

CAPTAIN SPORT

Privacy Policy

Crownville Ltd's "Captain Sport" Service (B2C)

CONFIDENTIAL

Table of Contents

1	Introduction	1
1.1	Scope	1
1.2	Responsibilities	1
1.2.1	Document Owner and Approval	1
1.3	Distribution.....	1
2	Usage Requirements	2
2.1	Availability and Prominence	2
3	Privacy Policy	3

1 Introduction

1.1 Scope

This document contains the Privacy Policy (a.k.a. Privacy Notice or Privacy Statement) that applies to Crownville Ltd ("**Captain Sport**") that is provided directly to users.

The scope of this document is constrained to the rationale, usage and contents of the Privacy Policy that relates to the Crownville Ltd and the Privacy Policy itself will be published on the Captain Sport website at www.captainsport.co.uk and referred to within user communications.

The Privacy Policy must comply with the requirements of both the UK Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) ("**GDPR**").

1.2 Responsibilities

1.2.1 Document Owner and Approval

The Data Manager is the owner of this document and is responsible for ensuring that this policy is reviewed in line with the review requirements of the GDPR.

1.3 Distribution

Contact	Title	Email

2 Usage Requirements

2.1 Availability and Prominence

To ensure the availability of the Privacy Policy it will be published on the Captain Sport corporate website at www.captainsport.co.uk.

2.2 Crownville Ltd Service Landing Page

The Crownville Ltd landing page is the first Crownville Ltd website page that a user will see when they are referred to the Captain Sport service by a Merchant. This landing page allows the user to:-

- a) Find out more information about Crownville Ltd's tipping service "Captain Sport"
- b) Access numbers in order to contact our tipping service
- c) Provides a link to Crownville Ltd Privacy Policy (which refers to the Terms where applicable).

3 Privacy Policy

Version 1.0, Last updated 17th December 2019

1 Introduction

- 1.1 This Privacy Policy (together with our terms of use and any other documents referred to in it) explains what we do with your personal data.
- 1.2 It describes how we collect, use and process personal data, and how, in doing so, we comply with our legal obligations.
- 1.3 We respect your privacy and are committed to protecting it through our compliance with applicable privacy and data protection laws and regulations. Please read this privacy policy carefully to understand our policies and practices regarding your personal data and how we treat it. By using the Captain Sport Service, you are accepting the practices described in this privacy policy.
- 1.4 If you do not want your information to be processed as set out in this privacy policy, please **do not** use our tipster service.
- 1.5 It is important to note that we may amend this Privacy Policy from time to time. We review our Privacy Policy on an annual basis, sooner if changes to regulation require or if we change the way we process personal information. We will post any updates to this Privacy Policy on our website at www.captainsport.com so please visit this page if you would like to stay up to date.
- 1.6 If you have any questions about our privacy practices, please refer to the contact details at the end of this privacy policy.

[Who Are We?]

- 1.7 The Crownville Ltd Service ("Captain Sport") is owned and operated by Crownville Ltd, a company registered in England and Wales with Company No 04248856 ("Crownville Ltd", "we", "us" or "our"). Our registered office is at 17 Bourne Court, Southend Road, Woodford Green, IG8 8HD
- 1.8 For the purposes of the UK Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"), in respect of Crownville Ltd's Captain Sport service, we are the data controller. We are responsible for the processing of any personal data you provide to us whilst using our services.

2 When This Privacy Policy Applies

- 2.1 This Privacy Policy applies to personal information that we collect whilst you are using the Crownville Ltd and in any email and other communication between you and us.
- 2.2 It does not apply to information collected by any other website or web-based service operated by us (or our group companies), any website operated by a third party including those operated by the merchant that referred you to the Crownville Ltd or any third party application or content (including advertising) that may link to or be accessible from the Captain Sport website.
- 2.3 Please check the privacy policies of any external site before submitting any personal data to them, as we cannot accept any responsibility or liability in relation to them.

3 Why does Crownville Ltd Limited need to collect and store personal data?

- 3.1 We collect information in order to provide a tipster service to consumers over the phone.

4 Personal Data we collect and how we collect it

4.1 In order for us to provide our tipster services to you we need to collect limited personal data from you for identification purposes. In any event, we are committed to ensuring that the information we collect, and use is kept to a minimum, is appropriate for this purpose and does not constitute an invasion of your privacy. Crownville Ltd does not collect or process sensitive personal data.

4.2 Data we collect directly from you via the telecommunications systems when you use our service:

Personal Data Type	Source
Mobile/Landline Phone Number	You via the telecommunications systems when you use our service

4.3 Data collected automatically

4.3.1 When you access our web-based services, we may also receive information automatically which relates to your computer, mobile device and internet connection, whether you decide to use our services or not. This includes your internet protocol address ("IP address"), your country of location, operating system, browser and platform type and access times. These are not actively utilised by the service and are only present in log file for technical operations and maintenance purposes. These log files are automatically deleted after 3 months.

4.3.2 Our website uses cookies which are small files of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also helps us to improve our website. We use analytical cookies which enable us to recognise and count the number of visitors and to see how visitors move around our website. This helps us to improve the way our website works.

We currently use the following types of cookies.

Cookie	Purpose	Type
PHP Session Cookie	Allows a user to be recognised within a website visit so that changes or data selection is remembered from page to page.	Session Cookie
Google Analytics	We use Google Analytics cookies which allows Google Inc. to collect information about how visitors use our site. We then use this information to help us improve our site. The Google privacy policy is located at: https://www.google.co.uk/policies/privacy You can find out how to opt out of Google Analytics by visiting https://tools.google.com/dlpage/gaoptout	Persistent Cookie Various Durations (max 2 Years)

4.3.3 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

4.3.4 Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org.

5 **Consent**

5.1 Crownville Ltd does not collect or process sensitive personal data.

6 **Will Crownville Ltd share my personal data with anyone else?**

6.1 We may disclose your personal data if we are required to do so by law, any applicable regulation or to protect the rights, property, or safety of ourselves or others.

6.2 Crownville Ltd will not pass on your personal data to any other third parties. We do not pass the personal data you provide to us.

7 **How will Crownville Ltd use the personal data it collects about me?**

7.1 Crownville Ltd will process (collect, store and use) the information you provide in a manner compatible with the UK Data Protection Act 2018 and the GDPR. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Crownville Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

8 **How long will Crownville Ltd keep the personal data it collects about me?**

8.1 Crownville Ltd will process personal data only for the time required to complete the tipster process and once this is complete we will store the personal data for a period of two years in order to provide customer service, maintain an audit trail and comply with our legal and regulatory requirements.

9 **Under what circumstances will Crownville Ltd contact me?**

9.1 Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. We will not normally contact you once our tipster service is complete. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

10 **Your Rights as a Data Subject**

10.1 At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our systems.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.

- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that VeriMe Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

10.2 If you would like to exercise any of these rights, details of how to contact our Data Manager can be found at the end of this policy. In order to assist you with exercising these rights we will first need to confirm your identity.

11 How to Complain

11.1 Crownville Ltd takes complaints very seriously and will respond to complaints within 30 days, this allows us time to investigate your complaint thoroughly. In the event that you wish to make a complaint about how your personal information is used by us please contact our Data Manager.

How to Contact our Data Protection Officer

The Data Protection Office
 Crownville Limited
 Cotswold House
 219 Marsh Wall
 London
 E14 9FJ

11.2 If you are not satisfied with our response or believe we are not processing your personal data in accordance with UK Data Protection Act 2018 and the requirements of the GDPR; you can complain directly to the UK Supervisory Authority.

How to Contact the UK Supervisory Authority

Customer Contact
 Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 SK9 5AF
 United Kingdom

Email: casework@ico.org.uk

Web: www.ico.org.uk

Helpline: 0303 123 1113