

CopyBet UK Ltd
Website Privacy Notice
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Document Release:

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1. Introduction

The website is managed by CopyBet UK Ltd. We are a limited company registered in England and Wales under registration number 10949712 and we have our registered office at 55 Baker Street, London, England, W1U 7EU. We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO") in relation to our processing of Personal Data under registration number ZB598283.

CopyBet UK Ltd, CopyBet EU Ltd, and its affiliates, subsidiaries and related entities ("CopyBet", "us", "we", "our") are committed to protecting the privacy and security of the Personal Data we collect about end customers and users of our services ("you/your").

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

2. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You enquire about our products and/or services
3. You sign up for our products, services, and/or our betting platform
4. You are an existing customer
5. You contact us by email, telephone or by using our online contact form
6. You sign up to receive newsletters and/or other promotional communications from us
7. Your Personal Data is processed as part of our legal, regulatory or business obligations

3. What is Personal Data

'Personal Data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special Category Personal Data' is type of Personal Data that is considered more sensitive. This includes information revealing:

- racial or ethnic origin
- political opinions

- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purposes of uniquely identifying someone
- data concerning physical or mental health
- data concerning someone's sex life or sexual orientation

4. Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you.

When you register an account with CopyBet, we collect:

- Username & Account Number
- Full name
- Gender
- Date of birth (DOB)
- Home address
- E-mail address
- Telephone numbers (in process)
- Marketing preferences
- Any other information as part of the registration process and/or for the continued use of our platforms, products and/or services.

To verify your identity, we may also collect documents such as:

- A copy of your passport or driving licence
- Proof of address such as bank statements or utility bills.

For the type of Personal Data we collect, see the table below in the section entitled 'Purposes for which we use Personal Data and the legal bases'.

5. How we collect your Personal Data

We collect most of the Personal Data directly from you by telephone, text or email, and/or via our website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists;
- affiliate marketing and referral partners;
- other betting partners;

- publicly available sources such as social media platforms;
- sub-contractors and service providers in technical, payment and customer support;
- KYC and identity verification providers;
- Credit Reference Agencies;
- advertising networks;
- analytics providers; and
- Other brands within the CopyBet Group.

6. Purposes for which we use Personal Data and the legal basis

When providing services to you, we use your Personal Data for the following purposes and on the following lawful bases:

Purpose	Type of Personal Data	Lawful Basis for Processing
To register you onto our platform, verify your identity and contact details, and deliver our services in accordance with the terms and conditions.	Registration Information.	Performance of a contract. Legal and Regulatory Obligations.
To respond to your enquiries and correspondence from (website, email, social channels or by any other means).	Registration Information. Contact Information.	Legitimate Interests: to respond to enquiries and provide support.
To verify your age, ensuring that underage accounts are not created.	Registration Information. Know Your Customer Documentation. Publicly Available Information (UK).	Performance of a contract. Legal and Regulatory Obligations.
To perform affordability and/or anti money laundering screenings.	Registration Information. Know Your Customer Documentation. Source of Funds Information.	Performance of a contract. Legal and Regulatory Obligations.

Purpose	Type of Personal Data	Lawful Basis for Processing
To detect and prevent fraud and suspicious activity.	Account Information. Cookie & Tracking Information. Platform activity.	Performance of a contract. Legal and Regulatory Obligations.
Linking multiple accounts for AML and SG purposes.	Account Information.	Legal and Regulatory Obligations.
For information security and loss prevention purposes (for the protection of our privacy, rights, safety, property and/or those of other individuals).	Registration Information. Betting and Transaction Data. Correspondence. Device Information.	Legitimate Interests. Legal and Regulatory Obligations.
For Financial Reporting & Analysis (maintaining financial records in accordance with the law).	Registration Information. Betting and Transaction Data.	Legal and Regulatory Obligations.
To analyse customer behaviour to improve our services, products and/or platform.	Registration Information. Betting and Transaction Data.	Legitimate Interests: to allow analytics and search engine providers to help improve and optimise our products/platform.
For diagnostics, research and development (diagnosis of faults, maintain our systems, test and analyse the platform).	Device Information. Server Logs and Traffic Information.	Legitimate Interests: to allow analytics and technical providers to help test and analyse our systems/products/platform.
For mobile app notifications.	Account Information. Device Information.	We process this information with your consent. Preferences can be set on your account.
To process payments, payment methods, deposits and/or withdrawals.	Registration Information. Payment Information. Cookie & Tracking Information.	Performance of a contract.

Purpose	Type of Personal Data	Lawful Basis for Processing
	Device Information.	
To send marketing communications about our product/services or promotions.	Registration Information. Contact Information.	<p>If you are an existing customer or have expressed an interest in our products or services, we will rely on legitimate interests to contact you for marketing purposes.</p> <p>You may object to the processing for this purpose by emailing dpo@copybet.com.</p> <p>If we have captured your consent for the purposes of marketing, that consent may be withdrawn at any time by emailing dpo@copybet.com or using the unsubscribe option.</p>
To enhance your betting experience related to services and products.	Registration Information. Information from Betting Partners.	We process this information with your consent.
To Improve our websites and user experience.	Cookie and Tracking Information.	We use cookies on our websites with your consent.

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.

7. Cookies

We use cookies on our website to ensure it works properly, remember your preferences, improve performance, and understand how users interact with it.

Where required by law, we request your consent before setting non-essential cookies. You can manage your preferences through our cookie banner or your browser settings at any time.

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](#).

8. Sharing your data

As part of the CopyBet Group, we may share your Personal Data with other companies within the group for operational, regulatory, and administrative purposes, as permitted by law.

We may also disclose your information to third parties where necessary to deliver our services, comply with legal obligations, or support our business operations. These third parties may include:

- Business partners, suppliers and sub-contractors who process data on our behalf (e.g. Neteller, Skrill, Ecommpay, Apple, Google)
- Identity verification and KYC providers, such as Sumsub and GBG
- Marketing and communication providers, such as GetResponse
- Advertising networks, social media platforms, and affiliate partners
- Analytics and search engine providers
- IT service providers

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy policy of every website you visit.

Where required by law and regulation, we may disclose your Personal Data to:

- Law enforcement agencies
- Regulatory bodies (e.g. Gambling Commission)
- Fraud prevention and crime agencies
- Legal advisors
- Other parties where necessary to protect the rights, property, or safety of CopyBet, its personnel, users, or others.
- GAMSTOP – to check and apply national online self-exclusion.
- GamProtect – to identify and protect high-risk customers across participating operators (see Section 13).
- IBAS (Independent Betting Adjudication Service) – to resolve customer disputes.
- IBIA (International Betting Integrity Association) – where we participate in sports integrity monitoring.

9. Platform Features

The Company processes User data to facilitate the Platform Features, enhance platform security, and fulfil contractual obligations (as covered in section 6 of these terms).

The legal bases for this processing are:

- Article 6(1)(b) UK GDPR (Performance of a contract): The processing is necessary for providing the agreed-upon services;
- Article 6(1)(f) UK GDPR (Legitimate interests): Data is processed to maintain a transparent and trustworthy user environment; and
- Where mandated by law or for optional features, the legal basis will be Article 6(1)(a) UK GDPR (Consent).

By activating the Tipster functionality on the CopyBet Platform, you acknowledge and consent to the public display of specific personal data associated with your platform activity to other Users. This data, collectively referred to as the "Displayed Data," may encompass, but is not limited to:

- Profile information (including but not limited to username, profile picture, profit/loss information and betting strategies);
- Betting performance statistics;
- Open bets; and
- Historical betting activity.

Any additional information reasonably necessary to enable or enhance the intended functionality of the Platform Features.

10. International Transfers

It is unlikely that we will ever share your Personal Data outside the United Kingdom (UK), the European Union (EU) or European Economic Area (EEA). However, if it becomes necessary to provide our services to you, we will only share it with organisations in countries benefiting from an adequacy decision or where we have taken appropriate steps to ensure that the Personal Data processed has an essentially equivalent level of protection to that guaranteed in the UK or EU.

We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State/European Commission has confirmed has an adequate level of protection (an adequacy regulation);
- We enter into an International Data Transfer Agreement ("IDTA") with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf](#) (ico.org.uk)) or
- We enter into Standard Contractual Clauses ("SCCs") with the receiving organisations and adopt supplementary measures, where necessary. (A copy of the SCCs can be found here [Standard Contractual Clauses \(SCCs\)](#)).

11. How long we keep your data

We retain your Personal Data for as long as is necessary to provide you with our services and for a reasonable period thereafter to comply with our legal obligations and to deal with complaints and claims.

This includes retention to:

- Meet our obligations under applicable gambling and anti-money laundering (AML) laws
- Respond to complaints or legal claims
- Maintain proper business and financial records
- Support responsible gambling initiatives

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.

12. How we protect your data

We implement appropriate technical and organisational measures to protect your Personal Data against unauthorised access, disclosure, use, alteration, or destruction.

CopyBet has added SSL certificates to their website to secure online transactions and to keep customer information private. This technology creates an encrypted link between the web server and web browser, therefore guaranteeing the safety of your information. SSL technology safely protects information from being captured by third parties.

We also rely on access control, regular monitoring, and backup of our systems to guarantee the safety, integrity, and availability of the Personal Data we hold. In addition, 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.

In addition to the technical and organisational measures we have put in place, there are simple things you can do to further protect your personal information, such as:

- Never share One Time Passcodes (OTPs) or passwords with anyone.
- Never enter your details after clicking on a link in an email or text message.
- Use encrypted email when sending sensitive information.
- Do not leave your devices unattended while logged into any online service.
- Always close your browser after logging out.
- Never install software or allow remote access to your devices, during or after a cold call.

- You can easily identify secure websites by looking at the address in the top of your browser which will begin https:// rather than http://.

13. Your data protection rights

CopyBet would like to make sure you are fully aware of your rights. We will always ensure, no matter where you are located in the world, that we adhere to and fully respect your data protection rights.

You have the following rights if you are located in the UK or EU:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their Personal Data.
Right of access	Individuals have the right to receive a copy of their Personal Data, and other supplementary information.
Right to rectification	Individuals have the right to have inaccurate Personal Data rectified or completed if it is incomplete.
Right to erasure (the 'right to be forgotten')	Individuals have the right to request their personal information to be erased, in certain circumstances.
Right to restrict processing	Individuals have the right to request the restriction or suppression of their Personal Data, in certain circumstances, in particular: <ul style="list-style-type: none"> • if your data is not accurate; • if your data has been used unlawfully but you do not want us to delete it; • if your data is no longer needed, 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.
Right to data portability	Individuals have the right to obtain and reuse their Personal Data, in a machine-readable format, for their own purposes across different services, in certain circumstances.

Rights	Description
Right to object	<p>Individuals have the right to object to the processing of their Personal Data, in certain circumstances.</p> <p>Where we are using your Personal Data because it is in our legitimate interests to do so, you can object to us using it this way.</p> <p>Where we are using your Personal Data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so.</p>
Rights with respect to automated decision-making and profiling	Individuals 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.

In addition to the above, an individual also has the following rights:

Rights	Description
Right to withdraw consent (if applicable)	Where we are using your Personal Data based on your consent, you can withdraw your consent at any time.
Right to lodge a complaint with a supervisory authority	You have the right to raise a complaint about how we handle your personal information with the Information Commissioner's Office by calling 0303 123 1113 or visiting https://ico.org.uk/make-a-complaint/ .

Exercising your data protection rights

You do not need 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 data protection rights, please email dpo@copybet.com.

14. Participation in GamProtect

We participate in GamProtect, a scheme designed to protect customers who are at the highest risk of gambling-related harm in the UK.

If you meet the criteria for inclusion in GamProtect, your personal data will be shared with GamProtect and subsequently with other gambling operators who are participating in the scheme.

The purposes of sharing your data with GamProtect are to help protect vulnerable individuals, prevent gambling-related harm, and safeguarding those at risk.

The legal bases for sharing your personal data with GamProtect are:

- Legitimate interests – to promote safer gambling and protect individuals at risk of harm.

- Substantial public interest – specifically, the safeguarding of children and of individuals at risk.

For more information about how your personal data is processed withing GamProtect, please visit the [GamProtect Privacy Notice](#).

15. Children's Privacy

Our services are intended for individuals aged 18 and over, and we do not knowingly collect or process Personal Data from children.

We do not market our products or services to individuals under the age of 18. If we become aware that we have collected Personal Data from a child, we will take appropriate steps to delete that information securely and permanently, in line with our legal obligations.

If you are a parent or legal guardian and you believe your child has provided us with Personal Data, please contact us at dpo@copybet.com so we can take appropriate action.

16. Marketing Communications and Consent

We are committed to respecting your privacy and ensuring full transparency in how we collect and use your Personal Data for marketing purposes, in accordance with the UK Gambling Commission's Social Responsibility Code 5.1.12.

We only send direct marketing communications (such as emails, push notifications or in-app messages) where:

- You have provided explicit opt-in consent.
- You may choose to receive marketing communications for specific products or channels, or opt out entirely.

You are always in control of your marketing preferences:

- You can manage your marketing consents in your account settings at any time;
- You can opt in or out of specific communication channels (e.g. email, push notifications);
- You can withdraw your consent at any time, without affecting your access to the services;
- We maintain a clear record of your consent status, linked to your player ID;
- Your preferences are respected and enforced across all marketing systems.
- You can unsubscribe directly from any marketing message we send you.

We will not send marketing communications by default, only where permitted by law and in accordance with your preferences.

If you have any questions about how we use your Personal Data for marketing, or would like to update your preferences, please contact us at dpo@copybet.com.

17. Contact us

If you would like to exercise your statutory data protection rights, or if you have any concerns or questions about how we handle Personal Data, please contact us using the details below:

CopyBet UK Ltd
Office 116
N.1 Royal Exchange
London
EC3V 3DG

Alternatively, you can email us at dpo@copybet.com.

We have also appointed a Data Protection Officer ("DPO"). Our DPO is Evalian Limited and can be contacted by using the above email or postal address.

18. Changes to this privacy notice

We may update this Privacy Notice (and any supplemental privacy notice), from time to time to reflect changes in our services, legal obligations, or data processing practices.

When we make changes, we will revise the "last updated" date at the bottom of this notice. Where required by law, we will notify you of any significant changes.

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