

Penrith Lottery are committed to protecting your privacy and promise to collect, process and use your data safely and securely in any interactions you have with us, including on our membership system, website, and our newsletter. Our Privacy Policy tells you how we do this and what your rights are. Any personal data processed in line with our Privacy Policy is controlled by us, as the data controller.

Our Privacy Promise

Transparency – We will always tell you what data we’re collecting about you and how we use it. We will never share, sell or give away your data.

Security – We are committed to following industry best practice to ensure your data is stored safely and securely. We protect the confidentiality, accuracy and availability of the information we collect about you.

Control – We will always give you control over the marketing you receive from us. You can choose the types of messages you receive and whether you want to stop receiving marketing communications.

Our Privacy Policy

1. Information we collect about you

- Personal and contact information when you join Penrith Lottery (or update that information whilst you are a member of the Lottery), including your name, address, email address, telephone number(s), title and date of birth. We may collect some of that contact information when you interact with us including via our email, newsletter subscription, social media or phone.
- Details (and copies) of your communications and interactions with us via our administration team or otherwise, including by email, telephone, post, or on the Penrith social media channels.
- Transaction details including payments from you for the weekly draws, payments to you (for example prizes or grant funds), details of Penrith Lottery draws entered into and the outcomes of those draws.
- Financial information including your bank account details when paying by standing order, and payment card information when you apply to become a member.
- Personal and contact information, when contributing to our advertising and/or media content, including your image, voice, footage (and any other information that identifies you) when completing the contributor’s consent/release form and in any correspondence with us about your contribution.
- Technical information about your device or browser when you use our website, social media platforms or newsletter subscription, including geolocation data to determine what country you are accessing our services from, your internet protocol (IP) address, device ID, browser type and version and time zone setting, which may in some circumstances be personal data.

2. How and why we use your personal data

In the table below, we set out all the ways we may use your personal data, and why. We have also identified what our legitimate interests are where appropriate.

It is sometimes necessary for us to process your personal data in order to enter into a contract with you, or to satisfy a contractual requirement (referred to as ‘performance of a contract with you’ below), or to comply with a statutory requirement. In those circumstances, if you do not provide the personal data we require, we will be unable to provide our lottery draw to you.

List of how we use your personal data and why

	How we use your personal data	Why we use your personal data
Registration	We use your personal and contact information to register you as a new member. We collect financial information if you pay by standing order or payment card.	Necessary for the performance of a contract with you.
Eligibility	We request your date of birth and address as part of completion of the membership form to allow us to verify you are over 16, and that you are a UK resident.	Necessary for compliance with a legal obligation.
Verification	We may require copies of documents to verify your identity where we are required by law to provide assistance or in order to comply with any request you may make regarding your Lottery membership.	Necessary for compliance with a legal obligation.
Playing our lottery	We use the personal and contact information provided by you and the transaction details about your purchases, to provide our lottery and other services to you.	Necessary for the performance of a contract with you.
Managing your account	We use your personal and contact information, financial information, and transaction details about your membership, to manage your entry in the weekly draw, to contact you if you've won a prize, and to pay those prizes.	Necessary for the performance of a contract with you.
Paying prizes	We use your personal and contact information to contact you if you've won a prize, and to pay (or facilitate payment of) those prizes.	Necessary for the performance of a contract with you.
Communicating with you	We use the personal and contact information provided by you, copies of your communications with us and, in some circumstances, transaction details, to manage our relationship with you. For example: <ul style="list-style-type: none"> to notify you about changes to our Terms & Conditions or this Privacy Policy; to communicate with you in response to any query, request or complaint you may have including by email, telephone and social media. 	Necessary for the performance of a contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated).
Market research	We may use the personal and contact information you have provided to ask you to take part in a survey. We also use the results of any surveys that you undertake to improve our draws, our website, or our service.	Necessary for our legitimate interests (to assess and improve our draws and service).
Technical issues	If you contact us about an issue, we may use technical information, and personal and contact information to administer and protect our business and the website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Necessary for our legitimate interests (for running Penrith Lottery, the provision of administration and IT services, security and fraud prevention) and to comply with a legal obligation.
Publicity	We may use your personal and limited contact information and image in publicity materials, on our website on social media or at events, provided that you have given your consent.	To promote the lottery with your consent.
Contribution to media content	We may use your personal data provided as part of your contribution (for example, being interviewed or giving us the right to use a photograph) for our marketing content, across all media.	Necessary for our legitimate interests (to consider and/or to publish your contribution) and for the performance of our contract and relationship with you (for rights management, making payments, and contacting you about your contribution).
Regulatory compliance	We may use your personal and contact information, financial information, information about any transaction between you and us, copies of your communications with us, information about your use of the website, or technical information, to enable us to comply with our legal and regulatory obligations. These include reporting aggregated data and other information to the Eden District Council as we are a community lottery.	Necessary to comply with a legal obligation.
Fraud prevention/ Queries and other investigations	We may use your personal and contact information, financial information, information about any transaction between you and us, copies of your communications with us, information about your use of the website, or technical information, in order to undertake analysis for the purposes of identifying and dealing with any fraud or fraudulent activity, with any investigation of a prize claim, or any request, complaint or query from you.	Necessary to comply with a legal obligation and for our legitimate interests (to ensure that transactions and interactions with us are not fraudulent).

How we use your personal data for direct marketing

We send you marketing communications through the post or via email only. You will receive direct marketing by email if you have either consented to receive such email marketing during membership registration, or if we have a legitimate interest to send you email marketing and you have not asked us to stop.

How to opt out of direct marketing

You can opt out from receiving direct marketing communications and notifications from us at any time using the following methods:

- click 'unsubscribe' in any email communication we send you; or
- send an email to the lottery administrator, info@prideinpenrith.co.uk; or
- write to us at our administration office at The Old Bank, 41 King Street, Penrith, CA11 7AY.

Please note that our systems may take up to a week to update after changing your preferences.

Sharing your information with our marketing partners

We do not share any information with marketing partners.

3. Your data with third parties

- The data we have collected from you may sometimes be accessed by trusted third party data processors working on our behalf. Banks and payment providers – to set up a standing order or direct debit on your account, to obtain payment of any amounts due to us and to pay prizes to you.
- Our lottery system provider – in order to provide software to set up your participation in the weekly draw.
- Marketing service providers – to allow us to send email communications and notifications and for managing external communications.
- Our website developer – to allow members to apply online.
- Online survey companies – to undertake surveys and to analyse the results.
- Professional advisers including lawyers, bankers, auditors and insurers – for the purposes of providing consultancy, banking, legal, insurance and accounting services.
- Eden District Council – for legal purposes as we are registered as a community lottery through them.
- Police or other such regulatory authority – as part of an investigation or otherwise for legal or regulatory purposes.
- Dispute Resolution agencies – for the purposes of dealing with any complaints.
- UK law enforcement agencies – for the purposes of ensuring that we comply with the law.
- We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request. We do this in order to protect our rights, property or safety or of our members, or others.

4. How we protect your personal data

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where we do, we require that third party to have appropriate technical and organisational measures in place to protect your personal data; however, in some instances we may be compelled by law to disclose your personal data to a third party, and have limited control over how it is protected by that party.

We have put various measures in place to protect your personal data:

- The secure areas of our website are accessed using https rather than http, meaning that all information that is sent and received is encrypted for additional security. You can see this in the address bar of your browser.
- Our hardware is encrypted and password protected; and our specialist lottery software is also password protected. Our back up memory sticks are encrypted.
- Hard copies of all documentation, including application forms, correspondence and reports are retained in a locked cabinet

Your personal data is not processed outside of the European Economic Area (EEA).

5. How long we keep your personal data

We will only keep your personal data 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.

At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you) and used for research or statistical purposes.

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

In some circumstances you may be entitled to ask us to delete your data: see **Section 7. Your rights** below for further information.

6. Your rights

You have the right:

- to ask us not to use your personal data for direct marketing. See **Section 3. How we use your personal data for direct marketing**.
- to ask us not to process your personal data where it is processed on the basis of legitimate interests, if there are no compelling reasons for that processing;
- to request from us access to personal information held about you (see **Section 8. Contact us**, below)
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask that we stop any consent-based processing of your personal data after you withdraw that consent;
- to ask, in certain circumstances, to delete the personal data we hold about you;
- to ask, in certain circumstances, for the processing of that information to be restricted; and
- to ask, in certain circumstances, for data portability.

7. Contact us

If you have any questions about our Privacy Policy, including any requests to exercise your rights, please contact the Penrith Lottery Chairman using the details set out below:

By post to: Penrith Lottery Chairman, The Old Bank, 41 King Street, Penrith, CA11 7AY

By email to: info@prideinpenrith.co.uk

In order to request a copy of the personal data that Penrith Lottery holds about you, please send your request in writing to the Penrith Lottery Chairman at the above address. To enable us to verify your identity and process your request, you must include all the following information and documentation with your request:

- your full name;
- the email address registered to your account;
- a description of the data that you are requesting, including a date range;
- a copy of your current and valid photo ID (e.g. passport photo page);
- proof of your address in the form of a photocopy of a utilities or service provider bill; and
- the date of the request.

If you are unhappy with our processing of your personal data, you have the right to complain to the Information Commissioner's Office (ICO) at any time. The ICO's contact details are available here: <https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with any concerns before you approach the ICO, so please contact the Penrith Lottery Chairman in the first instance.

Changes to this Privacy Policy

Any changes that we may make to our Privacy Policy in the future will be available on our website. Where appropriate, we will notify you of the changes when you next visit our website.