

SENSE PRIVACY POLICY

NB please note that references to the previous operators of the SENSE scheme, The National Casino Forum (“NCF”) and The Betting and Gaming Council (BGC) should be read and understood as references to the current operator of the scheme, SENSE Ltd. [July 2022]

1. SENSE – WHO WE ARE

Self Enrolment National Self Exclusion Ltd (“SENSE”) are a company limited by guarantee registered in England and Wales under registration number 13998497 with a registered address: 1st Floor, 90 Chancery Lane, London WC2A 1EU

Contact SENSE:

Telephone: (+44) 020 34092047

Email: info@sensescheme.com

Website: www.senseselfexclusion.com

2. SENSE SCHEME

SENSE is the voluntary Self Enrolment National Self Exclusion scheme. The SENSE scheme is operated on behalf of UK licensed land-based casinos.

SENSE self-exclusion programme allows individuals to voluntarily exclude themselves nationally from all land based casinos in Great Britain licensed by the Gambling Commission.

SENSE is a data ‘Controller’ of any personal information we collect about you. SENSE must process personal data (this may at times also include sensitive personal data) so that it can provide its services, in doing so, the SENSE act as a data controller.

SENSE will process your personal information in accordance with all applicable laws, including the UK and EU General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA 2018).

3. WHAT IS PERSONAL DATA?

The term “Personal Data” means any information relating to you that identifies you, or through which you can be identified, directly or indirectly. In particular, by reference to an identifier such as a name, an identification number, location data, or an online identifier or to one or more factors specific to you physical, physiological, genetic, mental, economic, cultural or social identity.

As an example, for SENSE enrolment we require an enrolees full name, phone number, email, address, date of birth and photograph. Whereas for email or website enquiries we may require name, email address and phone number, processed so that we can respond to a query.

4. THE PURPOSE OF THIS PRIVACY POLICY

The purpose of this privacy policy is to let you know how we collect and process your Personal Data when you interact with us for whatever reason. This privacy policy also contains information about your rights under applicable data protection legislation.

We are committed to compliance with data protection laws. We believe that ensuring data protection compliance is the foundation of trustworthy business relationships.

It is important that you read this privacy policy together with any other Privacy Policy or Notice we 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 the other notices and is not intended to override them.

5. WHAT IS SPECIAL CATEGORY PERSONAL DATA?

Sensitive personal data, also referred to as Special Category Personal Data, is defined as Personal Data that needs more protection due to its sensitive nature. Special Category Personal Data could include information such as an individual's sexual orientation, health data, religion, race and trade union membership. As such, additional obligations are placed on the data Controller and/or Processor for them to process Special Category Personal Data lawfully, which comes under Article 9 of the UK and/or EU GDPR.

We do not collect Special Category Personal Data for the purposes of providing the SENSE service. We do however accept that on occasions we may be provided with Special Category Personal Data, particularly health data. We will only use Special Category Personal Data where you have provided your explicit consent or where there is a legal requirement to do so.

Special Category Personal Data can also include biometric data, and while SENSE do not process biometric data to offer the SENSE service, we appreciate that technological advances allow for new methods of identification techniques. In the circumstances it is strongly recommended that enrolee's look at the relevant Casino Company privacy policy for any physical or physiological biometric identification techniques.

6. HOW DO WE COLLECT YOUR PERSONAL DATA?

SENSE will collect Personal Data in several ways. For example, directly from an enrolee when they enquire about the scheme, or for example via an enquiry you submit via email to SENSE, via SENSE website, or from participating Casinos.

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To administer the self-exclusion scheme.
- To discuss the scheme with potential participants.
- When you browse any page of our website
- When you contact us with a query regarding the scheme via email, letter or via our website.

Types of data we may collect

When you use SENSE or visit our website, you may provide us with the following Personal Data, and we may collect and process such Personal Data in accordance with this Privacy Policy and for the following purposes:

- **Contact details**
This includes your name, email address and any other contact details you may choose to provide to us.
- **Financial information**
SENSE do not collect your financial information or Casino gaming financial history.
- **Data that identifies you**
Your IP address, login information, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version.
- **Data on how you use the SENSE website**
Your URL clickstreams (the path you take through our website), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions. This helps us optimize performance and improve the website.
- **Survey data**
This includes any additional information you may choose to give us as part of a survey we conduct to analyse trends and develop new content.
- **Location data**
This includes your precise and approximate geo-location which is collected from the device you use.
- **Aggregate data**
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. 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.

7. OUR LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA

The UK and EU GDPR, (Our global standard of compliance) requires that a data Controller (an organisation that collects and decides what to do with your Personal Data) must have a legal basis for doing so. SENSE is a data 'Controller' of any personal information we collect about you in accordance with all applicable laws, including the UK and EU General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA 2018).

We will not process your Personal Data for any other reason without your consent or informing you of any other lawful basis for doing so.

In most instances, our legal bases for processing your personal information are:

- a) Your consent. *(We will obtain your consent in writing, where you would be able to withdraw your consent at any time. You can do this by contacting SENSE by email info@sensescheme.com*
- b) We have a contractual obligation. *(For example, to enrol in the SENSE voluntary self-exclusion enrolment registration, to enable the SENSE scheme to work effectively, or for customer support including notifying you of any changes to our service, solving issues via email including any bug fixing.)*
- c) We have a legal obligation.
- d) We have a vital interest.
- e) We need it to perform a public task.

- f) We have a legitimate interest. *(For example, testing features, managing landing pages, traffic optimization and data analysis and research, including profiling and other techniques over your data and in some cases using third parties to do this.)*

8. MARKETING

SENSE do not undertake any marketing activities. However, if we were ever to undertake marketing activities in the future, then we will comply with the requirements set out in the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), which will include the option to stop receiving marketing material from us.

9. HOW LONG WE WILL KEEP YOUR PERSONAL DATA

SENSE will only keep your Personal Data for no longer than is necessary, and this will vary according to the reason for collecting the personal data. For example, our legal basis for processing enrolee's personal data is contractual, this means that in accordance with contract law, we will keep enrolee's personal data for six years from the end of an enrolee's exclusion removal date. However, if someone makes a general enquiry on our website then the retention period would be much less as there is likely to be no reason to retain the personal data for six years.

When calculating the appropriate retention period for your data, we consider the nature and sensitivity of the data, the purposes for which we are processing the data, and any applicable statutory retention periods. Using these criteria, we regularly review the Personal Data which we hold and the purposes for which it is held and processed.

The retention period depends on the type of Personal Data and the reason we are processing it. Should you require further detail please email; info@sensescheme.com

When we determine that Personal Data can no longer be retained (or where we must comply your request us to delete your data in accordance with your right to do so) we ensure that this data is securely deleted or destroyed.

10. SECURITY OF YOUR PERSONAL DATA

In order to protect your Personal Data, we put in place appropriate organisational and technical security measures. These measures include ensuring our internal IT systems are suitably secure and implementing procedures to deal with any suspected data breach.

In the unlikely event of a data breach, we will take steps to mitigate any loss or destruction of Personal Data and, if required, will notify you and any applicable authority of such a breach.

Although we use appropriate security measures once we have received your Personal Data, you will appreciate that the transmission of data over the internet (including by email) is never completely secure. We endeavour to protect Personal Data, but we cannot guarantee the security of data transmitted to or by us.

11. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE EEA

To provide our services, we may need to share your Personal Data with third parties and suppliers outside the UK and European Economic Area (the "EEA"). If we do this, we will ensure your Personal Data receives the same protection as if it were being processed inside the EEA. For example, our contracts with our suppliers stipulate the standards they must follow to process Personal Data. Where a casino company UK support services are located outside the UK or the EEA the casino company is a controller in their own right. For

information on how personal data is protected by a casino company please see their respective privacy notice published in the UK.

12. YOUR RIGHTS

You have rights under the data protection legislation and, subject to certain legal exemptions, we must comply when you inform us that you wish to exercise these rights. There is no charge, unless your requests are manifestly unfounded or excessive. In such circumstances, we may make a reasonable charge or decline to act on your request. Before we action your request, we may ask you for proof of your identity. Once in receipt of this, we will process the request without undue delay and within one calendar month. In order to exercise your rights please contact SENSE Data Protection Officer info@sensescheme.com

You can contact us if you wish to complain about how we collect, store and use your Personal Data. It is our goal to provide the best possible remedy with regard to your complaints.

However, if you are not satisfied with our answer, you can also contact the relevant competent supervisory authority. In the UK, the relevant supervisory authority is the ICO, contact details of which can be found below.

Your rights in connection with personal information are set out below:

Subject Access Request - You have a right to receive a copy of all the Personal Data we hold about you.

Rectification - If any of the Personal Data we hold about you is incomplete or inaccurate, you have a right to have it corrected.

Erasure - This is also known as the “right to be forgotten”. You have a right to ask us to delete your Personal Data where there is no good reason for us continuing to process it. However, certain criteria apply and if we have a legitimate reason to continue processing your personal data, we will not be legally required to delete it.

Objection - You have a right to object where we are relying on legitimate interests as our legal basis for processing your Personal Data but, in certain circumstances we may be able to continue with the processing. For example, if we have compelling legitimate grounds which override your interests, rights and freedoms or your personal information is needed for the establishment, exercise or defence of legal claims.

Restriction - You have a right to ask us to restrict the processing of your Personal Data in certain circumstances. For example, you may require us to suspend processing information about you whilst checks are made to ensure it is accurate. Restriction is not available where the legal basis relied on for processing Personal Data is ‘performance of a contract’.

Portability - You have the right to ask us to transfer any Personal Data you have provided to us to another party, subject to certain criteria being satisfied. We will provide this Personal Data in a structured, commonly used and machine-readable format.

Right to withdraw consent - If you have given us your consent for the processing of your Personal Data, you can withdraw this at any time. Please note, the withdrawal has no effect on the legality of the data processing carried out in the past on the basis of your consent. To exercise your right to withdraw consent contact us at info@sensescheme.com

Right to complain - If you are unhappy with the way in which your personal information has been or is being processed, you have the right to make a complaint about it to the Information Commissioner's Office (ICO). They can be contacted at:

Information Commissioner's Office
Wycliffe House, Water Lane,
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

13. YOUR OBLIGATIONS

If any of your Personal Data changes whilst you are a user of our services, it is important that you inform SENSE immediately in writing to ensure that the data we hold about you is accurate and up to date, please contact SENSE Administration at info@sensescheme.com

14. HOW TO CONTACT OUR DATA PROTECTION OFFICER

If you wish to contact SENSE in order to exercise any of your rights referred to above or any other data protection matter, please contact our DPO at info@sensescheme.com

15. THE DATA PROTECTION PRINCIPLES

We will comply with the EU GDPR, UK GDPR and the DPA 2018. Article 5 of the UK and EU GDPR contains the data protection principles, which require that Personal Data shall be:

- Processed lawfully, fairly and in a transparent way.
- Collected for specified, explicit and legitimate purposes and not used in any way that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary for the purposes we have told you about.
- Kept securely.

We operate according to the principles of the UK and/or EU GDPR, and PECR, regardless of the location of the data subject.

16. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this privacy policy from time to time. Updates to this privacy policy will be published on our website www.senseselfexclusion.com. To ensure you are aware of when we make changes to this privacy policy, we will amend the revision date at the top of this page. Changes apply as soon as they are published on our website. We therefore recommend that you visit this policy regularly to find out about any updates that may have been made.

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