

# McBride Racing Limited Data Protection Policy

**Effective Date:** 01/01/2025

**Review Date:** 01/01/2026

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## 1. Introduction

McBride Racing Limited is committed to protecting the privacy and personal data of its customers, employees, and all individuals with whom we interact. This Data Protection Policy outlines our approach to data protection and our commitment to complying with applicable data protection laws, including the General Data Protection Regulation (GDPR) in the UK and Ireland, and the Data Protection Act 2018 (UK) / Data Protection Act 2018 (Ireland).

This policy applies to all personal data processed by McBride Racing Limited across all our operations, including:

- Retail betting shops in the UK and Ireland.
- The Dial-A-Bet telephone and text betting service.
- Our prize draw competitions service (via [mcbridecompetitions.com](https://mcbridecompetitions.com))
- Our online betting website ([mcbridebetting.com](https://mcbridebetting.com)).
- Any other services or platforms where personal data is collected.

We recognise the importance of protecting personal data and are dedicated to ensuring that all personal data is processed lawfully, fairly, and transparently.

## 2. Scope

This policy applies to all employees, contractors, agents, and third parties who process personal data on behalf of McBride Racing Limited. It covers all personal data held by McBride Racing Limited, regardless of the format (electronic, paper, etc.) or location.

## 3. Key Data Protection Principles

McBride Racing Limited adheres to the following principles of data protection as outlined in the GDPR:

- **Lawfulness, Fairness, and Transparency:** Personal data is processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- **Purpose Limitation:** Personal data is collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- **Data Minimisation:** Personal data collected is adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

- **Accuracy:** Personal data is accurate and, where necessary, kept up to date. Every reasonable step is taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- **Storage Limitation:** Personal data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and Confidentiality (Security):** Personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.
- **Accountability:** McBride Racing Limited is responsible for, and able to demonstrate compliance with, the above principles.

#### 4. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- **Special Categories of Personal Data:** Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. (Note: While betting habits are not "special category," we treat them with high confidentiality due to their sensitive nature).
- **Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Data Controller:** The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. McBride Racing Limited is the Data Controller for the personal data it collects.
- **Data Processor:** A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the Data Controller.
- **Data Subject:** The identified or identifiable natural person to whom the personal data relates.
- **Consent:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

#### 5. Types of Personal Data Collected and Processed

McBride Racing Limited may collect and process the following types of personal data, depending on the service being used:

- **Customer Data:**
  - **Identification Data:** Name, address, date of birth, nationality, photographic identification (for verification purposes, particularly for age verification and anti-money laundering).
  - **Contact Information:** Email address, phone number (for Dial-A-Bet, online accounts, and prize draws).
  - **Financial Information:** Bank account details, payment card details (for deposits and withdrawals).
  - **Betting Activity Data:** Betting history, transaction records, win/loss records, preferred sports/events, stakes.
  - **Account Information:** Username, password (for online accounts).
  - **Communication Data:** Records of communications with customer support (phone calls, emails, chat logs, text messages).
  - **Location Data:** IP address, if using online services.
  - **Marketing Preferences:** Opt-in/out for marketing communications.
  - **Responsible Gambling Data:** Self-exclusion history, deposit limits, details of interactions related to responsible gambling (e.g., affordability checks).
  - **Prize Draw Data:** Entries, contact details, prize redemption details.
- **Employee Data:**
  - HR records, payroll information, contact details, performance data, health information (where necessary and with consent).
- **Website/App Usage Data:**
  - Cookies, IP addresses, device information, Browse history, click-stream data.

## 6. Purposes of Processing Personal Data

McBride Racing Limited processes personal data for the following purposes:

- **To Provide Betting Services:**
  - Processing bets and transactions (retail, Dial-A-Bet, online).
  - Managing customer accounts.
  - Verifying identity and age.
  - Processing deposits and withdrawals.
  - Fulfilling contractual obligations.
- **Customer Support and Communication:**
  - Responding to queries, complaints, and feedback.
  - Providing information about services.
  - Sending transaction confirmations and account updates.
- **Legal and Regulatory Compliance:**
  - Complying with anti-money laundering (AML) regulations.
  - Adhering to responsible gambling regulations.
  - Reporting to regulatory bodies (e.g., Gambling Commission in UK, Revenue Commissioners in Ireland).
  - Preventing and detecting fraud, collusion, and other illegal activities.
- **Marketing and Promotions:**

- Sending promotional offers and news (where consent is given or legitimate interest applies).
- Administering prize draw competitions.
- Personalising offers and website content.
- **Business Operations and Improvement:**
  - Internal record keeping and administration.
  - Improving our services, websites, and apps.
  - Conducting statistical analysis and research.
  - Monitoring and auditing internal processes.
- **Employee Management:**
  - Managing employment contracts, payroll, and HR matters.
  - Ensuring workplace safety.

## 7. Lawful Basis for Processing

McBride Racing Limited relies on the following lawful bases for processing personal data:

- **Contractual Necessity:** Processing is necessary for the performance of a contract with the data subject (e.g., processing bets, managing accounts).
- **Legal Obligation:** Processing is necessary for compliance with a legal obligation to which McBride Racing Limited is subject (e.g., AML, responsible gambling regulations, age verification).
- **Legitimate Interests:** Processing is necessary for the purposes of the legitimate interests pursued by McBride Racing Limited or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject (e.g., fraud prevention, improving services, marketing to existing customers where not requiring consent). A Legitimate Interest Assessment (LIA) will be conducted where appropriate.
- **Consent:** The data subject has given clear consent for McBride Racing Limited to process their personal data for a specific purpose (e.g., for direct marketing communications where not covered by legitimate interest, certain types of cookies). Consent can be withdrawn at any time.

## 8. Data Security

McBride Racing Limited implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- **Physical Security:** Secure storage of physical records, access controls to retail premises and data centres.
- **Technical Security:**
  - Encryption of data in transit and at rest where appropriate.
  - Firewalls and intrusion detection systems.
  - Regular security assessments and penetration testing.
  - Access controls and strong authentication mechanisms (e.g., multi-factor authentication).
  - Secure software development practices.
- **Organisational Security:**

- Data Protection training for all employees.
- Strict access controls and "need-to-know" principles for personal data.
- Clear internal policies and procedures for data handling.
- Incident response plan for data breaches.
- Due diligence on third-party processors.

## 9. Data Retention

McBride Racing Limited retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, accounting, or reporting requirements.

- Customer data related to betting activities and transactions will be retained for a minimum of [e.g., 5-7 years] to comply with anti-money laundering and responsible gambling regulations.
- Marketing consent records will be retained for as long as the consent is active and for a short period thereafter to demonstrate compliance.
- Employee data will be retained in accordance with employment law requirements.
- Records of communications will be retained for a reasonable period to manage customer relationships and resolve disputes.

At the end of the retention period, personal data will be securely deleted or anonymised.

## 10. Data Subject Rights

McBride Racing Limited respects the rights of data subjects concerning their personal data. Data subjects have the following rights:

- **The Right to Be Informed:** About how their personal data is being processed.
- **The Right of Access:** To obtain a copy of their personal data held by McBride Racing Limited.
- **The Right to Rectification:** To request correction of inaccurate or incomplete personal data.
- **The Right to Erasure (the "Right to Be Forgotten"):** To request the deletion of their personal data in certain circumstances.
- **The Right to Restriction of Processing:** To request the limitation of the processing of their personal data in certain circumstances.
- **The Right to Data Portability:** To receive their personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller.
- **The Right to Object:** To the processing of their personal data in certain circumstances, particularly for direct marketing.
- **Rights in Relation to Automated Decision-Making and Profiling:** To not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them, unless certain conditions are met.

To exercise any of these rights, data subjects should contact our Data Protection Officer (DPO) using the details provided in Section 15. We will respond to all legitimate requests within one month.

## 11. International Data Transfers

As McBride Racing Limited operates in both the UK and Ireland, data transfers between these two jurisdictions will comply with applicable data protection laws. For transfers of personal data outside the UK or the European Economic Area (EEA), McBride Racing Limited will ensure that appropriate safeguards are in place, such as:

- Adequacy decisions by the European Commission or UK Secretary of State.
- Standard Contractual Clauses (SCCs) approved by the European Commission or UK ICO.
- Binding Corporate Rules (BCRs).
- Other legally recognised transfer mechanisms.

## 12. Data Breaches

In the event of a personal data breach, McBride Racing Limited will take prompt action to assess the breach, contain the impact, and restore the integrity of our systems. Where required by law, we will notify the relevant supervisory authority (e.g., ICO in the UK, DPC in Ireland) without undue delay and, where appropriate, the affected data subjects.

## 13. Use of Data Processors

Where McBride Racing Limited engages third-party Data Processors to process personal data on our behalf (e.g., IT service providers, marketing agencies, payment processors), we will:

- Conduct due diligence to ensure they can provide adequate data protection safeguards.
- Enter into a written contract (Data Processing Agreement) that includes all mandatory GDPR clauses, obliging the processor to comply with data protection requirements.
- Monitor their compliance.

## 14. Children's Data

McBride Racing Limited's services are not intended for individuals under the legal gambling age (18 in both the UK and Ireland). We do not knowingly collect personal data from children. If we become aware that we have collected personal data from a child, we will take steps to delete that information as quickly as possible.

## 15. Contact Details and Data Protection Officer (DPO)

For any questions, concerns, or to exercise your data protection rights, please contact our Data Protection Officer:

**Data Protection Officer:** Thomas McBride

**Email:** [management@mcbridebetting.com](mailto:management@mcbridebetting.com)

**Address:** Unit 1, Carrowreagh, Bridgend, Co. Donegal, Republic of Ireland, F93 EP26  
Unit 8, Whitehouse Retail Park, Buncrana Road, Derry, BT48 8LB

## 16. Complaints

If you are not satisfied with how McBride Racing Limited has handled your personal data or responded to your request, you have the right to lodge a complaint with the relevant supervisory authority:

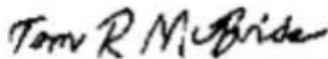
- **In the UK:** The Information Commissioner's Office (ICO)
  - Website: [www.ico.org.uk](http://www.ico.org.uk)
  - Helpline: 0303 123 1113
- **In Ireland:** The Data Protection Commission (DPC)
  - Website: [www.dataprotection.ie](http://www.dataprotection.ie)
  - LoCall: 1890 25 22 31

## 17. Policy Review

This policy will be reviewed annually or more frequently if there are significant changes to data protection legislation, our processing activities, or business operations.

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**Approved by:**



Tom McBride, Chief Executive Officer

**Date of Approval: 01/01/2025**