

MERKUR Casino Entertainment UK LTD

### Membership Privacy Policy

The privacy and security of your personal data is of the utmost importance to MERKUR Casino and we invest heavily in measures that help to protect your data protection rights.

This privacy notice (“notice”) sets out how MERKUR Casino Entertainment UK Limited (see “Contact Details” below for further details) (“MERKUR”, “we”, “us” and “our”) use and protect your personal data when you visit our Casinos (“premises” and “venues”) and provides you with a clear explanation of when, why and how we collect your personal data. This notice applies to anyone (including members of the public, customers, suppliers) visiting our premises (“visitors”).

MERKUR is the controller and responsible for your personal data and we take our responsibilities to handle your personal data with care, keep it secure and comply with applicable data protection and privacy laws seriously. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this notice. If you have any questions about this notice, please contact our DPO using the information set out in “Contact Details” below. This policy outlines how your data will be processed lawfully, fairly and in a transparent manner.

### Personal Data We Collect About You

Personal data means any information about an individual from which that person can be identified (whether directly or indirectly).

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. We use CCTV and facial recognition technology to view and record visitors when they enter and reside within our premises to maintain a safe environment for staff and visitors, as well as the other purposes set out in “Processing your personal data” below.

The data we process is footage showing visitors on our premises which is captured by our CCTV cameras and stored on our systems. We also use facial recognition technology which records the facial images of visitors to create unique numerical representations. These representations are used to identify dwell time on our premises and future visits/dwell time. We recognise that the images of individuals recorded by such cameras/technology are personal data which must be processed in accordance with applicable data protection laws.

There is no planned or scheduled sharing of CCTV footage with external organisations (except with our third-party service providers as set out below in “Disclosures of your personal data”). However, in the event of a security incident or suspected security incident, footage may be shared with relevant organisations, such as the police. Where there is a security incident, some criminal offence data may be processed.

MERKUR Casino collects your personal data in order to manage your membership of our venues. We also collect your data so that we can send you marketing information regarding our products, promotions and services for which you have provided your consent by specifying your choice of medium for receiving the communication.

MERKUR Casino 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 MERKUR Casino 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 MERKUR Casino, collects and processes Personal Information of our club members. MERKUR Casino 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.

## 2. The information we collect

Your personal data will only be processed for one or more of the following purposes:

- 2.1 protecting the health and safety of visitors and staff while on our premises and maintaining a safe environment for visitors and staff;
- 2.2 preventing and detecting crime and criminal activity, and protecting our premises from damage, disruption, vandalism or other criminal activity; and,
- 2.3 providing more accurate, up-to-date and relevant information to enable us to:  
(i) improve our products and services, customer relationships and experiences, develop our business and inform our marketing strategy, and (ii) assist with the effective, efficient and safe staffing of our premises.

### 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 MERKUR Casino clubs. This means you would no longer be able to visit or play at our clubs unless you were to re-join as a member.

### 4. Our legal basis for processing

The law requires us to have a legal basis for collecting and using your personal data. We rely on legitimate interests. We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example, prevent/detect crime and enable us to give you the best and safest customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).

We may also need to use personal data to establish, exercise or defend against legal claims.

If a security incident takes place on our premises, criminal offence data may be processed, but only where authorised by applicable law, for example, for the purposes of detecting and preventing crime

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;
  - 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.

## 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 club or emailing [dataprotection@merkur-casino.com](mailto: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](mailto: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 Casino, Matrix House, North Fourth Street, Milton Keynes, MK9 1NJ. We require up to one month in order to respond to such requests.
- 8.3 Requests for access to your personal data are free of charge.

## 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 Casino	Data retained for 5 years after data subjects' most recent visit.
CCTV	(i) CCTV cameras will be stored in accordance with our CCTV guidelines for 31 days from the date of recording; (ii) Images recorded via facial recognition will be stored for 24 hours from the time of the facial image recording,	31 Days from date of recording  24 Hours from time of recording

**Figure 1.1 data retention periods**

Unless we need to retain your personal data for a longer period, for example, for insurance or law enforcement purposes, under a court order, or if we reasonably believe there is a prospect of legal proceedings.

At the end of their useful life, all images/footage stored in whatever format will be deleted permanently and securely.

We retain unique numerical representations created via facial recognition technology.

## 10. Advertising and use of Cookies

- 10.1 We may collect anonymous information about your use of our websites, if appropriate using "cookies", pixel tags and similar functionality. We use cookies for the operation of the website. We also use cookies for our own analytical purposes so that we can improve our customers' experience.
- 10.2 If you object to cookies or want to delete any cookies that are already stored on your computer, you should follow the instructions for deleting existing cookies and disabling future cookies on your web browser or equivalent software. Further information is available at [www.aboutcookies.org](http://www.aboutcookies.org).

10.3 As part of the website's operation, and for our own statistical analysis of site traffic, our website automatically logs internet IP addresses.

## 11. 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.

Where CCTV and facial recognition technology are in use on our premises, we ensure that signs are displayed at the entrance of the surveillance zone to alert visitors of their existence and use. Our signs contains our details, the purpose for using these systems, link to this notice and who to contact for further information.

We do not, and none of our service providers, transfer your personal data outside the UK/EEA.

## 12. Your Legal Rights

You have a number of rights under data protection laws in relation to your personal data. In certain circumstances these rights might not be absolute, as they depend on our reason for processing your personal data. These rights include:

**Request access to your personal data** (commonly known as a "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. Please also be aware of our retention periods set out above.

**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** in certain circumstances. 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) as the legal basis for that particular use of your data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

**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.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in one of 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; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 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 using the "Contact Details" set out below.

If you wish to exercise any of the rights set out above, please contact our DPO at: [dataprotection@merkur-casino.com](mailto:dataprotection@merkur-casino.com).

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.

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.



In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual. We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.

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.

### 13. Complaints

MERKUR Casino 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 Entertainment UK Ltd  
Matrix House  
North Fourth Street  
Milton Keynes  
MK9 1NJ

Or email [dataprotection@merkur-casino.com](mailto: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](mailto:casework@ico.org.uk)

0303 123 1113

### 14. Contact information

Please contact us via the address above in Milton Keynes or email us at [dataprotection@merkur-casino.com](mailto:dataprotection@merkur-casino.com)