

PRIVACY POLICY

Introduction

The National Property Draw Ltd, a company incorporated and registered in Scotland under company number SC584179 and having our registered office at Hudson House, 8 Albany St, Edinburgh, EH1 3QB, Scotland, ("We") are committed to protecting and respecting your privacy.

This policy (together with our website terms of use our Prize Competition Terms and Conditions and any other documents referred to in our website terms of use) sets out the basis on which any personal data we collect from or about you, or that you provide to us, will be processed by us.

<https://www.thenationalpropertydraw.co.uk/docs/termsofwebsiteuse.pdf>

<https://www.thenationalpropertydraw.co.uk/docs/lifestyleandspecialeventdrawstermsandconditions.pdf>

<https://www.thenationalpropertydraw.co.uk/docs/propertydrawstermsandconditions.pdf>

Please read the following carefully to understand our views and practices regarding your personal data and how and why we are using your data. By visiting www.thenationalpropertydraw.co.uk the practices described in this policy will apply. The website is not intended for children and we do not knowingly collect data relating to children.

Controller

We are the controller and responsible for your personal data.

Personal information we collect from you

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 will collect and process the following personal data about you:

- **Information you give us.** This is information about you that you give us by filling in forms on our website www.thenationalpropertydraw.co.uk (**our website**) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you enter a prize competition, promotion or survey, and when you report a problem with our website or otherwise give us some feedback. The information you give us may include your name, address, e-mail address and phone number. If you win a prize competition we will also require you to provide us with information to verify your eligibility and your identity, including your address.
- **Information we collect about you.** With regard to each of your visits to our website we will automatically collect the following information:
 - 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, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), page response times, download errors, length of visits to certain pages, and any phone number used to call our customer service number.

- **Information we receive from other sources.** We will receive personal data about you from various third parties as set out below:
 - Technical Data from analytics providers such as Google based outside the EU; and
 - If you win a prize competition, we may obtain personal information about you from third parties to verify your eligibility and your identity, including fraud prevention agencies such as Cifas.

How we use your personal data

We will only use your personal data when the law allows us to do so.

We use personal information held about you in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- to carry out our obligations arising from the operation, management and administration of our prize competitions;
- to provide you with the information and services that you request from us;
- to verify whether you are eligible to receive a prize;
- to provide you with information about other prize competitions promoted by us if you have consented to this;
- to notify you about changes to our services and our competitions;
- to ensure that content from our website is presented in the most effective manner for you and for your computer and/or other devices from which you access and use our website;
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our services, when you choose to do so;
- as part of our efforts to keep our website safe and secure; and
- where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by unsubscribing.

Purposes for which we will use your personal data

The personal information that you give us, which we collect about you and which we receive from other sources is necessary for us to allow you to participate in our prize competitions and for us to administer, manage and

promote our prize competitions. If we did not have this information you would be unable to participate in our prize competitions.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as an entrant into a prize competition.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our services, to develop them and grow our business)
To process your prize competition entry including to manage payments, determine eligibility and award prizes	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant website content to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Change of purpose

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy

<https://www.thenationalpropertydraw.co.uk/docs/cookiespolicy.pdf>

Disclosure of your information

We have the right to share your personal information with:

- selected third parties namely our suppliers and sub-contractors (including providers of technical and payment services) for the performance of any contract we enter into with them or you. This includes the following:
 - our website provider, Tentacle Solutions Limited (Company No. SC321147) having its registered office at Clement Millar, Spiersbridge House, 1 Spiersbridge Way, Spiersbridge Business Park, Glasgow, G46 8NG, Scotland ;
 - our random number generator and random prize winner selector, Sterling Management Centre Ltd, (Company No. 02451813) having its registered office at MOTT MACDONALD HOUSE, 8-10 Sydenham Road, Croydon, Surrey, CR0 2EE, England;
 - our payment services provider, Sykes Global Services Limited (Company No. SC086519) having its registered office at Nether Road, Galashiels, Selkirkshire, TD1 3HE, Scotland as well as the Sykes Global Services owned company Link Network Limited (Company

No. SC167675) having its registered office at Nether Road, Galashiels, Selkirkshire, TD1 3HE, Scotland. Our payment services provider is also a controller of your personal data and their use of your personal information will be subject to the terms of their privacy policy;

- our suppliers where you have won a prize competition in order that you can receive your prize. The suppliers will vary according to each prize competition and their details will be made available to the winner;
- analytics and search engine providers that assist us in the improvement and optimisation of our website;
- professional advisers including lawyers, bankers, auditors and insurers who provide legal, banking, accounting, insurance and consulting services; and
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

If you win a prize competition we will also share your personal information with fraud prevention agencies. Your name and county will also be posted on our website and you may also be required to take part in publicity unless you have told us that you do not want such information to be published or made available.

We will also disclose your personal information to third parties:

- If we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or our Prize Competition Terms and Conditions and other agreements; or to report suspected fraud; or to protect our rights, property, or safety and those of our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention.

<https://www.thenationalpropertydraw.co.uk/docs/termswebsiteuse.pdf>

<https://www.thenationalpropertydraw.co.uk/docs/lifestyleandspecialevendrawstermsandconditions.pdf>

<https://www.thenationalpropertydraw.co.uk/docs/propertydrawstermsandconditions.pdf>

International transfers

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [*European Commission: Adequacy of the protection of personal data in non-EU countries.*](#)

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the **Privacy Shield** which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data Security

All information you provide to us is stored on secure servers. Any payment transactions made to our payment provider will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Data Retention

We will retain 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.

Where you have entered one of our competitions we will hold your information relating to that competition for up to twenty four (24) months after the end of the prize draw or longer in order to comply with any legal obligation or in order to enforce or apply our terms of use or our Prize Competition Terms and Conditions and other agreements; or to report suspected fraud; or to protect our rights, property, or safety and those of our customers or others.

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In some circumstances you can ask us to delete your data: see below for further information.

Third-party links

This 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 notice of every website you visit.

Your duty to inform us of changes

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

Your rights

You have rights under data protection laws in relation to your personal data. Under certain circumstances, you have the right to:

- request access to the personal information we hold about you;
- have your personal information rectified if it is inaccurate or incomplete;
- have your personal information deleted in specific circumstances;
- request that the processing of your personal information be restricted in specific circumstances;
- object to the processing of your personal information where it is being processed on the basis that it is necessary for our or a third party's legitimate interests;
- ask us not to process your personal data for marketing purposes;
- receive your personal information which you have provided to us in a certain format and to transfer that to another controller in certain circumstances; and
- withdraw your consent at any time to us processing your personal information but only where we are relying on your consent to do so.

If you wish to exercise any of these rights, you should contact us.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

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

Changes to our privacy policy

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

The Information Commissioner's Office

You also have the right to lodge a complaint about how we handle your personal information with the Information Commissioner's Office (the "ICO"). You can call the ICO's helpline on 0303 123 1113. See also

<https://ico.org.uk/global/contact-us/>. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us at complaints@tnpd.co.uk in the first instance.

Contact Us

Questions and comments regarding this privacy policy (including any requests to exercise your rights) should be addressed to the data privacy manager at:

The National Property Draw Ltd

Hudson House
8 Albany St
Edinburgh
EH1 3QB
Scotland.