

Privacy Policy

Protecting your data and information

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us in the event you have a complaint.

Summary

We use your data to provide our services to you the client and delete your data when it is no longer needed. Generally, we do not give your information to third parties, but there are some exceptions where we use external service providers to power our operations – some of these are outside Europe.

We are happy to answer your questions about any of this – email us at service@lottery24.com.

Who we are

Lottery24 Ltd collects, uses and is responsible for certain personal information about you. When we do so, we are regulated under the General Data Protection Regulation which applies to data on users within the EEA. We are therefore responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use

We collect the following personal information when you provide it to us. References to the basis of processing (e.g. "Basis: Legitimate Interest") are a reference to the article of the General Data

Protection Regulation under which we undertake the processing in question. More information is provided on the different bases for processing further down.

- Information you provide when signing up for our service, or enquire about our service. We use this to help us provide you with the service as well as to receive and make payments to you. We also use it to provide you with more information about services and products offered by Lottery24. We also use it to combine it with other clients' data in order to carry out statistical research and improve the way we run our service. Basis: Performance of Contract; Legitimate Interest.

- Further information you provide to us in 'on-boarding' emails and phone calls with you are used for the same purposes as above. Basis: Performance of Contract; Legitimate Interest.

- Any payment data you provide to us which may contain personal data (for example, on a payment card). We use this for the purposes of arranging payment for the service. Basis: Performance of Contract.

- Your preferences as to whether we contact you with information about Lottery24. We use this to make sure we don't send you anything you have asked not to receive. Legal basis: Consent; Legitimate Interest

- Any feedback you give us regarding Lottery24. We use this to help us improve the service. Basis: Legitimate Interest.

Additionally, we will also use your information in the event that we need to enforce our terms of service. Basis: Legitimate Interest.

We may also need to process your data for compliance with a legal obligation to which we are subject.

Information collected by us – if you sign up for our newsletter

We collect your name and email address when you sign up to receive our newsletter. We use this to send you the newsletter. Basis: consent.

Information collected from other sources

We also obtain personal information from other sources as follows:

- If you are a client or wish to be a client and you provide a link to your LinkedIn profile, website, social media account or other place which contains information about you, we will obtain information from that source. Basis: Legitimate Interest.

Web browser cookies

The Lottery24 Website uses cookies to enhance your user experience. Cookies may be stored on your hard drive for record keeping purposes and to track information about how you use the site. You may use your browser to either delete or refuse cookies and/or to alert yourself to when cookies are being sent. If cookies are disabled then certain areas of the site may not function properly.

Who we share your personal information with

We routinely share your personal information with a range of third party service providers who help us provide, analyse and promote services and products by Lottery24. Some of those third party recipients may be based outside the European Economic Area — for further information including on how we safeguard your personal data when this occurs, see 'Transfer of your information out of the EEA'.

The website and software is currently operated by Prudential Investments Ltd who has been operating the website until March 2018. Although, the service is run by Innovant Ltd, the website is currently still based on the old software and will be migrated by September 2018.

If you are a client who wins a prize above £50, we might have to share relevant information about you from your Lottery24 client account (including your name, email address, date of birth, address, lottery tickets and phone numbers) with authorities, insurance company, a lawyer, trustee or bank.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will not share your personal information with any other third party.

Whether information has to be provided by you, and if so why

The provision of all the information we obtain from you is necessary in order for us to provide you with the service. Without it, we'd be unable to maintain a Lottery24 account about you, and without that we can't do business with you.

How long your personal information will be kept

- Data about clients: we will keep this for the duration of your relationship with us, then 5 years.
- Name and email addresses for those who send us an enquiry: we will keep this for 2 years following your last interaction with us.
- Cookie data: Cookies are deleted after a maximum of 365 days.

Transfer of your information out of the EEA

We may transfer your personal information to the following third party service providers, which are located outside the European Economic Area (EEA). We do this to help us provide and promote Lottery24:

Google, USA - for the purposes of analytics and documents. Basis: EU-US Privacy Shield certification,.

Amazon Web Services, USA - for the purposes of hosting and file storage. Basis: EU-US Privacy Shield certification.

Freshdesk, USA - for the purposes of providing you with a help desk facility to contact us. Basis: EU-US Privacy Shield certification.

Microsoft, USA - the purpose of email. Basis: EU-US Privacy Shield certification.

Inspectlet, USA - for the purpose of user experience monitoring. Basis: Model clauses in contract.

Stripe, USA - for the purpose of payment processing. Basis: EU-US Privacy Shield certification.

PayPal, USA - for the purpose of payment processing. Basis: EU-US Privacy Shield certification.

Prudential Investments Ltd, Belize - For the purpose of website usage. Basis: Model clauses in contract.

Mailchimp, USA – For the purpose of email. Basis: EU-US Privacy Shield certification.

Slack, USA - For the purpose of internal team communication. Basis: EU-US Privacy Shield certification.

Sentry, USA - For the purpose of bug tracking. Basis: EU-US Privacy Shield certification.

Such countries do not have the same data protection laws as the EEA. Whilst the European Commission has not given a formal decision that those countries provide an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal information will be subject to appropriate safeguards as permitted under the

General Data Protection Regulation that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

We will not otherwise transfer your personal data outside of the EEA.

Your rights

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances

General Data Protection Regulation.

If you would like to exercise any of those rights, please:

- email us at service@lottery24.com
- let us have enough information to identify you,
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

If you would like to unsubscribe from any email newsletter you can update your notification settings in your account.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

Changes to this privacy notice

This privacy notice was published on Thursday 24rd May 2018 and last updated on Thursday 24rd May 2018.

We may change this privacy notice from time to time, when we do in any way that affects you significantly we will inform you.

How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you. If you wish to contact us please send an email to service@lottery24.com, or write to us at 29 ST MARY STRRET, BIRKIRKARA, BKR 4684, MALTA

Legal Bases for Processing

In the section of this notice which sets out what data we collect and how we use it, we refer to different legal bases for processing. Further details on each of those are set out here.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service 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 between us and you or to take steps at your request before entering into such a contract. Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.