

Layer II

Additional Information for clients and users:

SELAE hereby declares that it scrupulously respects users' fundamental rights with respect to the processing of their personal data, while strictly complying with current data protection regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR")
- The Personal Data and Digital Rights Protection Act, Organic Law 3/2018 of 5 December ("Personal Data and Digital Rights Protection Act")
- In addition to any implementing regulations that may apply.

The following information is duly provided as regards the processing of personal data:

Data controller and data protection officer:

Data controller:

Data controller's identity:

SOCIEDAD ESTATAL LOTERÍAS Y APUESTAS DEL ESTADO, S.M.E., S.A. (SELAE) - Tax identification number A86171964.

Postal address: Calle Poeta Joan Maragall 53, 28020 Madrid

Telephone: (+34) 900 112 313 / (+34) 915 962 300 (Customer Service)

Contact details for the Data Protection Officer (DPO):

Address: SELAE, Registry, attention "Data protection", Calle Poeta Joan Maragall 53, 28020 Madrid

Email address: communication form available at:

<https://www.loteriasyapuestas.es/es/contacto-proteccion-datos>

Processing purpose:

Purpose:

The personal data of clients and users is handled in order to provide SELAE services and process the relationship with the general public.

This involves satisfying corporate compliance obligations within the legal framework and the management business activities of SELAE necessary for the correct provision of the service and its improvement and the defence of SELAE's interests. It includes the governance, direction, management, monitoring, supervision and auditing of the service, all of which entail aggregated statistical analysis, process improvement, information protection, compliance with regulations and the protection of personal data, always respecting due confidentiality and privacy and the principles of data minimisation, pseudonymisation and anonymisation where and as soon as it is feasible.

Clients registered on SELAE's Digital Gaming Platform:

The personal data of the clients registered on SELAE's Digital Gaming Platform is processed in order to formalise the relationship between the parties and provide the services associated with the aforesaid platform (website and apps), including participation in SELAE's online games.

The data of those registered who actively participate on the Digital Gaming Platform is treated according to the indications of Royal Decree 958/2020, with specific reference to Articles 34 and 35 of the Royal Decree on commercial communications of gambling activities for:

- a) the detection of unsafe behaviour, with processing carried out to comply with the Royal Decree and to detect this behaviour.
- b) action to be taken on registrants for whom unsafe behaviour has been detected.

Applicants and claims:

The personal data of applicants and claims is handled to process the request made by claimants of prizes at points of sale, or the claims presented in gambling-related sales offices or SELAE itself.

Large prize winners:

The personal data of large prize winners or their representatives is handled in order to pay individuals who have won a large prize, subject to special tax or other identification obligations, pursuant to currently applicable regulations, as well as to the beneficial owners in the case of legal entities.

Syndicate members:

The personal data of syndicate members is known at the time of claiming higher prizes, when they are identified by SELAE and the corresponding prize payment is handled.

Users:

The personal data of users is handled in order to process SELAE's relationship with the public (including requests for information, complaints, suggestions and congratulations – both in person and online) and website/app visits.

Data storage period:**Clients registered on SELAE's Digital Gaming Platform:**

When a participant permanently leaves the SELAE gambling website, complying with the necessary requirements: not having money in the Lotobolsa account, not having any active bets etc., their data will be blocked for a period of ten years, in the case of compliance with the requirements of the Gaming Law, with the gaming contract automatically cancelled. This does not prevent the interested party from being able to re-register and accept the gaming contract again.

Applicants and claims:

Six years after the request or claim has been attended to.

Large prize winners:

Ten years after effective payment of the prize, pursuant to the Prevention of Money Laundering and the Financing of Terrorism Act 10/2010 of 28 April.

Syndicate members:

Ten years after effective payment of the prize, pursuant to the Prevention of Money Laundering and the Financing of Terrorism Act 10/2010 of 28 April.

Users:

Two years

Legitimate interest:

The legal basis of the processing is as follows:

Contractual issues through the gaming contract for registered customers

Business relationship: based on SELAE game rules and lottery instruction.

Legitimate interest to respond to inquiries from the general public or website visitors

Consent in the case of the use of cookies by visitors to SELAE's website.

Legal compliance: gambling and fiscal regulations, anti-fraud law, the law on the prevention of money laundering and the financing of terrorism, current regulations for the protection of personal data etc. Legal obligations imply the identification of the major winners, the prohibition of gambling because they are listed on the General Register of Gaming Access Bans, the detection and actions related to gambling risk behaviour according to Royal Decree 958/2020 (Articles 34 and 35) etc.

Recipients:

Clients registered on SELAE's Digital Gaming Platform:

Data may be passed on to the tax administration, other public administration bodies, the General Directorate for Gambling Regulation, police forces and security bodies, banks, savings banks and rural savings banks, public administration bodies with powers in the matter, lawyers, attorneys, courts and tribunals.

Applicants and claims:

Data may be passed on to the National Mint (FNMT). Data shall not be transferred to third parties, except where there is a legal obligation to do so.

Large prize winners:

Data may be passed on to the tax administration, other public administration bodies, General Directorate for Gambling Regulation, police forces and security bodies, public administration bodies with powers in the matter, lawyers, attorneys, courts and tribunals.

Syndicate members:

Data may be passed on to the tax administration, other public administration bodies, General Directorate for Gambling Regulation, police forces and security bodies, banks, savings banks and rural savings banks, public administration bodies with powers in the matter, lawyers, attorneys, courts and tribunals.

Users:

Data shall not be transferred to third parties, except where there is a legal obligation to do so.

It is not envisaged that your personal data be transferred to third countries or international organisations.

Rights:

Data subjects have the right to require that SELAE allow them to exercise their rights with respect to their personal data.

As the data controller, SELAE guarantees the interested party the exercise of the following legally established data protection rights in the terms set forth in applicable law:

- Access to personal data. Users may access their personal data at any time and request information in relation to the processing thereof by SELAE.
- Rectification or deletion of personal data Users will have the right to request the rectification of their personal data where it is inaccurate or incomplete.
- Suppression. Users can request that their personal data be deleted and the processing thereof stopped if it is no longer necessary for the purposes for which it was collected, they have withdrawn their consent, where the data has been treated unlawfully or for any other legally-established reason.

- Suppression. Users can request that their personal data be deleted and the processing thereof stopped if it is no longer necessary for the purposes for which it was collected, they have withdrawn their consent, where the data has been treated unlawfully or for any other legally-established reason.
- Limitation on processing. Users will have the right to request the limitation of the processing of their personal data where this is legally provided for.
- Objection to processing. Users may object to the processing of their personal data for the purpose of sending commercial notification or for any other legally-established reason.
- Data portability. Users have the right to receive their personal data in a structured, commonly used and machine-readable format and for it to be transmitted to another data controller.
- To exclude automatic decisions and to request the right to human intervention, express their point of view or challenge the decision, as long as these decisions have not been made in compliance with a legal obligation.
- To withdraw consent, where this is the legal basis for the processing. Users may withdraw the consent given at any time, where this is the legal basis for the processing. This will not affect the legality of the processing based on consent prior to its withdrawal.
- All other rights provided for under current regulations.

You can exercise your rights:

- a) By means of a written request duly signed and sent by postal mail to: SELAE, Register, Attention: "Data Protection" service, Calle Poeta Joan Maragall 53, 28020 Madrid, Spain stating the reference "Exercise of Rights", clearly and expressly indicating the processing referred to in the exercise of the right, the petition or right being exercised and the given name, surname(s) and postal address for the response, attaching a copy of both sides of a reliable identification document (national identity document, foreign residency document, passport or driver's licence) in order to unambiguously identify the user. SELAE will process this personal data on the legitimate basis of legal compliance, with the sole purpose of responding to your exercise of your rights.
- b) By making a request through the form available at <https://www.loteriasyapuestas.es/es/contacto-proteccion-datos>. The processing of the exercise of rights necessarily requires the contribution of the image of both sides of a reliable identification document. The user shall provide a contact email address for a stable mailbox where they can receive notification and to which SELAE can send their reply.

You are hereby informed that you can file a claim with the supervisory authority regarding the protection of your personal data (Spanish Agency for the Protection of Personal Data), particularly when you have failed to obtain a satisfactory response in the exercise of your rights, at its virtual office: <https://sedeagpd.gob.es/sede-electronica-web/vistas/infoSede/tramitesCiudadano.jsf>.

Possible consequences of failing to provide your personal data:

Clients registered on SELAE's Digital Gaming Platform:

You may not register if you do not provide all the data to be collected, except those indicated as optional. It may also be because the account was blocked for legal reasons.

Applicants and claims:

SELAE will not be able to process the request or claim correctly or the interested party will not be able to receive a response to it.

Large prize winners:

Opposition to providing personal data and its subsequent processing shall result in the impossibility of paying the prize for legal and commercial reasons.

Syndicate members:

Opposition to providing personal data and its subsequent processing shall result in the impossibility of paying the prize for legal and commercial reasons.

Users:

SELAE will not be able to correctly process game management with the user.

Source of personal data

All data, with the exception of that indicated in the following paragraph, is collected from the interested party or where appropriate from the representative of the interested party. Prior to the supply of any personal data of an interested natural person, their representative is obliged to inform them of the provisions of this document, meeting any other requirements that may be applicable for the proper communication of the former party's personal data, without SELAE having to perform any additional action on behalf of this party in terms of information or consent.

Exceptions:

- Feasibility of registration of the participant and the situation regarding capacity for gambling (no gambling ban), information provided by the Directorate General for the Regulation of Gambling.
- The data subject's banking entities. The data is collected on behalf of SELAE by the paying entity, which acts as the person in charge of processing for the collection thereof, limiting its activity regarding this assignment to the collection and transmission of the data to SELAE through secure channels. However, this communication shall be without prejudice to the data protection obligations with which the entities that collaborate with SELAE in the payment of prizes must comply.

Automated decisions and profiling:**Clients registered on SELAE's Digital Gaming Platform:**

Customers enrolled in the Digital Gaming Platform are not profiled. There is only one automated decision, corresponding to the user registration, and as required by the Gaming Act. It consists of comparing the data provided by the user with that of the DGOJ, and, following the indications of their systems, to reject or admit the registration of the user, based on the verification of said data and its entry or otherwise into subjective prohibitions. The user can contact the Customer Service Department.

Applicants and claims:

Neither automated decision-taking nor profiling is carried out when processing your personal data.

Large prize winners:

The profiling of certain stakeholders occurs when pre-established circumstances concur.

No automated decisions arise in any case.

Syndicate members:

After claiming a higher prize, the profiling of certain interested parties may occur under pre-established circumstances.

No automated decisions arise in any case.

Users:

Neither automated decision-taking nor profiling is carried out when processing your personal data.