



Privacy Policy

This Privacy Policy sets out how we use your personal information and what your individual data protection and privacy rights are.

This Privacy Policy was last updated on 1st May 2018 and is version 1.0.

Who is Responsible for Processing Your Personal Data

The Lottery Solutions Brand includes companies that act on behalf of our Marketplace Partners and unless covered by a separate Privacy Policy are acting as a Data Processors. Our Marketplace Partners are the legal entities responsible for how your personal data is collected, stored and processed.

The Lottery Solutions Brand incorporates a number of different limited companies to which this privacy policy relates. These limited companies are Total Gaming Solutions Limited, Lottery Services Limited, Fieldgate Solutions Ltd, Fairmont Hall Ltd, LSL (SM1) Ltd, LSL (SM2) Ltd, LSL (SM3) Ltd, LSL (SM4) Ltd, LSL (SM5) Ltd, LSL (SM6) Ltd and LSL (SM7) Ltd.

Acting as a Data Processor for Our Marketplace Partners

We act as a data processor for other companies including, but not limited to a number of English Sporting Organisations. These companies are the Data Controllers and pass your personal data, for example - name, address, email address, telephone numbers and date of birth - to us for the sole purpose of fulfilling and managing a contract on their behalf. We may occasionally contact you in respect of a written contract using this data.

When placing an order for subscription lottery membership with these companies, you will be agreeing to their terms and conditions and their privacy policy. Please contact the relevant company (Data Controller) should you have any questions, comments or complaints about how your data is used.

Sharing Your Personal Data with Third Party Processors & Partners

As part of delivering our services to our Marketplace Partners, we will share your personal data with carefully chosen Third Party Processors and Partners who carry out a number of services on our behalf via a written contract.

Should you wish to obtain a list of our latest Third Party Processors and Partners, you can request this at any time by contacting our Data Governance team.

Any third party that communicates with you on our behalf must only do so for the purpose of carrying out the services in the written contract and not for the purpose of direct marketing their own products and services.

If you have any concerns about any of our third party processors and partners, please contact our Data Governance team.

Managing Your Personal Data

When you share your personal information with the Data Controller, you have a right to expect that information to be treated with total confidentiality. Therefore, it is their responsibility to manage your personal data that you provide with care and in accordance with all data protection legislation and industry best practice.

As Data Processors we adhere to the same strict principles.

Whether you have supplied your personal details online, by phone, by email or in a letter, we will never process them without a lawful reason to do so. We will use your personal data for the purposes for which they were initially requested and as fully explained in this Privacy Policy.

It is your responsibility to ensure that your personal data provided to the Data Controller is accurate and up to date.

You can update your personal contact details, including email address and phone number, by contacting the Data Controller directly, or by emailing info@lotterysolutions.co.uk or, if you need to update any other personal details, by ringing us on 01282 685400 and we will ensure your updated information is passed to the Data Controller on your behalf.

Using Your Personal Data for Direct Marketing Purposes

We hold your personal data for the purposes of direct marketing to you for a maximum period of six months from the date provided by the Data Controller and under a written agreement with the Data Controller.

Obtaining Your Consent-

It is the Data Controller's responsibility to obtain your consent.

You can change your email and telemarketing preferences at any time - see [Changing Your Marketing Preferences](#).

Email Marketing-

The Data Controller would like to keep you informed about their latest product offers and promotions using the email address you provide to them. This information may be passed to us in order to fulfil a contract. They also provide your date of birth to ensure you are legally eligible to receive such marketing.

You can opt out of email marketing at any time - see [Changing Your Marketing Preferences](#).

Telemarketing-

The Data Controller will ask your permission to ring you about their latest product offers and promotions when you make a purchase with them. This information may be passed to us in order to fulfil a written contract. They also provide your date of birth to ensure you are legally eligible to receive such marketing.

We will use your personal data for telemarketing in the following manner:

- Your personal data, such as name, telephone numbers and date of birth, will be transferred to our third party call-centres so they can contact you on behalf of the Data Controller.

You can opt out of telemarketing at any time - see Changing Your Marketing Preferences.

If you have subscribed to the Telephone Preference Service, we nor our third party call-centres, will not contact you by phone unless you have explicitly opted in to receiving telemarketing calls from the Data Controller.

Direct Mail-

The Data Controller may use your name and address to send you personalised marketing mails in the post as they have a legitimate business interest to send you information about their products and offers in the post as they know that many of their customers like to keep informed of their activities and promotions. This information may be passed to us in order to fulfil a written contract. They also provide your date of birth to ensure you are legally eligible to receive such marketing.

However, should you wish to exercise your right to stop personalised postal marketing activity, you can do this at any time - see Changing Your Marketing Preferences.

Social Media-

The Data Controller uses Social Media to keep you informed about their product offers and promotions via social media platforms. The Data Controller may also use Social Media to promote winners. Any personal information passed to us is in order to fulfil a written contract.

Third Party Marketing-

We will **not** share your personal data with third party companies for the purpose of them marketing **their** products and services to you.

We only use your data in accordance with the requirements of the Data Controller in order to fulfil a written contract.

Changing Your Marketing Preferences-

You can change your marketing preferences for Email Marketing at any time by:

- Contacting the Data Controller Directly;
- Clicking unsubscribe in the body of the email sent to you;
- Ringing us on 01282 685400.

You can change your marketing preferences for Telemarketing at any time by:

- Contacting the Data Controller Directly;
- Advising the call centre staff at the time of receiving a call;
- Ringing us on 01282 685400.

Please allow 48 hours for your changes to be processed for email and telephone marketing.

You can exercise your right to object to Direct Mail or Social Media at any time by:

- Contact the Data Controller directly;
- Ringing the us on 01282 685400.

Please allow 48 hours for your changes to be processed for social media. You may still receive direct marketing materials that are already processed before we received your request for up to 2 months.

Using Your Personal Data to Open Your Lottery Account

When you apply for a Lottery account with the Data Controller, we will use your personal data to make a decision as to whether or not your application can be approved. Without this data, we are unable to perform the services under the written contract i.e. to ensure your application meets the requirements of the Gambling Act 2005.

When you register to open a subscription Lottery account, we will hold your personal data which you have provided for 1 year, plus the current Lottery year, after the date of your last transaction on your Lottery Account.

Using Your Personal Data for Fraud Prevention

We carry out fraud checks on a regular basis. We may make periodic searches of our records that we hold about you. These searches will **not** be available to any other third party, including Credit Reference Agencies except for fraud prevention.

We will pass data relating to fraudulent activity such as name, address and email address to the relevant agencies to help protect individuals and other businesses from the threat of fraud in the future.

We will hold your personal data for 1 year, plus the current Lottery year, after the date of your last transaction on your Lottery Account.

Processing Card Payments-

We process all card payments in line with our obligations under the PCI-DSS regulations.

Whenever you provide your card details either online or over the phone, we will encrypt the payment details before sending to the card payment and banking provider. If you pay over the phone, we will mask any card data that you provide so that this is not visible to our customer advisors as well as stopping card data from being recorded in our Call Recordings.

When you make a subsequent card or cheque payment to purchase tickets or top up your account, we will use your personal data and card information to process the order in order to fulfil a written contract. This involves sending your personal data to the card payment and banking providers to ensure that you have sufficient funds to cover the value of the transaction.

Without this data, we are unable to fulfil your subscription request.

This is regularly monitored for quality assurance as part of our PCI-DSS obligations.

Any card details provided by customers via paper order forms will be immediately, and securely, destroyed once processed, the scanned document will remain on our secure server for 1 year, plus the current lottery year, after the date of your last transaction on your Lottery account.

Using Your Personal Data to Operate Your Lottery Membership

We will use the information, including personal data, which you provide when you apply for a Lottery Subscription to administer your lottery membership. Without this data, we are unable to administer your lottery membership.

We will use your personal data to operate your lottery membership in the following manner:

- We will use the contact details that you provide to communicate with you about your account and in relation to the products and services the Data Controller provides to you in order to fulfil a written contract.
- Details of prizes that you have won will be sent to the home address you provided, and we may also contact you by email or phone to advise you of your prize.

It is important that the contact information on your lottery account is accurate and up to date at all times. If you need to amend any of your details, you can do this by contacting the Data Controller or by calling us.

We will hold your personal data for 1 year, plus the current Lottery year, after the date of your last transaction on your Lottery Account.

Making Payments to Your Lottery Account-

You can set up a direct debit for your bank to make regular payments to your lottery account. If you choose to pay this way, we will require a bank account number, sort code and the type of payment you wish to make e.g. amount and frequency of payment.

We will share this information with the third party banking facility to fulfil a written contract.

We will use the personal data provided to verify that the account number and sort code combination are valid. We will also ask you for the bank account holder's name which the bank will use to verify the direct debit payment request. It is your responsibility to ensure that you either have a sole authority or that you have the bank account holder's permission to make payments from their bank account.

Where you pay by cheque, we will also store the cheque details including account number and sort code which are required to deal with any queries raised to us by your bank.

Where you pay by credit or debit cards, we process all card payments in line with our obligations under the PCI-DSS regulations. Please see Processing Card Payments section for more detail.

Documents via Email-

We will use the email address that you provide to us to communicate with you about your lottery account and in relation to related products and services.

Call Recordings-

Our third party telesales partners record all calls from their call centre for quality assurance, regulatory compliance and training purposes.

They retain all call recordings for a period of 12 months.

Enquiries and Complaints-

If you have any complaints with regards to the operation of your lottery account, please contact the Data Controller or call us on 01282 685400 so we can deal with your complaint as quickly as possible.

We will need to access your personal data and account history to verify your identity for security reasons and deal with the details of your complaint.

Details of any complaints received will be logged and recorded so they can be dealt with accordingly.

General Service Communications-

We will use your personal data for all general service communications. We need to do this for the performance of the written contract and any terms and conditions that you have signed.

Using Your Personal Data to Improve Services

Surveys-

From time to time, we may contact you to take part in a customer satisfaction survey. The Data Controller often uses third party partners to collect this information on their behalf.

They will share your basic personal data - name, address, phone number and email - for us to contact you to ask if you wish to participate in such surveys. We, or our third party partners, may sometimes follow up on surveys with you to get more information from you regarding specific complaints or feedback. You can choose not to participate in such surveys should you not wish for your personal data to be shared in this way by contacting the Data Controller

Social Media-

The Data Controllers actively use social media platforms as a way of connecting, and getting closer, to their customers to hear and understand what their customers think about them and their products and services.

Occasionally, we may contact you directly via those social media platforms if we would like to share your comments or pictures with other customers or publish them in the Data Controllers marketing materials. We will always ask you if you are happy for us to use your data in this way and will keep any data that you provide to us, such as email address, confidential and secure.

Your Personal Data Rights

Right of Access-

You may wish to access a copy of the personal data we hold about you - known as a Subject Access Request. You can do so by ringing, writing to or emailing the Data Governance team. We will respond to your Subject Access Request as soon as possible and, in any event, within the statutory 30 days. However, in the event that we need more information from you to verify your identity, which we must do to ensure we disclose your personal data to the right person, the 30 day response period will only commence from the time that we have validated your identity.

Please be aware that for security reasons we do not usually provide details of any bank details that we hold against your account(s). Please speak to our Data Governance team should you need this additional information.

Right of Rectification-

If you believe we have made an error as to the personal data we hold about you, please speak to one of our customer service advisors on 01282 685400 who will be able to process the correction for you. Should you wish to discuss this matter further, please contact the Data Governance team.

Right of Erasure-

You have the right to request your personal data to be permanently deleted from our records and systems to avoid any further communication with you. Your request will always be considered in light of the legal bases that we hold, store and process your personal data and the purpose that we collected your data. Where the legal bases permits, we will carry out your instruction without undue delay. Please note, however, that where we have a legal or contractual obligation to hold your personal data, we may not be able to carry out your request but we will explain this fully to you. Please address any request to delete your data to the Data Governance team.

Right to Restrict Processing-

Should you believe that we are processing your personal data in a way that you did not understand or agree to and wish to restrict such processing, please speak to the Data Governance team who will be able to assist you.

Right to Object to Processing-

You have the right to object to certain types of processing of your personal data. We will always make it clear at the outset of any new arrangement with you how we are going to process your personal data. Should you wish to object to such processing, we will give you the option to opt out on application. However, should you wish to discuss this matter further, please speak to the Data Governance team.

Right to Portability-

In the event that you wish to move your personal data that we hold on you to another organisation in the form of an excel or csv format, please contact the Data Governance team who will be able to assist you.

Right to be Informed-

You have the right to be informed about the collection and use of your personal data. This is commonly known as a 'privacy statement' or 'privacy policy'. We will provide you with the information about how we collect and use your data in various means, such as by 'just in time' notice provided to you at the time of collecting your personal data and via this Privacy Policy. Our Privacy Policy is regularly reviewed in line with our business processes. Any changes to this Privacy Policy will be communicated via email to all active customers. You can ask for a printed copy of our Privacy Policy by contacting the Data Governance team.

How to Contact Us

If you have any questions, comments or complaints about this Privacy Policy or our use of your personal data, please contact us at:

Data Governance Team
Lottery Solutions
Ribble Court
Mead Way
Padiham
BB12 7NG

Email: enquiries@lotterysolutions.co.uk

Tel: 01282 685400

If you are at all dissatisfied with the information provided by the Data Governance Team, please address any complaints to the Data Protection Officer at the same address.

Right to Complain to the Information Commissioner's Office (ICO)-

You have a right to lodge a complaint with the Information Commissioner's Office (ICO) if you have a complaint with how you believe your personal data has been handled. For more information, please visit <https://ico.org.uk/concerns>