



PRIVACY POLICY

MAY 2018

IMPORTANT NOTICE: Crown London Aspinalls' (Crown London) Members, Guests and Website Users by providing their personal information explicitly consent to their information being governed by this Privacy Policy, the Membership Rules and any other form of explicit consent provided by you to Crown London from time to time. Should you not agree and wish to vary, modify, limit or withdraw your consent subject to the *General Data Protection Regulations (GDPR)* please notify us.

Please note that emails sent to or received from Crown London are not encrypted, therefore communication via this method is at your inherent risk. Please see "How to Contact Crown London" for other available communication methods.

This Privacy Policy replaces any previous Privacy Policy.

YOUR PRIVACY IS IMPORTANT

Your privacy is important to us and Crown London is dedicated to protecting your personal information. This Privacy Policy explains Crown's personal information handling practices across the organisation including information about how we collect, use, disclose and store your personal information.

It also contains information about how you can access the personal information Crown London holds about you, how you can ask Crown London to vary, withdraw consent, correct or erase your personal information and how you can make a complaint if you have concerns about how Crown London managed your personal information.

You can find more information by contacting Crown London (please refer to the "How to Contact Crown" section of this policy).

COLLECTION OF PERSONAL INFORMATION

Crown London collects your personal information so that we can perform our functions or activities and offer our services to you including those of our affiliates. Crown's functions, activities and services are many and varied and include the casino, the Club Membership, concierge service, restaurant and bar, entertainment, retail, marketing, competitions, financial transactions, complaint handling, recruitment, compliance, security and surveillance.

Personal information is information or an opinion about you of which you can be identified. Personal information may include your name, image, date of birth, phone number(s), address, email address, identification, connections, Self-Enrolment National Self Exclusion (SENSE) information, financial information (card, account and funds provenance), gaming records, occupation(s), credit history, bookings, behaviour and any other information provided by you. The type of personal information we collect from you depends on your interaction with us.



Depending on the transaction, if Crown London does not collect your personal information, we may not be able to provide you an offer or service.

Collection from you

It is Crown London's usual practice to collect your personal information directly from you. For example, you provide us your personal information when you apply to become a Member of the Club, enter the premises as a Guest, utilise our website, write to us, participate in a survey or competition, make an enquiry, join a mailing list or make a restaurant reservation.

Collection from public sources or third parties

Where relevant, Crown will collect personal information about you from a publicly available source (such as other websites) or from third parties, this includes:

- credit reporting bodies (if we request information about your credit history);
- other casinos; and
- Crown London's related entities.

Collecting sensitive personal information

Sensitive personal information is information or an opinion about an individual's racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, criminal and civil offences, records and proceedings (including alleged offences) philosophical beliefs, sexual preferences health information, genetic information or membership of a trade union.

Crown London's general approach is not to collect, use or disclose sensitive information. However, in limited circumstances, Crown London will collect sensitive information where it is necessary for one of Crown London's functions or activities and you have consented to the collection of that information. For example, Crown London may collect health information from you should you wish to participate in an activity that requires knowing your physical condition in order to safely participate.

Collecting information required by law

Crown London also collects your personal information where we are required or authorised to do so by law or court order, for example, pursuant to *The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017* and/or the *Proceeds of Crime Act 2002*.

USING AND DISCLOSING YOUR PERSONAL INFORMATION

Crown London operates a range of businesses that handle personal information. We use and disclose your personal information that we collect (and share it with related companies) for a number of different purposes, including:

- to identify and contact you and manage our relationship with you;
 - to tell you about things at Crown London that you may be interested in;
 - to manage and administer our services to you;
 - to conduct and improve our businesses and improve the customer experience;
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- to maintain security and safety in our venues;
- to prevent or investigate any actual or suspected misconduct, fraud or unlawful activity;
- in relation to your credit worthiness, including to obtain a credit report about you;
- to consider any concerns or complaints you may raise against Crown London;
- to comply with our legal obligations as required by relevant laws, regulations and codes of practice.

Disclosing your personal information

We understand how important it is to keep your personal information private. We will use and disclose your personal information for the purposes we collected it and where you would reasonably expect us to. We will also disclose your personal information when:

- you agree to the disclosure; or
- the disclosure is required or authorised by law.

To the extent permitted by law, we may also disclose information about you to:

- Crown London's related companies;
- third parties who provide services to Crown London from time to time such as mail-house providers, customer research agencies/systems, collection agencies, advertising agencies and our advisers;
- government agencies and regulatory bodies including the Gambling Commission as part of our statutory obligations; and
- other casino operators, to identify credit worthiness, the prevention and detection of crime, the apprehension and prosecution of offenders and mitigation.

Disclosing your personal information overseas

For international customers, Crown may share your personal information with overseas recipients located in countries where Crown or an associated entity, has staff or a business, including without limitation, Australia, America and Hong Kong providing GDPR compliance equivalent.

For international gaming patrons, we may also share your personal information overseas in relation to the assessment of your credit worthiness.

Marketing

Where applicable Crown London will use your personal information to contact you via mail, SMS, email, telephone or online to tell you about news, special offers, products and services that you might be interested in. We do this where you have consented to receiving such information or it is related to the purpose for which we collected your personal information. This service is optional and you can contact us to update or withdraw your marketing preferences at any time, which Crown London endeavours to action as reasonably practicable, including at the time of providing your information should you select not to, in which case, this will occur with immediate effect. In instances whereby your information was obtained by or passed onto a third party provider, in accordance with this Policy, you may be required to contact them directly in order to update or withdraw your marketing preferences. Crown London does not market to any excluded persons including persons registered on SENSE.

Restaurant Reservation

Crown London, OpenTable/Bookarestaurant and Squaremeal collect your personal information in order to secure



your reservation at Crown London and for marketing purposes. If you do not provide this information you cannot make a reservation at Crown London. Your personal information may be disclosed to associated entities.

Surveillance

Crown London is subject to CCTV and audio surveillance to maintain security and safety in our venues at all times. Details of suspected or actual illegal or improper conduct may be shared with the Gambling Commission, law enforcement bodies and other casinos.

SECURITY OF PERSONAL INFORMATION

Crown London takes steps to protect the personal information it holds against loss, interference, unauthorised access, use, modification or disclosure and against other misuse.

Your personal information is held on Crown London premises and systems or offsite using trusted third party providers including being transferred and stored outside the European Economic Area (EEA). Crown London takes all reasonable measures to ensure adherence to this Privacy Policy by our employees and service providers to maintain the confidentiality of any personal information held by Crown London.

Our security safeguards include:

- staff training on their obligations with regard to your information;
- ensuring appropriate data handling and security arrangements are in place when we disclose and/or store information or use third parties to handle or store data;
- system security such as encryption, firewalls and intrusion detection systems and surveillance;
- complex security such as CCTV and audio surveillance; and
- destroying personal information when no longer required.

ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

Subject to some exemptions, you may ask Crown London to provide you access to the personal information that we hold about you. To do so, please notify us and complete Crown London's request for personal information form. Photo identification may be required to identify you.

Once Crown London has collected your personal information it will provide you a copy of it to you subject to verifying your identity.

A copy of your information will generally be made available to you within a month unless, an extension is required or we are not required to give you access to your personal information pursuant to a derogation in the GDPR. In each instance, you will be notified in response to your request.

Where applicable, we will inform you in advance of any fees for Crown London to find the information you have requested.

If you find that your personal information is inaccurate or out-of-date, please let us know. For further information about how to request access or changes to the information Crown London holds about you or to update your marketing preferences or unsubscribe please contact us (please refer to the "How to Contact Crown" section of this policy).



WEBSITES, DEVICES AND COOKIES

Where applicable, Crown London will also collect the following information from you:

- where devices are enabled to connect to, or are identifiable by, the Crown London premises infrastructure (for example Wi-Fi networks or Bluetooth infrastructure), we and our third party providers may automatically collect data from those devices including usage, type of device, location within the complex and arrival and departure time;
- the fully qualified domain name from which you accessed our websites, or alternatively, your IP address;
- the web browser that you are using and the pages you accessed;
- device ID number (MAC address);
- the date and time you accessed each page on our websites;
- the URL of any webpage from which you accessed our websites or by using the complex Wi-Fi, and the details of any mobile Apps you have accessed from a device using the complex Wi-Fi;
- publicly accessible social media posts and any personal information you allow us to collect by linking your account on our website with a third-party social-networking site including but not limited to Facebook, Twitter, or Google+; and
- cookies which track your visits to the our web sites (see below).

Where applicable, we are collecting this information (and may use or hold this information) to provide, improve and develop our services to you and the customer experience.

Crown London may use this anonymised data to inform our promotional and marketing strategies, as well as for research and profiling purposes including customer demographics, interests and behaviours based on personal information and other information provided to us. This research may be compiled and analysed on an aggregate basis, and we may share this aggregate data with our affiliates, agents and business partners. This aggregate information does not identify you personally. We may also disclose aggregated information in order to describe our services to current and prospective business partners and to other third parties for other lawful purposes.

Crown London may connect information you provide to us for one purpose with other information for use for one or more of the above purposes. If you access or log-in to the premises Wi-Fi service, and we already hold other information (both personal or non-personal) that can be associated to you or the device on which you are accessing the Wi-Fi service (including, but not limited to a device ID number (MAC address)), then that information may be linked with personal information we hold about you as set out in this policy, and will be treated in the same manner as the personal information to which it has been linked.

Cookies

Crown London also uses cookies which are a piece of information that allows the server to identify and interact more effectively with your device whenever it communicates with www.crownlondonaspinalls.com. Google Tag Manager, Google DoubleClick and Google Analytics interact with the website. These technologies use cookies. Crown London uses cookies to identify you between multiple visits, to better understand how www.crownlondonaspinalls.com is used, and to provide you information which may be of interest to you based on your previous visits to www.crownlondonaspinalls.com and to provide targeted advertising to you (including through ad-servers and other third party advertisers) when you visit crownmelbourne.com.au and certain other websites where advertising is found from time to time. We may provide the information we gather from cookies to third parties for these purposes and for other purposes connected with crownmelbourne.com.au. If cookie



information is linked with personal information we hold about you as set out above, this cookie information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

Most web browsers are set to accept cookies, however, if you do not wish to receive any cookies, you may set your browser to refuse them. In some instances this will mean that you will not be able to take full advantage of parts of the website that provides you with improved service.

MAKING A PRIVACY COMPLAINT

Crown London takes its obligations pursuant to the GDPR seriously. Individuals may make a complaint about a breach of the GDPR by Crown London by submitting their complaint in writing to Crown London's Data Protection Officer (using the address in the "How to Contact Crown" section of this policy).

Any complaint should set out in as much detail as possible, all the relevant particulars relating to the complaint, including why the individual says that Crown London has breached the GDPR.

Upon receiving a written complaint, Crown will acknowledge receipt of the complaint in writing within 7 days. Crown will investigate the matters described in the complaint and then provide a substantive written response within one month from the date the written complaint was received by Crown London.

HOW TO CONTACT CROWN LONDON

Individuals can obtain further information in relation to this Privacy Policy, or provide any comments, by contacting:

Telephone: +44 (0) 20 7647 5454

Post
Data Protection Officer
Crown London Aspinalls
27-28 Curzon Street

London W1J7TJ
Email: enquiries@crownaspinalls.com

Crown London Aspinalls also collects personal information as part of its normal communication processes directly related to those purposes, including:

- When an individual emails staff members
 - When an individual phones Crown London, it may store their phone number on its telephone system
 - When an individual provides Crown London their business card.
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