

## PRIVACY NOTICE

This version was last updated on 16<sup>th</sup> September 2020 and historic versions are archived and can be obtained by contacting us.

1. We are the data controller in respect of your personal data.

Our full name: WR digital GmbH (t/a Footstock)

Our contact details: am Schulberg 31, Cologne, NRW, 50858 COLOGNE

Registered in District Court Cologne under company number HRB 90905

Registered at the ICO under: ZA341637

The "**Website**" is the website at: <https://www.footstock.com/> and includes our Android and iOS mobile applications.

For data privacy and data protection matters our contact details are [compliance@footstock.com](mailto:compliance@footstock.com).

2. Our Website is not intended for children and we do not knowingly collect data relating to children. As set out in our [General Terms and Conditions](#), our Website may only be accessed if you are 18 or older. If you are the parent or legal guardian of a child under 13 who you believe has provided personal data to Footstock through the Website, please contact our privacy team at [compliance@footstock.com](mailto:compliance@footstock.com).

3. We collect the following information directly from you:

- information that you provide to us both when you create an account with Footstock (including your name, email address, home address, DoB) and following any further request from us in order to verify your identity or otherwise comply with our own obligations under applicable law (including our own regulatory compliance);
- details of the transactions you carry out through the Website;
- information that you provide to us for billing and/or other activities relating to undertaking transactions with us and other customers (e.g. contact phone number, billing address, payment card details);

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- information that you provide to us if you email us about a question, complaint or to report a problem with the Website;
- if you contact us by email, phone or otherwise, we may keep a record of that correspondence;
- technical information such as your IP address, device type, cookie ID, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked. Please see our [Cookie Policy](#) for further information.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. As set out in paragraph 6 of this Privacy Notice, we use a third party provider, Hooyu, to carry out verification services, establish the source of your funds and carry out enhanced due diligence as per UK Gambling Commission guidelines.

4. We use your information for the following purposes:

- to register you as a new customer and verify that you are who you say you are;
- to process any orders which you place through the Website;
- to take payment and to collect and recover money owed to us (if applicable);
- to enable you to partake in a prize draw, competition or complete a survey;
- to provide you with any customer support and handle any cancellation or refund requests;
- to use data analytics to ensure that content from the Website is presented in the most effective manner for you and for your computer;
- to send you push notifications of upcoming fixtures and tournaments (if you have consented);
- to collect information and create insights about your browsing habits on our Website; and

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- to meet any legal or regulatory obligations which we have, to enforce or apply the [General Terms and Conditions](#) or this Privacy Notice or to protect our rights or the rights of any third party e.g. we may provide your personal information to law enforcement agencies for fraud prevention purposes.
5. The legal basis for processing your personal data: we process your personal data either on the basis of your consent, where this has been given unambiguously, or on the basis that it is necessary for the performance of a contract between you and us (if you would like to purchase a product from the Website), or on the basis that it is necessary for the purposes of the legitimate interests pursued by us in operating and making available the Website. Where you have given your consent to us sending you push notifications and other marketing materials, you may withdraw your consent at any time by contacting us at [compliance@footstock.com](mailto:compliance@footstock.com) or turning off notifications directly in your account page on the Website or in the settings of the app. Alternatively, you may also click on 'Self Exclusion' in your account settings and we will shall remove you immediately from all marketing materials, newsletters or notifications.
6. The recipients or categories of recipients of your personal data are:
- our third party suppliers who help us to fulfil any order that you place on the Website e.g. our third party payment processors, which are presently Apcopay, Paydoo and MuchBetter;
  - our third party verification service, which is presently Hooyu, which helps to confirm that you are who you say you are;
  - our third party suppliers who help us maintain the Website and run our business e.g. our hosting provider, which is presently Amazon Webs Services (AWS);
  - if we believe reasonably necessary, GambleAware, a grant-making charity using best-practice in commissioning, including needs assessment, service planning, evaluation and outcome reporting to support effective, evidence-informed, quality assured prevention of gambling harms;
  - credit reference agencies, gambling authorities and regulators; law enforcement and fraud prevention agencies, so we can help tackle fraud or investigate any breach of the [General Terms and Conditions](#) and/or Privacy Notice or any other notice provided to you from time to time.

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We may also disclose your personal data to any prospective buyer of our business or assets or our professional advisors who provide legal, accounting, consulting, banking, or insurance services.

7. Our Website may enable you to post content to Social Networking Services (each, a "SNS") (e.g., Facebook, Twitter and Slack). If you choose to do this, we will provide information to such SNSs, only if you decide to do this. Where you allow this, you acknowledge and understand that you are solely responsible for your use of those websites and that it is your responsibility to review the terms of use and privacy policy of the companies providing such SNSs. We will not be responsible or liable for: (i) the availability or accuracy of any SNS's terms of use or privacy policy; (ii) the content, products or services on or availability of such SNSs; or (iii) your use of any such SNSs.
8. We are committed to protecting the information we receive from you. We follow reasonable technical and management practices to help protect the confidentiality, security and integrity of data stored on our system. While no computer system is completely secure, we believe the measures we have implemented reduce the likelihood of security problems to a level appropriate to the type of data involved.
9. We presently use AWS as our hosting provider in the UK and we have a UK subsidiary company as a result we may transfer, store and hold your data in the United Kingdom. We will put in place appropriate mechanism to ensure a safe transfer of your personal data outside of the European Economic Area, to the United Kingdom.
10. The Website may, from time to time, contain links to and from third party websites (e.g. GAMSTOP, Gambleaware, the UK Gambling Commission, Visa and Mastercard). If you follow a link to any of these websites, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.
11. The personal data will be stored for as long as you have an account with Footstock, or as long as is needed to fulfil any order which you make through the Website. We keep some of your personal data for longer if we are required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse or enforce the [General Terms and Conditions](#), even after you have closed your account or it is no longer needed to provide the services to you. When we no longer need personal data, we securely delete and destroy it.
12. You have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning you or to object to our processing of the

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data as well as the right to data portability. If you would like to do so, please contact us at [compliance@footstock.com](mailto:compliance@footstock.com).

13. If we are relying on your consent to process data, you may withdraw your consent at any time by notice to us.
14. You have the right to complain to the Information Commissioner's Office about the manner in which or otherwise in respect of the manner in which we process your personal data.
15. Your provision of personal data to us is not in general subject to a contractual or legal requirement, although it is subject to a contractual requirement in the event of a purchase of products from the Website. In all other circumstances, if you choose not to supply your personal data to us, however, you may not be able to access certain areas of the Website, nor use certain services.
16. We may change this page from time to time, to reflect how we are processing your data so we recommend that you review this page on a regular basis to make sure that you remain comfortable with our processing activities. However, if we make significant changes, we will endeavour to bring these to your attention either by making it that clear on the Website and/or by some other means of contact such as email, so that you are able to review the changes before you continue to use the Website.