

My Club Group Limited: Privacy Policy

Contents:

1. Overview
2. Information We May Collect from And About You
3. Collection of Information
4. Account
5. Failure to provide information
6. Uses Made of Your Information
7. What is the legal basis on which we rely to process your data?
8. Meeting our Obligations
9. Privacy Rights: Can I object to having my personal information used in this way?
10. Disclosure of your information
11. Where we store your personal information
12. Parents and Guardians
13. Marketing
14. Contact and further information
15. Changes
16. Who is responsible for your data?
17. How long do we keep data?
18. Your rights

1. Overview:

This Privacy Policy explains how we collect and process your personal data through your use of this website and the choices you can make about the way your information is collected and used. We are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By accessing and using the Services which are made available via our website or through our apps, or any mobile versions thereto or by continuing to use our Services you are accepting and consenting to the practices described in this Privacy Policy.

2. Information We May Collect from And About You:

There are a number of direct interactions that we may have with you which may result in your data being collected, including the following:

- When you register with us and open an account;
- When you enter such information while using the Service, such as when you place funds in your account, or, place a bet;
- When you interact with our Customer Services team;
- When you participate in marketing promotions;
- When you set preferences in the 'My Account' section of the My Club Betting Service's website;
- When you otherwise provide information to us through the Service or elsewhere.

3. Collection of Information:

We, whether directly or through third party suppliers, may collect information regarding your use of our Service, including but not limited to:

- Your name, username and password;
- Your personalised account details;
- Your contact details, including your email address, phone numbers and/or billing address;
- Your payment method, including details of your payment country; payment type and the history of any failed/successful payments;
- Information regarding your use of the Service;
- The language choices made by you in relation to your use of the Service which may include information relating to your location when using the Service;
- Your entry details for any competition or promotion;
- Device IDs or unique identifiers, device and software characteristics (such as type and configuration), connection information, statistics on page views, referral URLs, ad data, IP address and standard web log information;
- With your consent, the location of your device;
- Information collected via the use of cookies, web beacons and other technologies. See our [Cookies Policy](#) for more details;
- Any website that referred you to the Service, together with any online and email marketing campaigns that related to the Service;
- Your payment history on the Services and other account transactions;
- Information that you provide as part of Know Your Customer, Due Diligence and Enhanced Due Diligence checks, including copies of identification documentation for our Betting Service;
- The types of devices you use to view the Services provided;
- Behaviour on our Services as you click around the website or application;
- Online and email marketing campaigns you receive or subscribe to in relation to the Services.

4. Account

There are certain services you will only be able to access by registering with us. To register with us, you must provide us with at least your first name, surname, email address. Depending on the service you are registering for date of birth, username and a password & address information may be asked for.

5. Failure to provide information:

Where you are signing up to our My Club Betting Service, FSB (The Bookmaker) will be required to collect and process certain data about you (including your home address) in order to meet its legal obligations in providing the Services under Gambling Commission Rules. If you fail to provide that information – such as copies of documents to confirm your identity – we may be unable to provide your requested service.

6. Uses Made of Your Information:

We may use the personal information you provide to us to do some or all of the following, in each case to the extent permitted by applicable data protection laws:

- administer our website and apps;

- provide the Services you have requested;
- improving your browsing experience by personalising the Services for you (subject to your settings in the cookies section);
- recommend goods, services or promotions which may be of interest to you.
- prevent, detect and investigate potentially prohibited or illegal activities, including fraud, and enforce our terms;
- notify you about changes to our Services;
- contact you in order to conduct market research (but only where you have provided your consent for us to do so);
- send email alerts, text messages or device notifications you may have opted into;
- send you prizes won via our website or apps, and supply to you services purchased via our website or apps;
- provide third parties with statistical information ONLY about our users;
- to enable us to comply with any legal, regulatory and compliance requirements, including under the Gambling Act 2005 and the Gambling (Licensing and Advertising) Act 2014 and to meet any obligations we have with the Gambling Commission of Great Britain and any other competent authority;
- responding to any call or emails from you; and
- to understand customer trends and patterns.

7. What is the legal basis on which we rely to process your data?

On some occasions, we process your data with your consent (for example, when you agree that we may place cookies or process information that you input into our website).

On other occasions, we process your data when we need to do this to fulfil a contract with you (for example, for billing purposes) or where we are required to do this by law (for example, where we have to fulfil anti-money laundering requirements).

We also process your data when it is in our legitimate interests to do this and when these interests are not overridden by your data protection rights. Examples of this include processing your data to provide us with information on how our website is used and can be improved and ensuring compliance with our terms and conditions.

8. Meeting our Obligations

Legal and Regulatory Requirements:

As a provider of betting and gaming services, we are regulated by the Gambling Commission of Great Britain and in the Republic of Ireland under the Betting (Amendment) Act 2015. To comply with these legal requirements, we carry out checks at any time to ensure that our customers bet and play responsibly and legally.

We take our social responsibility and our commitment to responsible gambling very seriously and we actively look for behaviour that may indicate that someone is at risk of problem gambling so that we can intervene at an early stage to provide them with support and direct them to sources of help.

When a customer based in Great Britain self-excludes through the 'GAMSTOP' national self-exclusion scheme, we will receive a notification of this, which we will use to apply their chosen restriction across our sites and apps.

To help us understand the factors that can indicate the early stages of problem gambling, we look at information about customers who have self-excluded (either directly or through

GAMSTOP), such as age, location and past betting behaviour, to identify common factors. This helps us intervene earlier in cases where customers may be at risk of problem gambling and provide them with better support.

We are also subject to laws and regulations relating to other aspects of our business, such as payment processing or complaint handling and some of these may require us to retain personal information for a specified period of time, which may extend after your account has been closed.

Fraud, Money Laundering and Other Illegal Activity:

When you set up an account with us, place bets or play our games, we carry out identity verification, fraud prevention and anti-money laundering checks, validating the information you give against third party crime prevention databases and, where necessary, information from publicly-available sources. We may share your personal data with organisations that verify details and transactions and identify potential indicators of illegal activity, which they make available to other organisations using their services. Where necessary, we share your data with Credit Reference Agencies or fraud prevention agencies, which keep a record of that information and make it available to other organisations for use in credit decisions, identification checks and fraud detection and prevention. Where appropriate, we pass information to the police and other law enforcement agencies, debt recovery companies and other similar bodies.

It is important that betting and gaming operators work together to prevent illegal activity and promote responsible gaming. In Great Britain, our industry is working with the Gambling Anti-Money Laundering Group, the Gambling Commission and the UK Information Commissioner's Office to establish a framework for sharing information between providers for this purpose. Where we believe it appropriate and necessary to do so to prevent money laundering and fraud, we will share information with, and receive information from, other betting and gaming providers. We will always do this in legally and in accordance with any industry guidelines.

9. Privacy Rights: Can I object to having my personal information used in this way?

This category covers activities we are obliged to conduct in order to provide our Services legally, responsibly, and in accordance with the requirements of our regulators, and ultimately to protect our customers and our business. We cannot provide you with our services without carrying out these activities, and if you don't want your data used in this way, your option is to not use our services and close your account.

10. Disclosure of your information:

We share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Regulatory or Sporting in connection with policing the integrity or enforcing the rules of a sport or game and/or prevention and detection of crime and where we consider that there are reasonable grounds to suspect that you may be involved in a breach of such rules or the law, have knowledge of a breach of such rules or the law or otherwise pose a threat to the

integrity of the relevant sport or game based upon our assessment of your betting behaviours or it may be based on information provided to us by a regulatory or sporting body. Those bodies may then use your personal information to investigate and act on any such breaches in accordance with their procedures.

- Credit and Fraud-Prevention Agencies: for ID verification and the prevention of fraud, money laundering and other illegal use of our pay-to-play services, we use commercially-available tools or services provided by Credit Reference and Fraud Prevention Agencies and service providers.

We may also share your information in the following circumstances:

- In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of use.
- In order to prevent fraud, cheating and money laundering we may disclose your information and for betting and gaming history to third parties including, but not limited to, any relevant regulator, gaming and sporting bodies, financial institutions and law enforcement agencies or any other body that deals with the investigation of alleged offences.

In any of the above circumstances, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under applicable laws.

11. Where we store your personal information:

Security:

We understand that the security of your personal information is important to you. When handling personal information, security is paramount, and we seek to ensure that personal information is adequately protected. We use reasonable administrative, logical and physical controls, including password protection, to safeguard your personal information against loss, theft and unauthorised access, use or modification. However, some limited personal information provided to us is transmitted using unencrypted protocols.

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

International Data Transfers:

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this Privacy Policy.

Information which you provide may be transferred to our group companies, commercial partners, suppliers or agents located in countries which do not have data protection laws equivalent to those in force in the European Economic Area (the "EEA").

We will only send your data outside of the European Economic Area ('EEA') to:

- (i) follow your instructions;
- (ii) comply with a legal duty; or
- (iii) work with our agents and advisers who we use to help run your accounts and services.

If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards:

(i) transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the [European Commission Justice website](#);

(ii) put in place a contract with the recipient that means they must protect it to the same standards as the EEA. Read more about this here on the [European Commission Justice website](#);

(iii) transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. You can find out more about the Privacy Shield on the [European Commission Justice website](#).

You are deemed to accept and agree to this by using this website and submitting information to us.

12. Parents and Guardians:

Our Service is a general audience service. The My Club Betting Service is not intended for or directed at persons under 18 years of age. By providing your information to us via this service or app or otherwise you represent to us that you are at least 18 years old and acknowledge that your information can be used to verify that this is the case.

13. Marketing:

As mentioned above, we and/or selected third parties may contact you with information about offers, products and services that might be of interest to you (but only if you have consented to receive such marketing). If you have consented to receiving marketing communication by either (i) ticking the marketing box when you signed up or (ii) electing to opt-in within the My Account section on our services.

We aim to give you strong controls on our use of your data for direct marketing purposes including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and by managing your settings within the My Account section of our website.

14. Contact and further information:

Questions, comments and requests regarding this privacy policy should be addressed to enquiries@myclubgroup.com.

15. Changes:

We reserve the right to change the practices described in this Policy at any time. Any changes will be posted on the website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the website following the alterations. We recommend that you check this page regularly to keep up-to-date.

16. Who is responsible for your data?

The data processor for your information is:

MYCUBBETTING.Com Limited

Concord House

Grenville Place
London
NW7 3SA

The data controller for your My Club Betting information is:

FSB Technology (UK) Ltd
167 - 169 Great Portland Street
London
W1W 5PF

17. How long do we keep data?

We retain personal information for as long as we reasonably require it for legal, accounting or business purposes. Subject to us not having a legal or regulatory requirement or a risk management reason for retaining your information for a longer period, your information will not be kept for longer than 6 years after you have closed your account. Please note that we may be required in certain circumstances to retain your information indefinitely (for example under our procedures on responsible gambling and self-exclusion). We will take all necessary steps to ensure that the privacy of information is maintained for the period of retention.

18. Your rights:

Under the GDPR, you, as a data subject have a number of rights which are detailed below. Some of these only apply in specific circumstances and are qualified in several respects by legal exemptions. We will advise you in our response to your request if we are relying on any such exemptions.

Access to personal data:

You have a right to request a copy of the personal information that we hold about you.

Should you wish to make such a request, please see the Contact Us section for information on how to contact us.

You should include adequate information to identify yourself and such other relevant information that will reasonably assist us in fulfilling your request. Your request will be dealt with as soon as possible. If you do wish to make an access request, no fee is payable under the GDPR.

Correction of personal data:

You can ask us to rectify and correct any personal data that we are processing about you which is incorrect by sending an email to enquiries@myclubgroup.com.

Right to withdraw consent:

Where we have relied upon your consent to process your personal data, you have the right to withdraw that consent.

To opt out of marketing, you can use the unsubscribe link found in the marketing communication you receive from us. For other marketing preferences, you can visit the My Account tab when you log into your account.

Right of erasure:

You can request us to erase your personal data where there is no compelling reason to continue processing. This right only applies in certain circumstances, it is not a guaranteed or absolute right.

Right to data portability:

This right allows you to obtain your personal data that you have provided to us with your consent or which was necessary for us to provide you with our products and services in a format which enables you to transfer that personal data to another organisation. You may have the right to have your personal data transferred by us directly to the other organisation, if this is technically feasible.

Right to restrict processing of personal data:

You have the right in certain circumstances to request that we suspend our processing of your personal data. Where we suspend our processing of your personal data we will still be permitted to store your personal data, but any other processing of this information will require your consent, subject to certain exemptions.

Right to object to processing of personal data:

You have the right to object to our use of your personal data which is processed on the basis of our legitimate interests. However, we may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so or we need to process your personal data in connection with any legal claims.

Note that exercising your right of objection will usually mean you need to close your account and stop using our Services.

Rights relating to automated decision making and profiling:

You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you. This right means you can request that we involve one of our employees or representatives in the decision-making process. We are satisfied that we do not make automated decisions of this nature.

We hope that we can satisfy queries you may have about the way we process your data. If you have any questions or concerns, or wish to exercise any of your rights, you can contact us at enquiries@myclubgroup.com.