

# COMPREHENSIVE DATA PROTECTION POLICY

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## SOMERSET WEST TATTERSALLS CC TRADING AS VEGAS BETS

("Vegas Bets" and "The CC")

### ANNEXURE E

### PLATFORM PRIVACY POLICY

#### INTRODUCTION

Somerset West Tattersalls CC, trading as Vegas Bets ("Vegas Bets") respects your privacy and is committed to protecting your personal information. This Privacy Policy will inform you how we look after your personal information when you visit our website/app (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

#### 1. IMPORTANT INFORMATION

##### PURPOSE OF THIS PRIVACY POLICY

This Privacy Policy aims to give you information on how Vegas Bets collects, stores and processes your personal information.

It is important that you read this Privacy Policy together with any other privacy or fair processing notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your data.

We have appointed an Information Officer (IO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the IO using the details set out below.

##### CONTACT DETAILS

###### Our full details are:

Somerset West Tattersalls CC t/a Vegas  
Corner van der Byl & Main,  
STRAND

Our appointed Information Officer can be reached on: [iovegasbets@gmail.com](mailto:iovegasbets@gmail.com)

You have the right to make a complaint at any time to the SA Information Regulator, South Africa's supervisory authority for data protection issues. Contact details:

SA Information Regulator  
SALU Building



316 Thabo Sehume Street  
PRETORIA

Tel: 012 406 4818

Fax: 086 500 3351

[info@justice.gov.za](mailto:info@justice.gov.za)

We would, however, appreciate the chance to deal with your concerns before you approach the SA Information Regulator so please contact the IO in the first instance.

## YOUR DUTY TO INFORM US OF CHANGES IN YOUR PERSONAL INFORMATION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. If any of your personal details are incorrect, you can update them in the "My Account" section, or you can contact our Customer Care team via email at [info@vegasbets.co.za](mailto:info@vegasbets.co.za)

## CHANGES TO THE PRIVACY POLICY

We may need to change this Privacy Policy from time to time. If we do change the Privacy Policy, we will post the new version on the Website/App. The new version of the Privacy Policy will take effect immediately upon its publication on the Website/App.

## THIRD-PARTY LINKS

This website or App may include links to third-party websites, plug-ins and applications (for example Facebook, Twitter etc). Clicking on those links or enabling those connections may allow 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 you leave our website, we encourage you to read the Privacy Policy of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal information, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes: first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes: address, email address and telephone numbers.
- **Financial Data** includes: bank account and payment card details.
- **Transaction Data** includes: details about payments to and from you and other details of bets placed, games played, and products purchased from us.



- **Technical Data** includes: internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions and other technology on the devices you use to access our products and games.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website/app, bets placed, products and games played.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data. Aggregated Data may be derived from your personal information but is not considered personal information in law, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

We do not collect any Special Personal information 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.

### IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have entered into or propose entering into with you. In this case, we may have to terminate your account or cancel a bet you have placed with us but we will notify you at the time if this is the case.

### 3. HOW IS YOUR PERSONAL INFORMATION COLLECTED

We use different methods to collect data from and about you including:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you:
  1. place a bet with us or play a game;
  2. create an account with us;
  3. request marketing material to be sent to you;
  4. enter a competition, promotion or survey; or
  5. give us some feedback.
- Automated technologies or interactions. As you interact with our website/app, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies, and other similar technologies (such as Google Analytics). We may also receive Technical Data about you if you visit other websites employing our cookies.



- Third parties or publicly available sources. We may also receive personal information about you from various third parties and publicly available sources and utilize this information for purposes such as carrying out further identification checks to minimize fraud or money laundering risks to the business.

#### 4. HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal information other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on [info@vegasbets.co.za](mailto:info@vegasbets.co.za)

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

The table below provides a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer, to verify your age and to ensure you are not gambling from a restricted country.	(a) Identity (b) Contact	Performance of a contract with you
To process your bet and to enable you to play games including: (a) Manage payments from you, and pay you winnings (b) Collect and recover money owed to us including any fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms and conditions or privacy policy (b) Asking you to leave a review or take a survey. (c) to enable you to interact with our Customer Care team via email, phone and live chat.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, or competition or to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)



To administer and protect our business and the security of our website/app (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website/app content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website/app, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website/app updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about our products and offers or promotions that may be of interest to you and to carry out direct marketing	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MARKETING

We strive to provide you with choices and a personalised online betting experience, so you can receive offers or betting products that are relevant for you, in accordance with your marketing preferences.

You can opt out and unsubscribe and stop receiving personalised offers via email and SMS by clicking the unsubscribe link within each email or SMS that you receive from us, or by changing your marketing preferences in the “My Account” section of your account.

## PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you (we call this marketing).

You will receive marketing communications from us if you have opened an account with us, purchased a bet or played a game or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not unsubscribed from receiving such marketing communication.

## OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

## THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal information with any third party for marketing purposes.



## COOKIES

To enable the working of certain functions during your visit to our website or App, we make use of cookies on various pages. Cookies are small text files that are stored on your device. We make use of certain cookies that are deleted after your browsing session (session cookies). Other cookies remain on your device and allow our business partners and us to read information we have written into the file. The second type of cookies are read by us on your next visit to our website/app (persistent cookies).

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website or App may become inaccessible or not function properly.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may have to share your personal information with the parties listed below for the purposes set out in the table in paragraph 4 above.

- Other companies acting as jointly responsible parties or operators who provide customer services, IT and system administration services.
- Fraud prevention agencies used to provide customer due diligence including, money laundering, fraud, sanction checks.
- External third parties to provide marketing and promotional services on our behalf.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy.
- Service providers who provide IT and system administration services.
- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services to us.
- Regulators and other authorities who require reporting of processing activities in certain circumstance.

We require all third parties to respect the security of your personal information and to treat it in accordance with the requirements of the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in the manner instructed by us.

## 6. INTERNATIONAL TRANSFERS

We do not intend to transfer personal information held in respect of our customers beyond the borders of South Africa. Should we intend to do so in the future, the purpose for which such personal information will be transferred will be disclosed and the consent of the data subject shall first be obtained.

## 7. DATA SECURITY



We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL INFORMATION FOR?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five years after they cease being customers for money laundering purposes.

## **9. YOUR LEGAL RIGHTS**

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

- To request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- To request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- To request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- To object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. If you still wish to exercise your



right to object, we may have to terminate your account or cancel a bet you have placed with us but we will notify you if this is the case at the time.

- To request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- To withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the IO.

### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than this if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

