Privacy Notice

1. Introduction

At Inspired Gaming (UK) Ltd, (Inspired) we are committed to protecting and respecting your privacy, whilst striving to provide the very best experience. We work very hard to keep your information safe and we want our services to be safe and enjoyable for everyone. We follow strict security procedures on how personal information is stored, used and who sees it to help prevent any inappropriate exposure of the information.

This privacy notice explains the types of personal data we may collect about you when you sign up to the Cashless Card. It also explains how we'll store and handle your data and keep it safe. Please read this privacy notice carefully to understand our practices regarding your personal information.

We may update this notice from time to time. If there is any significant change, we will let you know by providing you with the updated notice.

For your information this privacy policy was last updated on the date noted at the bottom of this page.

2. Who are Inspired Gaming (UK) Ltd

Inspired is a global games technology company, supplying Virtual Sports, Mobile Gaming and Server Based gaming systems with associated terminals and digital content to regulated lottery, betting, and gaming operators around the world.

For simplicity throughout this notice, 'we' and 'us' means, Inspired, its brands and its business units.

We have a legal duty to protect personal information that we collect under Privacy Legislation such as, the UK GDPR, the Data Protection Act 2018 (the "DPA") and the Privacy and Electronic Communications Regulations 2003, (PECR).

For the purpose of the DPA and PECR, we are the data controller and are located at First Floor, 107 Station St, Burton on Trent, Staffs, DE14 1SZ. If you have any queries relating to this policy, you may write to us at this address or contact the DPO at dataprotection@inseinc.com

3. The Legal basis we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process personal data, including:

Consent

In certain circumstances, we can collect and process your data with your consent.

For example, we may ask you if you would like to receive news and offers. When we ask you this, we will always give you the option to tick a box informing us of your preferences.

To fulfil our contract to you

In certain circumstances, we can collect and process your personal data to fulfil our contract to you.

For example, if you decide to use the Cashless Card, we'll collect your personal information to enable us to register your account and to manage and monitor your use of the account.

Legal Compliance

If the law requires us to, we may need to collect and process your data

For example, we can pass on details of people involved in fraud or other criminal activity affecting Inspired Gaming (UK) Ltd or our partners (as mentioned in paragraph 7) and to law enforcement.

Legitimate Interest

In certain situations, we may process your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example;

Ensuring network and information security

Fraud and Anti Money Laundering prevention

Indicating possible criminal acts or threats to public safety

Personalising our application's content to improve your customer experience

We may send you surveys to ensure we understand your experience and to make improvements where necessary.

4. When do we collect your personal information?

We will collect and use personal information when you create a cashless card account with us.

5. What types of personal data do we collect?

- Name
- Email Address
- Holiday park cabin, lodge or room number
- MAC Address
- Mobile device IMEI number

6. How and why do we use your personal data?

- To manage, monitor and record your usage of the cashless card application.
- To protect our business and your account from fraud and other illegal activities. This
 includes using your personal data to maintain, update and safeguard your account.
 We'll also monitor your user activity with us to quickly identify and resolve any
 problems and protect the integrity of our application. We'll do all of this as part of our
 legitimate interest.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this privacy notice. These service messages will not include any promotional content and do not require prior consent when sent by email. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To develop, test and improve the systems, services, and products we provide to you.
 We'll do this on the basis of our legitimate business interests.
- To comply with our contractual or legal obligations to share data with law enforcement and other authorities.

For example, when a court order is submitted to share data with Government functions & law enforcement agencies or a court of law e.g. HM Revenue or DWP.

To send you survey and feedback requests to help improve our services. These
messages will not include any promotional content and do not require prior consent
when sent by email or text message. We have a legitimate interest to do so as this
helps make our products or services more relevant to you.

7. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties. Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We ensure appropriate Due Diligence is undertaken to ensure the security of your data.
- We work closely with them to ensure that your privacy is always respected and protected.
- If we stop using their services, any of your data held by them will either be deleted, returned or rendered anonymous.

Examples of the kind of third parties we may work with are:

- Partners (such as Bourne Leisure) to provide, manage and administer the cashless card application.
- IT companies and service providers (such as Semnox)who support our applications and other business systems.
- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.
- We may, from time to time, expand, reduce, or sell our business and therefore may share data with prospective buyers of our business or assets. If this happens your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

8. How we use Sensitive Personal Information

We **do not** collect sensitive personal information from you as part of the cashless card application.

9. Where We Transfer and Store Personal Information

The personal information that we collect from our website visitors and guests may be transferred to, and stored at, destinations outside the European Economic Area, (the "EEA"). To safeguard your personal information and to ensure that it is properly protected we have put in place contractual safeguards with our Data Processors.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this <u>Privacy Notice</u>.

10. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary and for the purpose for which it was collected.

We will retain your personal data for the duration that you use the application and continue to use the cashless card. If you stop using the application and the cashless card, we will delete your personal data after a period of 2 years.

11. Your Rights in Your Personal Information

You have certain rights in respect of the personal information that we hold about you. We will process all personal data in line with your rights, in each case to the extent required by and in accordance with applicable law only (including in accordance with any applicable time limits and any requirements regarding fees and charges). We will always respect your personal information rights. For more information on your rights, how to exercise these and when they apply, for a detailed explanation please see: https://ico.org.uk/your-data-matters/. In summary you have the right to:

- Right of access
- Right to rectification
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to data portability
- Right to object
- Right not to be subject to a decision based solely on automated processing

12. How do we protect your personal data?

We treat your information with the utmost care and take all appropriate steps to protect it. We secure access to all transactional areas of our apps using 'https' technology.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

13. Changes to this Privacy Notice

We reserve the right to modify this privacy policy from time to time. Any changes we make in the future will be communicated to you.

14. Any Questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it. If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you with any questions, concerns, comments, requests or complaints regarding this privacy policy and/or our use of your personal information. Please address your concerns in writing for the attention of: The Data Protection Officer, Inspired Gaming (UK) Ltd, First floor, 107 Station St, Burton on Trent, Staffs, DE14 2NZ, or by email at dataprotection@inseinc.com.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the EU. For the UK, this is the ICO (Information Commissioner's Office), which is also our lead supervisory authority. Its contact information can be found at https://ico.org.uk/global/contact-us/.https://ico.org.uk/make-a-complaint

This privacy notice was last updated on 06 Apr 2022.