



## The National Lottery Retailer Privacy Policy

We (Allwyn Entertainment Ltd, the operator of The National Lottery (“TNL”)) are committed to protecting your privacy and promise to collect, process and share your personal data, as an interested or operational National Lottery retailer or as a member of staff at a National Lottery retailer, safely and securely. Our Privacy Policy tells you how we do this and what your rights are, including a right to object to some of the processing which we carry out. It includes personal data that we process from and about you on the TNL Retailer Hub and Retail Training Centre website(s). It does not cover how we may use your personal data if you play National Lottery games on the National Lottery website or app which will be governed by a separate privacy policy.

More information about your rights, and how to exercise them, is set out in the "Your rights" section below. Any personal data processed in line with our Privacy Policy is controlled by us, as the data controller.

We also may provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information.

### Information we collect about you

Your contact details - name, address, date of birth, telephone number, email address - when you register and/or are being verified as a TNL retailer and, subsequently, to check that information remains up to date and accurate.

Your photograph ID when you register as a TNL retailer and/or when we ask you to verify your identity.

Details (and copies) of your communications and interactions with us via our Retailer Hotline, Operational Sales Team or otherwise, including by email, telephone (voice recordings) and post.

Copies of documents you provide to prove your identity and address (including driving licence, passport, and utility bills) and other information obtained from and in connection with our verification checks when:

- you are in the process of becoming a National Lottery Retailer;
- you are in the process of verifying your identity; or
- where there is a legal reason to request this from you.

Transaction details including National Lottery ticket sales, payments of National Lottery prizes by you, payment of retailer commission to you, and any rewards you receive in any retailer incentive scheme.

Your financial information including your bank account details – with supporting evidence, (which are sent to BACS) when you become a National Lottery retailer (and update that information with us).

Technical information about your personal device or browser when you use the TNL Retailer Hub website, Retail Training Centre website or National Lottery equipment and software, including your internet protocol (IP) address, device ID, browser type and version and time zone setting, login and password details which may in some circumstances be personal data.

We may also receive personal data directly from you or from various third parties and public sources, including credit reference agencies and fraud prevention agencies.

## How we use your personal data

	How we use your personal data	Why we use your personal data
<b>Interested retailers</b>	We use your personal, contact and financial information to record and consider your application to become a National Lottery Retailer.	Necessary for our legitimate interests (to ensure we appoint the right retailers).
<b>Verification</b>	We will use your personal and contact information, together with the copies of documents you provide at our request to verify your identity during the retailer appointment and as part of our identity verification and contracting process and where we are required by law to provide assistance or in order to comply with any request you may make as a National Lottery retailer.	Necessary for our legitimate interests (to ensure we appoint and verify the identity of and contract with the appropriate retailers).  Necessary for compliance with a legal obligation.
<b>Setting up, verifying and managing your retailer account</b>	We use your personal and contact information, and transaction information, to set up, verify and manage your retailer account. For example: <ul style="list-style-type: none"> <li>● Collecting monies from you and paying you commission on ticket sales</li> <li>● Managing Scratchcard orders, equipment repairs and installations</li> <li>● Assessing and advising on sales performance</li> <li>● Sending you point of sale materials for your store.</li> </ul>	Necessary for the performance of a contract with you.  Necessary for our legitimate interests (to ensure we appoint and verify the identity of retailers and to ensure our retailer network is operating at its optimum level).

<b>Managing your TNL Retailer Hub account</b>	<p>We use your personal and contact information, and transaction information, to manage your TNL Retailer Hub account, including keeping you up to date with news and information, and your rewards (if applicable) via the TNL Retailer Hub website.</p>	<p>Necessary for the performance of a contract with you.</p>
<b>Managing your Retail Training Centre account</b>	<p>We use your personal and contact information, and transaction information, to manage your Retail Training Centre account, including keeping you up to date with training materials via the Retail Training Centre website.</p>	<p>Necessary for the performance of a contract with you.</p>
<b>Communicating with you</b>	<p>We use the personal and contact information provided by you, copies of your communication with us and, in some circumstances, transaction information, to communicate with you. For example:</p> <ul style="list-style-type: none"> <li>● To communicate with you in response to any query, request or complaint you may have by email, telephone and SMS</li> <li>● To contact you in relation to your retailer account, including via our Operational Sales Team</li> <li>● To notify you about any changes to The National Lottery</li> <li>● To send you Jackpot Magazine, Lottery Update Direct Mails, and any other Direct Mails</li> <li>● In relation to your TNL Retailer Hub account</li> <li>● In relation to your Retail Training Centre account</li> <li>● To notify you about changes to retailer processes and/or the Retailer Agreement.</li> </ul>	<p>Necessary for the performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to keep our retailers updated).</p>
<b>Prize draws and competitions</b>	<p>We may use your personal and contact information, financial information and transaction information as part of a prize draw</p>	<p>Necessary for our legitimate interests (to drive retailer engagement).</p>

	or competition (including to enter, take part, and pay any prizes due as part of a competition or prize draw).	
<b>Publicity</b>	We may use your personal and limited contact information and photos of you in any publicity materials (including newspapers, magazines, TNL Retailer Hub and Allwyn's internal and external websites).	With your consent.
<b>Staff training</b>	We use copies of your communication with us (including voice recordings) and may use transaction information to train our staff.	Necessary for our legitimate interests (to ensure that we are able to provide the best service to you).
<b>Market research</b>	<p>We may use the personal and contact information you have provided to ask you to take part in market research or a survey.</p> <p>We use the results of any surveys or market research that you undertake to improve our business, our TNL Retailer Hub website and our services to you.</p>	Necessary for our legitimate interests (to assess and improve our service to our retailers, the TNL Retailer Hub website and our business).
<b>Technical issues</b>	We may use technical information, and personal and contact information to resolve and investigate a technical issue, or to administer and protect our equipment, the retailer website and the retailer training website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<p>Necessary for our legitimate interests (for running The National Lottery, the provision of administration and IT services, security and fraud prevention).</p> <p>Necessary to comply with a legal obligation.</p>
<b>Network planning and insight</b>	<p>We use your contact information and transaction information for retail network planning and to obtain business insight. For example:</p> <ul style="list-style-type: none"> <li>● Forecasting sales from newly installed National Lottery terminals</li> <li>● Assessing impacts on existing National Lottery</li> </ul>	Necessary for our legitimate interests (to ensure our retailer network is operating at its optimum level and to improve and inform our retailer strategy).

	<p>terminals as a result of new and closed terminals</p> <ul style="list-style-type: none"> <li>• Analysis on retailer estate saturation and the number of terminals in defined locations.</li> </ul>	
<b>Analytics</b>	<p>We use your transaction information, information about your use of the TNL Retailer Hub and Retail Training Centre websites, and technical information (including about your device) to improve our service and to optimise the TNL Retailer Hub and Retail Training Centre websites, services, retailer relationships and experiences.</p>	<p>Necessary for our legitimate interests (to define types of retailers that are eligible to use the TNL Retailer Hub and Retail Training Centre websites, to improve and keep these websites updated and relevant, to develop our business and to inform our retailer strategy).</p>
<b>Regulatory compliance</b>	<p>We may use your personal and contact information, financial information and transaction information to enable us to comply with our legal and regulatory obligations. For example:</p> <ul style="list-style-type: none"> <li>• Carrying out compliance checks (including credit checks) as part of our retailer onboarding and ongoing compliance functions</li> <li>• To enforce compliance with our terms of use and other policies or otherwise in connection with legal terms, compliance, regulatory and investigatory purposes as necessary (including disclosure of such information in connection with legal process or litigation)</li> <li>• Auditing retailers for compliance with Operation Guardian</li> <li>• For player protection measures</li> <li>• Providing independent verification services as required by the Gambling Commission in order to identify, track, match and</li> </ul>	<p>Necessary to comply with legal obligation.</p> <p>Necessary for our legitimate interests (to ensure your suitability as a retailer).</p>

	<ul style="list-style-type: none"> <li>pay prizes to winning tickets</li> <li>Reporting aggregated sales and/or retailer data to the Gambling Commission, and to allow us to provide any other information to the Gambling Commission as required to.</li> </ul>	
<b>Improve safety, security and integrity and to prevent fraud, money laundering and other criminal activity</b>	We may use your personal and contact information, financial information, and transaction information, in order to undertake analysis for the purposes of identifying, dealing with and preventing any suspicious activity, fraud or fraudulent activity, money laundering or other unlawful criminal activity.	Necessary to comply with a legal obligation.  Necessary for our legitimate interests (for example, to ensure that transactions and interactions with us are not fraudulent).
<b>Internal communications</b>	We may share examples of best practice, retailer success stories, and in-store execution amongst the Allwyn Retail Team. This will include limited personal information and may include photographs.	Necessary for our legitimate interests (to improve performance of our retailers and our Retail Team).

We use your personal data to create aggregated and anonymous data sets. You are not identifiable from that aggregated data, and it is not considered personal data. 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 have carried out the balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details in the Contact Us section of this document below.

## How we share your data with third parties

**We sometimes share the data we collect from you with the following trusted third parties:**

Banks and payment providers – to enable payments to be collected from and made to you.

Our IT system providers – in order to provide and repair/upgrade National Lottery equipment, software and systems to allow you to operate as a retailer and to allow on-site visits, and to communicate with you.

Marketing agencies – for the purposes of sending you Jackpot magazine, and other marketing communications by post, or on the retailer website.

Printing agencies – for the purposes of sending you relevant content.

Field service agencies – for the purposes of carrying out retailer visits and regulatory audits (including Operation Guardian).

Engagement agencies – to provide and host our TNL Retailer Hub website and manage the TNL Retailer Hub rewards process.

Online learning and training agencies - to provide and host our Retail Training Centre website.

Online survey companies and market research agencies – to undertake surveys (including for example, our retailer satisfaction survey) and other market research and to analyse the results.

Digital analytics companies – for the purposes of website and app analytics and reporting in respect of our analytics and marketing

Public relations agencies – for the purposes of managing external communications about us and our winners and retailers.

Professional advisers including lawyers, bankers, auditors and insurers – to enable them to provide consultancy, banking, legal, insurance and accounting services.

The Gambling Commission – for legal and regulatory purposes as required under our licence to operate The National Lottery.

Dispute Resolution agencies – for the purposes of dealing with any complaints and disputes.

Credit reference agencies – for the purpose of checking your credit history during the process of becoming a retailer and whilst you are a retailer (for example if you miss a payment), and to comply with our insurance and regulatory obligations.

Debt recovery agencies – for the purpose of recovering debts owed by you to us.

Security companies – for the purposes of security, including prevention and detection methods, for the protection of The National Lottery.

Auditors – to audit our systems and transactions for the purposes of ensuring efficiency, or regulatory or contractual compliance.

Fraud prevention agencies – for the purposes of identifying and dealing with any fraud or fraudulent activity

UK law enforcement agencies and third-party security companies – for the purposes of ensuring that we comply with the law and have adequate security measures in place.

We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data to comply with any legal or regulatory obligation or request. We do this to protect our rights, property or safety or those of our players, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In the event of another operator being awarded a future licence to operate The National Lottery, there might be a transfer of retailer data from Allwyn to the Gambling Commission and the new operator. If this happens, we will notify you of the transfer.

## **How we protect your personal data**

We take reasonable steps to protect your personal data information. Please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Please keep this in mind when disclosing any personal data to us or to any other party via the Internet. When you provide us with personal data via our retailer portal, we encrypt the transmission of that information using Transport Layer Technology

Your personal data may be processed outside the UK or European Economic Area ('EEA') – including by staff operating outside the UK or EEA who work for us or for one of our third parties mentioned. That includes the maintenance companies we use to repair our lottery terminals and our IT providers.

Where your personal data is transferred outside of the UK or EEA, we require that appropriate safeguards are in place. To find out more about the appropriate safeguards that we have in place, please contact us using the details in the Contact Us section of this document below.

## **How long we keep your personal data**

We will only keep your personal data for as long as necessary to fulfill 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) 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. For most personal data, this period will be 7 years from the date that a retailer ceases to be a National Lottery retailer.

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



## Your rights

You have the right:

- 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 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, noting that the withdrawal of your consent will not affect any processing which has already taken place at that time;
- 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;
- to ask, in certain circumstances, for data portability; and
- to ask us not to use your personal data for direct marketing, if we start sending direct marketing to you.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

We do not carry out any solely automated processing which can give rise to legal or similarly significant effects.

Where we collect personal data to enter into a contact with you or to comply with our legal obligations, this is mandatory and we will not be able to manage the retailer relationship without this information. In other cases, the failure to provide the requested personal data may affect your ability to work with us, where the data is needed for the specified purposes.

## Contact us

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

By post to:

**Data Protection Officer**  
Allwyn Entertainment Ltd  
Tolpits Lane, Watford  
WD18 9RN  
+44 (0) 203 003 2921

By email to:

[dpo@allwyn.co.uk](mailto:dpo@allwyn.co.uk)

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

- your full name and retailer number;
- 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;
- the date of the request; and
- if your request relates to the retailer website(s), the email address registered to your TNL Retailer Hub and Retail Training Centre account.

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 Data Protection Officer by email in the first instance.

## **Cookies**

We use cookies and similar technologies to recognise you, your browser and your device. We also allow certain third parties to use cookies and pixels while you are on the TNL Retailer Hub and Retail Training Centre websites, which collect information about your browsing habits and usage. For further information about cookies, please see [www.allaboutcookies.org](http://www.allaboutcookies.org).

When you visit our TNL Retailer Hub or Retail Training Centre website, you have the option to accept, reject or adjust most of the categories of cookies through our cookie consent management tool. You can modify these settings or withdraw your consent at any time by clicking the link in our cookie banner or by modifying your browser settings.

If you choose to disable cookies, then please note that this may limit the way you use the TNL Retailer Hub or Retail Training Centre websites. For example, you may have to re-enter information that would have ordinarily been stored as a cookie.

There are three main types of cookies and technology which we use on our retailer websites. Here's how and why we use them:

### **Strictly necessary cookies**

These are cookies that are required for the operation of our retailer websites. Without these cookies, you will not be able to use some functionality on our website, such as signing into your TNL Retailer Hub or Retail Training Centre account(s).

### **Performance cookies**

These cookies collect information about how you use the retailer websites and help us improve the way our retailer websites work.

## **Functionality cookies**

These cookies allow us to identify whether you are logged into your TNL Retailer Hub or Retail Training Centre account and to remember choices you make, in order to improve your experience of the retailer websites. More details of the cookies which we use (including third-party cookies and the partners with whom we may share your data) and their purposes are set out in our consent management platform.

## **How to control cookies on your desktop**

[Internet Explorer cookies information](#)

[Safari cookies information](#)

[Chrome cookies information](#)

[Firefox cookies information](#)

[Opera cookies information](#)

## **How to control cookies on your mobile device:**

[Apple iOS Safari](#)

[Android Chrome](#)

## **Changes to this Privacy Policy**

Any changes that we may make to our Privacy Policy in the future will be posted on the TNL Retailer Hub website. Where appropriate, we will notify you of the changes when you next visit the retailer website, or by any other form of communication we decide.

This Privacy Policy was last updated in May 2024.