

## **Privacy Policy (Customers)**

The Privacy Policy can be downloaded [here](#).

This Privacy Policy outlines how bet365 uses information and data provided by customers to ensure a successful working relationship with bet365.

Personal information provided by customers or otherwise stored relating to customers will be used in accordance with this Privacy Policy. Information may be provided through the bet365 website (the "Site"), telephone calls, or otherwise.

By accepting this Privacy Policy, you agree that you understand and accept the use of your personal information as set out in this Privacy Policy. If you do not agree to this data protection declaration, you should refrain from using the website and providing your personal data.

### **Who We Are**

References in this Privacy Policy to "bet365", "we", "us", or "our" refer to Hillside (New Media Malta) PLC, which is a structured partnership under the laws of Malta and has its registered office at the following address: Office 1/2373, Level G, Quantum House, 75 Abate Rigord Street, Ta' Xbiex XBX 1120, Malta ("Company") (trading as "bet365.fr"). We control how your personal information is collected and the purposes for which your personal information is used by bet365, acting as the "data controller" for the purposes of applicable European data protection legislation.

### **Protecting Your Personal Information**

Your personal information is protected not only by the quality, commitment, and high standards of bet365 but also by law. This means that we can only process your personal information where there is a legitimate reason to do so, and that reason must be one of the following:

- To perform a contract we have with you
- We have a legal obligation
- When you have consented to the processing
- When it is in our legitimate interests
- When it is in the public interest
- When it is in your legitimate interest

### **Legitimate Interests**

When we have a business or commercial reason to process your personal information, we rely on legitimate interests. Your personal information is still protected, and we must not process it in a way that is unfair to you or your interests.

If we use legitimate interests as a reason for processing your personal data, we will notify you, identifying our legitimate interests and giving you the opportunity to ask questions or raise possible objections. However, compelling reasons for processing such information may override your right to object.

### **How Long We Keep Your Personal Information**

Whenever your information is held by bet365, we will ensure that it is adequately protected and only used for acceptable purposes.

In accordance with applicable regulation, we will retain your data (including identity data, contact data, player data, playing data, banking and payment, transaction data, gaming operations, playing habits data, player profiles and gaming behaviour, promotional data, IT data, controls data, gaming incidents, fraudulent operations detected, etc) for 6 years from the date of closure of your account.

If you are no longer a customer of bet365, we will retain your information for the minimum period necessary to fulfil the purposes set out in this notice and to comply with any relevant legal or regulatory obligation. Your personal data could be kept longer if we cannot remove it for technical reasons.

Personal data relating to a prospective customer who is not a customer may be retained for a period of 3 years from the date of collection by bet365 or from the last contact made by the prospective customer (e.g. a request for documentation or a click on a hyperlink in an e-mail referring to the promoted service) or until the prospective customer withdraw his consent when processing is based on consent.

The retention period for telephone communications will depend on the purpose for which the telephone communications are processed:

- If we record the telephone communications with you to improve our customer service quality and ensure bet365 agents receive appropriate training, we will retain the telephone communications for 6 months from such telephone communications.
- If we record the telephone communications with you to enable us to comply with our legal obligations, we will retain the telephone communications for 6 years from the date of closure of your account.

## Why We Process Your Personal Data

What we do	How it's justified	Our legitimate interests
<ul style="list-style-type: none"> <li>• Manage customer relationships</li> <li>• Develop new products and services for our customers and to grow our business</li> <li>• Create, develop and send marketing</li> <li>• Learn from how our customers use our products and services</li> <li>• To provide support for our products and services</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent</li> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Maintaining our records</li> <li>• Letting you know about relevant products and services</li> <li>• Developing or improving products and services and determining who may be interested in them</li> <li>• Obtaining your consent when needed</li> <li>• Being efficient about how we fulfil our legal duties and contractual duties</li> </ul>
<ul style="list-style-type: none"> <li>• Develop and manage our brands</li> <li>• Develop and manage our products and services</li> <li>• To test new products, systems or services</li> <li>• To manage our relationship with and the performance of other companies that provide services to us and our customers</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Developing or improving products and services and determining who may be interested in them</li> <li>• Being efficient about how we fulfil our legal and contractual duties</li> <li>• Conducting brand image and reputation protection activities to support and grow the business</li> </ul>
<ul style="list-style-type: none"> <li>• Deliver quality products and services to you</li> <li>• Create and manage customer accounts, payments and withdrawals</li> <li>• Responding to any customer complaints</li> <li>• Prevent and detect improper use of our systems</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties</li> <li>• Complying with laws or regulations that apply to us</li> </ul>
<ul style="list-style-type: none"> <li>• Prevention of crime</li> <li>• Detect, investigate, and report crime</li> <li>• Managing risk for us and our customers</li> <li>• Complying with any laws and regulations that apply to us</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts</li> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Developing and improving how we deal with crime and attempted crime</li> <li>• Protecting our customers and ourselves from the impacts of crime</li> <li>• Complying with laws or regulations that apply to us</li> <li>• Being efficient about how we fulfil our legal and contractual duties</li> </ul>
<ul style="list-style-type: none"> <li>• Manage and run our business to efficiently and effectively provide quality products and services</li> <li>• Manage our finances</li> <li>• Ensure corporate governance and compliance to all legal and regulatory obligations. To run our business in an efficient and proper way</li> <li>• Fulfil our obligations as an accountable and responsible organisation</li> </ul>	<ul style="list-style-type: none"> <li>• Our legitimate interests</li> <li>• Legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with laws or regulations that apply to us</li> <li>• Being efficient about how we fulfil our legal and contractual duties</li> </ul>

If you choose not to provide us with your personal information, this may prevent us from complying with a legal obligation, performing a contract, or providing services

necessary to maintain your account. Failure to provide your personal information may mean that we are unable to provide products or services to you.

## **Information Collected**

We may collect, use, and process the following information and data about you:

- **Identification Data:** Name, Date of birth, Gender, Nationality and Identification numbers
- **Contact Information:** Email Address, Telephone Number and Postal Address
- **Account Information:** Username, Password and Account Preferences
- **Financial Data:** Payment Information (e.g. credit/debit card details, bank account information), Transaction history and Betting history
- **Device and Usage Data:** IP Address, Device type and operating system, Browser type and Location data (if applicable)
- **Communication Data:** Correspondence with customer service, Feedback and survey responses
- **Marketing Data:** Preferences for marketing communications and Interaction with marketing materials
- **Behavioural Data:** Betting patterns and preferences, engagement with the website and mobile app
- **Legal and Compliance Data:** Data required for compliance with legal obligations (e.g. money laundering regulations, fight against fraud, responsible gambling, game integrity)
- **Special Categories of Data:** Information related to health or vulnerability (if collected for responsible gambling purposes)

Where we deem it appropriate and not prejudicial to your rights and freedoms, we also collect personal information from publicly available sources such as internet searches, and the broadcast media.

## **Phone Calls**

Telephone calls to and from our customer contact centre are recorded for training and security purposes, together with the resolution of queries arising out of the service you receive from us. You will be informed at the beginning of the call about the recording system, the purpose of the recording and the possibility of objecting to it.

## **Social Features of Our Products**

If you choose to participate in any of our social features that we provide on our Products (such as chat rooms), bet365 may store, record, or otherwise process that information.

## **Use of Cookies**

For more information on how we use cookies, please see our Cookie Policy.

## **Personal Information That We Share with Others**

We may share your personal information within the bet365 group and with the following other organisations:

- Law enforcement, regulators (including the ANJ), and other authorities
- Fraud prevention agencies
- Identity verification agencies
- Governing sports bodies
- Organisations that introduce you to us
- Third parties that you ask (or whom you allow) to share your information
- Third parties as necessary to provide products or services you have requested

Depending on the products you choose, we may share your personal information with third parties who provide those services. When your personal information is transferred outside of the European Economic Area (EEA), we require that appropriate safeguards are in place.

We may also share personal information with other companies within our associates or subsidiaries and business partners, or successors of our business.

In particular, your personal information is shared with IQ EQ Management (RCS Paris 431 252 121), acting as a trustee and independent data controller within the meaning of the regulations on personal data. Your personal information may be further processed by IQ EQ Management for the purposes of the trust. We invite you to consult IQ EQ Management's privacy policy by clicking here (<https://iqeq.com/legal-and-compliance/>).

## **Data Transfers Outside the EEA**

We will only transfer your personal data outside the EEA where:

- You have given your express consent, or
- It is necessary for us to perform a contract that you have entered into with us; or
- To comply with a legal duty or obligation.

If we do transfer your Personal Data outside of the EEA, within the group or to our

business partners, we will take measures to ensure it is protected to the same standards as it would be within the EEA by relying on one of the following:

- The country receiving your personal information has been classified by the European Commission as offering the same level of security as the EEA. More information can be found on the website of the Court of Justice of the European Commission.
- We will use contracts that require the recipient to protect your personal information with the same standards as it would within the EEA.
- Standard Contractual Clauses or Binding Corporate Rules or other acceptable methods that ensure the protection of your personal information to the standards required within the EEA.

In some cases, we may be required by law to disclose your personal information to third parties, and we may have limited control over how they are protected from this site.

### **Your Rights Over Your Personal Information**

As a data subject, you have the following rights:

- **Right to Access:** You have the right to request access to your personal data.
- **Right to Rectification:** You have the right to request correction of inaccurate or incomplete personal data.
- **Right to Erasure:** You have the right to request the deletion of your personal data under certain conditions.
- **Right to Restrict Processing:** You have the right to request the restriction of processing your personal data in certain circumstances.
- **Right to Data Portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** You have the right to object to the processing of your personal data based on legitimate interests.
- **Right to Withdraw Consent:** If we process your personal data based on your consent, you have the right to withdraw that consent at any time.
- **Right to Challenge a decision made entirely by automated processing.** To express your point of view and to request that a human review the decision.
- **Right to Provide Instruction regarding the fate of your personal data after your death.**

To exercise any of these rights, please contact us at [data.protection@bet365.com](mailto:data.protection@bet365.com). If you believe that your rights regarding your personal data have not been complied with after contacting us, you can lodge a complaint to the Commission Nationale de l'Informatique et des Libertés (3 place de Fontenoy - TSA 80715 – 75334 Paris cedex 07 - telephone: 01 53 73 22 22).

## **Changes to Our Privacy Policy**

We may update this policy from time to time, so please keep checking back.

If material changes are made to this Privacy Policy, we will endeavour to notify you in advance by email, notice on our website, or other agreed communication channels. We will communicate the changes to you in advance and give you sufficient time to consider and understand the changes before they become effective.

We will not make any material changes to the Privacy Policy without your express consent. If you decline to accept the changes to the Privacy Policy or otherwise do not accept the changes within the time period, we may no longer be able to provide you with some or all of the products and services.

## **Contact Us**

If you have any concerns or would like more information about how we process your personal data, you can contact us at [data.protection@bet365.com](mailto:data.protection@bet365.com).