Stanleybet Privacy Notice for Land-Based (Retail) Customers and Franchise Owners/Operators

Version: 1.3

Last updated: November 2026

Introduction

This privacy notice explains how Stanleybet ('we', 'us') uses and protects any information that you give us. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy notice.

This notice does not form part of any contract for our services. A copy of our customer terms and conditions can be found here: https://shops.stanleybet.be/Rules.

Who this privacy notice is for

This notice applies to you if you use any of our land-based (retail) betting services, and if you own or manage one of our shop franchises (you may see these referred to as data transmission centres or CTDs) in Italy and Belgium.

About Stanleybet

We are made up of different legal entities in the Stanleybet group of companies. The ultimate parent company is Stanleybet Holdings Limited (registered in England & Wales with company number 06076739). Other entities in the Stanleybet group, located in various countries in the UK and the EU, provide the services described below to our retail/land-based customers and prospective customers:

- Magellan Robotech Limited, registered in England & Wales with company number 03357517 (provider of solutions and services to our business customers, operates from the UK).
- RSC Servicii Suport Srl, registered in Romania with company number RO29117794 (Helpdesk and support services provider operating from Romania).
- Stanleybet Belgium N.V., registered in Belgium with company number BE 0480.316.383 (Retail and online gaming operator in Belgium).
- Stanleybet Compliance Services Limited, registered in Alderney with company number 1977 (Compliance services provider operating from the Bailiwick of Guernsey).
- Stanleybet Malta Limited, registered in Malta with company number C.25866 (Retail gaming operator in Italy).
- Stanleybet Services Limited, registered in England & Wales with company number 09061264 (Support services provider operating from the UK).
- Total Gaming Solutions, registered in Malta with company number C80548 (online gaming operator).

Each company incorporates any specific privacy standards local to the country in which it is incorporated and/or operates.

Who is the Data Controller?

A 'controller' is the entity that decides what personal information to collect from you and what purpose it is used for.

When we mention 'Stanleybet' or 'we/us' we are referring to the relevant company in the Stanleybet group responsible for processing your personal data and therefore acting as 'controller'. Who that is, will depend on the type of engagement you have with us.

For example, if you are a customer using our Italian retail betting service, your controller will be Stanleybet Malta. If you are a customer using our Belgian retail betting service, your controller will be Stanleybet Belgium.

If you are a visitor to this website, then your controller will be Stanleybet Belgium N.V., the company responsible for this website.

We may also host events and exhibitions from time to time, such as Win and Fly and the Poker One event. We will provide you with a separate supplementary notice for these events which will explain how your data is collected and by whom.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our compliance with data protection laws. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

What personal data do we collect?

Personal data is any information that can be used to identify a natural, living individual.

If you use our retail/land-based betting services, we do not typically process your personal data except for what is set out below. Where we do process your personal data, this will typically be because we have a legal or regulatory obligation to do so. Please refer to the "What we use your personal information for" section for full details, or contact us using the details provided in the "Contacting Us" section below

- **Contact details**: information that allows us to contact you directly such as your name, email address, telephone number, addresses;
- **Verification information**: your ID, age and financial documentation (such as credit references) used for verification purposes;
- **Due Diligence information**: bank statements used for 'know your client' and anti-money laundering checks;
- **Records of your interactions with us and any information you disclose in your interactions with us**: any enquiries or complaints you make

- **Financial information**: bank accounts, payment and receipt details, refund or credit details;
- **Transaction information**: information about the transactions that you undertake with us, such as the bets you place, behavioral information (to monitor potentially suspicious activities);
- **Responses to any feedback forms, surveys or competitions**: we keep records of any responses you give us;
- **Your marketing preferences**: so that we know whether and how we should contact you (CTD owners only);
- **Videos, photographs and audio recordings**: which you or other people take and provide to us, or we take ourselves. This applies during, for example, any of our tournaments or events that you may participate in.
- **How you use our website**: if you visit one of our websites, we collect information about the pages you look at and how you use them. This includes your computer's IP address, which allows us to track your usage of our websites.
- **If you are working for one of our franchisees or CTDs**: details of your performance: when working with or for us or in relation to any project or work we are engaged in or any franchise or CTD arrangement in place with us.
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Closed-circuit television (CCTV)

Some of our shops are operated by our franchisees and CTDs. In some instances, they may operate CCTV cameras and collect footage when you visit their premises. We do not have access to this CCTV footage and are not the controller of this personal information. Please ask the relevant CTD or franchise for sight of their CCTV policies, to understand how they process your personal information.

Use of the EasyGate App (Italy only)

Stanleybet Malta requires all Italian shop owners and operators use the EasyGate application ("EasyGate App") as part of their service agreement.

For further details about the types of data that is processed by the EasyGate app, you should consult the standalone privacy notice, available when you download the EasyGate app from the Google Play Store.

Use of Epis (Belgium only)

Stanleybet Belgium requires some Belgian shop owners and operators to screen players using their ID via the Epis system ("Epis") prior to placing a bet. Epis is the central exclusion database operated by the Belgian Gaming Commission (BGC), designed to prevent excluded persons from gambling. Screening is a legal and regulatory requirement to ensure the player is authorized to place bets.

Special categories of personal information

We will sometimes collect, store, and use the following "special categories" of more sensitive personal information regarding you:

- **information about your race or ethnicity, religious beliefs, sexual orientation** (we do not collect this information explicitly, but it may be collected incidentally, for example in any photographs of you that we may collect when you attend any of our events or provide us with a passport or driving license for ID purposes, or arising as a result of the PEP or adverse media checks described below);
- **information about your health** (for the purposes of responsible gaming);
- **information about whether you have self-excluded from gambling**.

Whilst we may not collect all of the above types of special category information about you, in relation to the special category personal data that we do process, we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defense of legal claims; and/or
- based on your explicit consent.

We will generally not collect, store and use any criminal records information in relation to you. However, under certain circumstances (for example, if you place a bet that is above a certain amount), we carry out checks to determine whether someone is a Politically Exposed Person ('PEP'), checks for Combating the Financing of Terrorism ('CFT'), as well as adverse media checks. These checks are done to prevent our services being used for money-laundering purposes and may reveal criminal records information. We perform these checks in compliance with our legal responsibilities.

Where we collect your information

We will collect personal information from a number of sources. These include the following:

- **Directly from you**: for example, when you contact us, when you use our websites or complete forms we provide to you.
- **Other companies within the Stanleybet Group**: for the purpose of providing services to you and provision Group-wide services, such as responsible gaming.
- **From other sources** (e.g. credit check agencies and money laundering check providers, Belgian Chambers of Commerce).
- **Our websites**: which will include information about how you use them, the devices that you use to connect to our websites.
- **Other providers of information**: which may include social media platforms, news reports, adverse media checks.
- **The Government, local authorities, or relevant regulators**: to assist with investigations, for example the Belgian Data Protection Authority or the Federal Public Service Finance.

What we use your personal information for

Stanleybet can only process your personal data if there is a specific, explicit and legitimate reason. This is known as the lawful grounds for processing.

The table below shows what personal data we process, along with the main reasons for processing and the corresponding lawful basis.

Purpose	Personal information used	Lawful basis
To enable us to provide our services to you, where you may be a franchisee or a CTD, where we may be supplying products/services.	All the personal information we collect	This is necessary to fulfil our contract with you. We have a legitimate interest to fulfil our contracts
Enter into and perform contracts, where you may be a franchisee or a CTD, where we may be supplying products/services.	All the personal information we collect	To enter into and perform contracts either with you or the organisation that you represent. We have a legitimate interest to perform contracts with you and third parties
In order to carry out any promotional activities, e.g. The Poker One event	Images, audio or video recordings	We have a legitimate interest in marketing our services to you in order to make new sales We also may have obtained your explicit consent
Make payments to and receive payments from you and to keep records of your transactions	Transaction and payment information	This is necessary to fulfil our contract with you
To carry out verification, and due diligence checks such as anti-money laundering and fraud checks	All the personal information we collect, including Verification information and Due Diligence information	We have a legal obligation to do this
Marketing our services or products which may be of potential interest to you (CTD owners only, not applicable to players)	Name, personal contact details and other identifiers, including email addresses and marketing preferences	We have a legitimate interest in marketing our services to you in order to make new sales You may have requested that we send to you details of certain products and/or services

Purpose	Personal information used	Lawful basis
		We also may have obtained your explicit consent
To manage our relationship with you and operate and manage our business and internal reporting	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and manage our business properly To be able to manage and perform our contract with you
To deal with enquiries, complaints and other communications from you and dealing with legal disputes involving you	All the personal information we collect about you	We have a legitimate interest to ensure that we operate efficiently and deal with any enquiries, complaints or other communications We have a legitimate interest to ensure that all legal claims are managed effectively
For the purposes of staff training	All the personal information we collect	We have a legitimate interest to improve the services or products we provide
To perform credit checks	Contact details and payment information	We have a legitimate interest in ensuring we are likely to be paid for our services
To ensure that our systems and applications function as intended. To maintain the security of our systems and our information including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution	Your usage of our website and any IT services or functions we make available to you.	We have a legitimate business in ensuring our systems are secure To be able to manage and perform our contract with you
To conduct data analytics studies and customer satisfaction surveys to review, and better understand our customer, retention,	Our client records and any information you provide in response to our client satisfaction surveys	We have a legitimate interest in order to improve as a business

Purpose	Personal information used	Lawful basis
attrition and satisfaction levels CTD owners only, not applicable to players		
For the purpose of complying with any legal and regulatory requirements	All the personal information we collect about you	We have a legal obligation to comply with any legal requirements, including the licence conditions that apply to your business. We also have a legitimate interest in complying with any regulatory and licensing requirements
Storage of records relating to you and also records relating to our business	All the personal information we collect about you	To be able to manage and fulfil our contract with you, we may have a legal and/or regulatory obligation to do so and we also have a legitimate interest to keep proper records
'Special categories' of Personal Information or criminal records data		
Storage of images or video obtained via CCTV, video or photographs while attending events	Information about your race, ethnicity or health condition incidentally recorded as part of your image	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above.
To ensure we comply with any self-exclusion that you have requested	Information about your self-exclusion	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above
We will use and retain information about criminal records to comply with law.	Information about your criminal records and offences	We have a legal obligation to do so

You will have a legal, contractual or other requirement to provide us with some of your personal information. If you do not provide us with this information, we may not be able to properly perform our contract with you or comply with legal obligations. For other personal information, although you may not be under an obligation to provide it to us, if you do not provide it then we may not be able to properly perform our services for you.

You should be aware that we do not usually rely on consent as a basis for processing your personal information. However, if we have asked you for consent, and you have given us your consent to use your personal information, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note that the withdrawal of your consent will not affect any use of the information made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effect as not providing the information in the first place, for example we may no longer be able to carry out certain activities.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site and developing new services.

Use of automated processing

If you use any of our retail betting services, or if you are a CTD owner or operator, we do not use any form of automated means when processing your personal data. This includes any type of artificial intelligence, machine learning or profiling.

Should that change, we will update this privacy notice and notify you without undue delay.

Who we share your personal information with

We share personal data with the following parties:

- **Any party approved by you**: for example family members, other gambling operators, for example, in the interests of responsible gambling, your personal information may be shared between other operators, following your agreement to self-exclude.
- **Credit reference agencies/verification agencies:** We may need to conduct verification checks which could include sharing information with third party organisations, such as credit reference agencies and sanctions check services.
- **Other companies within the Stanleybet Group**: for the purpose of providing services to you and provision Group-wide services, such as responsible gaming.
- **If you are a franchisee or CTD owner/operator:** other franchisees or CTDS, where this is necessary to collaborate for the purpose of furthering our and your business.
- **If you are a player:** our CTDs: for the purpose of providing services or products to you.
- **Other service providers to our business and advisors**: third party banks, payment processors, administration and IT services and other service providers. All our third-party service providers are required to take appropriate security measures to protect your personal information.
- **Advisors**: either advisors appointed by you, for example legal advisors, or advisors appointed by us.
- **Purchasers of our business**: buyers or perspective buyers to whom we may sell or negotiate to sell our business or our assets.
- **Fellow members and operators of suspicious betting activity detection platforms**: they will have access to and process all suspicious betting activity alerts we might raise

and might report such data themselves to other interested parties, such as those noted in this section.

- **Sports governing bodies:** for example, ITIA for Tennis and the IBIA for betting integrity.
- **Regulators and other authorities**: Some of your personal information may have to be shared with appropriate Gambling Regulatory bodies, such as: ADM (Italy), MGA (Malta), BGC (Belgium), and the Gambling Commission (UK), as well as other regulators and the Information Commissioners, located in the relevant countries in which we operate or as otherwise required by regulators or legislation.
- **The Government, government bodies**: where we are required to do so by law or to assist with their investigations or initiatives, for example HMRC.
- **Law enforcement and security services**: to assist with the investigation and prevention of crime and the protection of national security.

Direct marketing

While we may advertise our products and services (for example via posters within our CTDs, or banners on our retail websites), we do not process any retail player data for the purposes of direct marketing, nor do we provide direct communications to players.

If you are a shop owner, we may contact you from time to time about services we believe you may be interested in, in accordance with any marketing preferences that you tell us you are happy to receive or you ask us to send you the information. Which applies will depend on the applicable marketing laws where you are based.

You can then let us know at any time that you do not wish to receive marketing messages by sending an email to us at privacy@stanleybet.com or by using the details set out in the "Contacting us" section below. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any written marketing messages we send to you or letting us know during any marketing telephone call.

Transferring your personal data internationally

The personal information we collect about you is not transferred to or stored in countries outside of the UK or European Union except as set out in this section.

Our staff and other individuals working for us may in limited circumstances access personal information outside of the UK and European Union if they are working abroad outside of the UK or European Union. If they do so they will be using our security measures and will be subject to the same legal protections that would apply to accessing personal data within the country in which the controller of your personal information is based.

In limited circumstances the people to whom we may disclose personal information as mentioned in the section "Who we share your personal information with" above may be located outside of the UK and European Union. In these cases we will impose protections to the personal information and rely on approved transfer mechanisms, for example the use of adequacy decisions, standard contractual clauses, binding corporate rules or other mechanisms such as the EU-US Data Privacy Framework (DPF).

If you require more details on the arrangements for any of the above then please contact us using the details in the "Contacting us" section below.

How long do we keep personal information for?

Data is retained only for as long as necessary to achieve the purposes for which it was collected, although this will vary depending on the jurisdiction, the type of information and the reason why we collected it from you.

For example, due to our legal and regulatory requirements, we generally retain all physical and electronic records for 10 years following the end of our customer relationship with you. However, in some cases personal information may be retained for longer periods, for example if there is an ongoing complaint or legal dispute.

Any information relating to your marketing preferences will be retained for no longer than 6 months.

With regards to information collected during our events and/or exhibitions, please consult the relevant privacy notice for that event.

If you are interested in how long your data is retained, please contact us using the details set out in the "Contacting us" section below.

Security

We have numerous security measures in place to protect the loss, misuse and alteration of information under our control, such as passwords and firewalls. We cannot, however, guarantee that these measures are, or will remain, adequate. We do, however, take data security very seriously and will use all reasonable endeavors to protect the integrity and security of the personal information we collect about you.

Accuracy of your information

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address. You can contact us by using the details set out in the "Contacting us" section below.

Your rights in relation to your personal information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;

- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision making processes using your personal information.

You should note that we might not be able to help with some of these rights, as they may have specific requirements and exemptions which apply to them but do not apply to personal information recorded and stored by us. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing for example, are absolute rights.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

This privacy notice sets out a general summary of your legal rights in respect of personal information, and you can find out more information about your legal rights on:

- The Information Commissioner's website at https://ico.org.uk/for-the-public/ if you are based in the UK;
- Information and Data Protection Commissioner's website at https://www.idpc.gov.mt/ if you are based in Malta;
- The Italian Data Protection Authority's website at https://www.garanteprivacy.it/ if you are based in Italy;
- The Belgian Data Protection Authority's website at https://www.dataprotectionauthority.be/ if you are based in Belgium; or
- From your local data protection regulator if you are based elsewhere.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

Changes to this notice

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

Contacting us

In the event of any query or complaint in connection with the information we hold about you, please email DPO@stanleybet.com or write to us at:

Information Security Manager and Group Data Protection Officer

The Plaza, Suite 14b, 100, Old Hall Street, Liverpool, L3 9QJ, United Kingdom