



Privacy Policy V1 Nov 2024

Introduction

We like to make things easy for our customers, so we have written this policy to explain how and why we use your personal data. Where we decide the purpose, or means, for which personal data is processed, we are the 'Data Controller'. We will comply with all applicable data protection laws, including the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR").

This policy explains the following:

What personal information we collect.
How we use that information.
Who we may disclose that information to; and
Your rights.

Our services contain hyperlinks to websites operated by third parties. These third-party websites will have their own privacy policies, and we recommend you review them. They will govern the use of personal information you submit, or which are collected by cookies whilst visiting those websites. We do not accept any responsibility or liability for them and your use of them is at your own risk.

We will update it from time to time and if we make changes that could affect you, we'll let you know beforehand.

Who are we?

These online services are provided by Essex Leisure Limited (trading as SX) a registered company in the United Kingdom. ("SX", "we", "us" or "our" in this policy). We are registered as a Data Controller with the Information Commissioners Office (ICO) and details are published on a public register on the ICO website at <https://ico.org.uk/>

Our Data Protection Officer

If you have any concerns about how your personal data is used or to exercise any of your rights, including submitting a subject access request, please contact us on the following:

Email: Guy.Weller@sxleisure.co.uk

Post: Data Protection Officer, SX Leisure, Essex House, 21 Eastway's, Witham, CM8 3YQ

Collecting Information about you

We collect and process the following information which may include your personal data.

Information you provide to us



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We collect information about you whenever you use our services. Some of it is provided directly, when you register with us, or make a complaint.

This information may well include your name, username, age, date of birth, gender, address, image, telephone number, e-mail address, password and other identity or source of funds information.

Information we collect from your device

We collect information from your device relating to the web address that you arrive from or click through to, pages viewed, page response times, download errors, the length of time you spend on certain pages, page interaction information such as scrolling, clicks, wagers, and methods used to browse away from our pages.

We use technology to determine your current location, to verify your identity, ensure that your location is within our permitted territories and to display relevant advertisements and promotions to you.

This information includes your IP and MAC address, hardware model, operating system and version, browser type, time-zone and browser plug-in details.

How and why, we use your personal information to provide the Services to You

As applicable, we will use information about you for delivering our service, including responding to your enquiries; to contact you about matters requiring your attention and providing you with a responsible gaming environment.

Marketing

Direct Marketing: We might send you marketing e-mails about products or services which are similar to or related to those available via our online services, or contact you by phone, SMS or post. We do this in our legitimate Interest of marketing our business and we only do this in accordance with the laws relating to marketing directly to individuals.

Group Marketing: With your consent, we may use various forms of marketing to provide you with promotional materials.

Targeted Marketing: With your consent, we may use the information we collect about you to serve you targeted advertisements via our own channels (i.e. our websites, apps, display advertising) including across multiple devices or browsers. We do this to provide you with more relevant advertising content.

Some of the third-party channels we use for these purposes may include:

Facebook
Twitter
Instagram



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LinkedIn
Snapchat
Google Bing
App Store
Affiliate networks and partner channels
Wi-Fi, Bluetooth and near field communication

To Understand how our Services are used

We process information to understand how visitors use our website and to compile statistical reports regarding that activity. This processing is necessary for us to pursue our legitimate interests of improving our services and providing a better and more personalised experience to our users.

We sometimes use third party analytics providers who may include:

Adobe
Tealium
Optimisely
Optimove
Monetate
DoubleClick
Google Services
Decibel Insights

Use of Special Category data

On occasion you may provide us directly or indirectly, with information about your physical or mental health or situation and talk to us about problems with gambling. We recognise that this is sensitive information and will only use it to provide you with the support you have asked for or to signpost you to appropriate sources of help.

You may indirectly provide us with other sensitive information about yourself such as nationality or ethnicity through the identity verification process. We will only ask for this information where we are required to do so to meet a legal or regulatory requirement and will not use it for any other purpose without your permission.

Your consent preferences

From time to time, you will be asked if you would like to consent to your information being used for specific purposes, including marketing. Please note that we will continue to send you information about other service messages even if you do not provide consent for marketing.

Sharing your information



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We share your Information with third parties only in the ways that are described in this privacy policy.

We keep your information confidential, but may disclose it to our personnel, other companies within the Shipleys, suppliers, or subcontractors insofar as it is reasonably necessary for the purposes set out in this privacy policy. We carry out checks to ensure that the companies we work with will provide the same level of safeguards to protect your data as we do, and we put contractual measures in place to reinforce those obligations.

In addition to the third parties already listed in this policy, examples of the types of third parties we work with are:

IT companies who support our IT systems;

Direct Marketing companies that help us deliver our service to you;

Data insight companies to help us ensure your details are correct and up to date; and

Third party sites such as Google and Facebook which might advertise our services.

We may disclose your information where we are required to do so by law. This may include to the police, or other law enforcement agencies, the courts, statutory authorities. Where necessary, we will share personal data with our regulators or external legal advisors in order to protect or defend our rights and interests.

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, you will be notified via email, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

We will ensure that we only share your data legally and with due regard to your privacy. Any request from law enforcement or other statutory bodies will only be fulfilled with a warrant, court order or other legally valid proof of authority.

Your Rights

You have the following rights over the way we process personal data relating to you. We aim to respond without undue delay, and within one month at the latest. To make a request, please see our contact details at section 1.

Ask for a copy of your data and have inaccuracies corrected

You have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. We will use reasonable efforts to the extent required by law to supply, correct personal information held about you on our files (and with any third parties to whom it has been disclosed to). If your request is unusually complex and likely to take longer than a month, we will let you know as soon as we can and tell you how long we think it will take.

There are occasional situations where data protection law requires or permits us to withhold some information (such as where it would involve disclosing information about someone



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else or information that is commercially sensitive) or permits us to charge for the information requested. If these circumstances apply, we will explain this to you.

Object to us processing your data or ask for your data to be deleted

You can ask us to restrict, stop processing, or to delete your personal data if:

You consented to SX processing the personal data and have withdrawn that consent. Shipleys no longer needs to process that personal data for the reason it was collected. Shipleys is processing that personal data because it is in the public interest or to pursue a legitimate interest of Shipleys Companies, you don't agree with that processing, and there is no overriding legitimate interest for us to continue processing it.

The personal data was unlawfully processed; or

You need the personal data to be deleted in order to comply with a legal obligation.

If we are unable to carry out your request, we will explain it to you.

If you are unhappy with our decision on this, you have the right to complain to the ICO.

Obtain a machine-readable copy of your data, which you can use with another service provider

If we are processing data to perform our obligations to you, or because you consented, if that processing is carried out by automated means, we will help you to move, copy or transfer your personal data to other IT systems.

If you request, SX will supply you with the relevant personal data in CSV format. Where it is technically feasible, you can ask us to send this information directly to another IT system provider if you prefer.

[Make a complaint to a Supervisory Authority](#)

If you do not agree with the way we have processed your data or responded to your concerns, an alternative is to submit a complaint to a Data Protection Supervisory Authority, which for UK customers is the Information Commissioner's Office.

[How long do we keep your information](#)

We typically retain your data for seven years from when our relationship ends to satisfy our regulatory obligations, including anti-money laundering regulations. If we hold any information relating to problem gambling matters, we may hold this for a longer period, as we reasonably deem necessary.

[Use of our service by children](#)

We do not knowingly solicit data from or market to children under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, they should contact us, and we will delete such information from our files within a reasonable time.



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How do we keep your data safe

We will take all reasonable technical and organisational precautions to prevent the loss or misuse of your personal information. Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

Changes to this policy

We will notify you of any significant changes to this policy by email, notice on the site or by account message.