

Bet Ltd

Exchange Privacy Policy

BET LTD EXCHANGE PRIVACY POLICY

1. Introduction

Bet Ltd is part of Easysoft Ltd. This Privacy Policy explains how we use any personal information that we collect about you when you use our betting exchange in compliance with the General Data Protection Regulations (GDPR).

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2. Your personal information we collect and how we use it

We collect information about you when you register with us and when you use our exchange. This information may include, but is not limited to your name, address, email address, phone/mobile number, credit card details, date of birth and other details required for our account creation process. Our lawful bases for processing are:

- Consent: e.g. for marketing purposes
- Contract: for setting up and managing your Account
- Legal obligation: to comply with our legal and regulatory obligations
- Legitimate interests: social responsibility towards our customers; management of business risks

Website usage information is collected using cookies. Cookies are text files placed on your computer to collect standard internet log and visitor behaviour information. We use it to track visitors' use of the exchange, personalise repeat visits and to compile statistical reports on exchange activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. Cookies do not give us access to your computer or any information about you. We do not store any of your personal information in your Cookies.

You can set your browser to not accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our exchange features may not function as a result.

We may record our telephone conversations with you for training and monitoring purposes and for effective resolution of any complaints or disputes that may arise.

In our legitimate interest, we may carry out profiling and analysis of your data. This enables us to manage the risks presented to us and to perform our legal and regulatory responsibilities such as:

- Compliance with the Gambling Act's objectives; preventing crime and disorder in gambling, fairness and openness; protection of children and vulnerable people
- identity and age verification
- setting up and managing your Account
- Keeping accurate records
- Providing you with services you have requested
- Updating you about your betting activities
- prevention, detection or investigation of crime including fraud

Your personal information may also be used to notify you about important changes, new services and special offers which may be of particular interest to you. We will not send you offers without your express consent.

Your data may be used to create aggregate and anonymised statistical data.

When accessing our website and Services and agreeing to our Terms & Conditions, you consent to Bet Ltd collecting, using, maintaining and disclosing personal information that you provide to us as described in this Policy.

3. Who we share your personal information with

We may share your details with, and also use information from, service providers to verify your identity and eligibility to open an Account with us. The information provided to them will be used to verify your identity and age and to process payments. This process may involve automated decision-making processes to determine your eligibility to open an account with us. We only use service providers who are GDPR-compliant and registered with the Information Commissioner's Office.

We are required by law to share your personal information with regulatory bodies such as the Gambling Commission and other law enforcement agencies.

We do not sell or provide personal information to third parties for marketing purposes.

Your data may be shared with other companies within the Easysoft Group.

4. How long we will retain your personal information for

Your information will only be retained for as long as we reasonably need it for legal and/or business purposes and as is necessary to allow us to effectively manage your Account and conduct our business. Typically, this will not exceed 7 years after account closure. However, we may need to retain your information indefinitely e.g. to manage self-exclusion or responsible gambling or for loss prevention, to protect our rights, privacy, safety, or property, or those of other persons in accordance with our legitimate interests.

We will employ industry best practices to ensure that your data remains secure at all times including its secure disposal.

5. Safeguarding your personal information

We are committed to safeguarding your information. Any information provided by you will be handled with high security and confidentiality and in accordance with the GDPR. In order to prevent unauthorised access or disclosure, accidental loss or destruction of personal data, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

By agreeing to our Terms and Conditions including this Privacy Policy, you accept responsibility for your internet security, making sure that you use trusted anti-virus protection, carry out regular software updates on your device and never leave your device unattended while using our Services. Ensure you use a strong password to protect against unauthorised access to your Account.

Generally, e-mail is not considered a secure medium of communication, hence, we advise that you take all reasonable care when sending us private and sensitive information via e-mail. Ensure that your network is secure for personal communication.

Although we take reasonable steps to ensure information security, we cannot be responsible for any acts of unauthorised access or abuse of our website. We make no warranty that we will always be able to prevent such access.

6. Your rights

The GDPR gives you certain rights about your data. These rights may be passed on to any third party with whom we have shared your data. Your rights may be exercised at any time by contacting us (contact details are below). They are summarised as follows:

The right to be informed of how we process your personal data: as detailed in this Privacy Policy.

The right of access: You have the right to request a copy of the information that we hold about you. This will be provided free of charge within 1 month, subject to confirmation of your identity.

The right to rectification: we will rectify any inaccurate or incomplete data within one month of notification by you. You can amend your address, email address and mobile number in your account profile by yourself.

The right to erasure: of your data if: it is no longer required for the purpose for which it was collected; you withdraw your consent to its use and there is no legitimate interest to retain it; it was unlawfully processed or needs to be erased for a legal reason; it relates to a child. This right does not apply where we need to retain the data due to a legal obligation or in defence of any claim.

The right to restrict processing: where you contest the accuracy of the data; you object to its processing; processing is unlawful; you require the data for a legal claim and we no longer require it.

The right to data portability: you may move, copy or transfer your data to another IT environment in a commonly used format free of charge within one month of the request (subject to confirmation of your identity). This right applies only to data which you personally supplied to us consensually or contractually and which is processed automatically.

The right to object to: processing based on legitimate interests; direct marketing (including profiling). Such requests will be responded to immediately unless overriding legal or legitimate grounds exist.

The right not to be subject to automated decision making and profiling: For automated decisions, you can insist on human intervention, can express your point of view and request an explanation of any automated decision and challenge that decision. This right does not apply where the automated decision is contractual, authorised by law, consensual or where it has no legal or significant effect on you. In all cases, we will ensure that we are fair and transparent about the logic involved, we use appropriate decision-making procedures, inaccuracies and errors are minimised and data is kept secure.

7. Your right to complain to a supervisory body

Should you remain dissatisfied with how we have dealt with your complaint or handled your information, you have the right to complain to the Information Commissioner's Office (ICO). Further details can be found on the Information Commissioner's website at <https://ico.org.uk/concerns/>

8. Transfer of your personal information

Although unlikely, we may need to transfer your information outside the European Economic Area. All such transfers will be carried out in full compliance with the GDPR and any other applicable legislation.

9. Other websites

Our website may contain links to other websites. This Privacy Policy only applies to our website, so when you visit other websites through a link provided on our website, ensure you exercise caution and read their Privacy Policy.

10. Changes to this policy

We review and amend our Privacy Policy on a regular basis. It forms part of our Terms and Conditions. If any changes are made to it, you will be given the opportunity to view them the next time you log on to our exchange. You will not be able to access the Exchange unless and until you have accepted the revised Terms and Conditions including the Privacy Policy.

11. Contact Us information

The Data Controller of your data is Bet Ltd, Thorp Arch Grange, Thorp Arch, Wetherby, LS23 7BA. Our Data Protection Officer may be contacted at this address or as follows:

Telephone: 01937 860000

Email: support@bet.me

We are registered with the Information Commissioner's Office (ICO). Our registration number is **ZA212847**. You may view our details on the register: <https://ico.org.uk/ESDWebPages/Entry/ZA212847>.