



CopyBet UK Limited

PRIVACY NOTICE

Last Updated: 02/10/2023

INTRODUCTION

The website is managed by CopyBet UK Ltd. The company's address is 3rd Floor, 120 Baker Street, London W1U 6TU. The company's business address is Office 116, N.1 Royal Exchange, London, EC3V 3DG.

CopyBet UK Limited, CopyBet EU Limited, and its affiliates, subsidiaries and related entities ("CopyBet", "we, "our") is committed to protecting the privacy and security of the personal data we collect about end customers and users of our services ("you/your").

The purpose of this privacy notice is to explain what personal data we collect about you when you visit our website and sign-up to our services, products, and our betting platform. When we do this, we are the data controller.

Any information about your activities collected by our staff is used for business purposes only. Usage of this data is intended for improvement of the service level, assessment of your financial abilities and needs, as well as due notification of new services and products offered by CopyBet.

CopyBet respects and honours the confidentiality of internet visitors and users of its products and services. When processing personal data, CopyBet acts in accordance with the General Data Protection Regulation (EU GDPR) regarding our customers and operations in the EU, and with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) regarding our customers and operations in the UK.

If we are legally obligated to provide your personal data to other organizations, such as the government, we do it securely and do not provide more information than the situation requires. These rules are applied to existing, as well as past and prospective clients.

Please read this privacy notice carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at dpo@copybet.com.

PERSONAL DATA WE COLLECT

Personal data is any information associated with a living person (data subject) which may be directly or indirectly used (combined with other information) for personal identification.

We collect your personal data only in accordance with the applicable data protection regulations. We can collect it from different sources, when may be relevant to any of our products or services that you are currently using or used in the past.

We can also collect your data when you communicate with us, for example, visit our websites of mobile channels, contacts us over the phone, or ask the company's representatives about any products and services CopyBet has to offer. Some part of this data comes directly from you when you register and provide identification documents.

We can also get some data from publicly available sources.

The data we collect may include:

- Personal information, such as name, sex, date, and place of birth.
- Contact information, such as a postal address, e-mail address, and phone number.
- Information about your identity, such as identity card with photo, passport data, and nationality.
- Logins and passwords or user subscription data, such as profile login credentials.
- Any other personal information that you provide by completing forms or communicating with us, whether by the phone, e-mail, internet, or any other method, including making enquiries or benefiting from our customer service.
- Internal analytics data, such as marketing analytics.
- Information about received warnings, notifications, news, and subscriptions.
- Bank statements and utility bills.
- Your financial information and information about your relationship with us, including products and services you use, as well as the history of your deposits/withdrawals and transactions.
- Information about transactions you make with CopyBet affiliates.
- Information about your gadget/PC/portable device and software, such as IP address, cookies and other similar technologies.
- Your betting history and activities received from our betting partners, if you choose to integrate our platform with theirs.

We use your data only given your consent or if we have some other legal reason to use it.

PURPOSES FOR WHICH WE USE PERSONAL DATA AND THE LEGAL BASIS

When providing services to you, we may use your personal data for the following purposes and on the following lawful bases:

Purpose	Type of personal data	Lawful Basis for Processing
To onboard you into our platform and website, and to make it possible for you to benefit from our products and services.	Name, sex, date of birth, place of birth, postal address, email address and phone number, nationality, ID, photo, and passport data.	Performance of your contract with us.
To check your eligibility to benefit from our products and services under the local law regulations.	ID, nationality, passport data, photo.	Legal obligation.
To make it possible for you to access our platform and website.	Logins and passwords or user subscription data, such as profile login credentials.	Performance of your contract with us.
To answer your enquiries, provide you with customer service and assist you upon your request	Any other personal information that you provide by completing forms or communicating with us, whether by the phone, e-mail, internet, or any other method, including making enquiries or benefiting from our customer service.	Performance of your contract with us.
To perform background checks and anti-money laundering checks.	Internal analytics data, such as marketing analytics.	Legal obligation.
To manage our commercial relationship and improve our services, products and platform.	Information about received warnings, notifications, news, and subscriptions.	Legitimate interests: in order to provide you with adequate standards of service and the appropriate functioning of our platform, including to improve it in your benefit.

To check your identity in order for you to benefit from our services, products and platform.	Bank statements and utility bills.	Performance of your contract with us.
To provide you with payments and charge you according to our terms of service and our contract with you.	Your financial information and information about your relationship with us, including products and services you use, as well as the history of your deposits/withdrawals and transactions, including with our affiliates.	Performance of your contract with us.
To reduce fraud, and enhance security	Information about your gadget/PC/portable device and software, such as IP address.	Legitimate interests: prevention and detection of crime, safeguarding operations and business reputation
To provide you with enhanced betting Services and products, on an optional manner and upon your request.	Your betting history and activities received from our betting partners, and your login credentials.	Consent
To send you emails regarding our services that are being provided to you and any payment information	Email address, financial information, history of services provided, the content of any enquiry you made	Performance of your contract with us.
To send you marketing communications	Email address	Consent (if you are a customer), or Legitimate Interests (if you are a business)

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required

information.

COOKIES

We use cookies on our website.

This helps us to provide you with a good experience when you browse our website, allows us to improve our website and understand how you interact with us.

For detailed information on these cookies, the way we use them, your rights and choices about cookies, and the purposes for which we use them, please see our [Cookie Policy](#).

SHARING YOUR DATA

We may share your personal data between our group and third-party companies that supply us with services and products, and we will only do it so when it is necessary for the purposes of personal data collection and on a proportional, safe, and need-to-know basis. When sharing data with reliable third-parties, we'll always make sure to check if they provide sufficient degrees of data protection and we sign the appropriate contractual commitments to guarantee the safety and protection of our customers' data.

For instance, we may share your personal data with our payment platforms:

- Neteller
- Skrill
- Ecommpay
- Apple
- Google

We may also share personal data from customers in the UK with our KYC (Know Your Customer) checking provider, Sumsub, and with our marketing and emailing platform, GetResponse.

If you want to know more about how such payment platform providers process your personal data, you must read their respective Privacy Notices.

It is unlikely that we'll ever share your personal data outside the UK, the European Union or European Economic Area. If, however, it becomes necessary for the purposes of providing our services to you, we will only share it with organisations in countries benefiting from a European Commission adequacy decision or on the basis of the International Data Transfer Agreement (IDTA) approved by the UK (regarding our UK operations and customers) and the Standard Contractual Clauses (SCCs) approved by the European Commission (regarding our EU operations and customers), which contractually oblige the recipient to process and protect your personal data to the standard expected within the UK, the EU and the EEA.

On extraordinary occasions, CopyBet can disclose a client's personal information to third parties if such disclosure is necessary according to applicable law and other regulations. For

instance, we will be obliged to disclose the personal information of a client to comply with judicial decisions and official requests. Also, such disclosure will be done in case we need to protect our rights and property.

HOW LONG WE KEEP YOUR DATA

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

If you want to know how long we store specific types of personal data, you may request a copy of our Data Retention Policy and Schedule.

HOW WE PROTECT YOUR DATA

We implement appropriate technical and organisational measures to protect data that we process from unauthorised disclosure, use, alteration or destruction.

CopyBet uses a modern security Secure Sockets Layer technology (SSL). This technology allows establishing an encrypted link between a web server and a browser and guarantees the safety of your information. SSL technology safely protects information from being captured by third parties.

We also rely on access control, monitoring activity and backup systems to guarantee the safety, integrity, and availability of the personal data we hold. On top of that, we also implement the appropriate organisational policies and procedures to ensure information safety is embedded in our activities.

We constantly improve our safety technologies to protect the system from unauthorized access and to make it impossible to use our database without permission.

YOUR RIGHTS AND OPTIONS

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify

or add to it.

- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal because it is in our legitimate interests to do so, you can object to us using it this way.
- Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so. You can do it directly by following the instructions embedded in each marketing communication we send you.
- You can ask us to restrict the use of your personal data if:
 - It is not accurate.
 - It has been used unlawfully but you do not want us to delete it.
 - We do not need it any-more, but you want us to keep it for use in legal claims; or
 - if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to erase your personal data and request a machine-readable copy of your personal data to transfer to another service provider.
- You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, please contact us at dpo@copybet.com.

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at: <https://ico.org.uk/concerns/>.

CONTACT US

If you have any questions, or wish to exercise any of your rights, then you can contact: dpo@copybet.com.

CHANGES TO THIS PRIVACY NOTICE

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 02/10/2023. The previous versions of our Privacy Notice can be found [here](#).