

Privacy Policy

Territory: United Kingdom

Revision: B

Updated: 14/09/24



Privacy Policy

This privacy policy notice is provided by Community Draws Limited, 85 Great Portland Street, First Floor, London, W1W 7LT.

1. Introduction

- 1.1. At Community Draws, we respect your privacy and are committed to protecting your personal data. This privacy policy outlines how we collect, process, and protect your data when you use our website, no matter where you access it from. Additionally, it explains your privacy rights and the measures we have in place to safeguard them. For definitions of specific terms, please refer to the Glossary section.
- 1.2. Purpose of this Privacy Policy
 - 1.2.1. This privacy policy aims to inform you about how Community Draws collects and processes your personal data when you interact with our website, such as when you enter a Prize Draw, or Competition, or sign up for our newsletter.
 - 1.2.2. Our website is not intended for children, and we do not knowingly collect data from individuals under the age of 18.
 - 1.2.3. Please read this policy alongside any other relevant privacy notices that we may provide on occasions when collecting or processing personal data. This privacy policy supplements these other notices and is not intended to override them.

2. Controller

- 2.1. Community Draws Limited is the controller responsible for your personal data, collectively referred to as Community Draws, "we," "us," or "our" in this privacy policy.
- 2.2. For questions regarding this privacy policy, including requests to exercise your legal rights, please contact our data privacy manager using the details provided below.

3. Contact Details

- 3.1. If you have any questions about this privacy policy or how we manage your personal data, please reach out to our data privacy manager at the following address: Community Draws Limited, 85 Great Portland Street, First Floor, London, W1W 7LT. You can also email us at: hq@communitydraws.co.uk.
- 3.2. You have the right to file a complaint with the Information Commissioner's Office (ICO), the UK's data protection authority. Visit their website at ico.org.uk, or call 0303 123 1113. However, we encourage you to contact us directly first so we can address your concerns.

4. Third-Party Links

- 4.1. Our website may include links to third-party websites, plugins, and applications. Clicking on these links may enable third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When leaving our website, we advise reading the privacy policy of every visited website.

5. The Data We Collect About You

- 5.1. Personal data, or personal information, refers to any information identifying an individual. It excludes data where identity has been removed (anonymous data).
- 5.2. We may collect, use, store, and transfer various personal data about you, grouped as follows:
 - 5.2.1. **Identity** Data includes first name, last name, username, or similar identifier, title.

Privacy Policy

Territory: United Kingdom

Revision: B

Updated: 14/09/24



- 5.2.2. **Contact** Data includes billing address, delivery address, email address, and telephone numbers.
- 5.2.3. **Device** Data includes device type, operating system, and browser version.

- 5.2.4. **Financial** Data includes payment card details.
- 5.2.5. **Social Media** Data includes information obtained when you engage with our website through social media platforms or allow access to your social media profiles.
- 5.2.6. **Transaction** Data includes payment details and product or service purchase information.
- 5.2.7. **Technical** Data includes IP address, login data, browser type, time zone, location, and device technology.
- 5.2.8. **Profile** Data includes your username, password, purchases, orders, interests, preferences, feedback, and survey responses.
- 5.2.9. **Usage** Data includes information about how you use our website, products, and services.
- 5.2.10. **Marketing and Communications** Data includes your marketing preferences and communication choices.
- 5.2.11. We also collect, use, and share Aggregated Data, which is not considered personal data. If Aggregated Data becomes identifiable when combined with personal data, we treat it as personal data.
- 5.2.12. We do not collect Special Categories of Personal Data or information about criminal convictions and offenses.
- 5.2.13. We may collect the minimum personal data required for your entry into Prize Draws, Competitions, or Promotions.

6. Failure to Provide Personal Data

- 6.1. If providing certain personal data is required by law or necessary for fulfilling a contract, and you fail to provide it when requested, we may not be able to deliver the services or meet the obligations of the contract. In such instances, we will inform you of any consequences related to not providing the required data.

7. How we Collect Your Personal Data

- 7.1. We gather personal data from you through various methods, including
 - 7.1.1. **Direct Interactions:** You provide us with your Identity, Contact, and Financial Data when filling out forms or communicating with us by post, phone, email, or other means.
 - 7.1.2. **Automated Technologies:** As you use our website, we automatically collect Technical Data, such as cookies or similar technologies.
 - 7.1.3. **Third Parties or Publicly Available Sources:** We may also obtain personal data from third-party sources, such as analytics providers, advertising networks, or publicly available information.

8. How We Use Your Personal Data

- 8.1. We only use your personal data when legally permitted. Typically, we do so in the following cases:
 - 8.1.1. To fulfil a contract with you.
 - 8.1.2. Pursuant to legitimate interests, ensuring your interests do not override ours.
 - 8.1.3. When it is in our legitimate interests, ensuring these do not override your rights.
 - 8.1.4. For more information on the legal bases for processing personal data, see the Glossary.
 - 8.1.5. Generally, we do not rely on consent as the basis for processing your personal data, except for direct marketing communications from third parties. You can withdraw consent for marketing at any time.

Privacy Policy

Territory: United Kingdom

Revision: B

Updated: 14/09/24



9. Purposes for Using Your Personal Data

9.1. The table below outlines the ways we plan to use your personal data and the legal bases we rely on:

| Purpose/ Activity | Type of Data | Lawful Basis for Processing *including basis of legitimate interest |
|--|--|---|
| User registration and account setup | (a) Identity (b) Contact | Performance of a contract with you |
| Provision of services, including: (a) Managing payments, fees, and charges (b) Handling any outstanding balances related to entries or events | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract (b) Legitimate interests (recovering due amounts) |
| Relationship management, including: (a) Informing you of updates to terms or policies (b) Requesting feedback or survey participation | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | (a) Performance of a contract (b) Legal obligation (c) Legitimate interests (ensuring accuracy of records and understanding user behaviour) |
| Facilitating participation in events or, Prize Draws, or Competitions, and survey completion | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications | (a) Performance of a contract (b) Legitimate interests (understanding user behaviour and improving our services) |
| Business and website administration (e.g., troubleshooting, system maintenance, and support) | (a) Identity (b) Contact (c) Technical | (a) Legitimate interests (ensuring business continuity, network security, and fraud prevention) (b) Legal obligation |
| Delivering relevant content and advertising, and measuring its effectiveness | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Legitimate interests (analysing user behaviour to develop products/services, grow the business, and inform marketing efforts) |
| Utilizing analytics to improve website performance, products/services, and user experience | (a) Technical (b) Usage | Legitimate interests (improving services, website, and marketing strategy) |
| Making suggestions or recommendations for products/services that may interest you | (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications | Legitimate interests (enhancing products/services and expanding the business) |

10. Publicity: Participation and Winner Naming

10.1. As the winner of a Prize Draw or Competition, you may be invited to partake in publicity activities related to the competition. Your involvement is voluntary, yet we would greatly appreciate your participation. Opting not to participate will not impact your competition engagement or chances of winning in any manner.

Privacy Policy

Territory: United Kingdom

Revision: B

Updated: 14/09/24



- 1.1. However, should you choose not to engage in publicity, declining to be identified as the winner may necessitate the disclosure of your details to the Advertising Standards Authority (ASA). This disclosure is essential for demonstrating the proper administration of the competition and the rightful awarding of the prize. This complies with legal requirements that we are obligated to follow. If you require details on how the ASA utilizes and processes your personal data, please inform us.

2. Marketing Choices

2.1. Promotional Offers from Community Draws

- 2.1.1. We may utilize your Identity, Contact, Technical, Usage, and Profile Data to assess your preferences and interests, enabling us to tailor relevant products, services, and offers to you (referred to as marketing).
- 2.1.2. You will receive marketing communications if you have sought information from us, purchased goods or services, entered a Competition or Prize Draw, and have not opted out of receiving such marketing.

3. Third-Party Marketing

- 3.1. Prior to sharing your personal data with any third party for marketing purposes, we will obtain your explicit opt-in consent.

4. Opting Out

- 4.1. At any time, you can request us or third parties to cease sending you marketing messages by using the opt-out links in any marketing message received or by contacting us directly.
- 4.2. Opting out of marketing messages does not affect personal data provided to us through product/service purchases, warranty registrations, product/service experiences, or other transactions.

5. Cookies

- 5.1. You can configure your browser settings to reject some or all browser cookies or receive alerts when websites attempt to set or access cookies. However, disabling cookies may render certain parts of the website inaccessible or impede proper functionality. For detailed information about our cookie usage, refer to our Terms.

6. Change of Purpose

- 6.1. We will only utilize your personal data for the originally intended purposes unless we reasonably determine the necessity for another compatible reason. If a new purpose arises, we will provide an explanation of the compatibility between the new and original purposes upon request.
- 6.2. In cases of using your personal data for unrelated purposes, we will notify you, explaining the legal basis permitting such use. Please note that processing your personal data may occur without your knowledge or consent, adhering to legal requirements or permissions.

7. Sharing Your Personal Data

7.1. Sharing Data within Community Draws

- 7.1.1. We may share your personal data within Community Draws, including affiliated companies, for legitimate business purposes outlined in this privacy policy.

7.2. Third Parties

- 7.2.1. We may also share your personal data with third parties for specific purposes, such as:
- 7.2.2. Service providers assisting with IT and system administration.

Privacy Policy

Territory: United Kingdom

Revision: B

Updated: 14/09/24



7.2.3. Payment processors handling financial transactions.

7.2.4. Analytics and search engine providers to improve our website's performance.

7.2.5. Third parties involved in Prize Draws, Competitions, promotions, or surveys.

7.2.6. These third parties will process your personal data as instructed and are obligated to implement appropriate security measures.

7.3. International Transfers

7.3.1. When transferring personal data internationally, we ensure adequate safeguards are in place to protect your data's security and confidentiality.

8. Data Security

8.1. We implement security measures to prevent your personal data from being accidentally lost, accessed, altered, or disclosed without authorization. Access to your personal data is restricted to those who need it for legitimate purposes.

9. Data Retention

9.1. We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting requirements.

10. Your Legal Rights

10.1. You have rights regarding your personal data, including:

10.1.1. The right to access your data.

10.1.2. The right to rectify inaccurate data.

10.1.3. The right to erase your data.

10.1.4. The right to restrict processing.

10.1.5. The right to data portability.

10.1.6. The right to object to processing.

10.1.7. Rights related to automated decision-making and profiling.

10.1.8. To exercise these rights, please contact our data privacy manager.

11. Opting Out of Marketing Communications

11.1. You can opt out of receiving marketing communications by following the opt-out links in our emails or contacting us. Opting out does not apply to essential communications, such as transactional or service-related messages.

12. Cookies

12.1. Our website uses cookies to enhance your browsing experience. For detailed information, refer to our Cookie Policy.

13. Contact Us

13.1. For questions about this privacy policy or to exercise your legal rights, contact our data privacy manager at: hq@communitydraws.co.uk, or the postal address provided.

Privacy Policy

Territory: United Kingdom

Revision: B

Updated: 14/09/24



14. Glossary

14.1. Find definitions for terms used in this privacy policy.

15. Changes to the Privacy Policy

15.1. We regularly review our privacy policy. Notify us of any changes to your personal data.

16. Third-Party Links

16.1. Our website may contain links to third-party websites. We are not responsible for their privacy policies. Review each website's privacy policy when leaving our site.

17. Your Consent

17.1. By using our website, you consent to our privacy policy.

18. Governing Law and Jurisdiction

18.1. This privacy policy is governed by the laws of England and Wales (or Scotland or Northern Ireland, as applicable). Any disputes arising from or relating to this privacy policy will be exclusively handled by the courts of England and Wales (or Scotland or Northern Ireland, as applicable)

Glossary

Personal Data

Any information relating to an identified or identifiable individual. This can include names, addresses, emails, and other identifying details.

Data Controller

The entity that determines the purposes and means of processing personal data. In this case, Community Draws Limited acts as the data controller.

Data Processor

An entity that processes personal data on behalf of the data controller, such as third-party service providers.

Data Subject

The individual whose personal data is collected, stored, or processed by a data controller or processor.

Consent

Freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of their personal data.

Cookies

Small pieces of data stored on your device when visiting websites, used to remember information about your browsing habits.

Privacy Policy

Territory: United Kingdom

Revision: B

Updated: 14/09/24



Legitimate Interest

A lawful basis for processing personal data where processing is necessary for the purposes of legitimate interests pursued by the data controller, provided those interests are not overridden by the data subject's rights.

Anonymized Data

Information that does not identify an individual and cannot reasonably be used to identify someone, as identifying details have been removed.

Aggregated Data

Data that has been compiled from multiple sources but is not personally identifiable on its own.