



network gaming

Privacy Policy

Introduction

In this Privacy Policy, **Network Gaming** and terms such as **we, our** and **us** or similar expressions shall refer to Network Fantasy Holdings Limited.

Network Gaming operates a sports gaming and data platform which provides sports prediction and pool betting games for end users (**Games**) on behalf of our partners (**Game Partners**). Our current Game Partners are talkSPORT, Fitzdares, Dream Team and our B2C brand Rock The Goat.

When you access this website or any website operated by Network Gaming on behalf of a Game Partner (**Website**), or participate in a Game, we will collect certain personal data.

Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or the appropriate supervisory authorities in the event you have a complaint.

When you access a website operated by us on behalf of one of our Game Partners, or play a Game provided by us for one of our Game Partners, we will share your personal data with that Game Partner. Where we share your personal information with a Game Partner in this way, that Game Partner will also be a controller and will be responsible to you for the personal data it holds. Apart from in the circumstances stated above, we will not share your personal data with any of our Game Partners unless you have given us your consent to do so. More information is provided below in Important information and who we are and Sharing of Information.

1. Important information and who we are

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them. This privacy policy should be read in conjunction with any privacy policy or fair processing notice provided to you by any of our Game Partners or third party supplier or partners.

Controllers

Network Fantasy Holdings Limited is a controller within the meaning of the Data Protection Act 2018 and other applicable data protection laws and is responsible for your personal data.

When we are operating a Website or Game on behalf of one of our Game Partners, we will share some of the personal data that we collect about you with that Game Partner (**Shared Data**). When we do this, the Game Partner will also be a controller of the Shared Data and will handle it in accordance with its own privacy policies. We publish a short-form privacy notice on each Website operated by us on behalf of a Game Partner, which identifies the relevant Game Partner and provides a link to that Game Partner's privacy policy. More information about the Shared Data that we provide to our Game Partners can be found in Sharing of information.

Contacting Us

We have appointed a data protection lead who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights as set out in this policy, please contact the data protection lead using the following details:

Name: Harry Collins

Email address: data@networkgaming.io

Postal address: 182-184 Campden Hill Road, London. W8 7AS

Supervisory Authority

We are registered with the ICO as a data controller under registration number: 07650001809.

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues. The ICO's website can be found at www.ico.org.uk or you can call them on 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please [contact us](#) in the first instance.

Changes to this privacy policy

We keep our privacy practices and policies under regular review. If we make any changes to this policy these changes will be posted to this page, and where appropriate may be notified to you when you next visit a Website or participate in a Game operated by us.

This privacy policy was last updated in December 2021. Historic versions can be obtained by contacting data@networkgaming.io.

Third-party links

Our 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 practices or policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Children

Our Websites and Games are not intended for children and we do not knowingly collect personal data relating to children. We have stringent processes in place to ensure that all persons who participate in our Games are at least 18 years of age.

2. The personal data we collect about 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 irreversibly removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Account Data** includes your username and password, email address, display name, your game history and preferences.
- **Identity Data** includes name, age, gender, country, region and postcode.
- **Technical Data** includes internet protocol (IP) address, device type, operating system and platform, connection type, user agent string, mobile carrier, identifiers assigned to your device including advertising identifiers and other technology on the devices you use to access our Website or to otherwise interact with our services, whether directly or indirectly.
- **Transaction Data** includes details about payments made by you and to you (for example prizes), details of Games played and the outcome of those Games.
- **Usage Data** includes information about how you use our websites and Games, whether directly or indirectly.
- **Contact Data** includes postal address, email address, social media usernames and telephone numbers (where you have provided these to us directly).
- **Marketing and/or Communications Data** includes your preferences in receiving marketing from us, our Game Partners and third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users seeing a specific advertisement. 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 do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity Data and/or Contact Data by creating an account on any of our Websites, participating in any Games, filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you directly register with us through any of our Websites, contact us by post, email, telephone, through our website or social media or where you request that marketing be sent to you.

Automated technologies or interactions. As you interact with our website and other online services, we will automatically collect Technical Data about your equipment, actions and behavioural patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [Cookie Policy](#) for further details.

Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:

- Financial and Transaction Data from providers of payment processing services;
- Identity Data from our identity verification partners;
- Identity and Contact Data made publicly available by you, for example if you have signed up to a self-exclusion scheme;
- Technical Data from analytics providers such as Google Analytics
- Identity and Contact Data from publicly available sources based inside the UK and the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. We will use your personal data when one or more of the following “lawful bases” for processing applies:

Performance of Contract: this is where we need to process your personal information in order to perform a contract we are about to enter into or have entered into with you.

Legitimate Interest: this is where the processing of your personal information is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Comply with a legal obligation: this is where we need to process your personal information in order to comply with a legal obligation.

Consent: this is where you have signified your agreement by a statement or clear opt-in to processing of your personal information for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us at data@networkgaming.io.

Purposes for which we will use your personal data

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. Please contact us at data@networkgaming.io 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 with a user account on our Websites	(a) Account Data	Performance of a contract with you

	(b) Identity Data (c) Contact Data	
To provide our services to you and our Game Partners, including organising, running and reporting on Games.	(a) Identity (b) Technical (c) Usage (d) Account (e) Marketing and Communications	Performance of a contract with you Legitimate Interests
Processing data where it is necessary to comply with professional, legal and regulatory obligations that apply to our business.	(a) Identity (b) Contact (c) Usage	Necessary to comply with a legal obligation
To gather and provide information required by or relating to audits, enquiries or investigations by regulatory bodies.	(a) Identity (b) Contact (c) Technical	Necessary to comply with a legal obligation
To check that you're not an excluded player	(a) Identity (b) Contact (c) Account (d) Usage	Necessary to comply with a legal obligation Necessary for our legitimate interests
To enable you to provide feedback or to communicate with us.	(a) Identity (b) Contact (c) Usage	Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	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)

	(d) Usage	reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
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To deliver relevant website content to you, including advertising.	(a) Identity	
	(b) Contact	
	(c) Usage	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
	(d) Technical	
	(e) Marketing and Communications	

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
	(b) Usage	

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity	
	(b) Contact	
	(c) Technical	Necessary for our legitimate interests (to develop our products/services and grow our business)
	(d) Usage	
	(e) Marketing and Communications	

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at data@networkgaming.io.

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

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

(i) Marketing directly from us

You will receive marketing communications from us by email or text if you have requested information from us and you have not opted out of receiving that marketing.

(ii) Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes, including our Game Partners.

(iii) Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the “unsubscribe” links on any marketing message sent to you or by contacting us at any time.

Where you opt-out of receiving marketing messages, we will still process your personal data in order to fulfil any contract with you and in accordance with our legal and regulatory obligations.

(iv) Cookies

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 our website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookie Policy](#).

5. Sharing of Information

We may share your information, including personal data, with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data](#) above. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Category	Explanation
Game Partners	We run Games on behalf of our Game Partners. When you participate in a Game, we will transfer your personal data to the Game Partner promoting the Game, who will also act as controller of your personal data. That Game Partner will handle your personal data in accordance with its privacy notice as published from time to time.

Service providers acting as processors based within the UK or the European Economic Area (EEA) who provide:

- IT and system administration services (e.g. Amazon Web Services, Google, MailChimp, Send In Blue, Dot Digital, Mail Gun, Fincore, CloudWays, Axxess)

- Our third party advertising partners including:

- o talkSPORT

Other External

- o Fitzdares

Third Parties

- o Virgin Bet

- o BetVictor

- o Unibet

- o Betfred

- o Betway

- Fraud prevention agencies (e.g. GB Group)

Identity Verification providers acting as processors based in the United Kingdom who provide age and identity verification checks on our behalf.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, Gambling Commission, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Other Third Parties	Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
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We recommend that you read our Game Partners' privacy policies for more information as to how they will handle your information.

6. International transfers

We will not transfer your personal data outside the UK or the EEA except to a country offering a similar level of protection for your personal data by ensuring at least one of the following safeguards is implemented:

- where the country has been deemed to provide an adequate level of protection for personal data by the European Commission;
- where we have used specific contracts approved by the European Commission which give personal data the same protection it has in Europe; or
- 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.

Please contact us at data@networkgaming.io if you want further information on the specific mechanism used by us when transferring your personal data outside of the EEA.

7. Data security

We have put in place appropriate security measures to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Where we disclose your personal data to a third party (including a Game Partner), 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

Where you choose to participate in a paid-for Game, we will pass your payment details securely to our chosen third-party provider of payment processing services using Secured Sockets Layer technology (SSL) or other industry standards. We do not store payment card details on our website.

When you participate in a Game, your display name will be publicly available to view on the leaderboards and results information shown on our Websites. It may also be published by our Game Partners on their websites and on other publicly available media outlets.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Where we have given you (or you have chosen) a password that enables you to access our Websites or Games, you are responsible for keeping this password confidential. It is a breach of our terms of use to share your password with anyone.

8. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or regulatory requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see [your legal rights](#) below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

In the event that you have not logged into one of our websites (including websites we operate on behalf of our Game Partners) for a period of 3 years then we will treat your profile as expired and the data connected to your profile will be deleted unless we reasonably believe that we need to keep it for longer.

9. Your legal rights

Under certain circumstances you have rights under data protection laws in relation to your personal data as detailed in the table below. If you wish to exercise any of the rights set out below then please contact data@networkgaming.io.

Right	Explanation
Request access to your personal data (“ Data Subject Access Request ”)	This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
Request correction of your personal data	This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
Request erasure of your personal data	This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data	This enables you to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
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Request restriction of processing of your personal data	<p>This enables you to ask us to suspend the processing of your personal data in the following scenarios:</p> <ul style="list-style-type: none"> • If you want us to establish the data’s accuracy. • Where our use of the data is unlawful but you do not want us to erase it. • Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims. • You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
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Request transfer of your personal data	This enables you to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
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Right to withdraw your consent.	You are entitled to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide our services to you. We will advise you if this is the case at the time you withdraw your consent.
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You will not have to pay a fee to access your personal data or to exercise any of the other rights set out above. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

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

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.