Privacy Policy for Users

This Privacy Policy is intended to provide all information on the processing of personal data carried out by Unleadmited SRL when the user signs up for a prize competition available on this site.

1. INTRODUCTION - ABOUT US

Unleadmited SRL with registered office in Pedara (CT) - Via Marconi 26, VAT no. 05774020878 (hereinafter, "**Data Controller**" or the "**Company**"), owner of the website selected-winners.co.uk (hereinafter, the "**Website**"), as the data controller of the personal data of users who browse and subscribe to the initiative accessible through the Website (hereinafter, "**Users**") provides below the Privacy Policy pursuant to art. 13 of EU Regulation 2016/679 and the UK General Data Protection Regulation 2018 (hereinafter, respectively, the "**Regulation**" and the "**UK GDPR**" and, jointly, the "**Applicable Regulation**").

Data Controller is registered with the UK Information Commissioner's Office under registration number ZB137430.

Our UK Representative:

Under Article 27 of the UK GDPR, we have appointed a UK Representative to act as our data protection agent.

Our nominated UK Representative is: **GDPR Local Ltd.**

Adam Brogden contact@gdprlocal.co m Tel +44 1772 217800

1st Floor Front Suite

27-29 North
Street, Brighton
England

BN1 1EB

2. HOW TO CONTACT US?

The Data Controller takes the utmost account of Users' right to privacy and personal data protection. For any information related to this Privacy Policy, Users can contact the Data Controller at any time, via any of the following means:

• By sending a registered letter with return receipt to the registered office of the Data Controller: Via Marconi 26 95030 Pedara (CT);

• By sending an e-mail to: info@unleadmitedsrl.com;

• By contacting our UK Representative: Our nominated UK Representative is: GDPR Local Ltd. Adam Brogden, contact@gdprlocal.com, Tel +44 1772 217800, 1st Floor Front Suite 2729 North Street, Brighton, England. BN1 1EB.

The Data Controller has identified a Data Protection Officer (RPD or DPO), pursuant to Article 37 of the Regulation: the DPO is Shibumi S.r.l., with Lapo Curini Galletti as its designated person (DPO appointment declared

to the Lead supervisory authority for the Controller, which is the Italian "Garante per la protezione dei dati personali").

TheUsers can contact the DPO at the e-mail: dpo@unleadmitedsrl.com.

3. WHAT DO WE DO? - PURPOSE OF THE PROCESSING

Users' personal data will be processed lawfully by the Data Controller pursuant to Article 6 of the Regulation for the following processing purposes:

a) **participation in the prize competition**, to allow the Website navigation or to execute the rules of the prize event, accepted by the User during registration and to fulfil specific requests of the User. The User's data collected by the Data Controller for the purposes of participation include: gender, name, surname, date of birth, residential address, email address and telephone number. Without prejudice to the other provisions contained within this Privacy Policy, the User's personal data will be used by the Data Controller also for the purpose of ascertaining the identity of the User (also by validating the email address), thus avoiding possible scams or abuses, and contacting the User for service reasons only (e.g. managing the User's participation in the prize event, notifying any winnings and managing the phase of awarding and delivery of prizes; contact the User to obtain additional data and information - such as a copy of the identity card; make any urgent communications by telephone during the collection and use of prizes).

b) **legal obligations**, or to fulfil obligations established by law, by an authority, by a regulation or by European legislation.

C)Marketing,

some of the User's personal data (i.e. name, surname, email address and telephone number) may also be processed by the Data Controller for marketing purposes (sending advertising material, direct sales, commercial communication), or so that the Data Controller can contact the User by mail, email, telephone (landline and/or mobile, with automated call or call communication systems with and/or without the intervention of an operator) and/or SMS and/or online messaging services (WhatsApp, Telegram, WeChat) to propose to the User the purchase of products and/or services offered by the same Data Controller and/or third-party companies, to present offers, promotions and commercial opportunities.

In case of consent, the User may at any time revoke the same making a request to the Data Controller in the manner and via the channels indicated in the following paragraph 7.

The User can also easily oppose further sending of promotional communications via email also by clicking on the appropriate link for the withdrawal of consent, which is present in each promotional email. Once the consent has been revoked, the Data Controller will send a notification to the User to confirm that the consent has been revoked. If the User intends to withdraw his consent to the sending of promotional communications by telephone, while continuing to receive promotional communications via email, or vice versa, please send a request to the Data Controller in the manner and via the channels indicated in

the following paragraph 7.

The Data Controller declares that following exercise of the right to object to receipt of advertising by email, it is possible that, for technical and operational reasons (e.g., formation of contact lists already completed shortly before the Data Controller's receipt of the objection) the User continues to receive some additional promotional messages. Should the User continue to receive promotional messages 24 hours after exercising the right to

object, please report the problem to the Data Controller, using the contacts details indicated in the following paragraph 7.

c) Communication of data to third-party companies for their marketing purposes,

the User's personal data (i.e., name, surname, gender, address, email address, telephone) will be communicated by the Data Controller to the following categories of third-party companies:

(i) landline and mobile telephone companies;

(ii) companies which operate in the publishing world (printed, internet, television and new media);

(iii) companies which operate in the field of e-commerce of products and services;

(iv) companies operating in the energy sector;

(v) companies operating in the travel and leisure sector;

(vi) companies that deal with professional and/or school training;

(vii) advertising agencies, media and contact centres;

(viii) companies operating in the food sector;

(ix) NGOs and ONLUS;

(x) companies operating in the financial and insurance sector;

(xi) companies operating in repair of household appliances;

(xii) companies operating in the marketing and web communication sector, as well as their commercial partners, belonging to the e-commerce, mail order, publishing, utilities, tourism, sports, communication, entertainment, financial, insurance, automotive, large sectors consumption, for sending advertising material and other promotional and commercial purposes, by post or telephone and/or automated call systems or call communication without the intervention of an operator and/or electronic communications such as email, fax, messages like MMS or SMS or other types; such companies includes;

Audience Serv GMBH - https://audienceserv.com/privacy-policy

Boots - https://www.boots.com/privacypolicy

British Gas - https://www.britishgas.co.uk/legal-compliance/privacy-policy.html

BT & EE - https://www.bt.com/privacy-policy/

Howden Insurance - https://howdeninsurance.co.uk/privacy-notice

IES Limited -https://www.allcleartravel.co.uk/privacy-policy/

Kwik Fit - https://www.kwik-fit.com/about-us/privacy-notice

Legal & General - https://www.legalandgeneral.com/privacy-notice/

Lendable Limited - https://www.lendable.co.uk/privacy

Omaze - https://omaze.co.uk/policies/privacy-policy

Outside Clinic - https://www.outsideclinic.co.uk/customer-privacy-policy

Park Holidays UK Limited - https://www.parkholidays.com/privacy-policy

Reclaim Legal Ltd - https://www.reclaimnow.com/privacy-policy/

Sky UK Ltd - https://www.sky.com/help/articles/privacy-hub-home

Staysure Group Ltd - https://www.staysure.co.uk/privacy-policy/

The AA - https://www.theaa.com/privacy-notice

Vitality - https://www.vitality.co.uk/privacy/

Zeta Global - https://zetaglobal.com/privacy-policy/

When you are registering on www.selected-winners.co.uk, it is not until you click the Confirm button that your information is transferred to the Unleadmited SRL database. Once you have completed and submitted all your details, you have then “completed” the registration confirming you are a valued member of our website.

The information collected at registration can include name, address, telephone number, email address, IP address and date of birth. We may use other reputable partners to provide its services in connection with your registration.

Once you are registered with the our website, you consent to Unleadmited SRL., its website sponsors and partners, being able to send you communications

via the channel(s) you selected as part of the sign-up process until such time as you exercise your right to opt-out of receiving such communications.

(xiii) companies operating as Marketing Services Providers who will use User's address, telephone number, email address, IP address and date of birth for a variety of direct marketing, targeted advertising, measurement & identity resolution, testing, research & product development purposes. Marketing Services Providers may carry out data

profiling. Marketing Services Providers may combine Users' data with data they get from other sources (including public sources) to create models useful to predict behaviour and preferences (e.g. how likely you are to buy a holiday online or take a particular type of holiday) or likely circumstances (e.g. whether you are eligible for a particular credit card);

Marketing Services Providers will also try to match and then link User's data that they receive about User's from other sources to make sure that the data they hold about User's is correct:

For example, they might do this to

- check whether you have recently moved address; or
- keep the IP address they hold about you up to date. IP addresses change regularly. The IP address they receive from us might change too quickly to make the data you provide through us useful for marketing purposes. Marketing Services Providers might find it helpful for this to be refreshed from time to time to ensure marketing messages are being delivered to the correct consumers, on the correct device(s).

They share your data, including the profiled data they have created about you, primarily to:

- help organisations better understand the likely characteristics of their customers (and find others like them);
- improve the relevancy and appropriateness of an organisation's marketing to its customers (e.g. offers, its products and services); and
- help them communicate with their customers more effectively offline and online. This may result in you receiving tailored advertising through channels such as direct mail, websites you visit, mobile apps, social media, or connected TV platforms. These providers use the information solely to deliver relevant marketing communications and to improve the effectiveness of these services. The Marketing Services Providers will not however advertise their own products or services to you.

To understand more about the use of your data by Marketing Services Providers and other third parties, and to find out how to exercise your data protection rights in relation

to their use of your data (including how to opt-out), please click through to the websites of the companies below:

- **Acxiom - https://www.acxiom.co.uk/privacy/**

- **CACI Limited - https://www.caci.co.uk/data-privacy/**
- **C-Centric Ltd - https://www.ccentric.co.uk/privacy-policy/**
- **EXPERIAN LTD** - https://www.experian.co.uk/marketing-services/consumer-information-portal
- **FIOR - https://www.fiordata.com/privacy-policy**
- We may share your personal information with FIOR, an identity verification organisation, to help verify your identity, stop others from misusing your data and prevent fraud. This data will be processed securely and will not be shared beyond verification purposes.
- **LiveRamp – https://liveramp.uk/privacy/web-privacy-policy/**
- We will share your data with LiveRamp, who will use it for a variety of direct marketing, targeted advertising, measurement & identity resolution purposes. You can learn more and opt-out from their services at any time: https://liveramp.uk/privacy/web-privacy-policy/
- **Mdeg Ltd - https://mdeg.co.uk/privacy-policy/**
- **Paragon Peterborough Limited - https://www.paragonprint.uk/privacy-policy/**
- **Sagacity Solutions Ltd - https://www.mydatachoices.co.uk/Privacy**

  We are permitted to share information with Sagacity who will share such information for marketing and non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, enforcement, debt collection and returning assets to you).
- **The Data Partnership Ltd t/a TDP Agency - https://tdp.agency/privacy-policy/**
- **Twenty Ci Ltd - https://www.twentyci.co.uk/data-privacy-policy/**
- In sharing User's data with Marketing Services Providers, we rely on a lawful ground called 'legitimate interest', as our business depends on our ability to partner with third parties who process personal data for marketing-related reasons

(xiv) companies providing repair services for household white goods and similar appliances.

These categories above include companies that have asked to be explicitly indicated within the extended list (hereinafter, the "**Extended List**") of third party companies, customers and/or commercial partners and/or sponsors of the Data Controller (hereinafter, "**Third- Party Companies**"): to view the Extended List, click on the following link **https://selected-winners.co.uk/sponsorlist** *

Third-Party Companies, as independent data controllers, will process the User's personal data for their own marketing purposes (direct sales, sending advertising material and commercial communication), and will be able to contact them by mail, email, telephone (landline and/or mobile, with automated call or call communication systems with and/or without the intervention of an operator) and/or SMS and/or online messaging services (WhatsApp, Telegram, WeChat) to offer the User the purchase of products and/or services offered by the same categories of third-party

companies and/or other companies they provide their services for and present offers, promotions and commercial opportunities to the User. Once the transfer has taken place,

and except in the case in which the policy of each Third Company is accessible from this text and/or

from the Extended List, it will be the responsibility of the Data Controller's business partner to provide Users with all the information required by the Applicable Regulation.

In case of consent, the User may at any timerevoke the same making arequest to the Data Controller in the manner and via the channels indicated in the following paragraph 7.

The Data Controller informs that User's personal data will be processed by the Third-Party Companies as independent data controllers, based on the specific privacy policy that will be issued by the Third-Party Companies to the Users. Any requests not to receive further commercial communications from Third-Party Companies, to which the data have already been communicated by the Data Controller, must therefore be addressed directly to them.

The provision of personal data for the processing purposes indicated above is optional but necessary, as failure to provide them will make it impossible for the User to register on the Website and take advantage of the services offered by the Data Controller on the Website. The personal data necessary to fulfil the purposes of the processing operations described in this paragraph 3 are indicated with an asterisk in the Website registration form.

***Among others, we may share your personal information with our partner **WINR Data Pty Ltd (WINR) and their global partners** for the purposes of:*

- *Fraud Prevention - preventing others from misusing your personal information. This may involve identity verification for anti-fraud, anti-money laundering, anti-crime, asset recovery, debt collection and reuniting individuals with unclaimed assets; and*
- *Digital Advertising - providing personalised advertising and content that is relevant to you. This may involve identity resolution for data analysis, matching and linkage.*

WINR and their global partners will process and retain your personal information for as long as necessary for these specific purposes and on the lawful basis of legitimate interests.

You can submit a request to exercise any of your privacy rights to the Data Protection Officer at WINR https://www.winrdata.com/privacy-policy/

WINR Privacy Statement Update

Aug 2026

As WINR has continued to grow internationally, we are moving to a more specialised operating structure with separate entities managing different business activities within the group. This separation helps protect us all from regulatory changes and supports revenue protection and growth.

Going forward:

WINR Data Pty Ltd (trading as WINR Nexus) will manage Identity Verification (IDV) and Fraud related activities

WINR Alchemist Pty Ltd will manage Digital Advertising and Identity Resolution (IDR) activities

Importantly, this is an internal restructure only. Both companies remain part of the same WINR group under WINR Corporation Pty Ltd, with the same ownership, management team, privacy standards and operational teams. This means we request that you update the WINR Statement included in your Privacy Policies to:

We may share your personal information with WINR Data Pty Ltd and its global partners for the purposes below, relying on our legitimate interests or your consent, where required.

• Fraud Prevention and Identity Assurance – helping prevent misuse of your personal information and supporting identity, age and eligibility checks, including fraud, crime and money laundering prevention, debt collection, asset recovery, and reuniting individuals with unclaimed assets.

The WINR Data privacy notice is available at: https://www.winrcorp.com/privacy/nexus

We may share your personal information with WINR Alchemist Pty Ltd and its global partners for the purposes below, relying on our legitimate interests or your consent, where required.

The WINR Alchemist privacy notice is available at: https://www.winrcorp.com/privacy/alchemist

4 LEGAL BASIS

Participation in the competition (as described in the previous par. 3, lett. a)): the legal basis is constituted by the provision by the data subjects of a consent to the processing of personal data for one or more specific purposes. For this reason, the Data Controller asks the User to provide a specific, free and optional consent to pursue of these processing purpose.

Legal obligations (as described in the previous paragraph 3, lett. b)): the processing is necessary to fulfil a legal obligation to which the Data Controller is subject.

Marketing activities (as described in the previous paragraph 3, lett. c)) and for **communication of data to Third Party Companies** for their marketing purposes (as described in the previous paragraph 3, lett. d)), the legal basis is constituted by the provision by the data subjects of a consent to the processing of personal data for one or more specific purposes. For this reason, the Data Controller asks the User to provide a specific, free and optional consent to pursue each of these processing purposes.

Service messaging; our legal basis for sending service-based messaging to data subjects via email, post and/or telephone is Legitimate Interest. Where a third-party partner sends a service-based message to data subjects via email, post and/or telephone, their legal basis is either Legitimate Interest or Contract.

Please notice that the Third-Party Companies may rely on different legal basis in order to undertake further processing activities, such as their Legitimate Interest, as better specified in their privacy policies, provided for in the Extended List available at https://selected-winners.co.uk/.

In case data shall be processed by said parties in pursuance of legitimate interests, it

may include using such data for postal and telephone marketing - for said Third-Party Companies or others - but in either case communication shall be in relation to products or services which the Third Parties believe may be of interest to the Users based upon information which the Users have provided. As with all Users' data, the Users can also object to Third-Party Companies processing their data in this way.

5 PROCESSING METHODS, SECURITY AND DATA RETENTION

5.1 Processing Methods

Users' personal data will be processed by the Data Controller in Company's CRM, using manual and IT tools, as strictly necessary to achieve the purpose for which they are processed, and in any event, to ensure confidentiality of the data. No automated decision making is performed by the Data Controller.

5.2 Security

Access Control and Monitoring. Controller implements stringent measures to control and monitor access to its database. Access is strictly regulated through the use of log logging systems, which enable continuous and precise tracking of each user's activities. This ensures that all access to the database is meticulously documented and can be reviewed as needed. These measures are designed to prevent unauthorized access and ensure that the integrity of the data is maintained.

Data Backup Protocols. The Company places a high priority on data continuity and security. To that end, daily backups of the database are conducted to ensure that data is preserved in the event of an incident. Additionally, comprehensive weekly backups are carried out to further enhance the security of the stored information. These backup copies are maintained to support the Company's business continuity needs, particularly in response to any security threats or indicators.

Hardware and Software Security. The Company's hardware and servers are protected by robust security measures, including regularly updated antivirus and firewall software. These measures are critical in defending against a wide range of cyber threats. Additionally, the Company has implemented anti-spam and anti-phishing filters to protect its IT infrastructure from malicious attacks.

IT Access Control Access to the Company's IT tools and systems is governed by rigorous authentication processes. These systems ensure that each user is uniquely identified using credentials and log tracking, making it possible to clearly and unequivocally attribute actions to the correct individual. Access rights are assigned based on the principle of necessity. Each user is granted only the permissions required to perform his/her specific tasks and only for the duration necessary to complete the activity. This approach minimizes the risk of unauthorized access **a**nd ensures that users have the appropriate level of access to perform their duties effectively.

5.3 Data Retention

The personal data of the Users of the Website will be kept for the time strictly necessary to carry out the primary purposes connected to the User's participation in the competition (illustrated in paragraph 3 above) and in any case for the time necessary for the civil

In the cases referred to in paragraphs 3, lett. c) and d), Users' personal data will be kept by the Data Controller for as long as the User continues to carry out actions (we consider "actions" and "activities", by way of example and not exhaustive, any access to the portal, interaction with communications sent by the Data Controller and/or Third-Party Companies, access to any service or content of the Platform) and, in any case, up to the withdrawal of consent. If the User does not carry out any activity for a period of 36 months, the Data Controller will proceed with the cancellation of personal data.

The data retention period by Third-Party Companies can be found by the User in the information provided by them pursuant to the Applicable Regulation.

6 DATA TRANSFERS, SCOPE OF DISCLOSURE AND DISSEMINATION OF DATA

The User's personal data may be transferred outside the United Kingdom but, at the moment, only towards European Economic Area's (EEA) countries.

The Applicable Regulation permits the transfer of personal data from United Kingdom to the EEA and to any countries which, as of 31 December 2020, were covered by a European Commission 'adequacy decision' (this is to be kept under review by the UK Government).

Appropriatesafeguards for data transfers to third countries:

Users' personal data may be transferred outside the European Union and the Controller ensures to use suitable safeguards for such transfers. If Users want to receive a copy of the measures applied to such transfers, additional to those listed in paragraph 5 below and in the present paragraph, Users can request them via the channels listed in paragraph 7 below.

Users' personal data may be disclosed to the employees and/or collaborators of the Data Controller in charge of managing the Website. These subjects, who are formally appointed by the Data Controller as "data processors", will process the User's data exclusively for the purposes indicated in this policy and in compliance with the provisions of the Applicable Regulation.

Third parties who may process personal data on behalf of the Data Controller as Data Processors may also become aware of the Users' personal data, such as, for example:

- service providers (such as administrative, IT, mailing services, credit recovery companies, etc.);
- consultants (such as accountants, auditing firms, lawyers, etc.);
- companies of the same group, associated companies.

Users have the right to obtain a list of any data processors appointed by the Data Controller, by making a request to the Data Controller in the manner indicated in paragraph 7 below.

Furthermore, the personal data of the Users may be communicated by the Data Controller, as well as to the Third-Party Companies referred to in paragraph 3, let. d), to other third parties, independent data controllers, to the extent that this is necessary to execute the competition regulations and/or to fulfil legal obligations, such as any public authority in charge of controlling the application of the rules on competitions and sweepstakes,, as well as third parties indicated in

the prize competition regulations, to which the data must necessarily be communicated to allow the User to take advantage of any prizes won (e.g. travel agencies, ticket offices, hotels, etc.).

7 RIGHTS OF DATA SUBJECTS

Users may exercise their rights pursuant to the Applicable Regulations by contacting the Data Controller as follows:

- By sending a registered letter with return receipt to the registered office of the Data Controller: Via Marconi 26 95030 Pedara (CT);
- By sending an e-mail to: info@unleadmitedsrl.com.

We remind that the Users can contact the DPO at the e-mail: dpo@unleadmitedsrl.com.

Pursuant to the Applicable Regulations, the Data Controller hereby declares that Users have the right to obtain information on (i) the source of their personal data; (ii) the purposes and methods of the processing; (iii) the logic applied to the processing, if carried out by means of electronic tools; (iv) the identity of the Data Controller and the Data Processor; (v) the parties or categories of party to whom the personal data may be communicated or who may gain knowledge of them in their capacity as data processing managers or persons in charge of processing.

Furthermore, Users have the right to obtain:

a) **access, update, rectify** or, should they wish to do so, **integrate** their data;

b) the **cancellation, transformation into anonymous form** or **blocking** of data which have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;

c) confirmation that the operations under a) and b) have been made known, including regarding their contents, to those to whom the data has been communicated or distributed, except in the event such compliance proves to be impossible or leads to the use of manifestly disproportionate means in respect of the right defended.

Furthermore, Users have:

a) the right to **withdraw consent** at any time, if the processing is based on their consent (it should be noted that this withdrawal does not affect the lawfulness of the processing based on consent before the withdrawal);

b) the right to **data portability** (the right to receive all their personal data in a format that is structured, commonly used and readable by automatic devices), the **right to limit the processing** of personal data and the **right to cancellation** ("right to be forgotten"); c) the **right to object**:

i) in whole or in part, for legitimate reasons, to the processing of their personal data, even if pertinent to the purpose of the collection; ii) in whole or in part, to the processing of their personal data for the purpose of sending advertising and direct marketing materials, or for carrying out market research or business communications; iii) if personal data is processed for direct marketing purposes, at any time to object to the processing of their data for this purpose, including profiling in so far as it is connected to such direct marketing.

d) Whereby it is believed that processing of the data is in breach of the Regulation, the

right to file a complaint with the Supervisory Authority (in the Member State in which they normally reside, in which they work or in which the alleged violation has occurred).

The UK supervisory authority is the Information Commissioner Office, and their contact details are: The Information

Commissioner's Office

Wycliffe House, Water Lane, Wilmslow,
Cheshire, SK9 5AF
https://ico.org.uk/global/contact-us/

Tel: 0303 123 1113.

The Data Controller is not responsible for updating all links that can be viewed in this Policy, therefore whenever a link is not functional and/or current, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by the link.

9. UPDATES TO THIS PRIVACY POLICY

We may make changes to this privacy policy from time to time. You should check this page regularly to see our most up to date policy. This privacy policy was last updated 12 October 2026.