

# People's Postcode Lottery Privacy Notice

## About this Privacy Notice

At People's Postcode Lottery we take the protection of Personal Data seriously. In this Privacy Notice we'll explain what Personal Data we collect from you, how we use and share that data, how we keep your Personal Data safe, and how long we keep it for. We'll also explain how we Process your data (and the Legal Basis for doing so) and help you to understand your Personal Data Rights.

## Any questions

If you have any questions about this Privacy Notice or would like additional clarification, please contact our Customer Experience Team at [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) or call on 0808 109 8765.

## What do we mean by Personal Data?

Personal Data is any information that could be used to identify you. That could be anything from your name and address, your bank details, your email address, an image or recording of you, your IP address or any other data that could be used to identify you. Occasionally we collect and process another type of Personal Data called [Special Category Personal Data](#).

## What do we mean by Special Category Personal Data?

Special Category Data is Personal Data of a sensitive nature. We only collect Special Category Data in specific circumstances. Normally this would be if you ask to self-exclude from gambling and where you choose to share information with us about your gambling habits.

As a responsible lottery we use data about your exclusion status and play behaviour to make decisions about whether participating in the Lottery is in your best interests. If we have concerns you will be unable to play.

## What do we mean by Processing your Personal Data?

Processing Data simply means doing something with your Personal Data. That could be as straightforward as collecting it or sharing it, or as complex as modelling the data or appending values to the data. If a company or organisation does anything with your Personal Data, they are Processing it.

## The Personal Data we collect

We collect your Personal Data when you register to play, when you contact us online through the "Contact Us form" on the website, through live webchat and where you interact with us on social media like Facebook.

## The Personal Data we collect when you join

We collect the following Personal Data when you join the lottery:

- Your name
- Your age
- Your full address
- Details of your chosen payment method and how many tickets you'd like to play with
- Any contact information you provide like your email address and phone number

We may ask you how you heard about us. This helps improve our marketing. Calls to our Customer Experience Team are recorded for quality, training, analysis and compliance reasons and we also keep call records to refer back to what you have told us so we can make sure we deal appropriately with your query.

If you tried to join online but didn't complete the process we may try and contact you by phone for up to one month to see if we can help you sign up. We will keep your data for analytical purposes for twelve months, after which your Personal Data will be erased if you have not joined.

## The Contact Us form

You can get in touch with us using our online Contact Us form. You can select a topic and write your comments on the form. To help us with your query we ask you for your name, email address and telephone number. If you tell us that you're a player, we'll ask you questions to ensure we're talking to the right person.

If you're a People's Postcode Lottery player we'll keep a record of your query as part of your player records (see [Correspondence](#)). If you're not a player (and never have been) we'll erase your query after a maximum of twelve months unless we have a legal obligation to retain it.

## Webchat

You can talk to our Customer Experience Team via our webchat tool. We won't ask you for any Personal Data on webchat or discuss details of your account, but our team will be more than happy to call you back or email you. When you use our webchat, we'll keep a record of that chat for twelve months. After that it will be erased.

If you're a People's Postcode Lottery Player and have a subsequent conversation with us off webchat, we'll keep a record of your query as part of your player records (see [Correspondence](#)). If you're not a player (and never have been) we'll erase your query after a maximum of twelve months unless we have a legal obligation to retain it.

## Social media

We operate pages on Facebook, Instagram, and Twitter. If you are a user of those services, you can contact us publicly or in a direct message and share information with us on those pages if you wish to. We won't ask you for any Personal Data on the open forums of any social media account or discuss details of your account but our team will be more than happy to call you back, send you a private message or email you. We use posts on social media to analyse customer service issues that may be

affecting our customers and to ensure that we are dealing efficiently with such issues. We may also use pseudonymised individual comments in our reporting to highlight specific issues affecting our customers and our reputation. We will keep a record of that information for 12 months. You should be aware that this retention only applies to the records we keep it doesn't apply to retention of the data on the social media platform which will separately apply retention to the data in line with its own policies.

As part of our commitment to Social Responsibility, 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. We may process personal data and special category data for this purpose and do so on the basis that processing is necessary for reasons of substantial public interest to safeguard our players' interests.

If you're a People's Postcode Lottery player and you engage in a private discussion with us on or off social media we'll keep a record of your query as part of your player records (see [Correspondence](#)). If you're not a player (and never have been) we'll erase your query after a maximum of 12 months unless we have a legal obligation to retain it.

Where you interact with us on social media, Personal Data may be collected by the platform provider with whom you have an account who may use it independently from us. We have no control over, and accept no liability for, how they use your Personal Data. You can access more information about how they use data gathered from their websites here:

[Facebook](#)  
[Instagram](#)  
[Trustpilot](#)  
[Twitter](#)

### **Social Media Competitions and Prize Draws**

When you enter one of our draws online or by email, we will keep a record of your social media handle or email address. When you enter a competition, we keep a record of the information on the entry form. We store this data until the winners' name is drawn or someone is identified as a competition winner. We use the details of those that enter only to administer their entry and distribute a prize if they are a winner. Except in the limited circumstances set out below, we do not share the details of entrants with third parties. Winner's names may be used to make an announcement on Social Media at conclusion of the competition or draw.

We ask our winners to provide a postal address so that we can issue their prize to them. If the prize is provided by a charity supported by the players of the postcode lottery, we may share the winners' name and address with the charity but only for the purpose of sending the prize to the winner.

When using social media platforms you should familiarise yourself with their Privacy Notices and how they use your data, for more detail see [Social Media](#).

## Online Competitions

We may process your Personal Data if you asked to receive marketing messages from us when you entered a competition. You can withdraw your consent at any time. We will only use your Personal Data for the purposes of marketing the People's Postcode Lottery, and we will never sell your Personal Data. Before we send any marketing to you, we will check you're not an excluded player and we may undertake other related checks including age verification to ensure you are over the age of eighteen (18). We will use third parties to send emails or post to you and to undertake other related checks. We will keep your data for no longer 12 months'. If you start to play the People's Postcode Lottery, the Personal Data you provide at the time of joining will be processed as set out in this Privacy Notice.

## Data Brokers

We may process your Personal Data if we have bought your name, address, and date of birth from a carefully selected data broker. We work with trusted partners including the REaD group who provide us with this data, and we may use this to send you postal marketing communications relating to People's Postcode Lottery. We rely on our [Legitimate Interest](#) to send you these postal communications.

We will use third parties to post these communications to you and to undertake other related checks. We will keep your data for no longer 12 months'.

Before we send any marketing to you, we will check you're not a current, lapsed or an excluded player and we will undertake other checks including age verification to ensure you are over the age of eighteen (18). We use Experian to undertake these age verification checks. If we made these checks before June 2021, they will leave a soft footprint on your credit file. The soft footprint supports the transparency of the checks made by Experian but will not be visible to lenders and do not affect your credit score. If you would like us to ask Experian to remove the soft footprint you can contact us using the details below. We rely on our [Legitimate Interest to undertake age verification checks](#).

If you'd prefer us not to use your Personal Data for marketing, or if you would like Experian to remove your soft footprint you can make this request by contacting our Customer Experience Team at [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) or on 0808 109 8765.

If you start to play the People's Postcode Lottery, the Personal Data you provide at the time of joining will be processed as set out in this Privacy Notice.

## What do we do with your Personal Data?

In this section we'll explain how we Process your Personal Data and the [Legal Basis](#) for doing so. Please note, we will never sell your personal data to a third party.

We'll also explain what a [Data Controller](#) and a [Data Processor](#) is. We have tried to use plain English wherever possible, but it is important you understand what these legal terms mean.

### **What is a Data Controller?**

People's Postcode Lottery is a Data Controller. That means we're responsible for determining what happens to the Personal Data we collect, including how we Process it. As a Data Controller we're also responsible for monitoring and approving the Data Processors we pass your Personal Data to.

### **What is a Data Processor?**

People's Postcode Lottery use Data Processors to provide Personal Data Processing services. A Data Processor carries out Processing on behalf of a Data Controller. We might employ the services of another company to carry out Data Processing for us. As an example, we (the Data Controller) might ask another company (the Data Processor) to send you an email or letter. We'd need to give that company your contact details, so they know where to send the letter.

### **What is a Legal Basis to collect and Process Personal Data?**

Under GDPR (the General Data Protection Regulation) there are a number of Legal Bases that a Data Controller can use to Process or share Personal Data.

## **The Legal Bases People's Postcode Lottery rely on to Process Your Personal Data**

### **Consent**

Consent means you've given us clear and informed permission to Process your Personal Data. Consent is a Legal Basis to Process Personal Data. An example might be where you have asked us to send you promotional materials. Remember, you can withdraw your Consent at any time.

### **Our Contract with you**

When you play the lottery, you enter into a contract with us. A contract is a Legal Basis to Process Personal Data. As a player we have several contractual obligations to you. These include (but aren't limited to) processing your monthly payments, paying out or delivering prizes, and informing you of important news about our service and your account.

### **Legal and Regulatory**

Sometimes we have a Legal or Regulatory obligation to Process your Personal Data. These are Legal Bases to Process Personal Data. That might include conditions relating to our operating licence (issued by the Gambling Commission) and to other relevant laws.

### **Legitimate Interest**

Sometimes we have a Legitimate Interest to Process your Personal Data. Where we use Legitimate Interest to Process your Personal Data, we'll ensure that our Legitimate Interests are proportional and

do not compromise your Personal Data rights. You can object to us Processing your data for Legitimate Interests at any time. In some circumstances we may continue to process your Personal Data using Legitimate Interests where we can demonstrate that our interests override your Right to [Object to Processing](#).

## How we Process the Personal Data we collect

### Your name and contact details

You need a valid British postcode and address to play People's Postcode Lottery. You can read more about valid postcodes in our [T&Cs](#). We use your name and address for the following reasons.

### Address verification

When you register, we verify your address using a postcode validation tool provided by a third-party Data Processor.

### Managing your account

Your playing postcode is your ticket. We use your name and address and postcode to manage your account and conduct our lottery draws. We have a [Contractual](#) obligation to do this.

### Correspondence

We use your name, address, email address and telephone number to communicate with you. We will only send you Service Messages (important messages that relate to your account). We may send other messages where you have actively given [Consent](#) for us to do so. Remember, where we use your Consent to send you messages you can withdraw that Consent at any time. We may also use your telephone number to contact you about your account. All players receive Services Messages as part of our Contractual obligation to manage your account.

We also like to send our players birthday cards and Christmas cards. We use [Legitimate Interest](#) to send you these cards.. We may send you information by post about the charities and good causes our players support as well as information about our Prize Plans and lucky winners. We use [Legitimate Interest](#) to provide you with that information. You can ask us to stop sending you any of these communications by contacting our Customer Experience team.

### While you play

We will retain records of all correspondence we've had with you. This might include telephone calls, emails, letters, webchats, and chats via our social media channels. This helps us manage your account, improve our services, and deal with any queries or complaints that may arise.

### If you're a lucky winner

If you win a noncash prize, we use your name and address and postcode to populate any websites which we may use to allow you to choose your prize, to deliver your prize and to provide updates on delivery. We have a [Contractual obligation](#) to do this. We use a third-party Data Processor to provide

any websites and to deliver the noncash prizes including updates on delivery. You may update your details on the third-party's website with an alternative postal or email address for delivery purposes only. Your alternative postal or email address will not be updated on your People's Postcode Lottery account. The Data Processors will delete such records two months' after the end of the period during which you can reclaim your noncash prize.

We may contact you to invite you to an event to celebrate your win. We use a third-party Data Processor to help us prepare those invites and they keep those records for no longer than three weeks.

We may contact you by video conference call to reveal your win. We use a third-party Data Processor to record those video calls and the keep those records for no longer than six months. This helps us deal with any queries or complaints that may arise. We may use the recording of the video call for marketing purposes but only when you have actively given [Consent](#) for us to do so. Remember, where we use your Consent, you can withdraw that Consent at any time.

If, as set out in our Terms and Conditions, you are not eligible to enter People's Postcode Lottery or you are restricted to winning a prize with a value of no more than £5,000, we will monitor our systems to ensure that these conditions are met.

#### **If you no longer play**

We may contact you for up to 24 months after you cancelled to ask if you'd like to start playing again. We use Legitimate Interest to Process your Personal Data in this way.

We may contact you beyond the 24 months if your name, address, and date of birth is included in the data that we purchase from a carefully selected data broker.

You can get in touch if you'd prefer not to be contacted about re-joining and we'll remove your details from our re-joining list. Please note that if you're removed from our re-joining list you may still receive marketing materials from us that is not targeted using Personal Data.

If you have been removed from our re-joining list or it has been more than 24 Months since you stopped playing, we have Legal Regulatory obligations to keep records of your account for seven years but all other Processing will be restricted.

#### **We check to ensure you're not an excluded player and undertake other related checks**

Some players choose to self-exclude from play for a time. You can read more about self-exclusion in the [Self-exclusion](#) section of our website or by calling our Customer Experience Team on 0808 1098 765. We process data to check players' exclusion status and we also process information to identify and protect potentially vulnerable people or people who can't play the lottery. We may check your details against a publicly available Government sanctions list and exclude anyone on the list from playing.

We have a Legal obligation 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. This is part of our commitment to Social Responsibility. We Process Personal Data to produce these

statistics. Where necessary we will also process data on an ad hoc basis to respond to enquiries about our operations from the Gambling Commission.

As part of our commitment to Social Responsibility, 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. We may use a third-party Data Processor to help us identify such players. We may process personal data and special category data for this purpose and do so on the basis that processing is necessary for reasons of substantial public interest to safeguard our players' interests.

If we use a third party Data Broker to provide us with data for postal marketing, we may provide the Data Broker with a list of the addresses of excluded players and those on our blocked play list to ensure they are removed from any postal marketing.

### Your age

You must be eighteen years or over to play People's Postcode Lottery. We may validate your age (along with your bank details) when you register to play. We submit a random selection of players' Personal Data to a Data Processor for additional age verification checks. Taking steps to verify your age is a Legal and Regulatory obligation.

### Your payment details and transaction history

We collect your payment details when you become a People's Postcode Lottery player. We use your payment details to manage your account, process your monthly payments and pay you if you win. We may also use a third party [Data Processor](#) to verify your payment details and identity when you join.

### While you play

We will keep a record of all the payments you make, any winnings you've received, and any other play-related financial transactions on your account. This is a necessary part of managing your account.

### If you no longer play

We will keep records of your account, transactions, and our correspondence with you for seven years. We do this to meet our obligations to retain adequate records for the Gambling Commission, to meet accountancy requirements and to allow us to deal with legal claims. Records of complaints by players are retained for 7 years from the date the complaint is resolved.

### Other ways we use Legitimate Interest to Process your Personal data

We Process your Personal Data as part of our normal business functions. We have a [Legitimate Interest](#) in doing so. Those activities include:

- The operation and testing of our Information Technology systems.
- Admin functions and organisational processes including the provision of insurance for our activities.
- Analysis and monitoring for business planning.
- To meet our Corporate Social Responsibility obligations.



- Communications activity and events administration.
- To manage complaints as set out in our Terms and Conditions.
- To monitor signs of suspicious online activity, including malware and the inappropriate transmission of data by using Security Information and Event Management software (SIEM)

### 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 where:

- A country is deemed adequate by the European Commission;
- We use standard European Commission approved contracts.

If you have any questions about this Privacy Notice or would like additional clarification, please contact our Customer Experience Team at [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) or call on 0808 109 8765.

Please note that where you interact with us or provide Personal Data to our social media pages using your social media accounts this may result in the processing of your Personal Data outside the European Economic Area by the relevant social media platform. The basis upon which any such Personal Data may be transferred outside the EEA is determined by the platform provider. You can access more information about how the hosts of our current social media accounts use data gathered from their websites here:

- [Facebook](#)
- [Instagram](#)
- [Twitter](#)

## The Personal Data we collect and Process when you visit our website

### How we monitor your activity on our website

It's 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. We use Consent as the [Legal Basis](#) to collect and Process this data.

### Consent

For a proportion of our website visitors 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. If you were not offered the option of using the Consent Management Platform, when you continue to browse our website you are giving your Consent, where required, to the use of the cookies listed below.

## How we use cookies on our website

We use cookies on our website. In this section we'll explain what cookies are, what cookies we use, and how you can disable cookies (and the implications of doing so) should you wish to.

### What are cookies?

Cookies are small data files that are downloaded to your computer when you visit our websites. Cookies help us manage how our website operates, understand how you use our websites, and to help us improve our marketing activity. The length of time a cookie is stored on your device can vary depending on the purpose of the cookie

### Functional cookies

Some cookies are necessary to enable our website to operate. These cookies do not rely on your Consent because they are required for the function of our website.

### Session cookies

Session cookies are temporary cookies that are downloaded to your device's temporary memory. They have no expiration date and are typically erased when you close your web browser, but some can persist longer. You can manage your preferences by opening the setting portal by clicking on the Privacy tab at the bottom of the browser window. If you were not offered the option of managing your cookies using the Cookie Management Tool when you first browsed our website, by continuing to browse our website you gave your Consent to the use of these cookies.

### Persistent cookies

Persistent cookies are downloaded to your computer so that when you close your browser they remain on your computer. Persistent cookies have an expiration date. You can manage your preferences by opening the setting portal by clicking on the Privacy tab at the bottom of the browser window. If you were not offered the option of managing your cookies using the Cookie Management Tool when you first browsed our website, by continuing to browse our website you gave your Consent to the use of these cookies.

### Social media cookies

Where we use third party social media sites these sites may also set analytics cookies which can result in those sites processing data about your visit. How these cookies are set and what information they gather is determined by the social media platforms. They use the information from cookies to provide us with anonymous statistical information about visitors to our pages on their sites. Depending upon your browser settings these cookies may be set on your device this can occur regardless of whether you have an account on the platform or not. We have public pages on Facebook and Instagram you can access more information about how they use data gathered from their websites here:

[Facebook](#)

[Instagram](#)

[Twitter](#)

## What type of cookies do we use?

### Google Analytics

A Google tracking cookie that helps us understand the way visitors interact with our websites to improve our website and services.

Provided by	Type	Retained for	Cookie code	Further info
Google Analytics	Persistent tracking cookie	5 years	_ga	<a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
Google Analytics	Session cookie	24 hours	_gid	

### Hotjar

We use Hotjar to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. <https://www.hotjar.com/legal/policies/privacy>

Provided by	Type	Retained for	Cookie code	Further info
Hotjar	Persistent 3 <sup>rd</sup> party advertising and analysis cookie	365 days	_hjClosedSurveyInvites _hjDonePolls _hjMinimizedPolls _hjDoneTestersWidgets	<a href="https://www.hotjar.com/legal/compliance/opt-out">https://www.hotjar.com/legal/compliance/opt-out</a>  <a href="https://www.hotjar.com/legal/policies/cookie-information">https://www.hotjar.com/legal/policies/cookie-information</a>

			_hjMinimizedTestersWidgets  _hjIncludedInSample  _hjShownFeedbackMessage	

### SA 360

A Google advertising cookie to help us serve relevant online adverts and to report on our advertising activity.

Provided by	Type	Retained for	Cookie code	Further info
Google	Session advertising tracking cookie	Up to 90 days	IDE	<a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>
<p><b>Amnet (Mediamath)</b></p> <p>Stores a cookie on the user's browser once they have visited specific pages on our website to serve relevant ads to that specific user within the cookie window.</p>				
Provided by	Type	Retained for	Cookie code	Further info
Amnet	Persistent 3 <sup>rd</sup> party advertising cookie	30 days	001. Order Your Tickets Form, 002. Sales Confirmation, 003. All Pages	<a href="https://www.amnetgroup.com/en/uk/terms-and-privacy/#Your_Rights">https://www.amnetgroup.com/en/uk/terms-and-privacy/#Your_Rights</a>

### Facebook Ads Manager

A third party cookie that helps us show Facebook adverts to prospective players and exclude current players from seeing those ads.

Provided by	Type	Retained for	Cookie code	Further info
Facebook	Persistent 3 <sup>rd</sup> party advertising cookie	30 days	Fr	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>
Facebook Pixel	First-Party Cookie	28 days	Fr	<a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>

### Google Ad Services

This measures visitor behaviour and sales on our website and helps determine how many times people who click on their advertisements end up purchasing their products.

Provided by	Type	Retained for	Cookie code	Further info
Google	Persistent 3 <sup>rd</sup> party advertising cookie	30 days	Conversion	<a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>

### Bing

This measures visitor behaviour and sales on our website and helps us attract new players using online paid search adverts via Bing.

Provided by	Type	Retained for	Cookie code	Further info
Microsoft	Persistent 3 <sup>rd</sup> party advertising cookie	30 days	/ MUID/ MUIDB/ _uetsid	<a href="https://account.microsoft.com/privacy/ad-settings">https://account.microsoft.com/privacy/ad-settings</a>

### Quantcast

Quantcast is a digital advertising company. They provide website rankings and the data they collect is also used for audience segmentation and targeted advertising.

Provided by	Type	Retained for	Cookie code	Further info
Quantcast	Persistent 3 <sup>rd</sup> party	45 days	MC	<a href="https://www.quantcast.com/privacy/">https://www.quantcast.com/privacy/</a>

### Twitter

A third-party cookie that helps us show Twitter adverts to prospective players and exclude current players from seeing those ads.

Provided by	Type	Retained for	Cookie code	Further info
Twitter	Persistent 3 <sup>rd</sup> party advertising cookie			<a href="https://help.twitter.com/en/rules-and-policies/twitter-cookies">https://help.twitter.com/en/rules-and-policies/twitter-cookies</a>

### Adalyser

This allows us to understand how users arrived at our website and measures the effectiveness of our television advertising.

Provided by	Type	Retained for	Cookie code	Further Info
Adalyser	Persistent 3 <sup>rd</sup> party tracking cookie	180 days	__adal_ca	<a href="https://www.adalyser.com/en/privacy">https://www.adalyser.com/en/privacy</a>
Adalyser	Persistent 3 <sup>rd</sup> party tracking cookie	7 days	__adal_cw	
Adalyser	Persistent 3 <sup>rd</sup> party tracking cookie	2 years	__adal_id	
Adalyser	3 <sup>rd</sup> party session cookie	30 minutes	__adal_ses	

## TV Squared

This allows us to understand how users arrived at our website and measure the effectiveness of our television advertising.

Provided by	Type	Retained for	Cookie code	Further Info
TV Squared	Persistent 1st party cookie	2 years	_pk_id.{variable id} or _tq_id.{variable id}	<a href="https://tvsquared.com/privacy-policy/">https://tvsquared.com/privacy-policy/</a>
TV Squared	Persistent 3rd party tracking cookie	2 years	_pk_uid	
TV Squared	1st party session cookie	30 minutes	_pk_ses	

## Lotame

These pixels allow us to collect anonymous user session data related to the user's website visits, such as the number of visits, average time spent on the website and what pages have been loaded.

Provided by	Type	Retained for	Cookie code	Further Info
Lotame	Persistent 3rd party tracking cookie	269 days	_crwdcntrl.net	<a href="https://www.lotame.com/about-lotame/privacy/">https://www.lotame.com/about-lotame/privacy/</a>
Lotame	3rd party tracking cookie	Session	crwdcntrl.net	
Lotame	Persistent 3rd party tracking cookie	269 days	crwdcntrl.net	
Lotame	Persistent 3rd party tracking cookie	269 days	crwdcntrl.net	

## Reducing current players exposure to our online and other ads

To reduce our current players exposure to our Facebook ads, we upload encrypted player email addresses and phone numbers to Facebook so they can be excluded. That way you won't see ads asking you to play when you already do. The Personal Data we send is encrypted before it is sent to Facebook. We also do this for Twitter by encrypting personal data and excluding [tailored audiences](#).

To reduce our current players exposure to advertising through Addressable TV, we also share player address information with Addressable TV providers, so players can be excluded from targeted advertising.

We use Legitimate Interests to Process your Personal Data in this way. If you'd prefer us not to use your Personal Data for this purpose you can ask us not to by calling our Customer Experience Team on 0808 109 8765 or by emailing [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk)

## Disabling cookies

If you were offered the option of managing your cookies using the Cookie Management Tool when you first browsed our website, you can manage your preferences by opening the setting portal by clicking on the Privacy tab at the bottom of the browser window.

If you were not offered the option of managing your cookies using the Cookie Management Tool when you first browsed our website and you'd prefer not to allow cookies, you can choose to disable cookies via your web browser. Your experience of our website may be compromised if you choose to disable cookies. Disabling cookies varies from web browser to web browser but the links below have instructions for some common browsers.

[Chrome](#)

[Internet Explorer](#)

[Firefox](#)

[Safari](#)

Please be aware that disabling cookies will disable all cookies in your web browser. If you'd prefer to stop online advertising only you can use ad blocking in your browser. Many web browsers now come with this as standard.

For more information about online advertising you can visit <http://www.youronlinechoices.com/uk/>

## We survey our players

We send regular customer feedback surveys to samples of our players because we have a Legitimate Interest in understanding player preferences. Samples may be drawn from our whole player base or a subset of it. In addition, from time to time we survey selected groups of players about specific topics to help us improve our services and products. If you cancel, we sometimes include a link to a cancellation survey in your cancellation confirmation email. We may also survey winners that have attended one of our events to help us improve our events. We don't use survey answers for any reason other than those stated and responding to surveys is entirely optional. You can opt out of receiving future survey requests at any time.



## Your Personal Data Rights

Under GDPR (the General Data Protection Regulations) you have a number of Personal Data Rights you can exercise over your Personal Data. We'll explain those rights and how you can exercise them here.

### Your Right to be Informed

We believe it is important that you fully understand what we do with your Personal Data. This is known as the Right to be Informed. This Privacy Notice gives detailed information about the type of Personal Data we collect, how we Process that data, and how we share that data with Data Processors and other Data Controllers. We'll inform you:

- Of your Data Protection Rights
  - When we share your Personal Data with Data Processors or other Data Controllers
  - If we send your Personal Data outside of the EU
  - Of the purpose of and Legal Basis for our Processing
  - About the implications of not providing Personal Data we have requested under a Contractual or Legal requirement
  - How to withdraw Consent you have given previously
  - About any Profiling activity we conduct which results in automated decision making. This is explained in more detail in [Your Right to Object to Profiling](#)
  - About your Right to Complain to the Information Commissioner
  - About the length of time we retain your Personal Data for and the reasons we do
  - If we want to change the way we Process your Personal Data we'll inform you beforehand and give you an opportunity to object
- If and how we obtained your Personal Data from a third party

### Consent can be withdrawn if you choose

You can withdraw your Consent at any time by calling our Customer Experience Team on 0808 109 8765 or by emailing [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) You can also unsubscribe from emails by clicking the unsubscribe link.

### Your Right to Correct Personal Data we hold

Although we make every effort to ensure your Personal Data is complete, up-to-date, and accurate we recognise that sometimes mistakes happen. You can ask us to correct your Personal Data at any time. This is known as the Right to Rectification.

You can ask us to amend your Personal Data by calling our Customer Experience Team on 0808 109 8765 or by emailing [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk)

### Your Right to Access your Personal Data

You have the right to ask for a copy of your [Personal Data](#) and any [Special Category Data](#) we hold. You can also request copies of any Personal Data and Special Category Data we have shared with our Data

Processors and any other Data Controllers. There are many reasons you might request a copy of your Personal Data:

- You'd like to check the details we hold to correct any inaccuracies
- To ensure we are processing your data lawfully
- To make a Subject Access Request (SAR). This is a specific request to get a copy of the Personal Data we use; our Data Processors and any joint Data Controllers hold. Data will be provided in a user-friendly secure format (see [Your Right to Move Your Personal Data](#).)

You can ask us for a copy of your Personal Data by contacting the Lottery's Data Protection Officer at 28 Charlotte Square, Edinburgh, EH2 4ET or by email at [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) You can also call our Customer Experience team on 0808 109 8765 who are happy to help.

The more information you provide when you make your request the sooner we'll be able to respond. We aim to provide the data requested within thirty days, but more complex requests may take longer (up to three months). We'll let you know if we believe your request could take longer to respond to than one month.

We won't charge you for making an access request unless we've already provided the Personal Data you ask for. In those cases, we'll provide new information only. We may decline excessive requests or unfounded requests (or charge a small fee to provide the information) but we'll always make it clear why we believe that to be the case. In unusual cases we may decline a request because the data requested contains Personal Data about someone else and we consider that their rights may be compromised by the request.

### Your Right to Object to Processing

You might not want us to Process your Personal Data in a certain way or for a specific reason, and can ask us not to where we use Legitimate Interests as the [Legal Basis](#) for Processing. What does that mean in plain English? When we're using Legitimate Interests as the basis for Processing your Personal Data, you can ask us not to do this at any time. If we want to continue to process the data, we must be able to show that our continued processing is not detrimental to your interests.

### Your Right to Object to Profiling

What do we mean by Profiling? Profiling is the way we use data to better understand our players. Some of this is carried out by us or by our Data Processors. This helps us to provide a better lottery experience and service for our players.

We may build profiles of new audiences to contact based on our existing player data. The information we use includes the age, gender, and location of existing players to enable us to better understand our player demographic.

We may share some or all of this information securely with third parties who we partner with to identify opportunities to improve how we advertise the People's Postcode Lottery and to introduce us to potential new players. We carry out this activity on the basis of legitimate interest.

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. We may also use Profiling for matters such as checking our players are 18 years or over, the identity of our players, and that the bank details that have been provided are correct.

We may also use a third-party Data Processor to analyse key words and phrases to help us identify players who may be considered vulnerable and at a greater risk of experiencing the harms associated with gambling.

If you'd prefer us not to use your Personal Data for a specific Profiling activity, you can ask us not to by contacting our Customer Experience Team at [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) or on 0808 109 8765.

The more information you provide when you make your request the sooner we'll be able to respond. We aim to provide the data requested within one-month but more complex requests may take longer (up to three months). We'll let you know if we believe your request could take longer to respond to than one month.

### Your Right to Access your Personal Data

You can make a Subject Access Request by calling our Customer Experience Team on 0808 109 8765 or by emailing [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk). We may ask for additional Personal Data to verify your identity before we release your information depending on the nature of your request.

### Your Right to Erasure

We recognise that sometimes you'd rather we erase some or all of the Personal Data we hold. This is known as the Right to Erasure. You might ask us to do this where:

- We no longer need the data for the purpose it was gathered
- You gave us [Consent](#) but want to withdraw that Consent
- You object to the automated Processing we carry out
- We have Processed your data unlawfully
- We have a legal requirement to erase your Personal Data

The more information you provide when you make your request the sooner, we'll be able to respond. We aim to provide the data requested within one month, but more complex requests may take longer (up to three months). We'll let you know if we believe your request could take longer to respond to than one month.

Note, however, that we may not always be able to comply with your request of Erasure for specific legal reasons which we will tell you about at the time of your request. For example, we may decline a request to delete your Personal Data where we still need to retain it to meet our regulatory obligations and we require to retain it in line with our regulatory retention periods.

## Your Right to Restrict Processing

You have the right to ask us to restrict the way we Process your Personal Data. You can ask us to restrict the ways in which we Process your Personal Data because:

- You believe the Personal Data we hold is inaccurate and you'd like us to stop Processing your Personal Data until it has been corrected.
- You believe your Personal Data has been unlawfully processed and you would like us to restrict our Processing while we investigate.
- You may not need the Personal Data anymore, but you'd like us to retain it while a legal claim is in process.

You can ask us to restrict our Processing by contacting our Customer Experience Team at [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) or calling us on 0808 1098 765. The more information you provide when you make your request the sooner, we'll be able to respond. We aim to provide the data requested within one month, but more complex requests may take longer (up to three months). We'll let you know if we believe your request could take longer to respond to than one month or if we are unable to comply with it for legal reasons.

## Your Right to Move your Personal Data

If you want a copy of your Personal Data that you'd like to give to someone else, you can ask us to give you that data in a common, user-friendly, and secure format. We can send your Personal Data directly to you or to a third party you specify. This is known as your Right to Portability.

You should be aware that asking for a copy of your Personal Data doesn't mean we'll erase that data unless you specifically ask us to. You can find more about on erasure in your [Right to erasure](#).

You can ask us for a copy of your Personal Data by contacting the Lottery's Data Protection Officer at 28 Charlotte Square, Edinburgh, EH2 4ET or by email at [info@postcodelottery.co.uk](mailto:info@postcodelottery.co.uk) or call 0808 1098 765.

The more information you provide when you make your request the sooner we'll be able to respond. We aim to provide the data requested within one month, but more complex requests may take longer (up to three months). We'll let you know if we believe your request could take longer to respond to than one month.

## Your Right to Complain

We pride ourselves on our high standards of customer service. Even with the best intentions and training we recognise that we may sometimes fall short of your expectations. If you are a player and want to complain about the way we undertake activities under our licence from the Gambling Commission, this may be dealt with through our Complaints Procedure, which can be [found here](#)

If your complaint relates to your Personal Data you can contact our Data Protection Officer at 28 Charlotte Square, Edinburgh, EH2 4ET or by email at [data.protection@postcodelottery.co.uk](mailto:data.protection@postcodelottery.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 process at

<http://www.ico.org.uk> or by writing to the ICO at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

If you stop playing People's Postcode Lottery, we will retain your account details for seven years including payment details, personal details, and any correspondence between us and you. This to ensure we have sufficient Personal Data to process regulatory and other complaints and to ensure we meet our legal record keeping obligations.

### **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're 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 and we undergo annual security audits by the Gambling Commission.

### **Our Commitment to Protecting your Personal Data**

People's Postcode Lottery hold BSI BS10012 certification. Our BSI certification demonstrates our commitment to collecting and processing Personal Data to the highest standards.

### **How we Minimise Risk**

People's Postcode Lottery hold ISO 27001 Certification. This certificate indicates we have established the legal, physical, and technical controls to minimise data security risk.

### **Our approach to Cyber Security**

People's Postcode Lottery hold Cyber Essentials certification. This certificate demonstrates our commitment to cyber security.

### Keeping Card Payments Safe

People's Postcode Lottery hold PCI (Payment Card Industry Data Security Standard) certification. The accreditation demonstrates 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. Personal Data collected by us is stored in secure operating environments that are not accessible by the public. In the unlikely event that an employee or a Data Processor misuses that information they will be liable to appropriate legal and disciplinary sanctions.

Last updated 05/10/21