

PRIVACY POLICY

Administration of Gambling on Tracks Limited (**AGT, we, or us**) is a company incorporated in the United Kingdom. Our registered office is 3a Kings Hall, Parsons Green, St Ives Business Park, St Ives, Cambridgeshire PE27 4WY. Via our site www.agt-ltd.co.uk (**our site**), through the post and in person on the racecourse, AGT provides various services to bookmakers, racecourses, racegoers and those involved in the racecourse industry.

This policy sets out the basis on which any personal data (information which can personally identify a living individual and referred to as **data** in this policy) we collect from you, or that you or others provide to us, will be processed by us.

For the purpose of data protection laws, the data controller is AGT.

1 HOW AND WHY WE PROCESS DATA

1.1 Paragraphs 1.2 – 1.9 below explain how and why we process your data, as well as the legal basis on which we carry out this processing.

1.2 **To process your annual registration and provide racecourse services:** When you register with us, we establish whether you have met the minimum requirements to become accredited as an on-course operator. We use this information to provide the administration services required by relevant racecourses, and to ensure the smooth operation of list position transfers.

We facilitate private sales and genuine communication between registered operators. We may be asked to pass on your telephone number, email address and other contact details for such purposes. You are given the opportunity to prevent us from using your data in this way on each registration form and can also ask us to stop using your data in this way by contacting us by email at mainoffice@agt-ltd.co.uk.

We will retain your data for a period of 7 years, to ensure that we are able to assist you should you have any questions, feedback or issues.

1.3 **To record bookmaker attendance data:** We record which bookmakers attended particular racecourses on a given day, in order to fulfil a contract between us and the relevant racecourse. We provide this information to the organisations providing services on the racecourse (such as IT support) who calculate the charges payable by bookmakers based on the information we have provided to them. We will retain your data until we are required to delete it in accordance with the contract between us and the racecourse, to ensure that we are able to assist you or the relevant racecourse with any questions, feedback or issues.

1.4 **To help you get payment on a lost betting ticket or collect a Late Pay:** When you ask us to help you recover a lost betting ticket or Late Pay, we process your data on the basis of your consent. We will retain your data for a period of 7 years, to ensure that we are able to assist you should you have any questions, feedback or issues. If you do not consent to us processing your data in this way, we will be unable to assist you in getting payment on a lost betting ticket or collecting a Late Pay.

1.5 **To make our site better:** We will also process your data in order to improve our site. We also use various cookies to help us improve our site (more details are set out in section 3) and share your data with third party analytics/search engine providers that assist us in the improvement and optimisation of our site.

We will also process your data for the purposes of making our site more secure, and to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

We use your data in this way because we have a legitimate interest to provide you with the best customer experience we can, and to ensure that our site is kept secure.

Our use of cookies for these purposes is subject to your consent. You can prevent us from using your data in this way by contacting us by email at mainoffice@agt-ltd.co.uk, or by using the 'do not track' functionality in your internet browser. If you enable this do not track functionality, our site may be less tailored to the device you are browsing our site on.

1.6 **To provide customer services to you:** We may also process your data in order to provide various supporting customer services to you (such as where you contact us with a question in connection with our services). The legal basis on which we process your data in these circumstances is your consent. If you do not provide us with the data we request from you for customer services purposes, we may not be able to fully answer your queries.

1.7 **If our business is sold:** We will transfer your data to a third party:

1.7.1 in the event that we sell or buy any business or assets, in which case we will disclose your data to the prospective seller or buyer of such business or assets (at all times in accordance with data protection legislation); or

1.7.2 if AGT or substantially all of its assets are acquired by a third party, in which case data held by AGT about its customers will be one of the assets transferred to the purchaser.

in each case, the legal basis on which we process your data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If you object to our use of your data in this way, the relevant seller or buyer of our business may not be able to provide services to you.

1.8 In certain circumstances we may also need to share your data if we are under a duty to disclose or share data in order to comply with a legal obligation. We also facilitate private sales and genuine communication between registered operators, as made clear on our information collection forms. AGT may be asked to pass on your contact details to other registered operators and service providers to you/the racecourses for such purposes. If you are not happy for us to use your contact details in this way, please contact us at mainoffice@agt-ltd.co.uk.

2 CATEGORIES OF INFORMATION WE COLLECT FROM YOU

We will collect and process the following data:

2.1 **Information you give us:** This is information about you that you give us by filling in forms on our site, completing the annual registration form, or by corresponding with us by phone, e-mail or otherwise. The information you give us may include trading names, names, addresses, bank details, email addresses and phone numbers.

2.2 **Information we collect about you:** With regard to each of your visits to our site we will automatically collect the following information:

- 2.2.1 technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and
 - 2.2.2 information about your visit, including the full Uniform Resource Locators, clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.
- 2.3 **Information we receive from other sources:** We may receive information about you when you use our site, or from third parties also involved in the racecourse industry. We also work with advertising networks, analytics providers, hosting providers and search information providers from whom we may also receive information about you.
- 2.4 We do **not** process any special categories of data, meaning data revealing:
- 2.4.1 racial or ethnic origin;
 - 2.4.2 political opinions; religious or philosophical beliefs or trade union membership;
 - 2.4.3 genetic or biometric data that uniquely identifies you;
 - 2.4.4 data concerning your health, sex life or sexual orientation; or
 - 2.4.5 data relating to criminal convictions or offences or related security measures.

3 COOKIES

- 3.1 Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.
- 3.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

Cookie	Name	Purpose	More information
CMS session cookie	SSESS\$DYNAMIC_STRING\$	This is used for the authentication and identification of the logged in user.	This cookie is dynamic - \$DYNAMIC_STRING\$ will be a different string on every machine.
Google Analytics	_ga, _gid, _gat_UA-26811054-1 (3 in total)	This is used for the tracking via Google Analytics.	Google Analytics uses all three cookies.

- 3.3 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.
- 3.4 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.
- 3.5 Except for essential cookies, all cookies will expire after 2 years.

4 USES MADE OF THE INFORMATION

We will combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

5 WHERE WE STORE DATA

- 5.1 Except for financial data, the data we collect from you will be stored in the European Economic Area.
- 5.2 The financial data that we collect from you (if any) will be stored in a location outside of the European Economic Area. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. In particular, any transfer of your data made by us to a location outside of the EEA will be governed by the EU-US Privacy Shield, a copy of which we will make available to you on request.
- 5.3 All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. You must not share your password with anyone.

6 YOUR RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

- 6.1 You have the right to object to us processing your data where we are processing your data:
 - 6.1.1 based on our legitimate interests (as set out at sections 1.5 and 1.7 above). If you ask us to stop processing your data on this basis, we will stop processing your data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and
 - 6.1.2 for direct marketing purposes. If you ask us to stop processing your data on this basis, we will stop.

7 YOUR OTHER RIGHTS UNDER DATA PROTECTION LAWS

Right of access

- 7.1 You have the right to receive confirmation as to whether your data is being processed by us, as well as various other information relating to our use of your data. You also have the right to access your data which we are processing. You can exercise such right by contacting us at mainoffice@agt-ltd.co.uk. If you exercise this right before 25 May 2018, your request will be subject to a £10 fee.

Right to rectification

- 7.2 You have the right to require us to rectify any inaccurate data we hold about you. You also have the right to have incomplete data we hold about you completed, by providing a supplementary statement to us.

Right to restriction

- 7.3 You have the right to restrict our processing of your data where:
- 7.3.1 the accuracy of the data is contested by you;
 - 7.3.2 the processing by us of your data is unlawful, but you do not want the relevant data erased;
 - 7.3.3 we no longer need to process your data for the agreed purposes, but you want to preserve your data for the establishment, exercise or defence of legal claims; or
 - 7.3.4 we are processing your data on the basis of our legitimate interest (as set out at sections 1.6 and 1.8 above) and you:
 - 7.3.4.1 object to our processing on the basis of our legitimate interest under section 6.1.16.1.1 above; and
 - 7.3.4.2 want processing of the relevant data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.
- 7.4 Where any exercise by you of your right to restriction determines that our processing of particular data is to be restricted, we will then only process the relevant data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

Right to data portability

- 7.5 You have the right to receive your data in structured, standard machine-readable format and the right to transmit such data to another controller.

Right to erasure

- 7.6 You have the right to require we erase your data which we are processing where one of the following grounds applies:
- 7.6.1 the processing is no longer necessary in relation to the purposes for which your data were collected or otherwise processed;

- 7.6.2 our processing of personal your data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your data;
 - 7.6.3 you object to the processing in as set out in section 6.1.1 of this policy and we have no overriding legitimate interest for our processing,
 - 7.6.4 the data have been unlawfully processed; and
 - 7.6.5 the erasure is required for compliance with a law to which we are subject.
- 7.7 You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

8 LINKS ON OUR SITE

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites or use our service, please note that you have left our site and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before you submit any data to these websites.

9 CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

10 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to mainoffice@agt-ltd.co.uk.

This privacy policy was last updated on 24th May 2018.