

MERKUR Bingo and Casino Entertainment UK LTD

Privacy Policy

The privacy and security of your personal data is of the utmost importance to MERKUR Bingo and Casino Entertainment UK LTD (MBCE) and we invest heavily in measures that help to protect your data protection rights.

This policy describes how and why we collect, store, process and manage the personal data we hold from our members. The term 'Personal Data' refers to any information relating to an identifiable individual or his or her personal identity.

This policy outlines how your data will be processed lawfully, fairly and in a transparent manner. MBCE does not sell or rent your personal data to third parties for marketing purposes.

We will ensure that the personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one particular purpose for any unconnected purpose unless the person has agreed to this or would otherwise reasonably expect this.

MBCE has appointed a Data Protection Officer (DPO) who is responsible for ensuring that personal data is managed responsibly throughout the company. You can contact the DPO using the details listed at the end of this document.

You have the right to see the data we hold on you, rectify that data and also to request us to delete that data at any time.

1. Introduction

- 1.1 MBCE is defined as the data controller with regard to all of the information contained within this document.
- 1.2 This Privacy Policy sets out the way in which MBCE, collects and processes Personal Information of our club members. MBCE is registered for the purposes of data protection with the Information Commissioner's Office in the UK (Registration Reference: Z6052826).
- 1.3 By using our Services and registering for membership, you acknowledge that you have read, and agree to the terms of this Privacy Policy in relation to processing under legitimate interests.
- 1.4 This Privacy Policy is incorporated into, and forms part of our terms & conditions of membership.

2. The information we collect

2.1 Personal data is any data that can identify an individual. We may collect, use and store personal data when:

- you become a member (registration)
- anti-money laundering limits and thresholds reached
- social responsibility reviews in-line with regulatory obligations
- register for mailing lists and promotions
- update your details
- request information with regards to a conference/ party booking or event
- visit our offices or sites
- use our website, social media pages or app
- apply for a job
- visit our restaurant and or book a conference/package or event
- for visitors, the visitors signing in book will be used to comply with Health and Safety and Fire Risk Register.

2.2 We collect your Personal Information when you register for membership or rewards, through the use of paper or online forms and when you email us your details.

2.3 We are required by law to comply with anti-money laundering and safer gambling regulations/legislation, we may need to request proof of identify and source of funds documents.

We may collect the following information from or about you:

- Name, address, telephone number(s), date of birth, e-mail address, nationality, ethnicity, visits, occupation, interests, social media information, photographic imagery
- Identification, for example passport/driving license
- Profile Information, this includes username and passwords, IP addresses of devices, MAC address of devices, interests and preferences
- Play history, drop and win information, player tracking data
- Payment transactions, including payment card, bank account information when you purchase products or services, which may be administered by third parties
- Offences and reasons for refusal of entry
- Use of our WIFI

- Marketing preferences, including communication
- Allergies and dietary requirements (for you or your party)
- CCTV security recordings
- Information that is publicly available
- Consents, any permissions, consents or preferences that you give us
- Reward schemes, details about reward schemes you may be part of
- Data collated from participation in promotions or competitions
- Information you provide to us by email, letter, telephone, social media, via our websites or apps, or in person
- To prevent and detect fraud and crime (for example through the use of CCTV in our sites)
- To assist in our safer gambling responsibilities

We may need to obtain sensitive information (special category) with regards to:

- health information such as disability needs (e.g. to assist with seating for conferences or party packages), allergies (e.g. restaurant bookings/conferences or party packages).
- Race or ethnicity
- Information with regards to criminal convictions and offences
- Information to assist in our duties under safer gambling to review financial harm

2.4 In addition, we may collect Personal Information through surveys which we undertake. Such surveys are voluntary and are anonymous where possible.

2.5 Online Information

We receive and store certain details through “cookies”, through websites and apps. Cookies are small files containing text documents that are stored in your browser or hard drive of your device, and are used to transfer information.

We use social media to provide updates on our activities and to promote events and projects.

In order to help us track whether we are sending relevant information we may track and record vouchers, emails, apps and text messages we send you or you collect.

We also use online tracking and analysis services such as Google Analytics, this helps with understanding how our websites are attracting new visitors, which marketing activities are working, this information enables us to enhance our online offering.

2.6 Data from third parties

We may also collect information about you from third party providers. This may include information with regards to age, source of funds, safer gambling responsibilities and to reduce risk, fraud or illegal activities.

The providers we use for the above are

- Accuris Intelligence Information Systems (formerly C6)
- Publicly available sources
- Self Exclusion scheme systems like PlayingSafe, SENSE and MOSES
- COIN
- Regulatory and Enforcement Agencies
- Other casino operators

3. Your rights as a 'data subject'

- 3.1 Under data protection law you retain the following rights over your personal data outlined in paragraph 3.2.
- 3.2 The right to access the data we hold about you
The right to rectification of any data that is inaccurate or incomplete.
The right to erasure of your data (also known as 'the right to be forgotten')
The right to restrict processing of your data
The right to data portability
The right to object to the processing of your data
Rights in relation to automated decision making and profiling.
- 3.3 If you exercise your right to be forgotten, this would result in a termination of your membership to MBCE. This means you would no longer be able to visit or play at our venues unless you were to re-join.

4. Our basis for processing personal data

- 4.1 For the purpose of managing a regulated business within the Gambling Industry it is important for us to maintain a membership database. This database allows us to achieve our regulatory compliance responsibilities and safeguard the security of our members.
- 4.2 Information collected and processed for the purposes of becoming and remaining a member is on basis of a legitimate interest. The justification for this is outlined in 4.1 above.
- 4.3 In order to keep you up to date with our news and promotional events we create and send regular marketing information via direct marketing, app, SMS and email channels. In order to send you this information we will gain your consent. This is usually obtained at the point of registration.
- 4.4 This consent can be withdrawn at any time by speaking to your local venue or by contacting the Data Protection Officer using the details at the end of this policy.

5. How we use your Personal Information

- 5.1 Your Personal Information is processed by us to provide you with the products and services relating to our business. In particular, we collect your Personal Information in order to enable us to:
 - Set-up, administer and manage your membership, associated accounts and records;
 - Receive and respond to your communications and requests;
 - Notify you about promotional offers and general marketing;
 - To share with approved suppliers (for instance direct mail)
 - to process a transaction and carry out completion of a purchase (your personal information and card details may be passed to third party service providers; card details will only be used in this way for the purpose of handling an individual transaction)
 - Ensure that we are able to fulfil our regulatory obligations regarding your account, including by verifying the accuracy of any information you give us;
 - Comply with our obligations under applicable laws (including, but not limited to the Gambling Act 2005);
 - Investigate, and assist with the investigation of, suspected unlawful, fraudulent or other improper activity connected with the services

(including, where appropriate, dealing with requests from regulatory bodies for the sharing of information);

- Carry out market research campaigns;
- In the event that we sell or buy any business, assets or shares in part or whole we may disclose your personal details to such relevant third parties involved.

6. Disclosure of your Personal Information

6.1 We may disclose your Personal Information to any of the following recipients:

- Any company within our Group (including to its employees and sub-contractors) which assists us in providing the services or which otherwise has a need to know such information.
- Any contractors or other advisers auditing any of our business processes or who have the need to access such information for the purpose of advising us.
- Any data processor which enables us to manage systems or processes as part of any service or promotion offered to our members.
- Any law enforcement or regulatory body which may have any reasonable requirement to access your Personal Information.
- In the event that we sell or buy any business, assets or shares in part or whole we may disclose your personal details to such relevant third parties involved.

6.2 Sharing data outside the EU

On occasions we may need to transfer your data outside of the EEA. This will only be completed once we have ensured that there are appropriate safeguards in place to do so, for example the same policies are in place as if your data was inside the EEA.

If we use providers based in the US, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

7. Marketing Preferences

- 7.1 We will not send you unsolicited information regarding any third party's products or services.
- 7.2 As part of the account registration process, you will have the opportunity to choose whether or not to receive information on our offers and promotions. This consent is subject to the data retention periods defined within this policy.
- 7.3 We will send you promotional marketing information and updates until such time that you inform us that you do not wish to continue to receive them or do not refresh your consent upon our request at the end of 5 years from the date of your consent. You may update your marketing preferences at any time by contacting your local venue or emailing dataprotection@merkur-casino.com

8. Accessing and Updating your Personal Information

- 8.1 You may update your Personal Information at any time by contacting your local club or the company data protection officer at dataprotection@merkur-casino.com
- 8.2 You may obtain a copy of your Personal Information held by us by contacting our Customer Services team or by writing to us at: The Data Protection Officer, MERKUR Bingo and Casino Entertainment, Seebeck House, 1A Seebeck Place, Milton Keynes, MK5 8FR. We require up to one month in order to respond to such requests.
- 8.3 You will not have to pay a fee to access your personal data, however we reserve the right to charge for reasonable administrative costs if your request is clearly unfounded, repetitive, or excessive.

9. How long do we keep your data for?

- 9.1 We retain your data for no longer than is necessary. This length of time is different for each type of personal data that we hold. These retention periods are subject to change only where deemed necessary by the Data Protection Officer where there is a defined vital interest under data protection law.

9.2 Data retention periods:

Membership information	This is the information we collect at the point of registration	Data retained for 5 years after data subjects' most recent visit.
Marketing Preferences	These are the marketing channels you give consent for us to contact you by	Data retained for 5 years from consent being given.
Information required by legislation	This includes data which relates to social responsibility or anti-money laundering policy	Data retained for 10 years after data subjects' most recent visit.
Data relating to spend information	This includes information on cash or card transactions which take place on or around our premises in exchange for products or services provided by MERKUR Bingo	Data retained for 5 years after data subjects' most recent visit.

Figure 1.1 data retention periods

10. Security

10.1 We use several methods to ensure that all customer information remains confidential. We have developed a comprehensive policy for data protection management which is reviewed and updated as necessary.

11. Complaints

MBCE takes the responsibility of holding personal data very seriously and is happy to receive any queries or concerns you may have. If you believe that we have not adhered to this policy or that your data has been handled in a way which you feel is not in accordance with your wishes then you may complain to the Data Protection Officer using the contact details below.

Data Protection Officer,
MERKUR Bingo and Casino Entertainment
Seebeck House
1A Seebeck Place,
Milton Keynes
MK5 8FR

Or email dataprotection@merkur-casino.com

Alternatively, you may contact the Information Commissioners Officer (ICO) directly who are the body responsible for managing data protection compliance in the UK.

You can contact the ICO at the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

casework@ico.org.uk

0303 123 1113

12. Contact information

Please contact us via the address:

MERKUR Bingo and Casino Entertainment
Seebeck House
1A Seebeck Place,
Milton Keynes
MK5 8FR

Or email:

dataprotection@merkur-casino.com