

# Inspired Entertainment, Inc privacy notice

## Introduction

Inspired Entertainment, Inc respects your privacy and is committed to protecting your personal data. This privacy notice informs you what personal data we collect from you, how we look after that personal data, how long we store your personal data, where we store your personal data and informs you about your privacy rights and how the law protects you.

### 1. Important information and who we are

Inspired is a global games technology company, supplying virtual sports, mobile gaming and server-based gaming systems with associated terminals and digital content to regulated betting and gaming operators around the world.

#### Purpose of this privacy notice

This privacy notice aims to give you information on how Inspired Entertainment, Inc and its affiliate entities collect and processes your personal data.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notices 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.

#### Controller

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

Inspired is made up of different legal entities, details of which are provided below (not limited to):

- Inspired Entertainment Inc (IEI)
- Inspired Gaming (USA) Inc
- Inspired Gaming (Holdings) Ltd
- Inspired Gaming (UK) Ltd
- Inspired Gaming International Ltd
- Inspired Gaming Gibraltar Ltd
- Inspired Gaming (Greece) Ltd
- Inspired Software Development (India) LLP
- Inspired Entertainment (Malta) Holdings Ltd
- Inspired Entertainment (Malta) Ltd

This privacy policy is issued on behalf of the Inspired Group so when we mention "Inspired", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Inspired Group responsible for processing your data. Inspired Gaming (UK) Limited is the controller and responsible for this 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.

### **DPO Contact details**

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

Email: [dataprotection@inseinc.com](mailto:dataprotection@inseinc.com)

or you can write to the DPO at:

FAO The Data Protection Officer, Inspired Gaming (UK) Limited, First Floor, 107 Station Street, Burton-on-Trent, Staffordshire, DE14 1SZ.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://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 notice**

We keep our privacy notice under regular review. The Privacy Notice includes the latest date of issue at the end of the document.

### **Third-party websites**

Inspired does not share your data with third party websites.

## **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, and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, 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.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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 notice.

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

At the point of making an offer to successful candidates when it is necessary we may request information about your health (which is Special Category Data), so as to ensure that the needs of employees are accounted for, such as access to a place of work and making reasonable adjustments under the Equality Act 2010.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

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

- **Direct Interactions.** You may give us your Identity Data, Contact Data and other data by filling in forms or by corresponding with us by post, phone, email, visiting our premises or otherwise. This includes personal data you provide when you apply or use Inspired products and services, request information, visit us and contact us. 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. CCTV images are taken and stored at Inspired office locations and in extra services locations as specified in the table in section 4.
- **Indirect interactions.** We may receive personal data relating to prospective candidates from our recruiting partners or from contracted marketing agencies. If we receive any personal data this way, we will provide you with a copy of an Article 14 privacy notice (Information to be provided where personal data have not been obtained from the data subject). This will be within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed.
- **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.

### **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.

- where we need to perform the contract we are about to enter into or have entered into with you.
- 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 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.

### Where we store your personal data

Your information is securely stored in the Inspired data centre (DC) in the UK, a in a third party contracted EEA based DC's or in a contracted third party UK based DC. For further information see the table below.

### 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, for how long we retain 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 require further details about the specific legal basis 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	Retention period	Location stored	Purpose for collection	Lawful basis for processing
Marketing - to provide you with Inspired product information	Name, company name, geographic location, email address	For as long as customers are subscribed to the service	Inspired DC in the UK	To provide appropriate online or email information about products and services that you have requested. This also includes those with access to our marketing portal	Consent Contractual fulfilment Legitimate interests
CRM Database Internal	Name, company name, geographic location, email address, Telephone number	For the term of the contract plus two years thereafter	Inspired DC in the UK	Database containing current client contact details.	Contractual fulfilment Legitimate interests
CRM Database External	Name, company name, geographic location, email address,	24 months	Third party EEA DC	Database containing current client contact details.	Contractual fulfilment Legitimate interests

	Telephone number				
Prospective employees (The provision of CV's for roles at Inspired)	Name, Email address, home address, contact phone number	If unsuccessful 6 months Successful applicants will become employees	Inspired DC in the UK XCD SaaS (third party DCs based in the UK)	To identify candidates for roles within the company and prospective candidates as supplied by Inspired recruiting partners	Consent Legitimate interests
Website browsing	IP Address	3 months online 3 years offline (Archived)	Inspired DC in the UK	IP Address, a unique visitor ID and a unique session ID is captured by our JavaScript tag, and sent to our API over HTTPS	Consent
The recording of CCTV images within Inspired offices, Extra services sites and customer gaming centres	CCTV images	31 days	Inspired DC in the UK Red Rhino (a third party DC in the UK)	Security and to ensure that persons of the correct age are gambling on Inspired machines.	Compliance with legal obligation. Legitimate interests Contractual fulfilment
The recording of conversations from our customer helpline.	Telephone conversation where the caller is asked to identify by giving their full name.	100 days	Third party DC's in UK/EEA	To provide reference and records of the calls made to the customer helpline for quality purposes.	Legitimate interests Contractual fulfilment

## 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>

## Types of cookies

- **Temporary Cookies:** are sometimes called “session cookies” and are only stored on your computer until you close your browser. They help us to remember things you've selected on previous pages, so you don't have to re-enter information.
- **Persistent Cookies:** These are stored on your browser for a fixed period (for example, 30 days), after which they are deleted. These cookies can help us remember preferences you may have made when returning to our website.

### **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.

- Internal Third Parties as set out in section 10 (headed Glossary)
- Third Parties as set out in section 10 (headed Glossary)
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **6. International transfers**

We share your personal data within the Inspired Group and with the third party EEA data centres as specified in the table above in section 4. This will involve transferring your data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

### **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.

Details of retention periods for different aspects of your personal data are set out in the table above in section 4.

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 of this notice.

### **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 calendar month. Occasionally it could take us longer than one calendar 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 Inspired Entertainment, Inc 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**

- Service providers based in the EEA who provide IT and system administration services, including those listed in the table above in section 4.
- Professional advisers including lawyers, bankers, auditors and insurers based in the United Kingdom and in the United States of America who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and in the United States of America who require reporting of processing activities in certain circumstances.

### **YOUR LEGAL RIGHTS**

You have the right to:



**The right of access** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**The right of rectification** 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.

**The right to erasure (“right to be forgotten”)** 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.

**The right to restriction of 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.

**The right to 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:

- The accuracy of the personal data is contested.
- 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.

**The right to data portability** 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.

**The right to object** to object to our processing of your data, you have the right to object where:

- Processing is based on legitimate interest.
- Processing is for the purpose of direct marketing.
- Processing is for the purposes of scientific or historic research; or
- Processing involves automated decision-making and profiling.

## Complaints

Under the GDPR 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](http://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.

This Privacy notice was last updated on 11 Jun 2021.

