



SPORTSTACK

Privacy Policy

SportStack understand the importance of keeping your data safe. The following document outlines the way in which SportStack will use the data you provide us, and the scope to which we will share certain parts with select third-parties in order to enhance the customer experience. The following policy also explains your data protection rights:

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1. What information may we collect?

1.1. The **information that you give** will be collected and includes:

- The details given in the sign-up process
- Your deposit and withdrawal details
- Any feedback, issues or problems that you report to SportStack including poll data
- Interactions with SportStack's customer support on any medium
- Details of self-exclusion or any other programmes under the Responsible Gambling Policy
- Any details regarding official complaints you wish to make. This applies to SportStack's own resolution centre, as well as escalated ADR cases.
- Any recommendations or input into SportStack's development of tools/features
- Your social media profile details should you contact us through a social media account such as Twitter, Instagram or Facebook.

This information may include, your full name, date of birth, registered home address, nationality, email addresses, phone numbers, financial and part-card information (i.e. first 2 and last 4 digits, and expiry date, to indicate which card you are using), photographs, copies of identification, and proof of address documents such as bills.

1.2. In addition to the above, we also **automatically collect** certain bits of data to enhance the customer experience and to abide by jurisdiction betting rules and our licence terms. These include, but are not limited to:

- Your IP address and any other location data required for authentication
- Your browser type, operating system and platform
- URL clickstream to and through the SportStack website/app
- Your betting and account transactions

- 1.3. We also **receive information** about you from third-parties that we work closely with. This includes advertising networks, analytic providers, and search information data. These are all collected in order to improve the customer experience and tailor marketing of our products.
- 1.4. We also **collect cookies** to distinguish between our customers. More information can be found in our **Cookie Policy**.

2. Why do we collect this information?

We collect information to deliver aspects we agreed in our contract to a satisfactory standard. Specifically, we collect data to:

- Satisfy regulatory bodies on sign-up
- Ensure you are using our services from a location in which we are authorised to do so
- Verify your identity which may include working with trusted third parties
- Accept deposits from you and process withdrawals to you
- Carry out additional AML checks which may include working with trusted third parties
- Provide customer services
- Deal with complaints received by you or others promptly
- Deal with feedback items and improvement suggestions you may have
- Analyse and distribute anonymised unique usage data to liquidity partners
- Collect information and assist investigations brought about by relevant law enforcement agencies
- Use data in support of any legal claims, regulatory or compliance purpose. This may include disclosure of information held to assist the legal process
- Send you generic, as well as demographic targeted and individually targeted marketing content
- Deliver diagnostic, research and development initiatives. This includes the use of A/B testing to help develop SportStack's offering
- Profile in order to help determine retail/professional user status
- Prevent and detect improper use of our systems
- Exercise our rights outlined in the **Terms and Conditions**

3. How is this information shared?

Your information may be shared with any current or future company within the Betvest Group. Currently this is only SportStack. We may also share information with select third parties to process that personal information based on our instructions and in compliance with this policy and any other appropriate confidentiality and security measures. There are three main categories of third-party service providers and reasons for sharing information:

- 3.1. **Third-parties for legal reasons** – We will share as we deem necessary information required to comply with legal obligations. This includes the response to requests made by government agencies, law enforcement, and other regulatory bodies. This includes sharing information with authorities outside your country of residence. We will not only share with these parties on request – SportStack will escalate concerns it may have as outlined in the **Terms and Conditions**. We will also share information in the occurrence of a company event such as take over, merger or other disposition.
- 3.2. **Regulatory or Sporting bodies** – SportStack will work closely with regulatory and sporting bodies. SportStack may share information including personal details as well as details on betting records with appropriate bodies to investigate foul play. We will do this if the group considers that there are reasonable grounds to suspect you may be in breach of rules or laws that threaten the integrity of the sport, as per the **Terms and Conditions**
- 3.3. **Account facilitation** – This can be in the form of payment service providers, identification verification agencies, fraud detection, gambling problem registration lists

4. Your rights

SportStack will assist you should you wish to exercise any of your rights on personal data. Under the General Data Protection regulation (GDPR) this includes:

- Access to personal data – you can request a copy of the personal information we hold about you. Do this by contacting us at support@sportstack.com alongside adequate information to identify yourself.
- Correction of personal data – change any personal data through your account settings.
- Right to withdraw consent – if we have relied on your consent, you can withdraw it. Marketing emails will include an unsubscribe link at the bottom. You can also change preferences in your Account settings, or by emailing support@sportstack.com.
- Right to erase – this only applies in circumstances where there is no compelling reason to continue processing.
- Right to data portability – Asking SportStack to provide you or another company you nominate with certain aspects of your personal data
- Right to restrict processing of personal data from this point forward

- Right to object to processing of processing personal data – this does not supersede our need to continue processing your personal data where there are compelling legitimate grounds to do so, or we need to in relation to any legal claim.
- Rights relating to automated decision making and profiling. You can request that any such decision is made by an employee.

5. Other useful privacy & data security information

Retention - SportStack retain information as long as we reasonably require it for legal or business purposes, but the standard is 6 years. We will retain data for as long as you are a customer, and for as long as the relevant legal and regulators requires us to do so, in accordance with GDPR.

Security - SportStack recognise that online security and data protection is integral to our business. Customers should feel comfortable with our processes before parting with their personal information. We are committed to employing security measures to protect your information from access by unauthorised persons and to prevent accidental or unlawful processing, disclosure, destruction, loss, alteration and damage. Our technological solutions are sound, and wherever possible we rely on market leaders for payment processing, KYC/AML verification, and other third-party integrations. SportStack however cannot guarantee the security of any information that you disclose using your internet connection. You accept the inherent security implications of using the internet and the group will accept no liability for any direct, consequential, incidental, indirect, or punitive losses or damages arising out of such an occurrence.

6. How to contact us

For any enquiries related to the use of your personal information please contact us via email at support@sportstack.com , or post

ATT Personal Data, Betvest Limited, 64 New Cavendish Street, London, England, W1G 8TB

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