

PRIVACY & COOKIE POLICY

Last updated: 16 October 2026

1. Who we are

93 Club Ltd ("we", "us", "our") runs prize competitions at 93club.co.uk. We are the data controller for the personal data described in this policy, which means we decide how and why it is used. We are a company registered in England & Wales (company number 17046194), with our registered office at Flat 5 Taaffe House, Dyke Road, Brighton, BN1 3RY. We have registered with the Information Commissioner's Office (ICO) and pay the data protection fee.

If you have any questions about this policy or your data, contact us at info@93club.co.uk.

This policy explains what personal data we collect, why we collect it, who we share it with, how long we keep it, how we protect it, and your rights. It applies to visitors to our website, people who enter our competitions (online or by post), winners, people who contact us, and people who follow or interact with us on social media.

2. The data we collect

Type of data	What it includes	Where it comes from
Identity and contact	Full name, email address, telephone number, postal address	You, at Stripe checkout or in a postal entry
Entry details	Competitions entered, number of entries, Ticket Numbers, your answer to the question, entry date and time, entry route (paid or postal)	You, and our entry records
Payment details	Amount paid, date, Stripe transaction reference, last four digits and type of card. We never see or store your full card number.	Stripe
Winner verification	Copy of photographic ID (including date of birth), proof of address, and where needed evidence of card ownership	The Winner only
Communications	Emails, messages and complaints you send us, and our replies	You
Marketing preferences	Whether you have agreed to receive marketing emails, and any unsubscribe requests	You
Responsible play	Requests to stop you entering, and any spending limits we apply	You, and our records
Technical data	IP address, browser and device type, pages visited, and security information	Your device, via our hosting provider and cookies
Social media	Your username and public profile, comments, tags and messages	Instagram, TikTok or Facebook, when you interact with us

We do not knowingly collect data from anyone under 18. If we find that someone under 18 has entered, we will void their entries, refund any payment, and delete their data unless we need to keep it for a legal reason.

We do not ask for special category data (such as health or religion). Your date of birth is only collected from a Winner's ID, to confirm they are 18 or over.

3. How we use your data, and our legal basis

Under UK data protection law, we must have a legal basis for each way we use your data.

What we use it for	Legal basis
Processing your entry, taking payment, allocating Ticket Numbers, and sending your Ticket Numbers and entry confirmations	Contract (to run the competition you entered)
Running the draw, contacting the Winner and delivering the prize	Contract
Checking the Winner's identity, age, address and eligibility	Contract and legitimate interests (preventing fraud and making sure prizes go to eligible people)
Publishing the Winner's first name, surname initial and town, and the entry list (first name, surname initial, town and Ticket Numbers)	Legitimate interests (showing our draws are genuine and fair)
Publishing photos or video of the Winner	Consent (optional, and can be withdrawn)
Sending marketing emails about new competitions and offers	Consent, or for existing entrants our legitimate interests under the "soft opt-in" rule (you can unsubscribe at any time)
Answering questions and handling complaints	Legitimate interests
Applying responsible play limits and self-exclusion requests	Legitimate interests (protecting entrants)
Preventing and detecting fraud, duplicate or bulk entries, and chargebacks	Legitimate interests
Keeping accounting and tax records	Legal obligation
Keeping our website secure and working	Legitimate interests
Measuring visits and advertising (only if we use these cookies, see section 9)	Consent

4. Marketing emails

- We will only send you marketing emails if you have agreed to receive them, or if you have entered a competition and did not opt out when given the chance (the "soft opt-in"). Marketing emails are only about our own competitions and offers.
- Every marketing email includes an unsubscribe link. You can also unsubscribe at any time by emailing info@93club.co.uk.
- Unsubscribing from marketing does not stop service emails about competitions you have entered, such as your Ticket Numbers or winner notifications.
- We will never sell your data, or share it with other companies for their own marketing.

5. Who we share your data with

We only share your data where needed to run our competitions and business. The companies we use act on our instructions and must keep your data secure.

Recipient	Why	Data shared
Stripe Payments UK Ltd	Payment processing and fraud prevention	Name, contact details, payment details
Cloudflare, Inc.	Website hosting, security and performance	Technical data
IONOS SE	Email hosting	Emails you send us and our replies
Delivery companies (e.g. Royal Mail, DPD)	Delivering prizes	Winner's name, address and phone number
random.org	Running the draw	Ticket Numbers only, with no personal data
Our solicitors, accountants and insurers	Professional advice, accounts and claims	As needed
Police, HMRC, regulators or courts	Where the law requires it, or to prevent fraud or crime	As needed

If we use an email marketing service, advertising platform or analytics service in future, we will update this policy and the table above.

6. Transfers outside the UK

Some of our providers, such as Stripe and Cloudflare, may process data outside the UK, including in the United States. Where this happens, the transfer is protected by UK adequacy regulations (including the UK-US Data Bridge, where the provider is certified) or by the UK International Data Transfer Agreement or Addendum, which require your data to be protected to UK standards.

7. How long we keep your data

Data	How long
Entry and payment records	6 years after the end of the financial year in which the competition closes, for tax, accounting and legal claims
Winner verification documents (ID, proof of address)	Deleted within 30 days of verification being completed. We keep a note that verification was carried out.
Postal entries (the paper itself)	Logged and kept until 6 months after the draw, then securely shredded. The logged entry record is kept as above.
Marketing preferences	Until you unsubscribe, after which we keep only your email address on a suppression list so we do not contact you again
Self-exclusion requests	For the exclusion period, or for as long as needed to honour it
Emails and complaints	2 years after the matter is closed
Technical data and logs	Up to 12 months

8. How we keep your data secure

- Our website uses HTTPS encryption, and is hosted on Cloudflare, which provides security and attack protection.
- Card payments are handled entirely by Stripe, which is certified to PCI DSS Level 1. We never receive or store full card details.

- Access to entry records and email accounts is limited to the directors of 93 Club Ltd, and protected by strong passwords and two-factor authentication where available.
- Postal entries and winner documents are kept securely and destroyed as set out in section 7.
- If a data breach is likely to put your rights at risk, we will tell you and the ICO as required by law.

9. Cookies

Cookies are small text files stored on your device when you visit a website. Similar technologies, such as local storage, work in a similar way. We call all of these "cookies" here.

Cookies we use now

Cookie	Provider	Purpose	Type	Expires
__cf_bm, cf_clearance	Cloudflare	Protects our site from bots and attacks	Strictly necessary	30 minutes to 1 year
__stripe_mid, __stripe_sid, and others set on Stripe's checkout page	Stripe	Processes payments securely and prevents fraud	Strictly necessary	30 minutes to 1 year

Strictly necessary cookies are needed for the site and payments to work securely, so they do not need your consent. We do not currently use analytics or advertising cookies.

Analytics and advertising cookies

If we add analytics cookies (to understand how visitors use our site) or advertising cookies, such as the Meta Pixel (to measure our Facebook and Instagram adverts), we will only set them if you agree through a cookie banner, and we will list them in the table above. You can change your mind at any time.

Managing cookies

You can block or delete cookies in your browser settings. If you block strictly necessary cookies, parts of the site, including checkout, may not work.

10. Your rights

Under UK data protection law, you have the right to:

- **Access** the personal data we hold about you, and get a copy of it.
- **Correct** data that is inaccurate or incomplete.
- **Erase** your data, where we no longer have a lawful reason to keep it.
- **Restrict** how we use your data in some circumstances.
- **Object** to us using your data based on legitimate interests, and to direct marketing at any time.
- **Data portability**: receive data you gave us in a common format, or have it sent to another organisation.
- **Withdraw consent** at any time, where we rely on consent. This does not affect anything we did before you withdrew it.

To use any of these rights, email info@93club.co.uk. We may ask you to confirm your identity. We will respond within one month, and there is usually no charge.

11. Complaints

If you are unhappy with how we have used your data, please contact us first at info@93club.co.uk so we can try to put it right. You also have the right to complain to the Information Commissioner's Office (ICO): www.ico.org.uk, 0303 123 1113.

12. Changes to this policy

We may update this policy from time to time, for example if we start using a new service provider. The latest version will always be on our website, with the date it was last updated. If we make significant changes, we will tell you by email or on our website.