



## Privacy Notice

We take your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us. We will never sell, share or use your personal information other than as described here.

A McLean bookmakers are a betting company selling betting products via telebetting, online and in retail stores.

### About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with A McLean bookmakers and how we process your data.

This policy relates to users of A McLean bookmakers services and associated suppliers. Processing of your data is required in order to offer you these services. This policy applies to individuals who have registered with A McLean as either a customer, user, administrator or in any other capacity.

### Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

### 1 WHO WE ARE AND WHERE TO CONTACT US

1.1 For the purposes on the Data protection Act 2004, the data controllers AMcLean Bookmakers, having its registered office at 402 LISBURN ROAD, BELFAST, BT9 6GN, Northern are registered with the Information Commissioners office (ZA159660).

1.2 Our website can be found at [www.A McLeanBookmakers.com](http://www.A McLeanBookmakers.com); Terms describing the A McLean Bookmakers Services are provided to the public via the Website.

1.3 This policy (together with our Terms and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data, and how we will process it.

#### 1.4 Contact details;

EMAIL: [Info@AMcLeanBookmakers.com](mailto:Info@AMcLeanBookmakers.com)

PHONE: 0044 28 90 682 419

FREEPHONE: 0800 121 4567

WEB: [www.AMcLeanBookmakers.com](http://www.AMcLeanBookmakers.com),

POST: A McLEAN BOOKMAKERS, 402 LISBURN ROAD, BELFAST, BT9 6GN

## 2 HOW WE COLLECT INFORMATION ON WEBSITE

2.1 When registering as a user of A McLean Bookmakers, opening an Account or during your time as a user of the services you will be asked to provide information to us. You are required to provide this information over the phone for our tele-betting service or to complete a registration form in which you must provide us with your details including but not limited to, your title, gender, first and last name, date of birth, email address, home or other physical address, phone number or other contact information for a website account. We will inform you at the time of collecting information from you whether you must provide the information to use the Website or specific Services or whether the provision of information requested by us is optional.

2.2 You agree that your username and name may be shown to other users of the Website. In all cases we will endeavour to inform you at the time of collecting the information from you whether the information that you provide to us will be accessible to other users of the Website or by third parties so that you can decide whether to provide the information to us.

2.3 We may collect and process the following data about you:

2.3.1 your title, gender, first and last name, date of birth, nationality, email address, home or other physical address, phone number, Account currency, affiliate reference (if applicable), username, encrypted password, payment details, bank account details and Card details;

2.3.2 an internationally recognised photo ID (passport, driving licence), a utility bill, proof of identity, residence and/or age, and/or a bank or credit card statement relating to your payment details that are registered with us;

2.3.3 if you contact us, we may keep a record of that correspondence;

2.3.4 information that you submit in response to a survey(s) or poll;

2.3.5 details of transactions you carry out through the tele-betting service or Website and your account number with us;

2.3.6 details of your calls or visits to the Website including, but not limited to Bets and transaction records, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access; and

2.3.7 when you make a withdrawal from your Account, we may require the following from you to effect the withdrawal and may carry out a security check:

- (1) a photocopy of both sides of your Card clearly showing your signature;
- (2) a faxed copy of your passport or driving licence;
- (3) a copy of your Card statement header showing your billing address; and
- (4) a completed A McLean Bookmakers Customer Authorisation Statement (CAS).

2.4 You acknowledge and agree that the information which you provide to any other company in the A McLean Bookmakers group for the purposes of registering for use of a website or other service offered by the company in the A McLean Bookmakers group is deemed to have been provided to us once you begin to use of the Website or any other channel for the purposes of accessing the Services.

2.5 We reserve the right to conduct credit checks with third party credit and financial institutions in order to confirm any information that you have provided to us or to determine your ability to perform this Agreement.

### 3 USES MADE OF THE INFORMATION

3.1 We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us or selecting unsubscribe at the bottom of any of our communications to you.

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a new customer and operating and managing your Account;	(a) Identity, (b) Contact	Performance of a contract with you
Verifying the payment details that you have provided to us, including the address of your Card; And confirming the details that you have provided to us in relation to	(a) Identity, (b) Contact	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation,

your Account;		
To process and deliver your order including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you,
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy, and asking you to leave a review or take a survey	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, reporting of crime or suspected crime, including money laundering or fraud, any threat to the integrity of that event and/or breaches of the rules of that event as laid down by the relevant governing (including sporting) bodies.)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy

<p>Verifying the accuracy of your information or the processing of Bets or transactions, including disclosure of such information to third parties (including financial institutions, software providers, identity verification, age verification and credit reporting agencies) in connection with such purposes (a record of the search will be retained and the third party may use the information to assist other companies for verification purposes);</p>	<p>(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile</p>	<p>Necessary for our legitimate interests to develop our products/services and grow our business</p>

3.2 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

3.3 We may process your personal data without your knowledge or consent where this is required or permitted by law;

- In order to validate Account information we also reserve the right to request further information from you prior to any withdrawals that you request to be made from your Account. You agree that we can contact you using the contact details that you have provided to us for this purpose.
- Except as set out in this Privacy Policy, we do not sell, rent, share, trade or give away any of your personal information to third parties. We may give some of your personal information to third parties who operate payment processors for purposes relating to the Website and Services, to third party affiliates who/which direct users to the Website for the purposes of confirming commission or other related purposes and to other third parties for the purposes of verifying information that you provided to us (e.g. provision of information to banks for verifying credit card payments).

3.4 We may also use your email address or your postal address to send you updates or news regarding the Website or Services if you have consented, but you may choose not to receive emails of this type by accessing the "My Account" tab of the Website ([www.AMcLeanBookmakers.com](http://www.AMcLeanBookmakers.com)), by selecting 'unsubscribe' on any of our emails or text messages, requesting so from our any of our tele-agents and updating your "My Preferences" settings.

3.5 You agree that we can provide the personal data relating to you to any of the other A McLean Bookmakers companies on your behalf should you decide to use the services of any other A McLean Bookmakers companies website or services including, but not limited to, for the purposes of managing the Account that you have with us and its use with regards to a A McLean Bookmakers company's website or services.

#### 4 CCTV

4.1 We may record video footage in our betting shops and these recordings are used for the following purposes;

- Recording is necessary for fulfilling a legal requirement
- Recording is necessary to protect the interests of one or more participants
- Recording is in the public interest, or necessary for the exercise of official authority
- Recording is in the legitimate interests of the recorder

Video recordings will not be shared with 3<sup>rd</sup> parties unless it is in the public interest and for use by an official authority such as PSNI or others.

4.2 Storage and retention – Recordings of video footage are stored for a period of 30 days, and Access is restricted to authorised personnel only

4.3 Access Requests - Any person whose image is recorded has a right to seek and be supplied with a copy of their own personal data from the footage. To exercise that right, a person must make an application in writing. The data controller may charge up to €6.35 for responding to such a request and must respond within 40 days.

When making an access request for CCTV footage, the requester should provide the data controller with a reasonable indication of the timeframe of the recording being sought - i.e. they should provide details of the approximate time and the specific date(s) on which their image was recorded. We will respond to such requests within 40 days.

#### 5 SECURITY AND CONTROL OF YOUR PERSONAL DATA

5.1 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

5.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website and/or your tele-betting account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone and ensure that the password is complex i.e. have a minimum of 7 characters and contains both numeric and alphabetic characters. For further details on creating a strong password see [http://msisac.cisecurity.org/resources/toolkit/oct14/documents/EasyTricksforCreatingaStrongPassword\\_000.pdf](http://msisac.cisecurity.org/resources/toolkit/oct14/documents/EasyTricksforCreatingaStrongPassword_000.pdf)

5.3 We have no obligation to monitor or moderate any user's activity or use of A McLean Bookmakers, however we retain the right at all times to monitor, retain and disclose any information as necessary to satisfy any applicable law, regulation, sporting body integrity investigation, legal process or regulatory authority request, to ensure that the Services are properly

used, that this Agreement is being complied with or to investigate a suspected breach of this Agreement.

5.4 We recognise that data security is an area of vital importance to you. It is an imperative that you should be fully satisfied that your personal details are secure before you commence activities with us. In an effort to increase the security associated with the transmission of information via the Internet communication (which is an insecure method of communication by its very nature) we use the TLS (Transport Layer Security) mechanism that is built into your browser to manage the communication between you and the Website. This means that any text you provide is 'translated' into extremely detailed encrypted code. Your data is only retranslated into text once it is stored on our web server. Information such as personal details, credit or debit card numbers, passwords and all account details are automatically coded. In addition, we have installed the latest firewall technology. This process is intended to act as a secure barrier to detect any unauthorised access to our server immediately. Furthermore, our Website utilises anti-fraud checks throughout all transaction and payment processes. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

5.5 Although we cannot completely guarantee the security of your data transmitted to the Website, we will do our best to protect your personal data. You must understand, however, that while we will take the steps set out in paragraph 5.4, any transmission of data by you over the internet is carried out at entirely your own risk. You acknowledge that we are not responsible for any intercepted information sent via the Internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted information in any unauthorised manner.

5.6 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours.

## **6 LINKS TO THIRD PARTY WEBSITES**

6.1 The A McLean Bookmakers Website and Service may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates as well as third party websites to which we have no affiliation. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

When you leave our website, we encourage you to read the privacy notice of every website you visit. If you have any queries or concerns about your data usage please contact us.

## **7 TELEPHONE SERVICES**

7.1 Telephone calls to and from any of our telephone numbers may be recorded for training and/or security purposes; along with the resolution of any queries arising from the service you receive.

7.2 Telephone calls to our tele-centre and are used for the following purposes;

- Recording is necessary for fulfilling a legal requirement
- Recording is necessary to protect the interests of one or more participants
- Recording is in the public interest, or necessary for the exercise of official authority
- Recording is in the legitimate interests of the recorder

Voice recordings will not be shared with 3<sup>rd</sup> parties unless it is in the public interest and for use by an official authority who use such data for non-marketing purposes to include credit and risk

assessment and management, identification and fraud prevention, debt collection and returning assets to you.

7.3 Storage and retention - Recordings are stored for 6 years after end of customer relationship as required to fulfil our obligations.

7.4 Access Requests - Any person whose voice is recorded on our voice recording system has a right to seek and be supplied with a copy of their own personal data from the recordings. To exercise that right, a person must make an application in writing. The data controller may charge up to €6.35 for responding to such a request and must respond within 40 days.

When making an access request for voice recording, the requester should provide the data controller with a reasonable indication of the timeframe of the recording being sought - i.e. they should provide details of the approximate time and the specific date(s) on which their voice was recorded

## 8 IP ADDRESSES AND COOKIES

8.1 We may collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration, statistical purposes. This is statistical data about our users browsing actions and patterns, and does not identify any individual.

8.2 For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer hard drive. On revisiting the Website our computer server will recognise the cookie, giving us information about your last visit. They help us to improve the Website and to deliver a better and more personalised service. They enable us:

8.2.1 to estimate our user size and usage pattern;

8.2.2 to store information about your preferences, and so allow us to customise the Website according to your individual interests; and

8.2.3 to speed up your searches.

8.3 You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.

8.4 For information on how to control your cookies go to [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 9 ACCESS TO INFORMATION AND UPDATING, VERIFYING AND DELETING PERSONAL DATA

9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.

- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

9.2 At any time, you can make a written request to us to have access to all the personal information that we hold about you in accordance with the Data Protection Act 2004. We reserve the right to charge you a small administrative charge should you make such a request which is excessive; the current maximum charge is €6.35 for responding to a request. We will respond within 40 days of such a request. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.4 You may inform us of any changes in your personal data and, in accordance with our obligations to you by contacting us at [Info@AMcLeanBookmakers.com](mailto:Info@AMcLeanBookmakers.com) or by calling our tele-centre on 028 90 682 419 , we will update or delete your personal data accordingly. You can change relevant personal data through the My Account section within the Website or by calling our tele-centre on 028 90 682 419. It is your responsibility to tell us when information that you have provided to us is out of date or needs to be amended.

## **10 COMPLETE CESSATION OF USE**

10.1 If in the case you close your Account, your personal details saved in our system will, be retained for so long as is reasonably necessary for us to ensure that we may enforce our legal rights and to comply with the agreements that we have relating to our Website and the Services, including in relation to any need we may have to demonstrate compliance with law or to prosecute or defend of legal claims or allegations or legal proceedings.

## **11 CHANGES TO OUR PRIVACY POLICY**

11.1 Any changes we may make to our Privacy Policy in the future will be posted on this page and will become effective upon posting of the revised Privacy Policy. You should visit this page periodically to review any changes to the Privacy Policy.

11.2 You can also request a copy of our Privacy Policy via email or post by calling 028 90 682 419.

## **12 USER FEEDBACK AND COMPLAINTS**

12.1 Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [Info@AMcLeanBookmakers.com](mailto:Info@AMcLeanBookmakers.com)

Date	Version Number	Author
30/04/2018	18	Sharon Byrne
09/05/2018	19	Sharon Byrne