

Privacy Notice for The Labour Lottery

1. Introduction

The Labour Party (“Labour”, “we”, “us”, “our”, the “Party”) is committed to protecting the privacy and security of the personal data we collect about individuals that participate in the Labour Lottery (“you”, “your”, “data subjects”, “Players”).

The purpose of this privacy notice is to explain what personal data we collect about you and how we will use it when we run the Labour Lottery. When we do this, we are the data controller.

Please read this privacy notice carefully as it provides important information about how we handle your personal data and your rights. If you have any questions about any aspect of this privacy notice you can contact us using the information provided below or by emailing us at dpo@labour.org.uk quoting “Labour Lottery” in the subject or body of the email.

Note: people under the age of 18 are not permitted to be a Player of the Labour Lottery.

2. Personal data we will collect and/or use

As a Labour Lottery participant (“Player”) we will use the following categories of your personal data (section 4 outlines clearly what we use your personal data for):

- Title; First name & surname; Home Address(es) including Post Code; Email Address(es); Phone Number(s); Date of Birth; Age;
- Photograph(s)/image(s) & testimonial(s) (if a Player is a winner);
- Survey Answers (where a Player decides to complete a survey);
- Behavioural difficulties (where a Player has completed a Self-Exclusion form);
- Lottery login details; Pseudonymised identifiers (Player Lottery Number(s) & internal Player monitoring IDs that may be associated to a Player);
- Either, copy of Driver’s Licence, Passport or other relevant proof of identity identifier (for identity verification);
- Further Personal Data shared voluntarily from you within any digitally recorded correspondence (e.g. email, video calls etc.);
- Bank Details including bank name, account number, & sort-code, Payment card information (direct debit and transaction management);
- Political opinion (where you have indicated within the Lottery contact preference centre or in correspondence a desire for further involvement with Labour as a political party separate to the Labour Lottery).

3. How we will collect personal data about you

We will collect personal data in a variety of ways and at a variety of times when you are a Player. We refer to “direct data collection” when data is collected directly from you and we refer to “indirect data collection” when the data is not collected directly from you). We will collect personal data about you in the following ways:

- From yourself when you became a member, supporter or volunteer of the Labour Party and told us you are happy for us to contact you about updates or events we conduct (Direct data collection) [also see the Labour Party website privacy notice regarding marketing preferences: <https://labour.org.uk/privacy-policy/>],

- From yourself when you sign up to become a Player of the Labour Lottery (Direct data collection),
- From yourself when you complete a survey either as a winner or as a participant and player of Labour Lottery (Direct data collection),
- From yourself when we have email, video call or phone conversations with you and you volunteer further personal data about yourself (Direct data collection),
- From yourself, if you have given us permission to do so, when you are a winner and we take photos and/or videos and/or further circumstantial information about you or your family to be used as promotional materials for Labour Lottery (Direct data collection),
- From yourself when you complete a self-exclusion form on the website (Direct data collection) [self-exclusion form can be found here: <https://labour.charitypayments.co.uk/e-self-exclusion>],
- From age verification, financial transactional, or anti-money laundering service providers (Indirect data collection).

4. Purposes for using your personal data and the lawful basis

We will use your personal data for the following purposes and on the following lawful bases. The table below is relevant to all data subjects who are Players of the Labour Lottery:

4.1 Purpose	4.2 Lawful Basis for Processing
For you to join/sign up for the lottery to become a Labour Lottery "Player".	The lawful basis we shall be relying in accordance with UK GDPR Article 6.1(b) where the use your personal data is necessary in the performance of a contract which you have agreed to or where we are working to enter into a contract with you.
To notify you if you have won and interact with you to supply your winnings.	
To process monies so you are able to participate in the Lottery.	
To send you notification emails to inform you about: Cancellations, Lottery Entry communications, Direct Debit management, Lottery Numbers Reminders, Winner Notification, inabilities to claim monies.	
To create statistics that we must submit to the Gambling Commission as part of our Annual Return to them.	
To conduct age verification checks in accordance with the Gambling	The lawful basis we shall be relying on is the legitimate interest of the Data Controller in accordance with UK GDPR Article 6.1(f). [Note:

<p>Commission requirements. This is to make sure you are not underage.</p>	<p>There is no law that specifies this as a requirement although is required in the Gambling Commission Licence Conditions and Codes of Practice: 3.2.13 - Remote lottery Social Responsibility code. This is a condition of our gambling licence.]</p>
<p>To send you marketing material for the lottery according to your preferences.</p>	<p>The consent you have provided us for this use of your personal data in accordance with UK GDPR Article 6.1(a).</p>
<p>To conduct Anti-Money Laundering checks on Players in accordance with UK Gambling Laws.</p> <p>You can find our Anti-Money Laundering Policy here: https://labourlottery.org/policies/anti-money-laundering-policy/</p>	<p>Compliance with a legal obligation under UK GDPR Article 6.1(c). The legal obligation is the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, and the Proceeds of Crime Act 2002.</p> <p>Where any special categories of your personal data are processed within these checks it is in accordance with GDPR Article 9.2(b) for employment, social security and social protection reasons (authorised by the pre-mentioned law).</p>
<p>Where you are a large prize winner we use your personal data to make contact with you to ask if you would like to provide a testimonial or be part of promotional materials for the Labour Lottery. This is in the form of a survey.</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller in accordance with UK GDPR Article 6.1(f).</p>
<p>If you provide your consent we will use your personal data in public facing promotional materials. You can withdraw your consent at any time.</p> <p>Please note: Where you have been included printed in promotional material we may not be able to remove the information about you although we will remove your information when we re-print similar materials.</p>	<p>The consent you have provided us for this use of your personal data in accordance with UK GDPR Article 6.1(a).</p>

<p>To make sure Players are based in Great Britain (GB) only (for the avoidance of doubt, this excludes Northern Ireland, the Channel Islands, Isle of Man, BFPO addresses).</p> <p>NOTE: payment pages are set to exclude post codes beginning with IM, GY, BT, and JE to try and prevent those residing in those outside GB territories (but still within the UK) from entering.</p>	
<p>To conduct statistical monitoring of the Lottery to monitor for issues and improvements we are able to make.</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller in accordance with UK GDPR Article 6.1(f).</p>
<p>To create pseudonymised identifiers to help reduce identifiability and allow us to monitor your activities within our systems.</p>	
<p>To handle inquiries by you about the Lottery (handled either by Sterling Lotteries or Labour) by phone or email.</p>	
<p>So you are able to register for self-exclusion and we can take appropriate action such as not targeting you with marketing material for the period of your self-exclusion (minimum 6 months).</p> <p>This is to reduce gambling harms. Labour registers this on our internal customer relationship management system. All the controls and mechanisms for social responsibility in gambling are in accordance with the Gambling Commission LCCP.</p> <p>Self-Exclusion Form can be found here: https://labour.charitypayments.co.uk/e-self-exclusion</p>	<p>Compliance with a legal obligation under UK GDPR Article 6.1(c). The legal obligation is the Gambling Act 2005.</p>

<p>To return funds to you where you have registered for self-exclusion and still have a positive fund amount.</p>	<p>The lawful basis we shall be relying in accordance with UK GDPR Article 6.1(b) where the use your personal data is necessary in the performance of a contract which you have agreed to.</p>
<p>To take you off the self-exclusion list when you make contact with us (this will be only after the minimum 6 month period has finished).</p>	<p>The lawful basis we shall be relying on is the legitimate interest of the Data Controller in accordance with UK GDPR Article 6.1(f).</p>
<p>Where you have indicated in your Lottery profile preferences that you wish to interact with, or have further involvement with, or be notified of the development with the Labour Party or politically relevant content we will send you further information, or make contact with you.</p>	<p>The consent you have provided us for this use of your personal data in accordance with UK GDPR Article 6.1(a).</p> <p>The consent you have provided us for this use of your personal data in accordance with UK GDPR Article 9.2(a), with particular reference to an inference of your political opinion.</p>
<p>To identify personal data and take relevant action upon submission of a data subject rights request.</p> <p>Note: any data subject rights requests submitted in the context of the lottery will be for personal data processed within the lottery only unless to specifically state otherwise.</p>	<p>Compliance with a legal obligation under UK GDPR Article 6.1(c). The legal obligation is the UK General Data Protection Regulation to uphold your data protection rights.</p> <p>Special categories of personal data used for the purpose stated will be under UK GDPR Article 9.2(g).</p>

5. Sharing your data

It is unlikely that we'll ever share your personal data outside the UK. If, however, it becomes necessary for the purposes of conducting our research we will only share it with organisations in countries benefiting from a UK or European Commission adequacy decision, or on the basis of International Data transfer Agreements or European Commission Standard Contractual Clauses with a UK required addendum (all of which are recognised by the UK) which contractually oblige the recipient to process and protect your personal data to the standard expected within the UK.

Any data shared with the below categories of recipients is the minimum necessary for the task they have been instructed to carry out on our behalf or in conjunction with us. Each category of recipient is subject to pre-approved review to ensure comparative technical and organisational measure for keeping the data secure.

1. Lottery platform service provider, also known as an External Lottery Manager (Sterling Management Centre Limited)
2. Digital communications and storage providers

3. Online survey platform providers
4. Age verification service provider
5. Payment processing providers
6. Anti-money laundering service providers
7. Labour Party platforms (where you indicated your desire to interact with us outside of the Lottery)

There may be scenarios where we are subject to a legal obligation to disclose or share your personal data, such as with law enforcement agencies, regulatory bodies or public authorities in order to prevent or detect crime. We will only ever disclose your personal data to these third parties to the extent we are required to do so by law.

Where you have indicated a desire for us to use your personal data within the wider activities of the Party we will use your personal data in line with our website privacy notice which can be found on: <https://labour.org.uk/privacy-policy/>

6. How long we keep your personal data

Data shall be reduced, redacted, de-identified and deleted at appropriate times so we retain the minimum amount of data possible throughout the running of the Labour Lottery.

We keep your personal data for at least seven (7) years once you are no longer a Player with us unless there is another legal reason to retain your personal data longer. All data is securely stored for this time and safely deleted.

7. How we protect your personal data

We implement appropriate technical and organisational measures to protect your personal data from unauthorised disclosure, use, alteration or destruction. A data protection risk assessment has been conducted which has reviewed all aspects of security in relation to Labour Lottery which will be reviewed annually.

Our External Lottery Manager is certified to the UK Cyber Essentials scheme requirements and under Remote Gambling and Software Technical Standards – Security Requirements. This entails annual security audits based on sixty-one (61) relevant security controls of Annex A of ISO/IEC 27001:2013 security standard.

Our External Lottery Manager (and therefore, for the Labour Lottery, Labour) maintain a suite of security related policies to maintain best practices and compliance to not only data protection requirements but UK gambling laws.

The lottery platform is security tested on a regular basis throughout any given year and maintains security encryption and access standards to maintain high levels of security but also to maintain compliance with Licence Conditions and Codes of Practice (LCCP).

We will always keep these under review to make sure that the measures we have implemented remain appropriate. Any personal data is not subject to any automated decision-making.

8. Cookies

We only process necessary and essential functional cookies on the Labour Lottery website.

9. Your rights and options

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal information because it is in our legitimate interests to do so, you can object to us using it this way.
- Where we use your personal data for direct marketing, including profiling for direct marketing purposes you can object to us doing so.
- You can ask us to restrict the use of your personal data if:
 - It is not accurate,
 - It has been used unlawfully but you do not want us to delete it,
 - We do not need it any-more, but you want us to keep it for use in legal claims, or
 - if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to erase your personal data and request a machine-readable copy of your personal data to transfer to another service provider.
- You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, please contact us at dpo@labour.org.uk

Note: Where you submit your rights request for Labour Lottery we will only process your rights request with respect to the Labour Lottery and no other part of Labour unless you explicitly state this.

10. How to Complain

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://ico.org.uk/concerns/>.

11. Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact:

Organisation: The Labour Party

Address: Labour Central, Kings Manor, Newcastle upon Tyne, NE1 6PA

Alternatively, you can email us at dpo@labour.org.uk

12. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify you of the changes where required by applicable law to do so.

Last modified: 11 September 2023.