

PRIVACY POLICY

Cheltenham Racecourse (**we**) are committed to protecting and respecting your privacy.

SCOPE OF POLICY

This policy (together with our end-user licence agreement as set out at <http://cheltenham.thejockeyclub.co.uk/> (**EULA**) and any additional terms of use incorporated by reference into the EULA, together **our Terms of Use**) applies to your use of:

- *Cheltenham Thinker Trail and 1.0.1* mobile application software (**App**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the App (**Services**).

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, via the App will be processed by us. It does not apply to any personal data provided to us by any other means or any other website. 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 data controller is *Cheltenham Racecourse of Evesham Rd, Cheltenham GL50 4SH*.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you:

- **Information you give us (Submitted information):** This is information you give us about you by filling in forms on the App, or by corresponding with us (for example, by e-mail or chat). It includes information you provide when you register to use the App, download or register an App, subscribe to any of our Services, search for an App or Service, share data via an App's social media functions, enter a competition, promotion or survey, upload or share a photograph or video via the App and when you report a problem with an App, or our Services. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, the Device's phone number, age, username, password and other registration information, personal description, gender, date of birth, photographs and videos.
- **Information we collect about you and your device.** Each time you use our App we will automatically collect the following information:
 - technical information, including the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, the Device's operating system, the type of mobile browser you use, time zone setting, country location (**Device Information**);

- information stored on your Device, including contact information, login information, photographs, videos (**Content Information**);
- details of your use of our App including, but not limited to traffic data, weblogs and other communication data, (**Log Information**).
- **Location information.** We also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling location services on your Device.
- **Information we receive from other sources (Third Party Information).** We are working closely with third parties (including, for example, business partners, sub-contractors in technical, advertising networks, analytics providers, search information providers, credit reference agencies).
- **Unique application numbers:** when you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

INFORMATION YOU GIVE TO US

We request that the information you provide to us is as accurate as possible because this enables us to differentiate you from other users of the Services and the App and allows us to create an account for you with the App. We may occasionally send emails to you asking you to update your details or to request confirmation that your details are up to date. If your personal information changes, we encourage you to update this through the App.

You will have a password to access the App, which you are responsible for and which you should keep confidential.

COOKIES

We use cookies to distinguish you from other users of the App or the Appstore. This helps us to provide you with a good experience when you use the App and also allows us to improve the App. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy found on this link: <http://cheltenham.thejockeyclub.co.uk/cookies>

USES MADE OF THE INFORMATION

We may use information held about you in the following ways:

- **Submitted Information:** to provide the App and the Services to you, to provide our services, activities or online content to you, to deal with your requests and enquiries, to enter prizes for competitions run through the App, to contact you with information or about marketing campaigns, promotions, products, services, special offers, charitable causes, competitions or surveys (where you have consented to be contacted for such purposes), to upload photographs and videos you share through the App to our website or social media accounts,

for our business partners and other companies (including our sponsors and sponsors of competitions run by us) to contact you with information or about marketing campaigns, promotions, products, services, special offers, charitable causes, competitions or surveys (where you have consented to be contacted for such purposes), to allow you to participate in interactive features in the App,.

- Device information: to produce analytics and reporting on use of the App to measure interest in and use of the features of the App and Services in order to improve our services and develop new relevant features and functionality to enhance the visitor experience and enjoyment when using the App.
- Content Information: to upload content you share through the App to our website or social media accounts in order for the App's content to have a wider audience reach and to enable you to share your images and comments; to allow us or our business partners to contact you with information or about marketing campaigns, promotions, products, services, special offers, surveys, competitions or charitable causes (where you have consented to be contacted for such purposes) and to enable you to enter competitions on the App.
- Log information: to produce analytics and reporting on use of the App to measure interest in and use of the features of the App and Services in order to improve our services and develop new relevant features and functionality to enhance the visitor experience and enjoyment when using the App.
- Location information: to identify your location within/outside the venue, enabling us or our business partners to contact you with information or about marketing campaigns, promotions, products, services, special offers, surveys, competitions or charitable causes (where you have consented to be contacted for such purposes), as the target audience.
- Third Party Information: to enable us or our business partners to contact you with information or about marketing campaigns, promotions, products, services, special offers, surveys, competitions or charitable causes (where you have consented to be contacted for such purposes).
- Unique application numbers: to produce analytics and reporting on use of the App to measure interest in and use of the features of the App and Services in order to improve our services and develop new relevant features and functionality to enhance the visitor experience and enjoyment of the App.

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with anonymous aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they

want to target (for example, women in SW1). We will use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

We may perform statistical analysis of users of the App and Services to measure interest in and use of the features of the App and Services. We may share this anonymous aggregate information with third parties in order that such third parties may reach the kind of audience they want to target.

DISCLOSURE OF YOUR INFORMATION

We will disclose the data we collect from you to the following third parties:

Category of data	Recipient	Purpose
Submitted Information; Device Information; Content Information; Log Information; Location Information; Third Party Information; Unique Application Numbers.	Loop FE Limited	In order that Loop FE Limited may process personal data on our behalf in order to provide you with the App and the Services which includes the storage of data on Loop FE Limited's servers. For statistical analysis of users use of the App and Services. For technical assistance with the App and Services.
Submitted Information; Log Information; Device Information; Location information.	Third Parties (including business partners and sponsors)	To provide you with information, marketing campaigns, products, services, promotions, special offers, competitions, and charitable causes, to ask you to participate in surveys, where you have consented to being contacted for such purposes. For statistical analysis of users use of the App and Services. For technical assistance with the App and Services.

As stated in the table above, we may share your personal data with organisations who are our business partners or other companies and we or they may contact you (unless you have asked

us or them not to do so) by email, telephone, SMS, mail, text/picture/video message, push notifications with information or about promotions, products, services, special offers, charitable causes, participation in surveys . If you would prefer not to receive any further direct marketing communications from us or our business partners, you can opt out at any time. See ‘**Your Rights**’ below.

You agree that we have the right to 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 Companies Act 2006.

We will disclose your personal information to third parties:

- As described in the table above.
- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If *The Jockey Club* 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 or regulatory obligation or request.
- In order to:
 - enforce or apply the EULA, Our Terms of Use and other agreements or to investigate potential breaches; or
 - protect the rights, property or safety of *The Jockey Club* our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on Loop FE Limited’s secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the App, 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 the App; 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 including the use of logins and secure passwords.

We will collect and store personal data on your Device using application data caches, application APIs, analytics platforms and browser web storage (including HTML 5) and other technology.

Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

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. We have also explained these above in '**Disclosure of Your Information**'. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at *Cheltenham Racecourse of Evesham Rd, Cheltenham GL50 4SH*.

The App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

ACCESS TO INFORMATION

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request will be subject to a fee of £5.00 to meet our costs in providing you with details of the information we hold about you.

CHANGES TO 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 when you next start the App. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to *Cheltenham Racecourse of Evesham Rd, Cheltenham GL50 4SH*.