### **WINNGOO FAME Privacy Policy**

At WINNGOO FAME, accessible from winngoofame.co.uk, we are dedicated to protecting your privacy and ensuring the security of your personal information. This Privacy Policy outlines our practices regarding the collection, use, disclosure, and protection of your information when you use our website or participate in our services.

By accessing or using our services, you agree to the terms of this Privacy Policy. If you do not agree with any part of this policy, please refrain from using our services.

### 1. Information We Collect

#### 1.1 Personal Information

We collect personal information that you provide voluntarily when you interact with our services, including but not limited to:

- First Name: Used for identification and personalization in our communications.
- Surname: Helps us address you appropriately and maintain accurate records.
- Email Address: Used to communicate with you about your submissions, competition updates, and promotional materials, if consented to.
- Phone Number: Allows us to contact you for urgent matters related to your submissions or account.
- City: Assists us in understanding the geographical distribution of our participants.
- Country: Necessary for compliance with regional regulations and to tailor our services accordingly.
- Reel Submission: A video file of 30 to 60 seconds showcasing your work, which is essential for participation in our competitions.

#### 1.2 Non-Personal Information

We may collect non-personally identifiable information automatically when you visit our website, including:

- Browser Type and Version: Helps us optimize the website for various browsers.
- Device Type: Information about the device you are using, which assists in enhancing user experience.
- IP Address: Used to identify your location and for security purposes.
- Time Zone: Helps us manage the timing of communications and events
- Referring Website: The website from which you arrived at our site, useful for understanding traffic sources.
- Pages Visited: Information about the pages you visit, which allows us to improve our content and user experience.
- Time Spent on Pages: Helps us analyze user engagement and areas for improvement.

#### 2. How We Use Your Information

We utilize the information we collect for various purposes, including:

- Competition Management: To process your entries and manage your participation in our competitions.
- Communication: To send you notifications and updates regarding your submission status, competition results, and any relevant announcements.
- Marketing Purposes: With your explicit consent, we may use your information to send you promotional content about upcoming competitions, events, and special offers.
- Service Improvement: To analyse user behaviour and preferences, enabling us to enhance our website and services continually.
- Legal Compliance: To ensure adherence to applicable laws, regulations, and legal requests.

#### 3. Data Protection

We are committed to ensuring the highest standards of data protection and privacy for all personal information we collect and process. Our security practices are aligned with applicable domestic and international data protection laws, including:

- The Information Technology Act, 2000
- The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011
- The General Data Protection Regulation (GDPR) (EU) 2016/679, where applicable
- Other relevant national and international data privacy frameworks

To protect your personal data against unauthorized access, use, disclosure, alteration, or destruction, we implement a combination of **technical**, **administrative**, **and physical safeguards**, which include but are not limited to:

- **Data encryption-** We employ advanced encryption methods to secure personal data during transmission and storage, ensuring confidentiality and reducing the risk of unauthorized access.
- **Access controls and Authentications-** Access to personal data is strictly limited through robust role-based access controls, multi-factor authentication, and secure login protocols
- **Secure Network Infrastructure-** Our systems operate on secure server environments equipped with firewall protection, intrusion detection/prevention systems (IDS/IPS), and ongoing security monitoring
- **Data minimization and Retention policies** We follow data minimization principles under the GDPR and retain personal data

only for as long as it is necessary for the purposes for which it was collected

- **Third party compliances** All third-party processors and service providers handling personal data on our behalf are contractually bound to comply with strict data protection obligations and must demonstrate adherence to comparable standards under both Indian and international law.
- **Regular Audit and Assessment-** we conduct periodic internal and external security audits, risks assessments and privacy impact assessments to evaluate compliance and enchance our data protection
- **Incident Management and Breach Notification-** In the event of a data breach, we have established procedures in place to respond promptly, assess the impact, contain the incident, and notify affected individuals and relevant authorities in accordance with the IT Rules, 2011 and Article 33 of the GDPR.

#### 4. SHARING YOUR INFORMATION

We are committed to maintaining the confidentiality of your personal information and ensure that it is not sold, rented, traded, or otherwise transferred to any third party without your explicit, informed consent, except as required under applicable laws or in connection with service delivery.

In accordance with the Information Technology Act, 2000, and the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011, as well as, where applicable, Article 6 and Article 28 of the General Data Protection Regulation (GDPR), personal data may be disclosed or transferred under the following lawful circumstances:

- **With Your Consent**: We may share your personal information with third parties for specified purposes—such as marketing, promotional activities, or personalized services—only after obtaining your prior, clear, and informed consent. You retain the right to withdraw such consent at any time.
- **Service Providers and Data Processors**: We may disclose personal data to trusted third-party service providers, contractors, or affiliates who assist in delivering our services (e.g., payment processors, cloud hosting providers, analytics services). Such disclosures are strictly governed by data processing agreements that impose data protection obligations consistent with applicable laws and ensure your information is used solely for authorized purposes.
- **Legal and Regulatory Compliance**: We may disclose personal data without your consent when such disclosure is required by applicable law, regulation, legal process, or governmental request. This includes, but is not limited to, disclosures made to comply with tax obligations, court orders, law enforcement authorities, or regulatory bodies.
- **Business Transfers**: In the event of a merger, acquisition, restructuring, or sale of all or part of our assets, your personal data

may be transferred to the relevant third parties as part of the transaction. In such cases, we will ensure appropriate safeguards are in place and, where required by law, notify you before any data is transferred or becomes subject to a different privacy policy.

All data disclosures are made in accordance with the principles of necessity, proportionality, and purpose limitation, ensuring that only the minimum necessary data is shared under secure and legally compliant conditions.

## 5. Your Rights Under UK Data Protection Law

Under the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, you are entitled to exercise a number of rights in relation to the personal data we collect and process about you. These rights are designed to give you more control over how your information is used and ensure transparency in data processing activities. Your rights include:

# • Right of Access (Article 15, UK GDPR)

You have the right to obtain confirmation as to whether we are processing your personal data and, if so, to request access to the personal data along with information on how it is being used.

- Right to Rectification (Article 16, UK GDPR)
  - You have the right to request the correction of inaccurate personal data or the completion of incomplete data that we hold about you.
- Right to Erasure ("Right to be Forgotten") (Article 17, UK GDPR)
  You may request the deletion of your personal data in certain
  circumstances, such as when the data is no longer necessary for the
  purposes for which it was collected or if you withdraw your consent
  (where consent was the legal basis for processing).
- **Right to Restriction of Processing (Article 18, UK GDPR)**You have the right to request that we temporarily restrict the

processing of your personal data in specific situations—for example, while the accuracy of the data is being contested or the processing is unlawful but you oppose erasure.

## Right to Data Portability (Article 20, UK GDPR)

Where the processing is based on consent or contract and carried out by automated means, you have the right to receive the personal data you provided to us in a structured, commonly used, and machinereadable format and to transmit that data to another data controller.

# Right to Object (Article 21, UK GDPR)

You have the right to object at any time to processing of your personal data that is based on legitimate interests, including profiling, or for direct marketing purposes.

# Right to Withdraw Consent (Article 7(3), UK GDPR)

If the processing of your personal data is based on consent, you have the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

# • Right to Lodge a Complaint

If you believe that your rights have been violated, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, the UK's independent authority for data protection

### 6. Data Retention

We retain your personal information only for as long as necessary to fulfil the purposes for which it was collected.

## 7. Changes to This Privacy Policy

We may update this Privacy Policy periodically. Any changes will be posted with an updated "Last Updated" date.

### 8. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy, please contact us:

Email: info@winngoofame.co.uk

Phone:020 3376 5250

Address:Unit 5, Martinbridge Trading Estate,240-242, Lincoln Road Enfield, EN1 1SP

Thank you for choosing WINNGOO FAME! We appreciate your trust in us to handle your personal information responsibly.

• info@winngoofame.co.uk