

Privacy Policy

1. INTRODUCTION

Reflex Gaming Limited (“**Reflex**”) respects privacy and is committed to protecting personal data. This privacy policy relates to those data subjects whose personal data is processed by Reflex as a controller. This privacy policy will inform you as to how we look after personal data and tell you about your privacy rights.

This privacy policy applies to information we collect about (without limitation)

- Visitors to our websites;
- Visitors to our premises;
- Customers (current and past); and
- Suppliers (current and past).

2. IMPORTANT INFORMATION AND WHO WE ARE

2.1 Controller

This privacy policy is issued on behalf of the Reflex Gaming Limited whose registered address is at 301 Bowbridge Road, Newark, Nottinghamshire, NG24 4EQ. Reflex Gaming Limited is the controller and responsible for this website.

We have appointed a data protection officer (“**DPO**”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please contact the DPO at DPO@Reflexgaming.com.

2.2 Changes to the privacy policy and your duty to inform us of changes

This version of the privacy policy was last updated on 19 April 2022 and we may amend this privacy policy from time to time at our discretion.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.3 Third-party links

Our website may include links to third-party websites, plug-ins and applications. 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.

3. THE DATA WE COLLECT ABOUT YOU

3.1 What is personal data?

Personal data, 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 data about you which we have grouped together follows:

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- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account information.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have 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, operating system and platform and other technology on the devices you use to access our websites.
- **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, products and services.
- **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 for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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).

3.2 If you fail to provide personal data

Where we need to collect personal data 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 or are trying to enter into with you (for example, to provide you with goods or services).

4. HOW IS YOUR PERSONAL DATA COLLECTED AND USED?

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

4.1 Online

(a) Visitors to our websites

When you visit our websites, we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the websites. This information is only processed in a way which does not identify anyone.

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To view the types of data collected by Google Analytics, see:

<https://www.google.com/analytics/analytics/features/>

The data collected is held for a retention period of 26 months. To view Google's Data Protection Statement, see:

<https://privacy.google.com/businesses/compliance>

Though Google Analytics records data such as your device, Internet browser, operating system and geographical location, none of this information is personally identifiable to us.

Google Analytics also records your computer's IP address, which could be used to personally identify you, but Google Analytics does not grant us access to this information.

Subsequently, any requests for the retrieval of personally identifiable data that is recorded and stored by Google Analytics should be submitted directly to Google.

We consider Google Analytics to be a Third-Party Data Processor.

You may decide to submit personal information to us through the website, for example when purchasing goods or services or signing up to a newsletter. When we collect personal data in this way this policy sets out what we intend to do with it.

(b) Cookies

A "Cookie" refers to a small file that is downloaded onto your device (such as your computer, mobile phone or tablet) whenever you visit a website. These "Cookie files" allow the websites you visit to recognise your device and to gather information about your interaction with the website, as well as the device you are using. A Cookie, by itself, cannot be used to identify you.

We use Cookies to monitor your behaviour once on our website, enabling us to amend our content with a view to improving your user experience.

Opt-Out of Cookies: You can choose to opt-out of cookies being stored on your device by disabling Cookies in the "Settings" your Internet browser, commonly found under the "Privacy" and / or "Security" tab(s). For step-by-step guides on how to remove cookies in various internet browsers, please click <https://ruinmysearchhistory.com/blog/how-to-block-cookies-in-all-browsers/>.

If you do choose to refuse all Cookies and opt-out of Cookie Tracking, our website may not function for you as intended.

If you have any questions about how we use Cookies, please contact the DPO at DPO@reflexgaming.com.

(c) Security and performance

To maintain the security and performance of our websites we use a third party service which processes the IP address of visitors and other Technical Data.

This information is retained for a maximum period of 26 months.

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(d) **Online enquiries**

When you contact us online, we treat your data as per any other purchase or enquiry, save that we may have received additional Technical Data about you which will be treated as above.

(e) **Online accounts**

When you set up an online account with us, we will request personal data from you in order to verify your identity and set up your account. This information will also be used when you interact with us through the websites.

We will keep this information for a period of 6 years from the date you cease being a customer.

4.2 **Direct interactions.**

We may collect personal information from our direct interactions with you. This may include through correspondence, attendance at meetings with you, or other direct interactions.

4.3 **Data received from third parties**

We receive data from third parties such as Experian when performing credit checks on customers. We will keep this information for a period of 6 years from the date you cease being a customer.

5. **CUSTOMERS**

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

We will also keep your purchase history information for the duration of any warranty period applicable to the goods and/or services purchased, which may be in excess of the period stated above.

6. **MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have data protection control mechanisms in place where you can make such choices at your discretion through the DPO at DPO@reflexgaming.com.

6.1 **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. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

6.2 **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company (including our own group of companies) for marketing purposes.

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6.3 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by emailing the DPO at DPO@reflexgaming.com.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

7. SERVICE DEVELOPMENT

We use Aggregated Data to develop our services and products, but we may from time to time use your personal data, including feedback, responses to polls and surveys and other information provided by you to improve our service.

We may also use personal information that you have provided (including your communications with us) to offer customer support and fix problems.

8. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our DPO at DPO@reflexgaming.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out above. These parties may be:

- Logistics providers (acting as processors) organising the delivery of your goods
- Service providers (acting as processors) who provide IT and system administration services and support.
- Professional advisers (acting as processors or joint controllers) including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities (acting as processors or joint controllers) based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 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

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the new owners may use your personal data in the same way as set out in this privacy policy.

- Gaming regulators who oversee and regulate the markets and business sectors in which we operate.

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

9.1 International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

10. DATA SECURITY

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

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

11. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are summarised below:

11.1 Request access to your personal data (commonly known as a "data subject access request").

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

11.2 Request correction of the personal data 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.

11.3 Request erasure of your personal data.

This enables you to ask us to delete or remove personal data 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 data 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 data 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.

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11.4 Object to processing of your personal data

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 may object to our processing of your personal data. You also have the right to object where we are processing your personal data 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.

11.5 Request restriction of processing of your personal data.

This enables you to ask us to suspend the processing of your personal data 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.

11.6 Request the transfer of your personal data to you or to a third party.

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

11.7 Withdraw consent at any time

Where we are relying on consent to process your personal data you may withdraw this consent at any time. 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.

11.8 How to exercise your rights

If you wish to exercise any of the rights set out above, please contact our DPO at DPO@reflexgaming.com.

You will not have to pay a fee to access your personal data (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.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data 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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month 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.

11.9 Your right to complain to the Information Commissioner's Office.

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your

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concerns before you approach the ICO so please contact our DPO at DPO@reflexgaming.com in the first instance.

12. GLOSSARY

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting our DPO at DPO@reflexgaming.com.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.