

PRIVACY POLICY

This privacy policy applies between you, the User of this Website and Kalooki Sportsbook Limited (of which 'Kalooki Sportsbook' is a trading name), the owner and provider of this Website. Kalooki Sportsbook takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

Please read this privacy policy carefully

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to Kalooki Sportsbook via the Website. This definition incorporates, where applicable, the definitions provided in the General Data Protection Regulation 2018 (GDPR);
Cookies	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);
Kalooki Sportsbook, or us	Kalooki Sportsbook is a trading name of Kalooki Sportsbook Limited, a company incorporated in England and Wales with registered number 10731050 whose registered office is at International House, 24 Holborn Viaduct, London, United Kingdom, EC1A 2BN;
UK and EU Cookie Law	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
User or you	any third party that accesses the Website and is not either (i) employed by Kalooki Sportsbook and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Kalooki Sportsbook and accessing the Website in connection with the provision of such services; and
Website	the website that you are currently using, https://www.thepunditleague.com , and any sub-domains of this site

unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

- a. the singular includes the plural and vice versa;
- b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
- d. "including" is understood to mean "including without limitation";
- e. reference to any statutory provision includes any modification or amendment of it;
- f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

3. This privacy policy applies only to the actions of Kalooki Sportsbook and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

Data collected

4. We may collect the following Data, which includes personal Data, from you:

- a) Your personal details, such as your name, email address, postal address, telephone or mobile number, gender or date of birth;
- b) Photographic identification and proof of address documents (to carry out due diligence)
- c) Banking and financial details (to establish the source of funds where a transaction is involved)
- d) Your account login details, such as your username and password
- e) in each case, in accordance with this privacy policy.

Our use of Data

5. For purposes of GDPR 2018, Kalooki Sportsbook is the "data controller".

6. We will retain any Data you submit for five years, unless you consent to receive marketing materials, in which case we shall retain your Personal Data until such a time as the business ceases to operate, or you withdraw your consent to be contacted.

7. Unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This includes our affiliates and / or other companies within our group.

8. All personal Data is stored securely in accordance with the principles of the GDPR. For more details on security see the clause below (Security).

9. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

- a. internal record keeping;
- b. improvement of our products / services;
- c. transmission by email of promotional materials that may be of interest to you;
- d. contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website;
- e. to deter, prevent or detect the use of third party software in peer-to-peer gambling
- f. to deter, prevent, or detect any activities conducted in breach of the Kalooki Sportsbook T&Cs.
- g. to make sure we offer our services to eligible persons;
- h. crime detection, prevention, and prosecution;
- i. to verify your identity and establish the source of funding in any transaction;

j. to carry out appropriate anti-fraud checks (by conducting online searches using a third party identity provider). Please note that this will not affect your credit rating;

k. to assess and manage any potential risks and prevent problem gambling.

l. in each case, in accordance with this privacy policy.

Third party websites and services

10. Kalooki Sportsbook may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services do not have access to certain personal Data provided by Users of this Website.

Links to other websites

11. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Changes of business ownership and control

12. Kalooki Sportsbook may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Kalooki Sportsbook. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

13. We may also disclose Data to a prospective purchaser of our business or any part of it.

14. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Controlling use of your Data

15. Kalooki Sportsbook has a policy of 'privacy by design', and your data will not be used for the purposes of direct marketing, unless you specifically request to receive such materials. Kalooki Sportsbook will not share your data with third parties without specific consent from you. Wherever you are opted to receive such materials, you will be given options to restrict our use of your Data. This may include the following:

16. use of Data for direct marketing purposes, if you have; and

17. sharing Data with third parties.

Functionality of the Website

18. To use all features and functions available on the Website, you may be required to submit certain Data.

19. You may restrict your internet browser's use of Cookies. For more information see the clause below (Cookies).

Accessing your own Data

20. You have the right to ask for a copy of any of your personal Data held by Kalooki Sportsbook (where such Data is held), as is your right to access under GDPR. There will be no charge for this provision (except where requests are repetitious or unreasonable), and we will provide the data within 30 days of receipt of your request. Any requests for Access or restriction must be made in writing to the Data Protection Officer through our postal address, or by email to kalookisportsbook@hotmail.com

Security

21. Data security is of great importance to Kalooki Sportsbook and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.

22. If password access is required for certain parts of the Website, you are responsible for keeping this password confidential.

23. We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the Website.

Cookies

24. This Website may place and access certain Cookies on your computer. Kalooki Sportsbook uses Cookies to improve your experience of using the Website and to improve our range of services. Kalooki Sportsbook has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

25. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

26. Before the Website places Cookies on your computer, you will be presented with a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Kalooki Sportsbook to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

27. This Website may place the following Cookies:

28. Type of Cookie and Purpose

- **Strictly necessary cookies**
These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, or make use of e-billing services.
- **Analytical/performance cookies**
They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies**
These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

29. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

30. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

31. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

General

32. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

33. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

34. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

35. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

36. Kalooki Sportsbook reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

Your rights

37. In addition to your rights to access and restrict the use of your Personal Data, you can also request to have this erased. If consent is the basis of processing of your data, then Kalooki Sportsbook will comply with this request and remove all Personal Data from our databases. However, if there is another legal basis for processing your data, we will clarify what data has been retained and the reasons for this.

38. We sometimes use systems to make automated decisions based on your personal information. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future, or the ability to use our services.

We may use automate decisions making in the following situations:

- a. tailoring products and services – we may place you in groups with similar customers (segments) to study and learn about preferences and your needs, and offer more tailored experience for you;
- b. detecting fraud - we use your personal information to help decide and detect if your account may be being used for fraud or money-laundering. If we think there is a risk of fraud, we may block or suspend the account;
- c. opening account - when you open an account with us, we check that the product or service is relevant for you, based on what we know. We also check that you meet the conditions needed to open the account. This may include checking age, residency, nationality or financial position;
- d. risk assessment connected to your bet.

Data protection law seeks to safeguard individuals against harm that may arise from decision-making - including profiling - that takes place without human intervention. You have the right not to be subject to a decision - including profiling - when it is based on the automated processing of your personal information and it has a legal effect or a similarly significant effect on you.

Please note that the right does not apply when the processing is:

- a. necessary for entering into or for the performance of a contract with you; or
- b. when it is authorised by law; or
- c. when it is based on your explicit consent.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO) by contacting them on 0303 123 1113 or visiting <https://ico.org.uk/>.

We are registered with the ICO, Reference: **ZB082152**

Our Data Protection Officer is James Stokes and you can contact them at kalookisportsbook@hotmail.com or by writing to;

Data Protection Officer
Kalooki Sportsbook Limited
63 Seafield Road,
Ramsgate,
Kent,
CT11 0AX

Certificate

Organisation Name:

Kalooki Sportsbook Limited

Reference number:

ZB082152

Tier:

Tier 1

Start date:

8 June 2021

End date:

7 June 2022

Data Protection Officer

Title: Mr

Name: James Stokes

Address: 63 Seafield Road
Ramsgate
CT11 0AX

Email address: kalookisportsbook@hotmail.com

Telephone number: 08009708948

Publish Name: No

Publish Contact Details: Yes