

Double Diamond Gaming Ltd – Affordability Profiling Privacy Notice

Who We Are?

Double Diamond Gaming Ltd TA Rainbow Casino is a registered company (number 6896085). Our registered office is 1 Portland Road, Birmingham, B16 9HN. We are the Data Controller in respect of any personal information we collect about you.

We will to use the information we collect about you in accordance with the General Data Protection Regulation (2018) (GDPR), and the Data Protection Act (2018).

This Privacy Notice is designed to be read alongside our main Privacy Notice which can be found [here](#)

We have appointed a Data Protection Officer (DPO) whose details are:

Email us: DPO@rainbowcasino.co.uk

Write to us: Data Protection Officer, Double Diamond Gaming Ltd, 10th Floor Cobalt Square, 83 Hagley Road, Edgbaston, Birmingham B16 8QG

Call us: 0121 454 0987

Introduction – Why are we using affordability profiling software

Our customers safety and wellbeing are very important, it is vital that we understand our customers and exhibit socially responsible strategies to support, help and protect our customers.

How we use Profiling

The Company will use the following analysis tools to assist with profiling of customers, in order to fulfil our social responsibility to ensure our customers' wellbeing

- 1) Third Party

The Company is working with a third party to assess our customers' affordability status.

- 2) Open Source Data

The company will use Government statistics.

This will only apply to those individuals who fall within the following categories:

- Active customers who are members

The aim of our affordability profiling process is to enable Double Diamond Gaming to protect and support our customers, and also to meet our social responsibility obligations.

How will we obtain your personal data for this purpose

Your personal data is obtained as follows:

- 1) At the point we entered into a contract with yourselves, at registration, when your personal details, including name, date of birth, address and, email were entered onto our systems.

The personal data used for affordability profiling will usually be collected through the means described [here](#). However, please also see our main Privacy Policy [here](#) for details of other ways in which we may collect your personal information.

Data Processor

Double Diamond Gaming Ltd, 1 Portland Road, Edgbaston, Birmingham, B16 9HN will at all times be the data controller in the respect of the personal information covered by this Privacy Notice. However we will use a data processor (the Data Processor) as part of the affordability profiling process and your data will be shared with them for this purpose only.

The Data Processor is Be Bettor, a company incorporated in England and Wales with company number 8404294 whose registered office is at Old Gunn Court, 1 North Street, Dorking RH4 1DE.

The Data Processor acts solely on the instruction of Double Diamond Gaming Ltd as the Data Controller.

How will your personal data will be processed

The affordability profiling process will provide Double Diamond Gaming Ltd with sufficient information to enable them to determine an individual's affordability rating.

- **Processing using Open Source Data**

Analysis will be carried out internally to ascertain an affordability criterion, based on government data and data the company holds on customers. Data with regards to average weekly earnings will be compared to occupation status and Drop, Win and Loss figures to determine an individual's affordability rating.

- **Processing with a Third Party**

This rating will be provided by the Data Processor based on the personal data we share with them.

The data processed by the Data Processor will include personal data falling into the following categories:

- Name, Date of Birth, Address, Phone Number, Email Address, Membership Number, Gaming figures (Drop, Win/Loss)

The data will be used by the Data Processor to produce an affordability score for each customer which is delivered to Double Diamond Gaming Ltd. We will use this information and review it against your profile. If this causes concern and we feel that your spending pattern is incompatible with your affordability score, this may result in an interaction with a Manager, which could include checking on your welfare or asking for more information with regards to your transactions. This process is required in order to ensure that we meet our social responsibilities further to Gambling Commission Guidelines and/or our licensing conditions.

Following completion of the above process we may take a number of actions which could include:

1. Allow the business relationship to continue if the affordability criteria is compatible with the data we have collated; or
2. Use the data to monitor our relationship to ensure that spend is consistent with the affordability score; or
3. Cease or suspend our business relationship.

The above process uses automated technologies to produce an affordability score. However, we do not consider that this process amounts to automated decision making under Article 22 (1) of the GDPR as no decision is made on the basis of the affordability score without some form of human intervention. Further, we do not consider that decisions made further to this process produce legal effects or similarly significant effects.

What is the Basis for Processing

Our lawful basis for processing affordability information will usually be that the processing is necessary for our legitimate interests (or those of a third party). Please see the table below for details of the specific provision relied upon. Due to our regulatory requirements, we are required to take steps to protect the vulnerable and affordability profiling is usually used for this purpose. In some circumstances we may also rely upon legal obligation as a lawful basis for example where processing is necessary to comply with a licensing condition. Double Diamond Gaming Ltd does not usually rely on consent as a lawful basis for processing in connection with the use of information for the purpose of affordability profiling.

| Customer Data | GDPR Article | Basis for Processing |
|----------------------------------|---------------|----------------------|
| Personal Data – Active Customers | Article 6-1-f | Legitimate Interest |

Who do we share personal data with and retention periods

For details of the circumstances in which we may share your personal data and our retention periods please see our main Privacy Notice which can be found [here](#). We envisage that we will only share any personal information covered by this Affordability Profiling Privacy Notice in very limited circumstances.

It will be retained only for as long as is necessary and in line with our data retention policies, which is data is normally removed after 5 years from the last visit date by the customer.

Individual Rights

You have a number of rights in relation to your personal data. Our full Privacy Notice, available [here](#) contains full details of all of the rights, although please be aware that not all of the rights will apply to you. You can also request a copy through the post from our DPO.

In particular you have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and you feel that this impacts on your fundamental rights and freedoms. However, we may still be able to continue processing if we demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

How to Complain

Please let us know if you are unhappy with how we have used your personal information. To do this please contact our DPO using the contact details above. You also have the right to complain to the Information Commissioner's Office. More information about this is available on the ICO's website www.ico.org.uk

Additional Information

If you have any questions with regards to affordability profiling processing activities, please contact us directly at DPO@rainbowcasino.co.uk.