



Privacy Policy

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1 Introduction

StarVale Management & Technologies Ltd (“StarVale”) is an External Lottery Manager, licensed and regulated by the Gambling Commission.

We provide a wide range of Society Lottery services, inclusive of: (i) consultancy, registration, marketing, promotion, compliance, management, administration, payment processing, computer data processing and operation of Society Lotteries; (ii) designing, developing, testing, installing and maintaining offline back office systems, gambling software and Lottery/Donation Microsites; and (iii) Direct Debit origination services via DDPay Ltd, a wholly owned subsidiary of StarVale.

StarVale are committed to protecting your personal data and respecting your privacy – and we will be clear and transparent about the information we are collecting and what we will do with that information.

2 Responsibility

The Executive Management Team is responsible for maintaining and developing this policy.

The Compliance Manager is responsible for updating this policy document.

3 How do we obtain personal information *from you*?

We obtain personal information *from you*, either:

- Directly, in the capacity of a data controller, if you have contacted StarVale e.g. regarding the services we provide or the employment opportunities we offer, or we have contacted you e.g. regarding any products and services you or your employer may offer, or if you are one of our employees or approved third party agents; or
- Indirectly, in the capacity of a data processor, if you have joined one of our clients’ Weekly Lottery schemes, purchased tickets in one of our client’s Raffles, or in some cases, if you have participated in one of our client’s Free Prize Draws or made a donation in support of one of our charity or ‘not for profit’ clients (“Client’s Supporter”).

4 How may we collect personal information *about you*?

We may collect personal information *about you* from:

- Publicly available, official sources such as Companies House, the Charity Commission or the Gambling Commission; or
- If you visit any of our Microsites, inclusive of your computing device’s IP address, information about your visits, your browsing history and how you used the Microsite. This information may be combined with other information you provide us with, as described above.

5 What personal information do we collect?

We may record telephone conversations received from our Client’s Supporters in accordance with our client’s wishes and we could collect the following types of information from you:

- Names, telephone numbers and email addresses of our clients, our client’s suppliers and our own suppliers;
- Names, addresses, telephone numbers, email addresses, dates of birth, bank details, debit/credit card details (but specifically excluding the electronic storage of such card details), data contact preferences, the value of any Lottery subscriptions or donations received and the data contact preferences of our Client’s Supporters; and

- Names, addresses, prize values and prize winners' cheque numbers of our Client's Supporters that have won a prize in one of our client's Society Lotteries or Free Prize Draws.

We do not collect sensitive personal data.

6 How we use the personal information belonging to our Client's Supporters.

We use the personal information we have collected lawfully, fairly and transparently, in order to:

- Meet our legal obligations and the contractual requirements placed upon us by each of our clients; and
- To provide the services that allow our Client's Supporters to participate in our client's Society Lotteries and in some cases, to participate in our client's Free Prize Draws and to make a donation in support of one of our charity or 'not for profit' clients.

7 Who has access to your personal information?

The information you provide is held securely by StarVale and is directly linked either to the company itself or, in the case of our Client's Supporters, to specific, individual clients.

Each of our clients are data controllers of the personal data that is directly linked to them and StarVale are the data processors.

StarVale will never disclose any of your information to anyone other than the data controller, unless:

- We are legally obliged to; or
- Our client requires us to do so in order to meet our contractual obligations e.g. DDPay Ltd processes Direct Debit payments on behalf of some of our clients - and we will only ever use your personal data in accordance with our client's written instructions.

8 How you can access and update your personal information?

If you are one of our Client's Supporters, you can ring the client specific helpline, email the client specific email address or write to the client specific postal address we have setup in support of many of our client's Weekly Lottery and/or Raffle products. Contact details can be found: (i) on our clients' websites; (ii) within the welcome letter you should have received if you joined one of our client's Weekly Lotteries; (iii) within the thank you letter you may have received if you made a donation; or (iv) within the email you should have received if you joined one of our client's Weekly Lotteries, bought Raffle tickets or donated via one of our Lottery/Donation Microsites;

You can also write to us at: StarVale Management & Technologies Ltd, FAO: The Compliance Manager, The Tannery, Chapel Lane, Galgate, Lancaster, Lancashire LA2 0PR

9 How do we protect your personal data?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed.

In addition, we limit access to your personal data to: (i) the data controller; (ii) those StarVale employees who have a business need to access your personal data and are subject to a duty of confidence; (iii) those third party agents who have a business need to access your personal data and who have been approved to do so by the data controller; (iv) regulators who we have a legal obligation to provide it to.

10 How long will we keep your personal data?

We will keep your personal data for as long as our legal or client obligations require, but typically for as long as we act as External Lottery Manager on behalf of each of our individual clients.

11 Transferring your personal data outside of Europe

StarVale will never transfer your data to countries outside of the European Union.

12 Reviewing this policy

This policy was last updated on 25th May 2018 and will be reviewed as and when current data protection legislation changes; or otherwise on an annual basis in January each year, when we are subject to an independent security audit that is completed by an independent, third party, ISO 27001 approved auditor.

Document Changes and Version Control;

| Date | Version | Change Detail | By |
|-------------|----------------|--|-----------|
| 2018 | V1 | Publication of Privacy Policy. | JB |
| 21/06/18 | V2 | Review and Publication of Privacy Policy following GDPR and DPA 2018 | JB |
| 11/01/21 | V2 | Annual Reviews with Header and Footer updates | SF |