



## Privacy Policy & Data Protection Disclosure

## **A) SPORTING INDEX PRIVACY POLICY**

*Last updated on 5 May 2016*

### **1 Introduction**

- 1.1. Sporting Index Limited (company number 2636842) of Gateway House, Milverton Street, London, SE11 4AP, ("we", "us" and "our") is committed to protecting and respecting your privacy. This document (the "Privacy Policy") explains how we use the information we collect about you, your rights under applicable data protection legislation and the procedures we have in place to safeguard your information.
- 1.2. This Privacy Policy applies to your information collected by us from [www.sportingindex.com](http://www.sportingindex.com) or any subdomains ending in <sportingindex.com>, whether accessed via a computer, telephone, mobile or any other device (the "Website") or via the products and services we provide.
- 1.3. By providing us with your information (which may include "personal data" as defined by the Data Protection Act 1998) you consent to us processing and disclosing your information in accordance with this Privacy Policy. Please read this Privacy Policy carefully to understand our views and practices regarding your information and how we will treat it. If you do not agree to accept and be bound by the Privacy Policy, please discontinue your use of the Website and our products and services.

### **2 Information we collect about you**

- 2.1 Our records may include all or some of the following information about you (although this is not an exhaustive list):
  - a) your name, gender, address, email address, telephone number, payment card details, date of birth, tax residency status, current employment status and employer, and job title, etc.;
  - b) details of your betting transactions and other activities carried out with us;
  - c) financial information, which includes but is not limited to: billing information; payment card details and account transfers;
  - d) records of electronic or voice communications and correspondence you have with us, whether by writing, by phone, by email or by various other forms and any other information which you may choose to provide to us;
  - e) details of your visits to the Website including, but not limited to, traffic data, location data, web logs, page views, ad data and other similar data, whether this is required for our own purposes or otherwise; and
  - f) additional information, such as details of your driver's licence, passport, credit card statement, utility bill or similar if required for authentication purposes or if we believe that you are violating our policies in any way.
- 2.2 Telephone calls to us may be recorded both to assist us in training and in quality management, and to allow for the speedy resolution of queries.
- 2.3 Please note that if you choose not to provide us with certain information, we may not be able to provide you with your requested product or service.

### **3 Information we receive from other sources.**

We may collect other information about you which is available from publicly available sources (for example, the Internet, the Electoral Register and the Register of County Court Judgments) which may be relevant to your use of the Website and our services and combine it with the information you have provided to us for the purposes set out in this Privacy Policy (depending on the types of information we receive).

### **4 How will we use your information?**

- 4.1 We may use information held about you in the following ways (although this is not an exhaustive list):
  - a) to help us identify you and any account you hold with us;
  - b) to provide you with our products and services and to allow you to participate in the interactive features of the Website, when you choose to do so;
  - c) in order to enforce or apply our terms of use and other agreements with you (including but not limited to the Account Operating Rules);
  - d) to respond to any enquiry from you regarding a transaction you have made with us;
  - e) to enable us and our third party service providers to carry out our business operations including, but not limited to, payment processing, marketing, affiliate and rewards programs, credit scoring and credit checking and customer support;
  - f) to investigate and prevent potential or actual fraud, cheating, money laundering, betting irregularities, sports integrity issues or any other unlawful or improper activity;
  - g) to comply with our legal and regulatory duties, obligations and responsibilities;
  - h) to make the Website easier to use by removing the need for you to enter repeatedly the same information;
  - i) to operate and improve the Website and our products and services and to notify you of any changes to the Website or our products and services which may affect you;
  - j) to perform research, analysis, development and testing aimed at improving our products and services;
  - k) to keep you informed of future events, offers and promotions from us or our partners as further described in Section 6 (Marketing); and
  - l) any other purpose which is necessary for the performance of our contractual obligations to you.
- 4.2 In order to comply with our legal and regulatory requirements we will retain information for a period of time (usually no longer than six years) after closure of your account. All such information will be held in accordance with this Privacy Policy.

## **5 Will we share your information with third parties?**

- 5.1 We may disclose your information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries and to our third party data processors that process your information on our behalf.
- 5.2 We may also share your information with third parties for the following reasons (although this is not an exhaustive list):
- a) to verify the accuracy of the information you provide to us;
  - b) to make enquiries at a credit reference agency. These enquiries may be assessed with reference to any 'financially associated' records. Records shared with credit reference agencies remain on file for 6 years after they are closed. The information recorded by credit reference agencies and fraud prevention agencies may be used by us and other organisations to make assessments and decisions about you and your financial associates on credit and credit related services, trace your whereabouts, recover debts that you owe, prevent crime, fraud and money laundering, verify your identity and manage your accounts or insurance policies including to update and maintain the accuracy of your records. Your credit rating may be affected by these searches. For more information, please refer to Part B - Data Protection Disclosure for Credit and Fraud below;
  - c) if you do not make payments due to us in good time and we need to collect outstanding debts from you we may share your information with third parties such as debt collection agencies;
  - d) to comply with our legal and regulatory duties, obligations and responsibilities;
  - e) to aid the investigation of suspected unlawful, fraudulent or other improper activity connected with the use of the Website and to report a crime or suspected crime, including money laundering or fraud;
  - f) to aid the prevention of match or price fixing, we may share your information with sporting bodies, regulators or any other third party, which deals with the investigation of such offences;
  - g) we may use third party organisations from time to time to help us deliver you with targeted marketing (please see Section 6 (Marketing) for further details); and
  - h) to licensed third party gambling operators who provide services on the Website (see Section 11 (Third Party Operators) below).
- 5.3 If we (or substantially all of our assets) are acquired by a third party, please be aware that any information held by us will be one of the transferred assets

## **6 Marketing**

- 6.1 We may use your information to send you targeted marketing material from time to time relating to our products and services such as future events, other promotional activities and information about special offers that we feel may be of interest to you.
- 6.2 We may communicate with you by the following methods: email, SMS, push messaging, telephone and social media (e.g. Twitter). You have the right to stop receiving our marketing communications at any time. If you no longer want to receive these communications or would like to change your marketing preferences you can inform us by clicking on the relevant link in our marketing communications to you, and these communications will be stopped or modified as soon as reasonably practicable.

## **7 International transfer of your information**

The information that we collect from you may be transferred to and stored at a destination outside of the European Economic Area ("EEA") for processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with applicable data protection legislation and this Privacy Policy. By providing us with your information you agree that we (or our third party data processors) may transfer, store and process your information outside the EEA.

## **8 Device monitoring, cookies and how we use them**

- 8.1 We may collect information about the device(s) you use to access the Website for monitoring purposes. This information includes the Internet Protocol (IP) address, memory and operating system of the device.
- 8.2 Like many websites, Sporting Index uses cookies and other tracking technology. For more information read our cookie policy [here](#).
- 8.3 Most browsers automatically accept cookies though you may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies automatically when you log on to the Website.
- 8.4 You consent to us storing cookies on your browser and computer's hard drive. Please note that some of our advertisers may use cookies but we do not control the use of cookies by third parties.
- 8.5 For more information on cookies and how to disable them, you can consult the information provided by the Interactive Advertising Bureau at [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **9 Protecting your information**

- 9.1 The security of your information is important to us. We maintain appropriate administrative, technical and physical safeguards to protect your information against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access, use and all other unlawful forms of processing of the information in our possession. Any payment transactions will be encrypted using SSL technology.

- 9.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to the Website; any transmission is at your own risk unless caused by our gross negligence or wilful default.

#### **10 Links to third party websites**

The Website may, from time to time, contain links to and from the websites of our partners' networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites.

#### **11 Services provided by third party gambling operators on the Website**

Sometimes we may include services on the Website that are provided by licensed third party gambling operators. Through providing these services to you these third parties may collect your information, and for certain purposes, they will be responsible for their collection and use of your information. These third parties may need to retain and use your information for the purpose of complying with applicable gambling laws and the terms of their gambling licences. We will always inform you before you receive any service on the Website that is provided by a third party gambling operator and we will explain how they collect and use your information.

#### **12 Updating Our Privacy Policy**

We may modify this Privacy Policy from time to time. This policy was last updated on 5 May 2016. We recommend that you regularly check this Privacy Policy for any updates.

#### **13 Access and Complaints**

- 13.1 Under terms of the Data Protection Act 1998, you may at any time request a copy of any personal information (not that of another person) that we hold about you.
- 13.2 If you wish to make such a request please send a letter in writing setting out your name, address, telephone number and your username and address it to: Subject Access Requests, c/o Customer Services, Sporting Index Limited, Gateway House, Milverton Street, London, SE11, 4AP.
- 13.3 Your letter must be accompanied by copies of two forms of identification, one of which should identify you (e.g. driving licence, passport, etc.) and the other should provide proof of your address (e.g. utility bill). Please include a cheque for £10 made payable to Sporting Index Limited with your request. Please note that subject access requests may take up to 40 days to be processed from the date of receipt by us.
- 13.4 We hope that you will be happy with the way we handle your information but if you would like to make a complaint, please contact us at the following email address: [enquiries@sportingindex.com](mailto:enquiries@sportingindex.com). If you are not satisfied with how we handle the matter, you have the right to complain to the Information Commissioner if there is a problem. For more information visit [www.ico.gov.uk](http://www.ico.gov.uk).

#### **14 Contact Details**

If you have any questions in relation to this Privacy Policy please do not hesitate to contact us at [enquiries@sportingindex.com](mailto:enquiries@sportingindex.com).

### **B) DATA PROTECTION DISCLOSURE FOR CREDIT AND FRAUD**

- 1 This is a specific guide to the use of your information by us and Credit Reference and Fraud Prevention Agencies.
- 2 When you apply to us to open an account, we will check the following records about you:
  - a) Our own;
  - b) Those at credit reference agencies (CRAs). When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders. They supply to us both public (including the electoral register) and shared credit and fraud prevention information; and
  - c) Those at fraud prevention agencies (FPAs).
- 3 We will make checks such as assessing this application for credit and verifying identities to prevent and detect crime and money laundering. We may also make periodic searches at CRAs and FPAs to manage your account with us.
- 4 Information on applications will be sent to CRAs and will be recorded by them.
- 5 If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention.
- 6 If you have borrowed from us and do not make payments that you owe us, we will trace your whereabouts and recover debts. We also reserve the right to register a default with a CRA for non-payment. Records of defaulted accounts shared with credit reference agencies remain on file for six years from the date of default, whether settled by you or defaulted.

- 7 We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.
- 8 CallCredit are the CRA that we use in the UK. You can contact them at Customer Care, CallCredit Check, PO Box 734, Leeds, LS1 9GX, by email to [care@callcreditcheck.com](mailto:care@callcreditcheck.com), by phone on 0845 3660071 or by visiting [callcredit.co.uk](http://callcredit.co.uk). Please note that they may charge you a fee for accessing information on your credit file.