



~ Updated 24<sup>th</sup> May 2018 ~

## PRIVACY POLICY

P2 Entertainment Limited ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which we collect, process, store and use any information collected in connection with our website [p2entertainment.co.uk](http://p2entertainment.co.uk) (the "site") and our products, services and (together "Services"). Services include mobile application software ("Apps") published by us and this Policy applies to any such Apps once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (the "Device").

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the **Act**), the data controller is P2 Entertainment Limited of Chulmleigh, East Street, Harrietsham, Kent ME17 1HJ

## OUR PROMISE TO YOU

- **Security.** We will always follow industry best practices to ensure your data is stored safely and securely.
- **Transparency.** We will always be transparent and tell you what data we are collecting about you and how it will be used. Your data will only ever be used by us. We will never share your data with or sell your data to third parties.
- **Control.** We will always give you control over the data we hold and any marketing correspondence you receive from us. You can choose whether you want to stop receiving correspondence from us at any time.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site . This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. We may also ask you for information when you enter a competition or promotion sponsored by us, and when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site and the resources that you access, including leaderboard registrations and subscriptions to newsletters.
- Device Type: We may collect information about the Device you are using to access our site if done so using a mobile device e.g. by use of a “More Games” button. This information is limited to the device type only and is used solely to determine the most appropriate screen layout for the Device. This data is not retained in any way.
- Location information: We may collect information about the country you are located in and this is used solely to determine the most appropriate content to display. This data is not retained in any way.
- Log information: when you view content on our site, we may automatically collect and store certain information in server logs including but not limited to internet service provider (**ISP**), clickstream data, browser type and language, viewed and exit pages and date or time stamps, but not internet protocol (**IP**) addresses.
- We do use Google Analytics to collect data regarding visitors to our site, such data, however is anonymised, non-personal and generic information and of a general nature. Information provided by Google Analytics includes the following;
  - How many visitors our site has at the moment -Who has visited our site recently, and how many of these are unique or repeat visitors -How often repeat visitors come back to our site
  - How visitors get to our site (e.g. referral, ads, direct, links or email)
  - What other sites are referring visitors to ours -Where our visitors are coming from (e.g. the U.S. or other countries)
  - Which pages on our site have been visited the most -How our site is faring in social networks; for instance how many +1s you’re getting on Google

Plus, the number of Facebook Likes/Sends you receive or the volume of Twitter Tweets about your pages;

- What is the “bounce rate” (the number of visitors who leave without examining other pages)
- The average time spent viewing our site
- What kind of browsers visitors are using
- The speed of the ISPs involved

**With respect to Apps we do not collect any personal or non-personal data i.e. data that does not directly identify you, whether this be email addresses, names, telephone numbers, MAC or UDIDs, location or log identifiers.**

## **COOKIES**

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

## WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers that are not available to the public. To prevent unauthorised on-line access to data, we maintain data behind a firewall-protected server.

Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password, which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## USES MADE OF THE INFORMATION

We use information held about you, and submitted via p2entertainment.co.uk in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those, which were the subject of a previous sale to you.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick or un-tick, as appropriate, the relevant box situated on the form on which we collect your data (the order form **OR** registration form).

We do not disclose information about identifiable individuals to our advertisers.

## DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If P2 Entertainment Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of P2 Entertainment Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## PARENTS

- We are committed to the safety and privacy of children who visit and participate in our Services.
- We encourage parents and/or guardians to play an active role in their children's online experience at all times. **We do not knowingly contact or collect information from children under 13 without the explicit permission of their parents/guardians. If you believe that we have inadvertently collected such information, please contact us so we can promptly either obtain parental consent or remove the information.**
- For those activities that may require us to collect personal information (e.g. competitions), we will only collect personal information, which is necessary to enable us to administer the relevant activity. If your child is under 13 we will only collect personal information and use such personal information where you have provided us with your explicit consent to collect such personal information and agreed to the type of usage, which consent may be provided to us by ticking an opt-in box on our site or by email or by post.
- In posting competition winners' names on our site it is our policy to indicate no more than a child's first name, first initial of last name, county, age or year group. We encourage parents and guardians to watch over their children's online use. Please educate your children to always ask for your permission before they provide personal information.

## CHILDREN

- Remember to be smart and safe online. Always ask your parent or guardian for permission before you give out any personal information. This could include your name, email address, home address, telephone number, where you go to school or any other information about yourself that would enable someone to contact you either online or offline.
- From time to time we run online competitions for you to enter. Always remember to ask your parent or guardian for permission before entering any competition on our site.

## **YOUR RIGHTS**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking or unchecking, as appropriate, certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at The Data Protection Officer P2 Entertainment Limited, Chulmleigh, East Street, Harrietsham, Kent ME17 1HJ .

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **ACCESS TO INFORMATION**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. This privacy policy was last updated 24th May 2018.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to The Data Protection Officer P2 Entertainment Limited, Chulmleigh, East Street, Harrietsham, Kent ME17 1HJ .