

Entain Group Data Retention Policy

Our Policy

Entain holds and processes large quantities of personal and sensitive data from customers, vendors, and you (our colleagues). To fulfil such requirements, personal data must be retained and disposed of in accordance with the retention schedules.

This Policy applies to all personal data processed by Entain as part of operational activities, regardless of whether it is processed electronically or the storage medium. This includes, but is not limited to, email, email attachments, databases or files such as Word, Excel, PowerPoint, Access, personal drives, shared network drives or other hard drives, memory sticks, thumb drives, USB paper (hard copy) form, photographic, video, instant messaging, CCTV, as spoken word (telephone systems) and in specific presentations, meetings and other discussions or any other storage medium.

Responsibilities

Our role, as the Data Privacy team, is to provide our colleagues with information and guidance on how to retain and dispose of personal data processed by Entain, to comply with record-keeping laws, regulations, contractual, operational and legitimate business requirements in relation to personal data wherever we operate. However, it is the responsibility of you, our colleagues, to understand and implement the guidance set out in this Policy, where personal data is being processed.

We must:

- Read, understand and adhere to this Policy and associated Policies, standards and procedures that impact data retention.
- Consult with line managers or heads of department if you are unclear about responsibilities.
- Ensure compliance with data retention timeframes. When in doubt, do not destroy the original document and seek advice from the Data Privacy team.
- Ensure all direct reports or companies working with us are aware of relevant policies, standards and procedures.
- Securely destroy all personal data of a “confidential”, “secretive”, or “protected” nature in compliance with this Policy, its Guidance Notes and the Data Classification Policy, when it is no longer required or has exceeded the timeframe set out in the schedule.
- Follow the retention schedule and securely remove data in line with the relevant retention period.

We must not:

- Hold or store Entain customer or employee personal data on personal devices.
- Keep personal data in a form that permits identification for longer than is necessary or for more than the period identified in the retention schedules (unless the business identifies a legitimate legal, business, or regulatory reason for a more extensive retention period) – if this is the case, please seek advice immediately from the Data Privacy team at dataprivacy@entaingroup.com.
- Hold personal data classified in the Data Classification Policy as “highly protected” or “protected” personal data in personal or unapproved storage mediums or unapproved cloud storage.
- Ignore any policy, procedure or guidance that is designed to ensure personal data is managed securely.
- Allow commercial objectives to override our legal and regulatory obligations.

Where can you go for help?

If you have any queries about this Policy, please speak to your line manager or the People team, or you can contact the Data Privacy team at dataprivacy@entaingroup.com. You can also get further guidance on the data retention page on Entain.Me.

Raising your concerns

If you suspect a breach of this Policy has occurred or may occur in the future, raise it with your line manager, or the Data Privacy team (dataprivacy@entaingroup.com) in the first instance. If that is not possible, please follow the Speak Out Policy. You will not face any adverse consequences for raising a genuine concern in good faith, even if you were mistaken about your concern. Retaliation against a colleague making a genuine report is not tolerated.

Who does this policy apply to?

This Policy applies to everyone working for, or on behalf of, Entain and its wholly or majority owned subsidiary companies and joint ventures, such as directors, employees, consultants or self-employed contractors. This Policy applies to all jurisdictions where Entain Group operates, unless a specific jurisdiction has a local country-specific Data Retention Policy (as stated in below. For more information about data retention periods by jurisdictions, please refer to our Data Retention Guidance Notes.

We take breaches of our policies seriously. Failure to comply with this Policy may result in disciplinary action, up to and including dismissal and/or prosecution.

Policy Owner: Group Deputy General Counsel – Commercial & Privacy

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