

People’s Postcode Lottery

Privacy Notice

Last modified – 1 March 2025

About this notice

At People’s Postcode Lottery, we take the protection of personal data seriously. We are committed to handling personal data in accordance with UK GDPR (General Data Protection Regulations) and Data Protection Act 2018 at all times.

This Privacy Notice sets out what personal data we collect from you, how we use and share that data, how we keep your data safe, and how long we keep it for. We will also explain how we process your data (and the legal basis for doing so) and help you to understand your personal data rights.

Contacting us

If you have any questions about this notice or would like to exercise one of your personal data rights, please contact our Customer Experience Team at info@postcodelottery.co.uk or call on 0808 109 8765.

The personal data we hold

We collect your personal data in a variety of ways including when:

- you register or begin to register to play
- you contact us
- when you update your details using My Account
- you interact with us on social media like Facebook.

We may also hold your data if you have entered a competition, or if we have bought your data from a third-party data broker.

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| When you register to play or update your details, we may collect: |
| Your name |
| Your date of birth |
| Your full address |
| Details of your chosen payment method and how many subscriptions you would like to play with |
| Email address and phone number |
| Correspondence |
| IP address |
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| When you register to play, we will create a Player ID for you. |
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| While you play, you may provide: |
| Additional information, for example information relevant from a social responsibility perspective relating to your ability to play the lottery. You can find out more information here . |
| If you are not a player and you contact us, you may provide: |
| Name |
| Email address |
| Telephone number |
| Postal address |
| Additional information you provide us relating to your query. |
| When you enter a competition or Prize Draw, we may collect: |
| Name |
| Date of birth or confirmation you are over 18 |
| Email address |
| Postal address |
| Telephone number |
| Additional information you provide us with |
| Where relevant, consent to send you email marketing |
| Data we may buy from a data broker: |
| Name |
| Date of birth |
| Postal address |
| Email |
| Additional information you may provide |

How long we hold your data for

The length of time we hold your data for varies depending on the type of data and whether or not you are a player.

We hold player data while you play and for up to seven years after you cease playing. We may contact you for up to 24 months after you have stopped playing to ask if you'd like to start playing again, but after this 24-month period until the expiry of the 7-year period all other processing will be restricted.

If you begin the registration process but do not complete the process, we will hold your data for 30 days.

For more detailed information about how long we hold your data please contact data.protection@postcodelottery.co.uk

What do we use your personal data for?

Below is a list of activities we may use your personal data for, as well as the legal basis we rely upon to do so under the UK GDPR. We may contact you by letter, email, electronic message, via direct message through social media or via telephone calls.

| Activity | Legal Basis |
|---|---------------------------------|
| To enter our players into the Postcode Lottery draw | Contract |
| To send our players service communications | Contract |
| To contact our winners by email, letter, telephone call or video conference | Contract |
| To send physical prizes | Contract |
| To send select players e-gift cards. Your data may be shared with a third party, either by us or by you, to allow you to claim your prize. | Contract |
| Payment verifications | Contract |
| To survey our players, invite them to take part in research interviews and focus groups and invite them to leave reviews for up to 24 months after they have cancelled. | Legitimate Interest |
| For a variety of marketing purposes (for more detailed information please see the next section) | Legitimate Interest or Consent |
| By email or telephone, for up to one month to assist with the completion of our online sales process. | Legitimate Interest |
| To answer any player queries or complaints | Contract or Legitimate Interest |
| To answer any non-player queries or complaints | Legitimate Interest |
| To deal with Subject Rights Requests | Legal Obligation |
| Address verification for players | Contract or Legal obligation |
| Bank detail verification for players | Contract |
| Age verification for players | Legal Obligation |

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| Age verification for marketing including verifying data purchased from a trusted third-party data broker. | Legal Obligation and Legitimate Interests |
| Normal business functions including the operation and testing of our Information Technology systems, admin functions and organisational processes, analysis and monitoring for business planning, data quality checks, Corporate Social Responsibility obligations, communications activity and events administration, to monitor signs of suspicious online activity, including malware and the inappropriate transmission of data, to provide security controls for My Account and to monitor CCTV footage. | Legitimate Interest |
| Social media messages from non-players | Legitimate Interest |
| Social media messages from players | Contract and Legitimate Interest |
| Social media prize draws | Contract |
| Online prize draws or competitions | Contract |
| Monitoring wins of players who are restricted under the terms and conditions to a win of £5000 | Contract |
| Photos or video footage including images of winners or beneficiaries of charities and good causes supported by us. | Consent or Legitimate Interest |
| Storing the data of players who have ceased playing. | Contract or Legal Obligation |
| Collecting and storing data relating to Exclusive Player Games Prize Draws | Contract |
| Social Responsibility | |
| To check players' self-exclusion status | Legal Obligation |
| To check your details against a publicly available Government sanctions list and exclude anyone | Legal Obligation |

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| <p>on the list from playing.</p> <p>To provide the Gambling Commission with information relating to exclusions, Duty-of-Care and those on our blocked play list which may include personal data.</p> <p>We may review and monitor player behaviour for the purpose of identifying those who may be considered vulnerable and at a greater risk of experiencing the harms associated with gambling and to identify people who cannot play the lottery.</p> | <p>Legal Obligation or Legitimate Interest</p> <p>Legal Obligation or Contract Substantial public interest</p> |
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Marketing

We may send you marketing communications through marketing communications through different channels, including email and post. Our advertising partners may also serve advertisements to you online. We will send marketing materials to you where we have your consent or where we have a legitimate interest to do so.

How to opt out of marketing

If you'd prefer us not to use your personal data for marketing, as listed below, you can make this request by contacting our Customer Experience Team at info@postcodelottery.co.uk or on 0808 109 8765.

When we may send you marketing

| Type of Marketing | More information | Legal Basis |
|--------------------|--|--------------------------------|
| Birthday cards | Sent by post to our players. Sent by email to our players. | Legitimate Interest Consent |
| Christmas cards | Sent by post to our players. Sent by email to our players. | Legitimate Interest Consent |
| Monthly newsletter | Email communications sent to our players Postal communications may be sent to our players | Consent Legitimate Interest |
| Email Marketing | We may contact you for up to 12 months: | |

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| | <p>To help you complete the sign-up process if you provided your details during our sign-up process and have not opted out of marketing.</p> <p>We may contact you for up to 24 months:</p> <p>If you provided consent for example when you entered a competition or requested information about playing the Lottery.</p> <p>If we purchased your email address from a trusted third-party data broker.</p> <p>We may contact you:</p> <p>If you provided consent for email marketing when you completed our sign-up process.</p> | <p>Legitimate Interest</p> <p>Consent</p> <p>Consent</p> <p>Consent</p> |
| Postal marketing | If you are a current player or for up to 24 months if we purchased your name and address from a trusted third-party data broker. | Legitimate Interest |
| Gifts, offers and prize awards. | We may occasionally send select players gifts, offers and/or prize awards by post. We may also inform those players of the gifts, offers and/or prize awards by telephone. Your data may be shared with a third party, either by us or by you, to allow you to claim your gift, offer or prize reward. | Legitimate Interest |
| Telephone calls to lapsed players | We may call you for up to 24 months after you cancelled to ask if you would like to start playing again. We may use a third-party call centre to make these telephone calls. | Legitimate Interest |
| Postal marketing to lapsed players | We may send you mail for up to 24 months after you cancelled to ask if you would like to start playing again. | Legitimate Interest |
| Refer a friend programme | To ensure rewards are made to eligible referrers and new players who have been referred we will share a list of our players with the company that operates the programme on our behalf. This company may share your data with a third party to identify players who have a sizable social media following. We may contact such players to explore opportunities to promote us via social media. | Legitimate Interest |

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| <p>Targeted advertising</p> | <p>We may share your data with our advertising partners, including advertisers, advertising networks and advertising agencies to provide you with our targeted advertising or to exclude you from our targeted advertising.</p> <p>We and our advertising partners may use cookies, web beacons, device IDs and other technologies to collect information about your use of our app or website and your browsing habits.</p> <p>We may also share your data with social media providers, including Meta, Snap Inc, NextDoor and Tik Tok, to exclude current players from our advertising.</p> | <p>Legitimate Interest</p> <p>Consent</p> <p>Legitimate Interest</p> |
| <p>Analytics</p> | <p>We may build profiles of new audiences to contact based on our existing player data or data provided to us by a third-party data broker.</p> <p>The information we use includes the age, gender, and location of existing players or prospective players to enable us to better understand our player demographic which helps us send marketing to prospective players who may be interested in playing People's Postcode Lottery. The information we use does not include any direct contact information such as names, addresses or emails.</p> <p>We may share some or all of this information securely with third-party partners to identify opportunities to improve how we advertise People's Postcode Lottery and to introduce us to potential new players.</p> <p>We use data supplied by a third-party data processor to append data to your personal data when you join the lottery. We do this to better understand our players and improve our services.</p> <p>We may use your data for analytical purposes for up to 12 months if you provided your details during our sign-up process and have not opted out of marketing.</p> | <p>Legitimate Interest</p> <p>Legitimate Interest</p> <p>Legitimate Interest</p> <p>Legitimate Interest</p> |

Data sharing

We will never sell your personal data to a third party.

However, we sometimes share the personal data we collect from you with the following third parties:

| Third Party | Reason for sharing |
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| Payment providers | To obtain payments from your account (for example setting up a direct debit) and to pay prizes to you |
| Insurers | To provide cover for the value of any prize winnings over a defined excess amount as specified by the promoting trust |
| IT system providers | To supply software to host your player account, and to supply our systems, including for the purposes of hosting, support, and software licensing. |
| Marketing service providers | To allow us to send postal and email marketing communications or to contact you by telephone. |
| Communication service providers | To allow us to send postal and email service communications. |
| Marketing agencies | To provide you with relevant advertising |
| Data brokers | To exclude current or blocked/suppressed players from data bought from third-party data brokers. |
| Social media platforms | To exclude current or blocked players from targeted social media advertising |
| Survey and research companies | To undertake online, telephone and in person player surveys and to invite players to take part in research interviews and focus groups |
| Review companies | To invite you to leave reviews about/rate PPL and to verify you as a player |
| Analytics companies | To help us better understand our player population |
| Referral Companies | To facilitate "refer a friend" schemes and identify players with a sizeable social media following. |
| Providers of services relating to physical prizes and/or e-gift cards | To supply and send out physical prizes and/or e-gift cards including those redeemed from our website or websites hosted by third party suppliers |
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| Age, address and bank verification companies | To verify your address, age and bank details |
| Professional advisors | To supply professional services such as legal and accountancy |
| Regulatory authorities | To supply required information to the Gambling Commission and where necessary the Police and other agencies |

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| Dispute resolution companies | To supply information when we use a third-party Alternative Dispute Resolution provider to resolve a complaint |
| Cyber security companies | For the purposes of security, including prevention and detection methods |
| Auditors | To audit our security systems and our financial records |
| Call monitoring services | To supply analysis of calls, emails, and social media messages |
| Website hosting | To host images including winners, attendees at events, charity beneficiaries and staff. We may host prize and/or e-gift card redemption on third party websites. |
| Image management system | To store images including winners, attendees at events, charity beneficiaries and staff |
| Postcode Lottery Group | From time to time we may share your data with other members of the Postcode Lottery Group |
| Providers of services relating to winners | To send out prize information to our winners, invites to our winners' events and to facilitate our winners' events and trips. |
| Third-party Call Centres | To call you if you cancelled in the last 24 months to ask you if you would like to start playing again. |
| Public Relations Companies | To provide public relations services about our winners and the charities supported by the players of PPL. |

If you pay by debit card, we may use Hyperwallet, a PayPal-owned service, to make prize payments back to your debit card. You can find out how PayPal process your data and how to exercise your data subject rights [here](#).

International transfer of your personal data

We may transfer some of your personal data outside of the EEA (European Economic Area). We will only do that if we have an appropriate safeguard in place for example, where:

- A country is deemed adequate by the European Commission.
- We use standard European Commission approved contracts with the ICO's approved Addendum or the ICO's International Data Transfer Agreement.
- Where a US organisation is certified under the UK extension to the EU-US Data Privacy Framework (the "UK Extension")

Your personal data rights

Under UK GDPR, you have a number of personal data rights you can exercise over your personal data. You can exercise these rights at any time by calling our Customer Experience Team on 0808 109 8765 or by emailing info@postcodelottery.co.uk

You have the right:

- to ask us not to use your personal data for direct marketing.

- to ask us not to process your personal data where it is processed based on legitimate interests if there are no compelling reasons for that processing.
- to request from us access to personal information held about you
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete.
- to ask that we stop any consent-based processing of your personal data after you withdraw that consent.
- to ask, in certain circumstances, to delete the personal data we hold about you.
- to ask, in certain circumstances, for the processing of that information to be restricted; and
- to ask, in certain circumstances, for data portability.

Your right to complain

We pride ourselves on our high standards of customer service and are fully committed to protecting the personal information you trust us with. If you wish to contact us to query or complain about the way we use your personal data, we will treat the matter with the utmost seriousness.

Please direct your query or complaint to our Data Protection Officer at 28 Charlotte Square, Edinburgh, EH2 4ET or by email at data.protection@postcode lottery.co.uk

If you remain unsatisfied with our handling of your complaint, you can complain to the **Information Commissioner's Office (ICO)**. You can find out more about that right and the complaint process [on the ICO website](#) or by calling 0303 123 1113 (local rate) Monday to Friday, 9am and 5pm (excluding bank holidays).

Your right to be informed if your personal data is compromised

In the unlikely event that the personal data we hold is breached or compromised in a significant way that would be a high risk to your rights and personal freedoms, we'll contact you without delay to let you know:

- What happened and how it happened
- What data was affected and what that means to you
- What we are doing about it and how you can stay informed
- How you can contact our Data Protection Officer

How we keep your personal data safe

At People's Postcode Lottery, information security is very important to our business. We are fully committed to ensuring information security, confidentiality and integrity. Examples of the way in which we do this are given below.

How we minimise risk and approach to IT Security

People's Postcode Lottery are ISO 27001 certified. ISO/IEC 27001 is the international standard for information security. It sets out the specification for an effective ISMS (information security management system).

ISO 27001's best-practice approach helps organisations manage their information security by addressing people, processes and technology.

Certification to the ISO 27001 standard is recognised worldwide to indicate that your ISMS is aligned with information security best practices.

Keeping card payments safe

People's Postcode Lottery hold PCI (Payment Card Industry Data Security Standard) certification. The accreditation shows that we collect, store and process card information to the highest security standards.

The information you send us online

The methods we use to ensure data is safeguarded while being sent over the internet are industry-standard. When information reaches us, we store it securely and only provide access to authorised personnel or data processors.

How we restrict access to your personal data

People's Postcode Lottery maintains strict physical, electronic, and administrative safeguards to protect your personal data from unauthorised or inappropriate access. The data we collect is stored in secure operating environments not accessible by the public

The data we collect and process when you visit our website

How we monitor your activity on our website

It is important to us that we give our website visitors and players the best possible experience when they use our site. We use a number of tools to help us monitor activity on our website. You can find out more in our [Cookie Notice](#).

Consent

We use a Consent Management Platform for you to opt-in to cookie collection and give you full control over opt-in/opt-out. Please note our website may not function correctly if you change certain preferences, such as disabling all cookies. You can amend your preferences on the Privacy Settings box on your window. You cannot access our site unless you have given or rejected (on a purpose/cookie-based level) consent.

We also use an API (application programming interface) to transfer hashed data to Meta (Facebook). We use an irreversible encryption mechanism, before transmitting the hashed data to Meta's servers via their Conversion API. We will only transfer the hashed data if you have accepted both 'Performance' and 'Targeting' cookies via our cookie management tool. We use this hashed data to improve the measurement of ad performance in Meta.