



## Public Figures Privacy Statement

This privacy statement details how we use the personal data of public figures, including athletes, sportspeople and other people of public prominence.

**Last updated 8<sup>th</sup> November 2024**

## Contents

1. OVERVIEW .....	2
1.1. About this Statement .....	2
1.2. Changes to the Statement.....	3
1.3. About the Flutter Group .....	3
1.4. Controller details.....	4
1.5. Contact details, including DPO.....	5
2. PERSONAL DATA WE USE AND HOW WE COLLECT IT .....	6
2.1. Personal data we use.....	7
2.2. How we collect your personal data .....	9
3. HOW AND WHY WE USE YOUR PERSONAL DATA .....	10
3.1. Purpose and legal basis for using your personal data .....	11
3.2. Who we share your personal data with .....	16
3.3. Group sharing .....	16
3.4. International transfers .....	17
3.5. Keeping your personal data secure .....	17
3.6. How long we keep your personal data for .....	17
4. YOUR DATA SUBJECT RIGHTS.....	19
4.1. Access .....	19
4.2. Rectification.....	20
4.3. Erasure, or ‘Right to be Forgotten’ .....	20
4.4. Restriction.....	21
4.5. Portability .....	21
4.6. Object.....	22
4.7. Rights relating to automated-decision-making and profiling.....	22
4.8. Rights to complain to the regulator .....	22



## 1. OVERVIEW

Welcome to the Flutter Entertainment plc (“**Flutter**”) privacy statement for Public Figures.

### 1.1. About this Statement

This privacy statement (“**Statement**”) applies to personal data belonging to individuals of public prominence, upon which Flutter brands base betting markets. Individuals of public prominence may include athletes, professional or amateur sportspeople, politicians, actors, e-sports or computer game players, celebrities, or people of other public prominence or fame. These individuals are hereinafter known as “**Public Figures**”.

***This Statement only provides information about our use of Public Figures’ personal data – it does not relate to customers or our use of customer personal data. If you are a customer of one of the Flutter brands, you will find information about the brand’s use of your personal data within that brand’s privacy notice located at the bottom of the brand’s website.***

At Flutter, we are committed to protecting your personal data and respecting your privacy, and we never lose sight of the fact that your personal data is **YOUR** personal data. We’ll be clear and open with you about how and why we use your personal data, and where you have choices or rights, we’ll explain them to you and respect your wishes. We will always keep your personal data safe using the highest standards of security.

This Statement is designed for you to easily access the information you need, when you need it. It’s also written in plain English, to make it clear, simple, and easy to read. It is split into four parts as follows:

- In this first **OVERVIEW** section of the Statement, we provide information about this Statement, about the Flutter Group, and about the data controllers, including their respective data protection and privacy contact details.
- The **PERSONAL DATA WE USE AND HOW WE COLLECT IT** section explains the different types of personal data that we use and the sources from where we collect that data.
- The **HOW AND WHY WE USE YOUR PERSONAL DATA** section explains what we use your personal data for. It provides information on the purpose and legal basis for using your personal data, on who we share your personal data with, on sharing within the

Flutter Group, on international transfers of personal data, on how we keep your personal data secure, and on how long we keep your personal data for.

- The [YOUR DATA SUBJECT RIGHTS](#) section provides you with information on the rights you have in relation to your personal data and how to exercise those rights.

We hope that you find this Statement helpful but if you have any concerns or questions please feel free to share feedback via the contact methods listed in the [Contact details, including DPO](#) section below.

## 1.2. Changes to the Statement

It is important to check back often for updates to this Statement. If we make material and important changes, we will let you know by placing a notice on our websites or through another appropriate channel.

## 1.3. About the Flutter Group

Flutter is the parent company of the world's biggest and most popular sports betting and iGaming brands. Any reference to "**Group**" within this Statement includes Flutter and all or any of its direct or indirect subsidiary undertakings, joint venture partners, and their related companies wherever located in the world as may exist from time to time. The Flutter Group is home to brands including, but not limited to Paddy Power, Betfair, Sky Betting & Gaming, PokerStars, FanDuel, Sportsbet, Sisal and more. A full list can be found in the [Controller details](#) section below.

The Flutter Group is split into four regional divisions, namely UK & Ireland ("UK&I"), US, Australia and International, with each one housing a number of the abovementioned Flutter Group brands.

More information about the Flutter Group and Flutter brands can be found at <https://www.flutter.com>

## 1.4. Controller details

The data controller of your personal data will be the Flutter brand that is using the personal data to create and provide betting markets to the brand's customers based on that personal data. The data controller details for the Flutter brands are set out below. References in this document to "us", "our", or "we" are references to any of the data controllers.

Brand	Data Controller information
<b>Flutter</b>	Flutter Entertainment plc, which is a company registered in Ireland with (registration number 16956) with offices located at Belfield Office Park, Beech Hill Road, Clonskeagh, Dublin 4, Ireland.
<b>Paddy Power</b>	Power Leisure Bookmakers Limited, which is a company registered in Ireland with (registration number 906103) with offices located at Belfield Office Park, Beech Hill Road, Clonskeagh, Dublin 4, Ireland, as the main establishment of the data controller making decisions on the purpose and means of processing covered by this Statement, and the other licenced legal entities with whom our customers in the UK or Ireland have a relationship, as set out in the " <a href="#">Who We Are</a> " section of Paddy Power's website. For more company information in relation to licensed entities and regulatory matters, please refer to the Paddy Power <a href="#">Regulatory Information</a> page.
<b>Betfair UKI</b>	Power Leisure Bookmakers Limited, which is a company registered in Ireland with (registration number 906103) with offices located at Power Tower Blocks, 1-3, Belfield Office Park, Beech Hill Road, Clonskeagh, Dublin, Ireland, as the main establishment of the data controller making decisions on the purpose and means of processing covered by this Statement, and the other licenced legal entities with whom our customers in the UK or Ireland have a relationship, as set out in the " <a href="#">Who We Are</a> " section of Betfair's website. For more company information in relation to licensed entities and regulatory matters, please refer to the Betfair <a href="#">Regulatory Information</a> page.
<b>Sky Betting &amp; Gaming</b>	For the Sky Bet, Sky Vegas, Sky Casino, Sky Bingo and Sky Poker brands, products or services: Bonne Terre Limited, whose trading names include Sky Betting and Gaming, Sky Bet, Sky Vegas, Sky Casino, Sky Bingo and Sky Poker. Bonne Terre Limited is a company registered in Alderney (Guernsey registered company number 1110) with offices located at: 5B, First Floor, St Anne's House, Victoria Street, Alderney, GY9 3UF. Bonne Terre Limited is licensed and regulated by the Gambling Commission of Great Britain (licence number 038718) in respect of customers located in the United Kingdom (" <b>UK</b> ") and Isle of Man, and the Alderney Gambling Control Commission (licence

	<p>number: 04C1C2) in respect of customers located in the Republic of Ireland, Gibraltar and the Channel Islands.</p> <p>For the Sky Games, Sky Sports Fantasy Football, Sky Sports Super6, ITV7 (non-broadcast competitions), Timeform and Sporting Life brands, products or services: Hestview Limited, trading as Sky Games, of 4 Wellington Place, Leeds, West Yorkshire, LS1 4AP.</p>
<b>Tombola</b>	<p>Tombola International plc is a company registered at, Floor 4, 55 Line Wall Road, Gibraltar, GX11 1AA and COMPANY registration number 105556 with offices based in Gibraltar and the UK. tombola International Plc (TIP) is licensed and regulated by the Gambling Commission of the United Kingdom (licence numbers 038613-R-319397-012 and 038613-R-319397-012) in respect of customers located in the UK.</p>
<b>Sporting Life</b>	<p>Hestview Limited, trading as Sky Games, of 4 Wellington Place, Leeds, West Yorkshire, LS1 4AP.</p>
<b>Timeform</b>	<p>Hestview Limited, trading as Sky Games, of 4 Wellington Place, Leeds, West Yorkshire, LS1 4AP.</p>

### 1.5. Contact details, including DPO

If you have any concerns about how we handle your personal data, you can contact the data protection and privacy teams, and, where applicable, the Data Protection Officer (DPO), of each respective Group brands using the contact details set out below. If you wish to exercise your data protection rights, please see the [YOUR DATA SUBJECT RIGHTS](#) section.

Brand	Contact Details
<b>Flutter</b>	<a href="mailto:dp@flutter.com">dp@flutter.com</a>
<b>Paddy Power</b>	<a href="mailto:dataprotection@paddypowerbetfair.com">dataprotection@paddypowerbetfair.com</a>
<b>Betfair UKI</b>	<a href="mailto:dataprotection@paddypowerbetfair.com">dataprotection@paddypowerbetfair.com</a>
<b>Sky Betting &amp; Gaming</b>	<a href="mailto:dp@flutteruki.com">dp@flutteruki.com</a>
<b>Tombola</b>	<a href="mailto:support@tombola.co.uk">support@tombola.co.uk</a>
<b>Sporting Life</b>	<a href="mailto:dp@flutteruki.com">dp@flutteruki.com</a>
<b>Timeform</b>	<a href="mailto:dp@flutteruki.com">dp@flutteruki.com</a>



## 2. PERSONAL DATA WE USE AND HOW WE COLLECT IT

In order to provide Public Figure based betting markets, and information about those markets to customers, we collect and use information that relates to your participation in games, competitions, events, matches, or other occasions that may be of interest to our customers or the general public (“**Public Events**”). Our Public Figure based betting markets may relate to any type of such Public Event, from sports betting markets in relation to a particular soccer match, to novelty or special betting markets on things like political elections and reality TV shows.

The personal data we use in this regard is limited to the data that enables us to price the betting markets, provide those prices to customers and then settle the markets once they close. This data will differ, depending on the Public Event you are participating in, but it will typically only identify data (e.g. name, age, nationality) and market pricing information (i.e. betting odds). Where we are modelling the market prices ourselves via our in-house trading teams, we may use additional information about your Public Event participation to enable us to generate fair prices for our customers, such as physical attribute information (e.g. height, weight, preferred kicking foot) and statistical information about your past performance in Public Events (e.g. appearances, goals, points, club information, etc.).

Aside from the data required to run our betting markets, there are a few other types of Public Figures’ personal data that we may use from time to time. This includes using some additional identity information (e.g. imagery) for promotional campaigns (subject to agreement with that Public Figure), or using a Public Figure’s statistical and performance information to produce journalistic content (to which journalistic exemptions per data protection laws shall apply).

In rare circumstances, the Public Figure personal data may contain special category data or criminal data. This occurs, respectively, where information about a Public Figure’s sporting injury is considered health data, or where criminal data about a Public Figure is processed in connection with a law enforcement, integrity, fraud or other related investigation.

The personal data, which is manifestly made public by you or your representatives through your involvement in Public Events, is collected by us through a number of third party sources, primarily from third party organisations representing your rights or interests, from trusted third party data organisations, or from publicly available online sources.

Below, the [Personal data we use](#) section provides details on the different types of personal data we use, whilst the [How we collect your personal data](#) section explains where we source and collect the data from.

## 2.1. Personal data we use

We use the following types of personal data belonging to Public Figures:



### Identity Information

Information directly related to your identity, such as your name, date of birth, age, gender or nationality.



### Physical Attribute Information

Information relating to your height, weight, or other physical attributes that may be relevant to your participation in an Event, such as preferred kicking foot relevant to a football Event, or use of publicly available imagery alongside Markets relating to you or the Event.



### Statistical Information

If you are a sportsperson or athlete, we use information relating to your sporting or athletic activities, including the sporting organisation(s) and/or team(s) you are associated with, competitions and events you participate in, and statistical information about your performance in sporting events (such as event results, position, distance travelled, appearances, points or goals scored, offences committed, etc.).

If you are a non-sporting Public Figure, we use information relating to your participation in Public Events, including the Public Events you participate in, and statistical information about your performance in past Public Events.



### Media Information

Information made public online or through other media (e.g. television, newspapers, magazines, radio, etc.) by you, your representatives, the organisation(s) you are associated with, journalists, websites, social media accounts or otherwise, that may be used for our Market Pricing. For example, a sports club confirming a transfer bid has been made for a player may be used for Market Pricing on a Market based on the transfers of that club or player. Another example would be a politician's social media posts may be used for Market Pricing on a Market based on election results.





### Market Price Modelling Information

For certain Public Figure markets, we analyse and model the information we hold to enable us to offer and settle Public Figure-related Markets to our customers. The analysis and modelling is based on various different data points, which differ depending on what Market it relates to. The data will typically be based on Statistical Information, but may include some Identity Information such as age or some Media Information such as team selection for an upcoming match.



### Market Pricing Information

Information relating to the betting market prices offered to our customers on betting markets about you. For example, a betting market on the winner of a race featuring you as a competitor in the race and where specific odds are offered to customers on you winning that race.



### Special Category Data

In the unlikely event that data used for Market Pricing about injuries sustained during Public Events could amount to health data, such data may be used for Market Pricing on the basis that it has already been made public by that Public Figure through their participation in the Public Event, or that the Public Figure has provided explicit consent to a rights association for such data to be used by third parties like us.



### Criminal Data

In rare occasions, and as part of our efforts to preserve integrity in sport, we may collect criminal offence data as part of an investigation into potential breaches of sporting integrity rules or related laws. We will only use this data where permitted by law to do so, and where necessary for the purpose of the administration of justice, prevention or detection of an unlawful act, or the protection of the integrity of a sport or sporting event.



## 2.2. How we collect your personal data

The Public Figure personal data we use is publicly available, albeit it collected from a number of different sources, including:

- Directly from third parties acting on your behalf, such as IMG. For example, where you have provided consent to, or have an agreement with, a data rights association to share your personal data with organisations like us.
- Publicly available sources, such as online search engine results, articles, social media networks, news channels and more.
- Trusted third party data partners, such as Betradar, BetGenius, and Sport Radar. These third parties use your personal data for their own purposes and act as data controllers, independent of our use of your personal data. We only become the data controller of your personal data once we receive it from the third party. For information on how these third parties use your personal data, please refer to each third party's respective privacy statements and information.
- Our in-house trading teams, who use information gathered from some or all of the above sources to generate Market Pricing Information which can then be shared and used by other Flutter brands.
- Sporting, regulatory or law enforcement bodies, or courts of law, as part of investigations into breaches of the integrity of sport.



### 3. HOW AND WHY WE USE YOUR PERSONAL DATA

We only use your personal data where necessary and where it is fair and lawful to do so. We collect and use your personal data for a limited number of specific and legitimate reasons, primarily because it is necessary for our legitimate interests to provide betting markets to our customers, but we also need to use the personal data for some other reasons.

Below, in the [Purpose and legal basis for using your personal data](#) section, we explain how and why we need to use your personal data, providing you with information on our different uses of your personal data. This includes detailed information on the reasons for using your data, the types of personal data we use and also information on the legal basis for using your data, which may include using your personal data:

- Where it is necessary for our own legitimate interests (“Legitimate Interests”) to:
  - Provide betting markets to our customers. The use of data to provide betting markets is typically limited to sharing the names and market prices of the Public Figures upon whom the customers can bet, but it can also include in-house pricing of those markets, as well as the provision of content about the markets to help with their market selections;
  - Protect and defend our rights and interests;
  - Restructuring our business.
- To meet our legal or regulatory obligations (“Legal and Regulatory Obligations”), such as to fulfil a court order, to meet our taxation, company or data protection law or our licencing obligations.
- To enter into or perform an agreement or contract between us and you, or an authorised third party acting on your behalf (“Performance of a Contract”). This only occurs in limited circumstances, such as where we have a commercial contract to do work with you on promotional, ambassadorial or marketing relating activities.
- Where you have provided us with consent to do so (“Consent”). This only occurs in rare circumstances, but it may arise where you, or an authorised third party acting on your behalf, has provided us with consent to use your personal data in a particular way, such as to feature you in an advertisement.
- To perform tasks in the interests of the general public (“Public interests”), such as safeguarding our customers and the public from gambling related harms. The use of your personal data in this regard will be limited only to your inclusion in a betting market as may be relevant to a customer’s activity.

- To protect a customer’s vital interests (“Vital interests”). Similar to Public Interests, any of your personal data used in this regard will be limited only to your inclusion in a betting market as may be relevant to a customer’s activity.

**Note on: Journalistic use of personal data**

We also use personal data for journalistic purposes, such as the production of articles, podcasts, news, or other online content about Events and/or Public Figures. The publication of these materials is in line with the general public’s interest in the specific subject matters, such as particular sports or Events, designed to provide the public with information and/or entertainment. As such, the journalistic exemptions contained within applicable data protection law apply to all personal data used for these purposes. These exemptions remove the usual requirements to have a lawful basis for using the personal data, provide privacy information to you, or comply with individual rights that you have in relation to this data. Accordingly, the rest of this Statement does not apply to our use of personal data for journalistic purposes.

**Note on: Legitimate Interests**

Before using your personal data for our Legitimate Interests, we make sure that we take into account any potential impact that such use may have on you to ensure that your interests and fundamental rights and freedoms do not override those interests. In particular, we take account of your reasonable expectations for your personal data to be used in this way, noting that Public Figure personal data used by us has been manifestly made public and, in many cases, has been collected from trusted data licensing companies who work in conjunction with associations and bodies that represent your profession. In other words, we have determined that we have a legitimate need to process your personal data and we are not aware of any reasons that, on balance, mean we should not be doing so. If you have concerns about our processing please refer to the [YOUR DATA SUBJECT RIGHTS](#) section.

### 3.1. Purpose and legal basis for using your personal data

**Providing betting markets to our customers**

Our use of Public Figure personal data as a data controller is typically based on our legitimate interests to create and offer betting markets to our customers, and is typically limited to sharing the names of the Public Figures involved in the market, along with the Market Pricing Information. This enables our customers to view and place bets on the markets.

The Market Pricing Information is collected by the Flutter Group brands either from our in-house trading teams or from trusted, independent third party data partners (see “Market Price Modelling” below for more information). Please note that the third party partners we work with and from whom we collect information about you, act independently of us, typically as data controllers in their own right. As such, each of these third party partners will have their own lawful basis for collecting, using and then sharing your personal data, for example, with us. To find out information about

these organisations' processing of your personal data, including their lawful bases for doing so, please consult their respective privacy and transparency notices and statements.

The use of personal data for Public Figure based betting markets upon which our customers bet, means that the betting market information, and thus your personal data, may be linked to each customer profile who bets on the market. For example, a customer's transaction history may show that they placed a bet on you to be the first goalscorer in a match. However, while this data may be visible as part of our customer records, any personal data of yours that may be visible will typically be limited to your name and the market pricing.



### **Market Price Modelling**

For certain markets, we have in-house trading teams who analyse what we know about your participation in a Public Event, including some or all of the Identity, Physical Attribute, Statistical and Media Information collected, to calculate the Market Pricing Information that can then be used by Flutter Group brands. These in-house trading teams typically sit within Flutter as the Group's parent company, but some sit within specific divisions due to specialised knowledge of certain markets. In all instances, the brand that houses the trading team is considered the data controller of the information used for Market Price Modelling, including the analysis and calculations (i.e. the Market Price Modelling Information), and of the Market Price Information outputs that are shared with other Group brands. Once a brand consumes and uses the Market Price Information, that becomes the data controller of the Market Price Information.

Such Market Price Modelling is not always conducted in-house and for many markets, we obtain Market Price Information from trusted, independent third party data partners. These third parties conduct all Market Price Modelling themselves as data controllers. As such, each of these third party partners will have their own lawful basis for collecting, using and then sharing your personal data, for example, with us. To find out information about these organisations' processing of your personal data, including their lawful bases for doing so, please consult their respective privacy and transparency notices and statements. Similar to our brand's use of Market Price Information, once one of the Flutter Group brands consumes and uses the Market Price Information that is shared by these third parties, the receiving Flutter Group brand becomes the data controller.



### **Market-related Content**

In some circumstances, we may produce and/or provide content to customers and to the general public about particular betting markets that involve Public Figures, providing information on the participants, on the participants' statistics and performance, on the Market Pricing Information and on possible tips, predictions or recommendations according to market experts or to technology-based predictions. This is conducted based on our legitimate interests to provide information to customers and the general public about our betting markets.



## Integrity

We are committed to helping to maintain the integrity of and prevent corruption or circumvention of rules or laws within the sports and other markets for which we offer betting markets to customers.

For these purposes, we routinely monitor activity on our betting markets to identify unusual suspicious activity and betting patterns. Where we identify such activity within a particular betting market, your involvement as a Public Figure within such a market may mean that your personal data is used as part of our integrity processes. This may include sharing the market information with relevant regulatory, law enforcement, or sporting bodies, in connection with

- Policing the integrity or enforcing the rules of a sport or game;
- Prevention and detection of crime;
- Where we consider that there are reasonable grounds, based on our assessment of betting behaviours or information provided to us by a regulatory, law enforcement or sporting body, to suspect that there may have been a breach of rules or laws, or may be a threat to the integrity of a the relevant sport or game.

These bodies may then use the market information, including your personal data as a Public Figure upon whom our customers could place bets as part of that market, to investigate and act on any such breaches in accordance with their procedures.

If you are also a customer involved in the suspected infringement, you can find out more about how we use your customer personal data in this regard within our customer privacy statements.



## Information/Disclosure Requests and Regulatory Submissions

Apart from the functions set out in this Statement, we do not share your personal data with third parties except where we are compelled or permitted by law to do so. These circumstances are rare but may require us to share information in response to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence.

Whenever we share personal data, and whatever the circumstances, we will always do so legally and with due regard to your privacy. If we receive a request from law enforcement or other statutory bodies, we do not disclose personal data without a warrant, court order or other legally valid proof of authority.



## Protecting and defending our rights and interests

We will process your personal data where necessary to protect or defend our rights and interests, defend against legal claims, resolve disputes, respond to what we consider to be incorrect or misleading information provided to a media outlet, or enforce our agreements. For these purposes,

we reserve the right to share personal data with regulators, external legal advisors, debt recovery and tracing agencies, and media outlets, although again these circumstances are rare.



### **Information Security and Loss Prevention**

We are required to use personal data as part of our information security practices. These practices are deployed to protect ours and stakeholders' rights, information, privacy, safety, or property, in accordance with our legal obligations (for example, we are legally obliged under data protection law to secure and protect the personal data of customers, employees and all other individuals whose personal data we use).



### **Restructuring**

If ownership of all or part of our business changes or we undergo a reorganisation or restructure, we will transfer your personal data to the new owner or successor company.



### **Financial Reporting and Analysis**

In accordance with our obligations under company law and other similar regulations we are required to keep a record of transactions in order to maintain proper financial records. These records including information about our Public Figure related betting markets and although the information is typically reported in an aggregated and anonymous way, supporting records, with the names of the betting markets, may be used as part of the activities.



### **Promotion, Public Relations and Advertising**

From time to time, we enter into commercial agreements with Public Figures, or with authorised third parties acting on their behalf, to use the Public Figures' imagery and other information as part of our promotional, ambassadorial or marketing activities. The use of personal data may range from simply using a picture of the Public Figure in an online advertisement, to featuring the Public Figure in a multi faceted advertising campaign across multiple media channels. Each use of personal data will be in accordance with the specific agreement in place, and is necessary for the Performance of a Contract.

In rare circumstances, we may seek consent of certain Public Figures to use their imagery or footage as part of specific advertising or promotional content. This is usually where the Public Figure is not the primary focus or "face" of the content, but instead may be one of many individuals whose imagery or footage is being used.

Purpose	Categories of PD	Legal basis
<b>Offer and settle betting markets</b> To offer and settle Public Figure related betting markets, and provide related information about those markets, to our customers	Identity Information Physical Attribute Information Statistical Information Media Information Market Pricing Information	Legitimate interests
<b>Market Price Modelling</b> Analysis and modelling of collected data to create prices for betting markets	Identity Information Physical Attribute Information Statistical Information Media Information Market Pricing Information	Legitimate interests
<b>Market-related Content</b> Analysis and modelling of collected data to create prices for betting markets	Identity Information Physical Attribute Information Statistical Information Media Information Market Pricing Information	Legitimate interests
<b>Integrity</b> Monitoring and analysing market activity to identify and investigate breaches of the rules of any sport or game, or law, and providing information on request, or on our own initiative, to sports governing bodies, regulatory bodies or law enforcement bodies, where there are reasonable grounds to suspect a breach such as a breach.	Identity Information Market Pricing Information	Legal and Regulatory Obligations
<b>Information/Disclosure Requests and Regulatory Submissions</b> Responding to valid requests from courts, law enforcement agencies, regulatory agencies, auditors, and other public and government authorities, or submitting information to regulatory agencies.	Any personal data held, as required to meet the purpose	Legal and regulatory obligations
<b>Protecting and defending our rights and interest</b> To protect or defend our rights and interests, defend against legal claims, resolve disputes, respond to what we consider to be incorrect or misleading information provided to a media outlet, or enforce our agreements.	Any personal data held, as required to meet the purpose	Legitimate interests Legal and regulatory obligations
<b>Information Security and Loss Prevention</b> Protecting rights, privacy, safety, or property, or those of our stakeholders	Any personal data held	Legal and regulatory obligations
<b>Restructuring</b> Transferring your personal data to the new owner or successor company.	All personal data held	Legitimate interests
<b>Financial Reporting and Analysis</b> Maintaining financial records in accordance with company law.	Market Pricing Information	Legal and regulatory obligations
<b>Promotions, Public Relations and Marketing</b> Use of Public Figure imagery and information as part of our promotion, PR or marketing campaigns.	Identity Information Physical Attribute Information	Performance of a contract Consent



### 3.2. Who we share your personal data with

We may share your personal data with:

- Our customers, where we provide Public Figure based betting markets and information about those markets to them.
- Third party suppliers who undertake various activities on our behalf in supporting our provision of Public Figure betting markets and related services to customers.
- Other companies within the Flutter Group, where our in-house trading teams provide Market Pricing Information to brands within the Group, or where specialist trading and risk teams provide support to other brands within the Group.
- Sports governing bodies, regulatory bodies, or law enforcement bodies involved in policing the integrity of sport or markets upon which our Public Figure betting markets are based;
- General public, where we publish content online about our Public Figure based betting markets.

We may also share your personal data in the following circumstances:

- If our business enters into a joint venture, purchases or is sold to or merged with another business entity, your information may be disclosed or transferred to the target company, or new business partners or owners or their advisors.
- We may use this information if we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation; or to enforce the relevant terms of service and any other agreement; or to protect our rights or the rights of third parties. This includes exchanging information with law enforcement or government bodies or the courts in connection with a criminal investigation, suspected illegal activity, fraud prevention and detection or in legal proceedings.

### 3.3. Group sharing

The [About the Flutter Group](#) section above provides information about Flutter and the Flutter Group.

We have explicitly called out a number of specific situations in this Privacy Statement where the Flutter Group companies may use your information, including where our in-house trading teams provide Market Pricing Information to Flutter Group brands and where one Flutter Group company provides support to other Flutter Group brands in the areas of trading and provision of services to customers, customer operations, crime prevention, and to meet legal and regulatory obligations.

Additionally, we may share personal data with the Flutter Group as part of our group internal reporting and assurance on the operation of our betting markets, in order to facilitate business efficiency and improvements including, but not limited to research across our group, testing of systems and/or suppliers, risk management, the provision of technology, finance or security support, and the development of new products and tools.

We may also in the future share personal data with other members of the Flutter Group for

purposes that are related to and compatible with those set out in this Statement. Finally, where we are required by law or regulation to share personal data to members of the Flutter Group for reasons beyond those set out in this Statement, we will be required to do this.

### **3.4. International transfers**

Some of the third-party providers we use, as well as companies within the Flutter Group, are based in, or carry out their activities in, countries outside of the jurisdiction you are located in. For all international transfers of personal data, they are conducted in accordance with data protection law requirements, which may include putting specific contractual measures and additional technical and organisational measures in place, to ensure your personal data is protected and kept safe. Where necessary.

### **3.5. Keeping your personal data secure**

We recognise that online security and data protection is an area of vital importance for all individuals whose personal data we use, so it is important to us that you have confidence in the security of your personal details. 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 security solutions are very advanced and are governed by a mature framework. Our approach is focused on preventing risks. In order to help us in this regard, we employ pseudonymisation and encryption whenever possible to reduce the impact of any potential incidents.

### **3.6. How long we keep your personal data for**

A key principle of data protection is 'storage limitation', which means that organisations should only hold onto your personal data for as long as is needed.

Accordingly, we have taken steps to ensure that we hold your personal data only as long as we have a valid legal basis or reason to do so, which includes providing betting markets to our customers, managing our customer relationships, meeting our legal and regulatory obligations, resolving disputes and enforcing our agreements.

The length of time for which we keep different types of personal data can vary, depending on why we originally obtained them, the reason we process them and the legal requirements that apply to them. When setting our data retention and deletion timescales we take into account a range of factors including applicable regulations and standards relating to gambling and gaming, anti-money laundering, taxation, payment processing and complaint handling, the need to prevent or detect crime or other misuses of our betting markets, and audit requirements.

To fulfil our requirements, some of your personal data will need to be retained for a period of time after you are featured in a Public Figure based betting market. When we no longer need it to fulfil

the purposes and legal bases set out in this Statement, we delete it securely. Subject to us not having a legal or regulatory requirement or a risk management reason for retaining your information for a longer period, your information will not be kept for longer than 7 years. This allows us to meet our record-keeping obligations in applicable legislation, as well as allowing us to defend ourselves against potential legal claims.

We will take all necessary steps to ensure that the privacy of information is maintained for the period of retention. Where we wish to retain any information for analysis purposes, we first anonymise it to the standards approved by the UK Information Commissioner's Office, (which, as we are based in the UK, is our lead regulator on matters relating to data protection) so that it can no longer be linked back to an individual.



## 4. YOUR DATA SUBJECT RIGHTS

Under data protection law, you have a number of rights, including:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction
- Right of portability
- Right of objection
- Rights relating to automated decision making
- Right to complain to a regulator

These are explained in more detail below.

We want to be clear about what those rights mean in practice and how you can exercise them. Please note that some of these rights only apply in specific circumstances and are qualified in several respects by exemptions in data protection law. We will advise you in our response to your request if we are relying on any such exemptions.

To exercise any of the rights below, you can contact us at the points of contact listed in the Contact section.



### 4.1. Access

You have a right to request a copy of the personal data that we hold about you. Should you wish to make such a request, please submit a request to the relevant point(s) of contact listed in the Contact section.

You will be asked to provide adequate information to identify yourself such as a copy of your photographic identification (ID Card, Driving License or Passport) and any other relevant information that will assist us in fulfilling your request.

We may also ask you to complete and return a form, which is not compulsory but helps us to help you by providing the information you are looking for.

Where you request a copy of your personal data, you will be provided with the personal data we hold, together with a data processing summary. If there is additional information that you believe we hold on you, please let us know and we will gladly investigate further.

We will fulfil requests wherever possible, but there are occasional situations in which the law requires or permits us to withhold some information (such as where it would involve disclosing information about another person or information which is commercially sensitive). If certain information is being withheld, we will explain this to you.

We will provide our response within one month however if your request is unusually complex and likely to take longer than a month, we will inform you of this and how long the request will take to complete.



## 4.2. Rectification

You can request us to rectify and correct any personal data that we are processing about you that you believe is incorrect. We'll update inaccuracies promptly, and within a month if you are requesting a more complex change. If we take the decision not to make a change you have requested, we will explain why and make a note on your account to show that you requested the change. If you disagree with our decision, you have the right to complain to the regulator.



## 4.3. Erasure, or 'Right to be Forgotten'

You have the right to request us to erase your personal data where we have no compelling reasons to continue storing or processing your data, and specifically, where one of the following grounds applies:

- Where the courts or our regulators have found us to be processing it unlawfully;
- Where our original purpose for collecting the data has been completed and we have no other valid legal grounds for continuing to hold it;
- Where you have withdrawn your consent for processing that is based on such consent and asked us to delete the information we previously used for those purposes; or
- Where you have successfully exercised your 'right to object' and there are no overriding legitimate grounds to continue processing.

Please note this right only applies in certain circumstances, it is not a guaranteed or absolute right. Personal data is retained for as long as is reasonably required for our legitimate legal purposes. As is outlined in the How long we keep your personal data for section, generally, your data will be retained for a period of 7 years, so, if you request your data to be erased during this time, we may not be able to uphold your request. If you still wish to exercise your right, you should contact us.

We will respond to your request within a month, and if we uphold your request and erase your data we will also notify any third parties to which the data has been passed, where we are able to do so, and tell you who they are. If we do not uphold your request, we will tell you why. If you disagree, you have the right to complain to the regulator.



#### 4.4. Restriction

You have the right, in certain circumstances, to request that we suspend our processing of your personal data, where one of the following grounds applies:

- The accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- The processing is unlawful, and you oppose the erasure of the personal data and requests the restriction of their use instead;
- We no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; or
- You have objected to processing that we perform on the basis of our legitimate interests, and we are verifying whether our legitimate grounds override yours as a data subject

Where we suspend our processing of your personal data, we will still be permitted to store your personal data, but any other processing of this information will require your consent, subject to certain exemptions.

Where you have obtained the restriction of processing you will be informed by us before the restriction of processing is lifted.

In order to make a request for the restriction of your processing, please contact us. You will receive a response within one month.



#### 4.5. Portability

The right of portability allows you to re-use some of your personal data online by making it available in a commonly-used, machine-readable format that can be passed to and used by other organisations. This right applies to data that you have provided to us with your consent, or which was necessary for the Performance of a Contract.

You may also have the right to have your personal data transferred by us directly to the other organisation if this is technically feasible.

If you wish to exercise this right, you should contact us. Before responding to your request, we will ask you to provide valid proof of identity, and we will provide our response within one month of receiving it.



#### 4.6. Object

You have the right to object to our use of your personal data which is processed on the basis of our legitimate interests. However, we may continue to process your personal data, despite your objection, where there are compelling legitimate grounds to do so or where we need to process your personal data in connection with any legal claims.

To exercise your right to object please contact us. We will respond to you within one month. If we refuse to uphold your request and disagree with our decision on this, you have the right to complain to the regulator.



#### 4.7. Rights relating to automated-decision-making and profiling

You have the right not to be subject to a decision which is based solely on automated processing (without human involvement) where that decision produces a legal effect or has a similarly significant affect on you. With regard to our use of Public Figure personal data, no such processing occurs.



#### 4.8. Rights to complain to the regulator

If you believe your data protection or privacy rights have been infringed, or you disagree with a decision we have made about your data protection or privacy rights, you have the right to complain to the data protection regulator within the jurisdiction where you are located, where the Flutter Group brand processing your data is located, or where the processing of your data is taking place.