

CopyBet UK Ltd
Website Privacy Notice
Last Updated: 10th October 2023

Document Control

OWNER	Compliance Manager
APPROVER	Money Laundering Reporting Officer
CLASSIFICATION	Public
DATE OF ISSUE	10.10.2023
ISSUE	v2.0
REASON FOR ISSUE/UPDATE	Annual Review/Content Update
LAST UPDATE/REVIEW	October 2023
NEXT REVIEW	October 2024
DISTRIBUTION	Internal/External

VERSION	AUTHOR	SUMMARY OF CHANGES	DATE
1.0	Evalian Limited	First version	10.05.2022
2.0	Evalian Limited	Annual Review/Content Update	10.10.2023

Document Release:

This document remains the property of CopyBet UK Ltd. Release to regulatory authorities is permitted as required. Release to other organisations or individuals may only be authorised by CopyBet Directors.

Introduction

The website is managed by CopyBet UK Ltd. We are a limited company registered in England and Wales under registration number 10949712 and we have our registered office at 3rd Floor, 120 Baker Street, London W1U 6TU. We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO") in relation to our processing of Personal Data under registration number ZB598283.

CopyBet UK Ltd, CopyBet EU Ltd, and its affiliates, subsidiaries and related entities ("CopyBet", "us", "we", "our") are committed to protecting the privacy and security of the Personal Data we collect about end customers and users of our services ("you/your").

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You enquire about our products and/or services
2. You sign up for our products, services, and/or our betting platform
3. You are an existing customer
4. You contact us by email, telephone or by using our online contact form
5. You sign up to receive newsletters and/or other promotional communications from us

What is Personal Data

'Personal Data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special Category Personal Data' is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you.

When you register an account with CopyBet, we require you to provide us with your name, date of birth, postal address, e-mail address, contact number, security information, marketing preferences and any other information we may request from you as part of the registration process and/or for the continued use of our platforms, products and/or services.

To enable us to verify your identity, we may request that you provide documents such as a copy of your driver's licence or passport, documentation that confirms your address such as bank statements or utility bills, or any other information we deem necessary to confirm your age and/or identity.

For the type of Personal Data we collect, see the table below in the section entitled 'Purposes for which we use Personal Data and the legal bases'.

How we collect your Personal Data

We collect most of the Personal Data directly from you by telephone, text or email and/or via our website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists;
- others to whom you have provided consent;
- other betting partners;
- publicly available sources such as social media platforms;
- sub-contractors in technical, payment and delivery services;
- advertising networks;
- analytics providers; and
- search information providers.

Purposes for which we use Personal Data and the legal basis

When providing services to you, we may use your Personal Data for the following purposes and on the following lawful bases:

Purpose	Type of Personal Data	Lawful Basis for Processing
To register you onto our platform, confirm your identity and contact details, and deliver our services in accordance with the terms and conditions.	Registration Information.	Performance of a contract. Legal and Regulatory Obligations.
For responding to correspondence from you (website, email, social channels or by any other means).	Registration Information. Contact Information.	Legitimate Interests. It is in our legitimate interest to respond to enquiries made via our website, by email, through our social channels or any other means.

Purpose	Type of Personal Data	Lawful Basis for Processing
To verify your age, ensuring that underage accounts are not set up.	Registration Information. Verification & Know Your Customer Documentation. Publicly Available Information (UK).	Performance of a contract. Legal and Regulatory Obligations.
To perform affordability and/or anti money laundering checks.	Registration Information. Verification & Know Your Customer Documentation.	Performance of a contract. Legal and Regulatory Obligations.
To detect and prevent fraud	Registration Information. Account Information. Cookie & Tracking Information. Platform activity.	Performance of a contract. Legal and Regulatory Obligations.
For information security and loss prevention purposes (for the protection of our privacy, rights, safety, property and/or those of other individuals).	Registration Information. Betting and Transaction Information. Correspondence. Device Information.	Legitimate Interests. It is in our legitimate interests to protect our privacy, rights, safety, property and/or those of other individuals. Legal and Regulatory Obligations.
For Financial Reporting & Analysis (maintaining financial records in accordance with the law).	Registration Information. Betting and Transaction Information.	Legal and Regulatory Obligations.
To analyse customer behaviour to improve our services, products and/or platform.	Registration Information. Betting and Transaction Information.	Legitimate Interests. It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our products/platform.

Purpose	Type of Personal Data	Lawful Basis for Processing
For diagnostics, research and development (diagnosis of faults, maintain our systems, test and analyse the platform).	Device Information. Server Logs and Traffic Information.	Legitimate Interests. It is our legitimate interest to allow analytics and technical providers to help test and analyse our systems/products/platform.
To process payments, payment methods, deposits and/or withdrawals.	Registration Information. Payment Information. Cookie & Tracking Information. Device Information.	Performance of a contract.
To send you information about our platform or product/service information which may be of interest.	Registration Information. Contact Information.	If you are an existing customer or have expressed an interest in our products or services, we will rely on legitimate interests to contact you for marketing purposes. You may object to the processing for this purpose by emailing dpo@copybet.com . If we have captured your consent for the purposes of marketing, that consent may be withdrawn at any time by emailing dpo@copybet.com or using the unsubscribe option.
To provide you with enhanced betting services and products.	Registration Information. Information from Betting Partners.	We process this information with your consent.
Improving our websites and the overall website visitor and user experience.	Cookie & Tracking Information.	We use cookies on our websites with your consent.

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Cookies

We use cookies on our website.

This helps us to provide you with a good experience when you browse our website, allows us to improve our website, and understand how you interact with us.

For detailed information on these cookies, the way we use them, your rights and choices about cookies, and the purposes for which we use them, please see our Cookie Policy.

Sharing your data

As we are part of the CopyBet Group, we may share your information with other companies within the group and also disclose your information to third parties in connection with other purposes set out in this privacy notice. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf (Neteller, Skrill, Ecommpay, Apple, Google for example)
- advertisers, social media platforms, and advertising networks
- analytics and search engine providers
- IT service providers

We may also share Personal Data from customers in the UK with our KYC (Know Your Customer) checking provider, Sumsb, and with our marketing and emailing platform, GetResponse.

This site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy policy of every website you visit.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider necessary to protect the rights, property or safety of CopyBet, its personnel, users or others.

International Transfers

It is unlikely that we will ever share your Personal Data outside the UK, the European Union or European Economic Area. However, if it becomes necessary for the purposes of providing our services to you, we will only share it with organisations in countries benefiting from an adequacy decision or where we have taken appropriate steps to ensure that the Personal Data processed has an essentially equivalent level of protection to that guaranteed in the UK or EU. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State/European Commission has confirmed has an adequate level of protection (an adequacy regulation);
- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf](#) (ico.org.uk)) or
- We enter into Standard Contractual Clauses (“SCCs”) with the receiving organisations and adopt supplementary measures, where necessary. (A copy of the SCCs can be found here [Standard Contractual Clauses \(SCCs\)](#)).

How long we keep your data

We will retain your Personal Data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your Personal Data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

If you want to know how long we store specific types of Personal Data, you may request a copy of our Data Retention Policy and Schedule.

How we protect your data

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction.

CopyBet have added SSL certificates to their website to secure online transactions and to keep customer information private. This technology creates an encrypted link between the web server and web browser, therefore guaranteeing the safety of your information. SSL technology safely protects information from being captured by third parties.

We also rely on access control, regular monitoring, and backup of our systems to guarantee the safety, integrity, and availability of the Personal Data we hold. In addition, we also implement the appropriate organisational policies and procedures to ensure information safety is embedded in our activities.

We constantly improve our safety technologies to protect the system from unauthorized access and to make it impossible to use our database without permission.

In addition to the technical and organisational measures we have put in place, there are simple things you can do to in order to further protect your personal information, such as:

- Never share One Time Passcodes (OTPs).
- Never enter your details after clicking on a link in an email or text message.
- Always send confidential information by encrypted email to reduce risk of interception.
- If you're logged into any online service do not leave your computer unattended.
- Close down your internet browser once you've logged off.
- Never download software or let anyone log on to your computer or devices remotely, during or after a cold call.
- You can easily identify secure websites by looking at the address in the top of your browser which will begin <https://> rather than <http://>.

Your data protection rights

CopyBet would like to make sure you are fully aware of your rights. We will always ensure, no matter where you are located in the world, that we adhere to and fully respect your data protection rights.

You have the following rights if you are located in the UK or EU:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their Personal Data.
Right of access	Individuals have the right to receive a copy of their Personal Data, and other supplementary information.
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete.
Right to erasure (the 'right to be forgotten')	Individuals have the right to request their personal information to be erased, in certain circumstances.
Right to restrict processing	Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular: <ul style="list-style-type: none"> • if your data is not accurate; • if your data has been used unlawfully but you do not want us to delete it; • if your data is no longer needed, but you want us to keep it for use in legal claims; or • if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
Right to data portability	Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances.
Right to object	Individuals have the right to object to the processing of their Personal Data, in certain circumstances. Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way. Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so.
Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

In addition to the above, an individual also has the following rights:

Rights	Description
Right to withdraw consent (if applicable)	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time.
Right to lodge a complaint with a supervisory authority	You have the right to raise a complaint about how we handle your personal information with the Information Commissioner's Office by calling 0303 123 1113 or visiting https://ico.org.uk/make-a-complaint/ .

Exercising your data protection rights

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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your data protection rights, please email dpo@copybet.com.

Children's Privacy

We do not market our products or services to children, and we do not knowingly collect their Personal Data. If we learn that a child has provided us with their Personal Data, we will securely and permanently delete it, in accordance with applicable law.

If you are a parent or guardian and you are aware that your child has provided us with their Personal Data, please contact us.

Contact us

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us using the details below:

CopyBet UK Ltd
Office 116
N.1 Royal Exchange
London
EC3V 3DG

Alternatively, you can email us at dpo@copybet.com.

We have also appointed a Data Protection Officer ("DPO"). Our DPO is Evalian Limited and can be contacted by using the above email or postal address.

Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 10/10/2023. The previous versions of our Privacy Notice can be found here.