

GAMING REGULATORS EUROPEAN FORUM LIMITED (GREFL)

DATA PROTECTION ACT 2018

DATA PROCESSING STATEMENT

1. Purpose

The purpose of this document is to set out how GREFL collects, uses and stores personal information. It is intended that this document will enable you to make an informed decision about your relationship with GREFL and in particular what information, if any, you supply to GREFL. You should familiarise yourself with this document before you make contact with GREFL, our website and our members and directors. This includes emailing a member or director and utilising the “contact us” section of our website.

GREFL is a company established in England and Wales and is limited by guarantee. The registered office of GREFL is 1 Bedford Row, London, WC1R 4BZ, United Kingdom. Its company number is 10791340.

Membership of GREFL is limited to those who are regulators or are in the employment of Gambling Regulators in Europe. It should be noted that this includes countries and jurisdictions that are members of the European Union (EU), the European Economic Area (EEA) and those who are neither in the EU or EEA. GREFL’s website is hosted within Google’s cloud solution.

By virtue of its multinational membership any information you provide to GREFL will be stored on servers that are both inside and outside of the EU and EEA.

GREFL is established as a not for profit organisation. It only processes information necessary to establish its membership, maintain this membership and support this membership. GREFL only processes information necessary to provide or administer activities for people who are members of GREFL or who have regular contact with it. GREFL only holds information about individuals whose data it needs to process for this purpose. The personal data GREFL processes is restricted to personal information that is necessary for these purposes. Accordingly, GREFL is not registered with the Information Commissioner’s Office.

2. Personnel

It is likely that the majority of your dealings with GREFL will involve you interacting with a member or director of GREFL or a person who works for or at a gambling regulator with the member or director of GREFL. GREFL performs minimal automated processing of personal information and does not reach automated decisions.

The primary means of contacting GREFL will be by email or telephone to a director or an employee of the regulator employing the director. Your data will be processed and stored on the servers of that regulator and in accordance with the data protection regime in force in that jurisdiction.

The table below sets out the current Directors of GREFL, their employing authority, the jurisdiction they are based in and the governing data protection legislation for that jurisdiction.

1. Name	2. Regulator	3. Jurisdiction	4. Relevant legislation
Robert Biegel	Kansspelautoriteit	Netherlands	Uitvoeringswet Algemene Verordening Gegevensbescherming
Jonny Engebo	Norwegian Gaming and Foundation Authority	Norway	Personal Data Act 2018
James Green	The Gambling Commission	United Kingdom	The Data Protection Act 2018
Jirina Juzlova	Ministry of Finance	Czech Republic	Data Processing Act (to be enacted)
Michele Magro	Malta Gaming Authority	Malta	Maltese Data Protection Act 2018
Claire Pinson	Autorite de regulation des jeux en ligne	France	Law No 2018-493 and the revised DPA
Jorn Starck	Alderney Gambling Control Commission	Alderney	The Data Protection (Bailiwick of Guernsey) Law, 2017

Each director works for a data controller registered in their jurisdiction of operation and are in countries or jurisdictions which have implemented the EU General Data Protection Regulation (GDPR) or legislation intended to give effect to the GDPR in domestic legislation.

3. What information does GREFL collect and hold

GREFL is a company limited by guarantee and must process the personal information of members in order to maintain its register of members and Directors in order to comply with the Companies Act 2006.

The information that will be collected for this purpose will include (but is not limited to) the following:-

1. Name
2. Address
3. Date of Birth
4. Home address
5. Home telephone number
6. Employer's name

7. Employer's address
8. Employer's email address
9. Employer's telephone number
10. Technical information that may be collected by the GREFL website in relation to the jurisdiction from which you access the GREFL website and your interactions with the GREFL website.

Whilst GREFL does not intentionally collect special category data it is possible that in the process of arranging conference attendances you may end up providing information that falls within the scope of special category data. This might include dietary preferences and information relating to any partner attending a conference with you. In addition if you attend a GREFL conference or event, filming or photography may take place and these images may be used to record and promote GREFL and its legitimate interests.

4. Why does GREFL hold this information?

Under the GDPR there are six lawful bases under which personal information can be collected and processed. GREFL will primarily process information under four of these bases. The four that are most likely to be the basis for processing are:-

- 1) Legal obligation
- 2) Contract
- 3) Legitimate interests
- 4) Consent

It is unlikely that GREFL will process personal information for vital interests. Whilst GREFL's members and Directors will be engaged by organisations whose processing is connected to the performance of a public task (licensing, supervising and regulating commercial gambling within a European jurisdiction) GREFL's processing is unlikely to fall within the scope of that ground.

LEGAL OBLIGATION

GREFL collects and makes use of personal information in order to meet its legal obligations with regards to the Companies Act 2006 in relation to both members and Directors as well as its obligations to Her Majesty's Revenue and Customs. This information will be used by GREFL to keep necessary records for administration purposes, general accounting and taxation purposes and conference attendance purposes.

CONTRACT

Information you provide to GREFL will be shared when necessary, for example in respect of arranging your participation and attendance at conferences and seminars. The information would be shared with members, other conference attendees, those who are providing services at or in relation to conferences or seminars. In addition your information may be shared with GREFL's professional advisors and those providing other support functions to GREFL including (but not limited) IT advisors.

LEGITIMATE INTERESTS

GREFL will process personal information in order to fulfil its objectives

- the exchange of views and information and discussing policy on matters relating to the gaming industry and its regulation
- on special occasions and with the agreement of participants representing the different views of the Members on the gaming industry and its regulation and also providing a central point of contact for enquiries directed at them from governmental authorities or related organizations in Europe and elsewhere.

CONSENT

When you interact with GREFL you will be asked to consent to GREFL processing your personal information. Should you change your mind and decide to withdraw your consent GREFL will cease processing your personal information save for where it is required to in order to meet its legal obligations and thereafter it will cease to process your personal information.

5. Protecting your information

As set out above GREFL only processes personal information for limited means. Members and Directors of GREFL are representatives of or employed by European gambling regulators and accordingly are aware of and trained in good data handling practices. Only those with a need to access GREFL data can do so. All GREFL data is stored on systems that are password protected and which can only be accessed by those with a specific need to access the data.

In the event of a data breach a report will be made to the Information Commissioner's Office.

6. Data retention periods

GREFL will only retain personal data for the time that it is necessary in order to meet the purposes set out in section four. Where data is requested to be deleted deletion will take place unless a statutory provision precludes deletion.

Data relating to the statutory filings of GREFL will be retained for 10 years following the cessation of membership. Information relating to conference attendances will be deleted three calendar years after the year the conference took place.

7. Cookies

The GREFL website makes minimal use of cookies save for permitting Googlemap use and facilitating LinkedIn connectivity for those who wish to share and comment upon their interactions GREFL and the GREF website.

8. Your Rights

You have the right to obtain the information that GREFL holds about you. You may exercise this right in the following ways:-

1. By writing to GREFL at its registered office – 1 Bedford Row, London, WC1R 4BZ, United Kingdom.
2. By emailing a Director of GREFL using the contact details you have for them.
3. By using the “Contact us” section of the GREFL website - www.gref.net/about-grefexecutive-board/joinus-2/

You may ask GREFL to correct any data that it is processing about you which you consider to be incorrect or incomplete.

You may ask GREFL to stop processing your personal information at any time.

You may ask GREFL to delete or destroy your personal information. GREFL will insofar as it is able to do so comply with this request. You should be aware that there may be limited circumstances where GREFL must continue to process your personal information to comply with other legislation.

In the event that you seek to exercise your rights in respect of the personal information that GREFL is processing about you and you should note that the authorities set out in column 2 of section 2 will be involved in dealing with your request.