

Introduction

Welcome to Playnation Limited's privacy policy.

Playnation respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Playnation Limited collects and processes your personal data. When you open the Gamblewise App on our premises, via the Gamblewise App, you will share your personal data with Playnation.

This website is not intended for children and we do not knowingly collect data relating to children. You must be 18 or over to gamble.

It is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Playnation Limited is a controller and responsible for your personal data (collectively referred to as "Playnation", "we", "us" or "our" in this privacy policy).

Please be aware that Gamblewise Limited ("Gamblewise") is a separate controller and responsible for your personal data. Details of how they use and collect your personal data can be found via the Gamblewise App or via their website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Playnation Limited

Email address: dataprotection@inseinc.com

Postal address: FAO of the Data Protection Officer, 3 The Maltings, Wetmore Road, Burton-on-Trent, Staffordshire, DE14 1SE

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review so please visit our website to see any changes that may have taken place.

Third-party websites

Please be aware that Gamblewise is also responsible for your personal data when you use the Gamblewise App and details of how they use it can be found via the Gamblewise App or via their website.

We do not control Gamblewise's or third-party websites and therefore we are not responsible for their or any other third party's privacy statements so we encourage you to read their privacy policy which is separate to ours.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, age and gender.
- **Contact Data** includes your email address.
- **Technical Data** includes your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your photograph, username, purchases made by you, preferences, feedback and responses.
- **Usage Data** includes information about how you use the Gamblewise App, our products and services.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific product/service. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

If you fail to provide that data when requested, then we may not have the information shared by Gamblewise when you enter our premises.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **The Gamblewise App.** You may give us your Identity, Contact, Technical, Profile and Usage Data by using the Gamblewise App. Gamblewise as the provider of the app services will share such data with us via your use of the Gamblewise App.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Direct Interactions.** We may receive personal data about you from direct interactions on our premises and via your use of the Gamblewise App. For regulatory reasons we may document those interactions with you noting by way of example, how long you were on the premises and for how long you used the facilities on our premises.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in circumstances where we need to comply with a legal obligation.

Please see the Glossary section to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data once it has been shared with us by Gamblewise.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To see that you are a customer on the Gamblewise App	(a) Identity (b) Usage (c) Profile (d) Contact	Compliance with legal obligation.
To see what limits you have set on the Gamblewise App and to interact with you when the limits set by you are being reached or exceeded	(a) Identity (b) Usage (c) Profile	Compliance with legal obligation.

	(d) Contact	
Document interactions with you in relation to the limits as set by you in the Gamblewise App	(a) Identity (b) Usage (c) Profile	Compliance with legal obligation.
To share documented interactions with the regulator of gambling activities in the UK (The Gambling Commission) to demonstrate our compliance with our regulatory obligations.	(a) Identify (b) Usage (c) Profile	Compliance with legal obligation.
To enable us to identify that you are on our premises that are using the Gamblewise App services and to see: <ul style="list-style-type: none"> - How many times you have been on each of our premises that are using the Gamblewise services; - The amount of time spent on our premises. 	(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage	Compliance with legal obligation.

Cookies

When you use our website, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://inseinc.com/wp-content/uploads/2019/06/Website-Cookie-Policy.pdf>

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.

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

We may share your personal data with the parties set out below for the purposes set out in the table above.

- As Gamblewise is responsible for the Gamblewise App, it will have access the information set out in the table above.
- Internal Third Parties as set out in section 10 (headed Glossary)
- Third Parties as set out in section 10 (headed Glossary)

6. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

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 will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we may be entitled to have to keep basic information about our customers after they cease being customers. The length of time we keep such information will depend on the legal obligation.

In some circumstances you can ask us to delete the personal data that we hold about you: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see section 10 below to find out more about these rights.

If you wish to exercise any of the rights set out above, please contact our DPO whose details are in section 1.

No fee usually required

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 could refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Playnation Group acting as joint controllers or processors and who are based in the United Kingdom and USA and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Gamblewise as a service provider of the Gamblewise App and who shares your personal data with us.
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.

- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.