

# **PRIVACY POLICY SPORTING CHANCE PRIZE DRAW (SCPD)**

## **INTRODUCTION**

1.1 SCPD values your privacy. This privacy policy ('Privacy Policy') explains how SCPD collects, stores, shares, protects and uses personal information of our business contacts, the visitors to our website ('Site'), and others, as detailed below. It also describes the website cookies we may use and send to your computer or mobile device when you use our Site.

1.2 In this Privacy Policy 'SCPD 'we', 'us' and 'our' refer to Sporting Chance Prize Draw Administration Ltd. SCPD acts as a controller of personal data for the purposes of the applicable data protection law, which means that we alone (or in some cases, jointly with others) determine the means and the purpose of processing your personal data.

1.3 'Personal data' (or 'personal information'), as used in this Privacy Policy, means any information that we hold about you from which you can be identified either directly or indirectly and it may include your name, contact details, job title, employer organisation, qualifications, employment history and information obtained from publicly available sources, and results of other due diligence carried out by us.

## **2. HOW WE COLLECT PERSONAL INFORMATION**

2.1 We may collect and store your personal information when you have had contact with SCPD through our website, or when corresponding with us.

2.2 We may collect personal information in writing, by telephone, by e-mail and through our Site. We may also receive information from third parties who collect personal information from you and pass it on to us; for example, where we conduct verification or anti-money laundering checks on sponsors and management teams for prospective transactions.

## **3. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU**

3.1 If you are a business contact, we will hold limited amounts of personal information about you such as your name, contact details, job title, employer organisation.

3.2 If you are a prize-giver or sponsor, personal information that we hold about you may include your name and contact details.

## **4. HOW WE USE YOUR INFORMATION**

4.1 We will use your personal data, and may share your personal data with other parties acting on our behalf, for one or more of the following purposes: a. managing and maintaining records of services or advice we have received b. seeking and obtaining advice from our professional advisers, including lawyers, accountants and other consultants; c. inviting you to presentations and events d. for our own administrative and record-keeping purposes, analysing our activities, or conducting internal audits; e. protecting our legal rights and interests; f. if you are a supplier, consultant, professional advisor or investor, to carry out our contract with you; and g. to conduct research about the use of our Site.

4.2 We will not sell your personal information to others.

4.3 If we wish to use your personal information for a purpose beyond that for which it was originally provided, we may ask for your consent or seek to rely on another valid legal ground to process your personal information in accordance with the applicable law.

## **5. INFORMATION FOR MARKETING PURPOSES**

5.1 We may use your personal information to send you updates and news concerning SCPD, its business and activities and events, or to inform you about the Funds or other investment products, if we believe such information may be of interest to you.

5.2 If at any time you wish us to stop using your information for these purposes, please notify SCPD, see Contact information in paragraph 17 below.

## **6. GROUNDS FOR PROCESSING**

6.1 In order to collect, store and process your personal data lawfully we rely on one or more of the following legal grounds: a. where applicable, your consent to particular processing activities. For example, where you have consented to us using your information for marketing purposes; or b. our legitimate interests in running our business. The legitimate interests to collect your personal information may include any of the purposes identified in this section and any other purpose where we, or a third party on our behalf, have determined that you have a reasonable expectation for us, or such third party, to collect or use your personal information for such purpose. c. our compliance with a legal obligation to which SCPD is subject. For example, we may require your personal information in order to comply with our obligations to prevent financial crime; or d. if you are a party to a contract, because processing your personal data is necessary for the performance of that contract.

## **7. DISCLOSURE OF YOUR PERSONAL INFORMATION**

7.1 There are circumstances where we may wish to disclose or are compelled to disclose your personal data to third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These scenarios include disclosure: a. to our outsourced third party service providers who process personal information on our behalf such as providers of cloud hosting solutions or providers of data storage or security; b. to professional advisers, such as lawyers and accountants, fund administrators or consultants; c. to legal and regulatory authorities where we are required by law or regulation to do so; and d. to any other third party where you have provided your consent.

## **8. RETENTION OF PERSONAL INFORMATION**

8.1 We will take all reasonable steps to retain personal data only for the duration of the purpose for which it was obtained as set out in this Privacy Policy, unless longer retention is required by the applicable law or regulation, or we have another legitimate interest in doing so.

## **9. CONFIDENTIALITY AND SECURITY**

9.1 SCPD will take reasonable steps to ensure that your personal data remains confidential and secure.

9.2 We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorised access or disclosure and loss or corruption by computer viruses and other sources of harm.

## **10. YOUR RIGHTS WITH REGARDS TO YOUR PERSONAL INFORMATION**

10.1 Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant data protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below at paragraphs 11.1.1 to 11.1.6:

10.1.1 Right to obtain a copy of your personal information. You may have the right to obtain a copy of the personal information we hold about you.

10.1.2 Right to rectification. You may request that we rectify any inaccurate and/or incomplete personal information. If we disagree and believe the information to be accurate and complete, we will advise you and include a notation on the record that you dispute the information's accuracy.

10.1.3 Right to withdraw consent. You may, as permitted by law, withdraw your consent to the processing of your personal information at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent.

10.1.4 Right to object to processing. You may request that we stop processing your personal information.

10.1.5 Right to erasure. You may request that we erase your personal information, and we will comply, unless there is a lawful reason for not doing so.

10.1.6 Right to lodge a complaint with the supervisory authority. We suggest that you first contact us if you have any questions or if you have a complaint in relation to how we process your personal information (see Contact information in paragraph 16 below). You also have the right to complain about the use of your personal information to the relevant supervisory authority, which in the UK is the information Commissioner's Office.

10.2 Any request under paragraphs 10.1.1 to 10.1.6 should be submitted in writing to [simon@sportingchanceprizedraw.com](mailto:simon@sportingchanceprizedraw.com)

## **11. LINKS**

Our Site may provide hyperlinks to websites owned and controlled by others. SCPD is not responsible and accepts no liability in relation to such websites or their contents or for their privacy practices. You should read any applicable privacy policy on any such website.

## **12. THIRD PARTIES**

Where you submit personal information on behalf of another person, you must make that person aware of how we may collect, use and disclose their personal information, the reason you have provided it, how they can contact us and the terms of this Privacy Policy.

## **13. COMPLIANCE WITH PRIVACY LAWS**

13.1 SCPD complies with the data protection and privacy laws to which it is subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time.

13.2 Except to the extent expressly stated otherwise in this Privacy Policy, SCPD accepts no obligations with respect to the handling of personal information other than those mandated by law in any relevant country.

## **14. USE OF WEBSITE COOKIES**

14.1 Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our site. This section of the Privacy Policy explains what cookies are, why we use them and what you may do if you wish to restrict, remove or refuse to accept cookies.

14.2 By continuing to use our Site, you agree to the use of cookies for the purposes set out in this Privacy Policy.

14.3 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

14.4 We use the following cookies:

14.4.1 Strictly necessary cookies. These are cookies that are required for the operation of our Site.

14.4.2 Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.

14.4.3 Functionality cookies. These are used to recognise you when you return to our Site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). cookies) you may not be able to access all or parts of our Site.

## **15. CHANGES TO SCPD PRIVACY POLICY**

We reserve the right to change this Privacy Policy at any time and any changes will be posted here, so please check this Privacy Policy for changes each time you access our Site.

## **16. CONTACT INFORMATION**

If you have any questions about this Privacy Policy, please contact us by email at [simon@sportingchanceprizedraw.com](mailto:simon@sportingchanceprizedraw.com)