account as permitted under data protection legislation (i) where we are under a legal requirement under gambling or tax legislation to retain your data; and (ii) to exercise or defend our legal rights
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The above retention times may be extended for example where it is needed to meet a specific regulatory obligation, investigate a crime, handle a claim or resolve a complaint

Locations that we may transfer your personal data

From time to time, service providers, members of the WINBET555 Group and organizations with whom we work with, may be located outside the European Economic Area in countries that do not have the same standards of protection for personal data as the UK. We will, however, always use every reasonable effort to ensure sufficient protections are in place to safeguard your personal data. We will also ensure that our service providers enter into compliant processing agreements with us to ensure that your personal data is processed in accordance with applicable data protection legislation.

Security

We implement technical and organizational measures which take into account the harm that may be suffered, to protect your personal data. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at



your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

Cookies

We use cookies for various purposes including making your experience of our website better. For more information on our use of cookies, please see.

COOKIES POLICY

Information about our use of cookies

Our website (our "site") is operated by WinBet555 and its group companies ("we", "us", "our"). The site uses cookies to distinguish you from other users and this helps us to provide you with a good experience when you browse our site and also to improve our site.

If you wish to remove cookies placed on your device by our site or stop our site placing further cookies on your device you can do this at any time (learn how to do this below).

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site or make use of e-billing services. We do not require your consent to place these cookies. Nevertheless, you may be able to block these cookies yourself on your device/ browser, but restricting these cookies is likely to mean that our site will not work as you would expect and certain functionality may be inoperable.

Non-essential cookies

- **Analytical/performance cookies.** They allow us to recognize and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily. We use cookies to compile visitor statistics such as how many people have visited our site, how they reached our site, what type of technology they are using (e.g. Mac or Windows which helps to identify when our site isn't working as it should for particular technologies), how long they spend on the site, what page they look at etc. This helps us to continuously improve our website.
- **Functionality cookies.** These are used to recognize you when you return to our site. This enables us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our site, the pages you have visited and the links you have followed. This information will be used by us and third parties to



make our site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

- **Social Website Cookies.** So you can easily "Like" or share our content, we have included sharing buttons on our site for certain social media sites such as Facebook and Twitter. These cookies are set by the third party social media sites to which they relate, including:
 - Facebook
 - Twitter
 - YouTube

The privacy implications vary from social media site to social media site and will be dependent on the privacy settings you have chosen on these sites. Please refer to the relevant social media site's privacy and cookies policy for more information. Please note that third parties (including, for example, advertising networks, other gambling operators and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, as set out above, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. For instance, our site, like most websites, includes functionality provided by third parties. A common example is an embedded video powered by YouTube and Vimeo. Disabling all cookies may mean you cannot access the functions offered by these third parties.

MORE INFORMATION

More information about cookies, including how to block them or delete them, can be found at <http://www.aboutcookies.org/>

If you have any further questions, comments or requests regarding our cookies policy or how we use cookies on our site, then you can contact us by email at Support@WinBet555.com.

Changes to THIS COOKIES policy

Any changes to this cookies policy in the future will be posted on this page and we will take all measures necessary to communicate any changes to this cookies policy to you. Please check back frequently to see any updates or changes to this cookies policy. We will also bring your attention to such changes by updating our cookie banner/ pop-up.

This policy was last reviewed and updated: November 2018

Marketing Communications and your choices

When we first collect your personal data we'll ask you to tell us how you would like to hear from us in future about our other products and services. It' will normally be via a tick boxes on forms or web page and you can change your mind

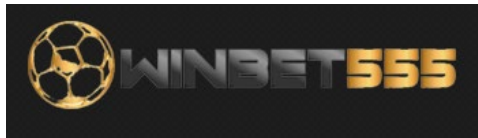


at any time through “unsubscribing” or changing your preferences on your account settings.

Your rights

	DESCRIPTION OF RIGHT
Right 1	A right to access personal data held by us about you
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below)
Right 4	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims
Right 5	In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organization, at your request
Right 6	A right to object to our processing of personal data held by us about you where the processing of such data is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process personal data which override your rights or which are for the establishment, exercise or defense of legal claims
Right 7	A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you
Right 8	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products)
Right 9	You have the right to complain to the relevant Data Protection Supervisory Authority. In the UK, this is the Information Commissioner’s Office

Contact Us or Our Data Protection Officer



If you have any questions about this notice or would like further information about your rights, please contact our Data Protection Officer by emailing support@WinBet555.com.

Questions, comments and requests regarding this privacy policy are welcomed.

Business Contacts

Where we collect and use your personal data from a corporate perspective (i.e. where we are contracting with you as a sole trader or partnership, or contracting with the business you are employed / contracted by) this will be done in accordance with the relevant parts of this privacy policy. If you have any questions or concerns about this, please contact us using either the details set out below or by speaking with your usual contact.

Changes to this Privacy Policy

Any changes to this privacy policy in the future will be posted on this page, and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this privacy policy.

This policy was last reviewed and updated: 26th November 2018