

People's Postcode Lottery Privacy Notice

Last modified - 26 May 2025

About this notice

At People's Postcode Lottery, we take the protection of personal data seriously. We are committed to handling personal data in accordance with UK GDPR (General Data Protection Regulations) and Data Protection Act 2018 at all times.

This Privacy Notice sets out what personal data we collect from you, how we use and share that data, how we keep your data safe, and how long we keep it for. We will also explain how we process your data (and the legal basis for doing so) and help you to understand your personal data rights.

Contacting us

If you have any questions about this notice or would like to exercise one of your personal data rights, please contact our Customer Experience Team at info@postcodelottery.co.uk or call on 0808 109 8765.

The personal data we hold

We collect your personal data in a variety of ways including when:

- you register or begin to register to play
- you contact us
- when you update your details using My Account
- you interact with us on social media like Facebook.

We may also hold your data if you have entered a competition, or if we have bought your data from a third-party data broker.

/hen you register to play or update your details, we may collect:	
our name	
our date of birth	
our full address	
etails of your chosen payment method and how many subscriptions you would like to prith	lay
mail address and phone number	
orrespondence	
address	
/hen you register to play, we will create a Player ID for you.	



While you play, you may provide:

Additional information, for example information relevant from a social responsibility perspective relating to your ability to play the lottery. You can find out more information here.

If you are not a player and you contact us, you may provide:

Name

Email address

Telephone number

Postal address

Additional information you provide us relating to your query.

When you enter a competition or Prize Draw, we may collect:

Name

Date of birth or confirmation you are over 18

Email address

Postal address

Telephone number

Additional information you provide us with

Where relevant, consent to send you email marketing

Data we may buy from a data broker:

Name

Date of birth

Postal address

Email

Additional information you may provide

How long we hold your data for

The length of time we hold your data for varies depending on the type of data and whether or not you are a player.

We hold player data while you play and for up to seven years after you cease playing. We may contact you for up to 24 months after you have stopped playing to ask if you'd like to start playing again, but after this 24-month period until the expiry of the 7-year period all other processing will be restricted.

If you begin the registration process but do not complete the process, we will hold your data for 30 days except where you do not opt out of Marketing, when we will hold your data for 12 months

For more detailed information about how long we hold your data please contact data.protection@postcodelottery.co.uk

What do we use your personal data for?

Below is a list of activities we may use your personal data for, as well as the legal basis we rely upon to do so under the UK GDPR. We may contact you by letter, email, electronic message, via direct message through social media or via telephone calls.



Activity	Legal Basis
To enter our players into the Postcode Lottery draw	Contract
To send our players service communications	Contract
To contact our winners by email, letter, telephone call or video conference	Contract
To send physical prizes	Contract
To send select players e-gift cards. Your data may be shared with a third party, either by us or by you, to allow you to claim your prize.	Contract
Payment verifications	Contract
To survey our players, invite them to take part in research interviews and focus groups and invite them to leave reviews for up to 24 months after they have cancelled.	Legitimate Interest
For a variety of marketing purposes (for more detailed information please see the next section)	Legitimate Interest or Consent
By email or telephone, for up to one month to assist with the completion of our online sales process.	Legitimate Interest
To answer any player queries or complaints	Contract or Legitimate Interest
To answer any non-player queries or complaints	Legitimate Interest
To deal with Subject Rights Requests	Legal Obligation
Address verification for players	Contract or Legal obligation
Bank detail verification for players	Contract
Age verification for players	Legal Obligation



Age verification for marketing including verifying data purchased from a trusted third-party data broker.	Legal Obligation and Legitimate Interests
Normal business functions including the operation and testing of our Information Technology systems, admin functions and organisational processes, analysis and monitoring for business planning, data quality checks, Corporate Social Responsibility obligations, communications activity and events administration, to monitor signs of suspicious online activity, including malware and the inappropriate transmission of data, to provide security controls for My Account and to monitor CCTV footage.	Legitimate Interest
Social media messages from non-players	Legitimate Interest
Social media messages from players	Contract and Legitimate Interest
Social media prize draws	Contract
Online prize draws or competitions	Contract
Monitoring wins of players who are restricted under the terms and conditions to a win of £5000	Contract
Photos or video footage including images of winners or beneficiaries of charities and good causes supported by us.	Consent or Legitimate Interest
Storing the data of players who have ceased playing.	Contract or Legal Obligation
Collecting and storing data relating to Exclusive Player Games Prize Draws	Contract
Social Responsibility	
To check players' self-exclusion status	Legal Obligation
To check your details against a publicly available Government sanctions list and exclude anyone	Legal Obligation



on the list from playing.

To provide the Gambling Commission with information relating to exclusions, Duty-of-Care and those on our blocked play list which may include personal data.

We may review and monitor player behaviour for the purpose of identifying those who may be considered vulnerable and at a greater risk of experiencing the harms associated with gambling and to identify people who cannot play the lottery.

Legal Obligation or Legitimate Interest

Legal Obligation or Contract Substantial public interest

Marketing

We may send you marketing communications through marketing communications through different channels, including email and post. Our advertising partners may also serve advertisements to you online. We will send marketing materials to you where we have your consent or where we have a legitimate interest to do so.

How to opt out of marketing

If you'd prefer us not to use your personal data for marketing, as listed below, you can make this request by contacting our Customer Experience Team at info@postcodelottery.co.uk or on 0808 109 8765.

When we may send you marketing

Type of Marketing	More information	Legal Basis
Birthday cards	Sent by post to our players. Sent by email to our players.	Legitimate Interest Consent
Christmas cards	Sent by post to our players. Sent by email to our players.	Legitimate Interest Consent
Monthly newsletter	Email communications sent to our players Postal communications may be sent to our players	Consent Legitimate Interest
Email Marketing	We may contact you for up to 12 months:	



		1
	To help you complete the sign-up process if you provided your details during our sign-up process and have not opted out of marketing.	Legitimate Interest
	We may contact you for up to 24 months:	
	If you provided consent for example when you entered a competition or requested information about playing the Lottery.	Consent
	If we purchased your email address from a trusted third-party data broker.	Consent
	We may contact you:	
	If you provided consent for email marketing when you completed our sign-up process.	Consent
Postal marketing	If you are a current player or for up to 24 months if we purchased your name and address from a trusted third-party data broker.	Legitimate Interest
Gifts, offers and prize awards.	We may occasionally send select players gifts, offers and/or prize awards by post. We may also inform those players of the gifts, offers and/or prize awards by telephone. Your data may be shared with a third party, either by us or by you, to allow you to claim your gift, offer or prize reward.	Legitimate Interest
Telephone calls to lapsed players	We may call you for up to 24 months after you cancelled to ask if you would like to start playing again. We may use a third-party call centre to make these telephone calls.	Legitimate Interest
Postal marketing to lapsed players	We may send you mail for up to 24 months after you cancelled to ask if you would like to start playing again.	Legitimate Interest
Refer a friend programme	To ensure rewards are made to eligible referrers and new players who have been referred we will share a list of our players with the company that operates the programme on our behalf. This company may share your data with a third party to identify players who have a sizable social media following. We may contact such players to explore opportunities to promote us via social media.	Legitimate Interest



Targeted	We may share your data with our advertising partners,	Legitimate Interest
advertising	including advertisers, advertising networks and advertising agencies to provide you with our targeted advertising or to exclude you from our targeted advertising.	Legitimate interest
	We and our advertising partners may use cookies, web beacons, device IDs and other technologies to collect information about your use of our app or website and your browsing habits.	Consent
	We may also share your data with social media providers, including Meta, Snap Inc, NextDoor and Tik Tok, to exclude current players from our advertising.	Legitimate Interest
Analytics	We may build profiles of new audiences to contact based on our existing player data or data provided to us by a third-party data broker.	Legitimate Interest
	The information we use includes the age, gender, and location of existing players or prospective players to enable us to better understand our player demographic which helps us send marketing to prospective players who may be interested in playing People's Postcode Lottery. The information we use does not include any direct contact information such as names, addresses or emails.	
	We may share some or all of this information securely with third-party partners to identify opportunities to improve how we advertise People's Postcode Lottery and to introduce us to potential new players.	Legitimate Interest
	We use data supplied by a third-party data processor to append data to your personal data when you join the lottery. We do this to better understand our players and improve our services.	Legitimate Interest
	We may use your data for analytical purposes for up to 12 months if you provided your details during our signup process and have not opted out of marketing.	Legitimate Interest



Data sharing

We will never sell your personal data to a third party.

However, we sometimes share the personal data we collect from you with the following third parties:

Third Party	Reason for sharing
Payment providers	To obtain payments from your account (for example setting up a direct debit) and to pay prizes to you
Insurers	To provide cover for the value of any prize winnings over a defined excess amount as specified by the promoting trust
IT system providers	To supply software to host your player account, and to supply our systems, including for the purposes of hosting, support, and software licensing.
Marketing service providers	To allow us to send postal and email marketing communications or to contact you by telephone.
Communication service providers	To allow us to send postal and email service communications.
Marketing agencies	To provide you with relevant advertising
Data brokers	To exclude current or blocked/suppressed players from data bought from third-party data brokers.
Social media platforms	To exclude current or blocked players from targeted social media advertising
Survey and research companies	To undertake online, telephone and in person player surveys and to invite players to take part in research interviews and focus groups
Review companies	To invite you to leave reviews about/rate PPL and to verify you as a player
Analytics companies	To help us better understand our player population
Referral Companies	To facilitate "refer a friend" schemes and identify players with a sizeable social media following.
Providers of services relating to physical prizes and/or e-gift cards	To supply and send out physical prizes and/or e-gift cards including those redeemed from our website or websites hosted by third party suppliers
Age, address and bank verification companies	To verify your address, age and bank details
Professional advisors	To supply professional services such as legal and accountancy
Regulatory authorities	To supply required information to the Gambling Commission and where necessary the Police and other agencies



Dispute resolution companies	To supply information when we use a third-party Alternative Dispute Resolution provider to resolve a complaint
Cyber security companies	For the purposes of security, including prevention and detection methods
Auditors	To audit our security systems and our financial records
Call monitoring services	To supply analysis of calls, emails, and social media messages
Website hosting	To host images including winners, attendees at events, charity beneficiaries and staff. We may host prize and/or e-gift card redemption on third party websites.
Image management system	To store images including winners, attendees at events, charity beneficiaries and staff
Postcode Lottery Group	From time to time we may share your data with other members of the Postcode Lottery Group
Providers of services relating to winners	To send out prize information to our winners, invites to our winners' events and to facilitate our winners' events and trips.
Third-party Call Centres	To call you if you cancelled in the last 24 months to ask you if you would like to start playing again.
Public Relations Companies	To provide public relations services about our winners and the charities supported by the players of PPL.

If you pay by debit card, we may use Hyperwallet, a PayPal-owned service, to make prize payments back to your debit card. You can find out how PayPal process your data and how to exercise your data subject rights <u>here</u>.

International transfer of your personal data

We may transfer some of your personal data outside of the EEA (European Economic Area). We will only do that if we have an appropriate safeguard in place for example, where:

- A country is deemed adequate by the European Commission.
- We use standard European Commission approved contracts with the ICO's approved Addendum or the ICO's International Data Transfer Agreement.
- Where a US organisation is certified under the UK extension to the EU-US Data Privacy
 Framework (the "UK Extension")

Your personal data rights

Under UK GDPR, you have a number of personal data rights you can exercise over your personal data. You can exercise these rights at any time by calling our Customer Experience Team on 0808 109 8765 or by emailing info@postcodelottery.co.uk

You have the right:

to ask us not to use your personal data for direct marketing.



- to ask us not to process your personal data where it is processed based on legitimate interests if there are no compelling reasons for that processing.
- to request from us access to personal information held about you
- 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.

Your right to complain

We pride ourselves on our high standards of customer service and are fully committed to protecting the personal information you trust us with. If you wish to contact us to query or complain about the way we use your personal data, we will treat the matter with the utmost seriousness.

Please direct your query or complaint to our Data Protection Officer at 28 Charlotte Square, Edinburgh, EH2 4ET or by email at data.protection@postcodelottery.co.uk

If you remain unsatisfied with our handling of your complaint, you can complain to the **Information Commissioner's Office (ICO).** You can find out more about that right and the complaint process <u>on the ICO website</u> or by calling 0303 123 1113 (local rate) Monday to Friday, 9am and 5pm (excluding bank holidays).

Your right to be informed if your personal data is compromised

In the unlikely event that the personal data we hold is breached or compromised in a significant way that would be a high risk to your rights and personal freedoms, we'll contact you without delay to let you know:

- What happened and how it happened
- What data was affected and what that means to you
- What we are doing about it and how you can stay informed
- How you can contact our Data Protection Officer

How we keep your personal data safe

At People's Postcode Lottery, information security is very important to our business. We are fully committed to ensuring information security, confidentiality and integrity. Examples of the way in which we do this are given below.

How we minimise risk and approach to IT Security

People's Postcode Lottery are ISO 27001 certified. ISO/IEC 27001 is the international standard for information security. It sets out the specification for an effective ISMS (information security management system).

ISO 27001's best-practice approach helps organisations manage their information security by addressing people, processes and technology.



Certification to the ISO 27001 standard is recognised worldwide to indicate that your ISMS is aligned with information security best practices.

Keeping card payments safe

People's Postcode Lottery hold PCI (Payment Card Industry Data Security Standard) certification. The accreditation shows that we collect, store and process card information to the highest security standards.

The information you send us online

The methods we use to ensure data is safeguarded while being sent over the internet are industry-standard. When information reaches us, we store it securely and only provide access to authorised personnel or data processors.

How we restrict access to your personal data

People's Postcode Lottery maintains strict physical, electronic, and administrative safeguards to protect your personal data from unauthorised or inappropriate access. The data we collect is stored in secure operating environments not accessible by the public

The data we collect and process when you visit our website

How we monitor your activity on our website

It is important to us that we give our website visitors and players the best possible experience when they use our site. We use a number of tools to help us monitor activity on our website. You can find out more in our **Cookie Notice.**

Consent

We use a Consent Management Platform for you to opt-in to cookie collection and give you full control over opt-in/opt-out. Please note our website may not function correctly if you change certain preferences, such as disabling all cookies. You can amend your preferences on the Privacy Settings box on your window. You cannot access our site unless you have given or rejected (on a purpose/cookie-based level) consent.

We also use an API (application programming interface) to transfer hashed data to Meta, Tik Tok, Snap and Next Door. We use an irreversible encryption mechanism, before transmitting the hashed data to their servers via their Conversion API. We will only transfer the hashed data if you have accepted both 'Performance' and 'Targeting' cookies via our cookie management tool. We use this hashed data to improve the measurement of ad performance in Meta, Tik Tok, Snap and Next Door.