

RECORD OF PROCESSING ACTIVITIES

Applicable regulations: GDPR – Article 30: Records of processing activities

1 INFORMATION REGARDING THE DATA PROCESSOR

Responsible organisation:	Sociedad Estatal Loterías y Apuestas del Estado S.M.E. S.A. (SELAE)
Data processor contact information	Calle Poeta Joan Maragall 53, 28020 Madrid. Telephone 900 112 313 / 913 489 100. Registered at the Madrid Companies Register, Volume 28078, Folio 202, Section 8, Sheet M-505970 Tax Identification Number A-86171964
Corresponding Data Protection Officer designation	Yes

2 CONTACT THE DATA PROTECTION OFFICER

Data Protection Officer	
Data Protection Officer contact details	Calle Poeta Joan Maragall 53, 28020 Madrid. Attention: Data Protection Office Telephone 900 112 313 / 913 489 100. External electronic contact: <ul style="list-style-type: none">- Website form: https://www.selae.es/es/web-corporativa/contacto-proteccion-datos

3 PROCESSING
3.1 LIST OF PROCESSING WITH PURPOSES THEREOF

<i>Designation of processing</i>	Purpose of the processing												
“Clients and users”	<p>The personal data of clients and users is handled in order to provide SELAE services and process the relationship with the general public.</p> <p>This involves satisfying corporate compliance obligations within the legal framework and the management business activities of SELAE necessary for the correct provision of the service and its improvement and the defence of SELAE’s interests. It includes the governance, direction, management, monitoring, supervision and auditing of the service, all of which entail aggregated statistical analysis, process improvement, information protection, compliance with regulations and the protection of personal data, always respecting due confidentiality and privacy and the principles of data minimisation, pseudonymisation and anonymisation where and as soon as it is feasible.</p>												
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 30%;">Sub-processing</th> <th>The purpose of sub-processing</th> </tr> </thead> <tbody> <tr> <td>Clients: Registered clients</td> <td> <p>The personal data of those registered on SELAE’s Digital Gaming Platform is processed in order to formalise the relationship between the parties and provide the services associated with the aforesaid platform (web and apps), including participation in SELAE’s online games.</p> <p>The data of those registered who actively participate on the Digital Gaming Platform is treated according to the indications of Royal Decree 958/2020, with specific reference to Articles 34 and 35 of the Royal Decree on commercial communications of gambling activities for:</p> <ul style="list-style-type: none"> • (a) the detection of unsafe behaviour, with processing carried out to comply with the Royal Decree and to detect this behaviour. • (b) Actions to be undertaken for registrants for whom unsafe behaviour has been detected. </td> </tr> <tr> <td>Clients: Applicants and claims</td> <td>The personal data of applicants and claims is handled to process the request made by claimants of prizes at points of sale, or the claims presented in gambling-related sales offices or SELAE itself.</td> </tr> <tr> <td>Clients: Large prize winners</td> <td>The personal data of large prize winners or their representatives is handled in order to pay individuals who have won a large prize, subject to special tax or other identification obligation, pursuant to currently applicable regulations, as well as to the beneficial owners in the case of legal entities.</td> </tr> <tr> <td>Clients: Syndicate members</td> <td>The personal data of syndicate members is known at the time of claiming higher prizes, when they are identified by SELAE and the corresponding prize payment is handled.</td> </tr> <tr> <td>User name</td> <td>The personal data of users is handled in order to process SELAE’s relationship with the public (including requests for information, complaints, suggestions and congratulations - both in person and online) and website/app visits.</td> </tr> </tbody> </table>	Sub-processing	The purpose of sub-processing	Clients: Registered clients	<p>The personal data of those registered on SELAE’s Digital Gaming Platform is processed in order to formalise the relationship between the parties and provide the services associated with the aforesaid platform (web and apps), including participation in SELAE’s online games.</p> <p>The data of those registered who actively participate on the Digital Gaming Platform is treated according to the indications of Royal Decree 958/2020, with specific reference to Articles 34 and 35 of the Royal Decree on commercial communications of gambling activities for:</p> <ul style="list-style-type: none"> • (a) the detection of unsafe behaviour, with processing carried out to comply with the Royal Decree and to detect this behaviour. • (b) Actions to be undertaken for registrants for whom unsafe behaviour has been detected. 	Clients: Applicants and claims	The personal data of applicants and claims is handled to process the request made by claimants of prizes at points of sale, or the claims presented in gambling-related sales offices or SELAE itself.	Clients: Large prize winners	The personal data of large prize winners or their representatives is handled in order to pay individuals who have won a large prize, subject to special tax or other identification obligation, pursuant to currently applicable regulations, as well as to the beneficial owners in the case of legal entities.	Clients: Syndicate members	The personal data of syndicate members is known at the time of claiming higher prizes, when they are identified by SELAE and the corresponding prize payment is handled.	User name	The personal data of users is handled in order to process SELAE’s relationship with the public (including requests for information, complaints, suggestions and congratulations - both in person and online) and website/app visits.
	Sub-processing	The purpose of sub-processing											
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User name	The personal data of users is handled in order to process SELAE’s relationship with the public (including requests for information, complaints, suggestions and congratulations - both in person and online) and website/app visits.												

Designation of processing	Purpose of the processing
“Data analysis and dashboard”	<p>Personal data is processed to generate aggregate (i.e. not individualised) information, operational reports that make it possible to improve SELAE's management at a commercial, organisational and satisfaction level for both the client and the points of sale.</p> <p>In some cases, reports can be made on demand in which the point of sale can be identified.</p> <p>This involves satisfying corporate compliance obligations within the legal framework and the management business activities of SELAE necessary for the correct provision of the service and its improvement and the defence of SELAE's interests. It includes the governance, direction, management, monitoring, supervision and auditing of the service, all of which entail aggregated statistical analysis, process improvement, information protection, compliance with regulations and the protection of personal data, always respecting due confidentiality and privacy and the principles of data minimisation, pseudonymisation and anonymisation where and as soon as it is feasible.</p>
“Rights of the interested parties”	<p>The personal data of the interested parties is processed in order to handle their requests for the exercise of their data protection rights, as well as claims before the Spanish Data Protection Agency.</p> <p>This involves satisfying corporate compliance obligations within the legal framework and the management business activities of SELAE necessary for the correct provision of the service and its improvement and the defence of SELAE's interests. It includes the governance, direction, management, monitoring, supervision and auditing of the service, all of which entail aggregated statistical analysis, process improvement, information protection, compliance with regulations and the protection of personal data, always respecting due confidentiality and privacy and the principles of data minimisation, pseudonymisation and anonymisation where and as soon as it is feasible.</p>
“Promotions, commercial notification and advertising campaigns”	<p>The personal data of participants in promotions is processed to facilitate their participation in the promotion. The personal data of recipients of advertising and information is handled for the purposes of the sending out of advertising and commercial research in relation to SELAE's products and services with prior consent or non-opposition, where appropriate, and the dissemination of commercial notifications.</p> <p>The purposes of sub-processing.</p> <p>Commercial promotions.</p> <p>These are actions that are normally oriented to specific online SELAE games in which those who voluntarily register can win prizes. They are usually held occasionally (although they may become more regular over time), of limited duration and in which personal data is generally used for the sole purpose of administering the promotion, including determining the winner(s) and awarding the prize to them and associated commercial actions such as diffusion of the winner's photo or other actions. Data is not subsequently treated for any other purpose. These games operate as stipulated in the corresponding legal terms and conditions.</p> <p>Advertising campaigns</p> <p>SELAE runs numerous online and traditional media advertising campaigns that are not specifically targeted at the recipient. These can be seen on both its own media (SELAE websites) and in the contracted media. In them, the appearance of people (their photos, videos and voice) is frequent, which therefore entails the processing of their personal data, in their capacity as actors. In the event of running recipient-targeted advertising actions, the corresponding sub-processing would have to be implemented.</p> <p>Commercial research</p> <p>SELAE gives out commercial notifications to the users who participate in its promotions through SELAE's own websites or those developed by third parties, regardless of the way in which they subscribe to the promotion.</p>

<i>Designation of processing</i>	Purpose of the processing
	This involves satisfying corporate compliance obligations within the legal framework and the management business activities of SELAE necessary for the correct provision of the service and its improvement and the defence of SELAE's interests. It includes the governance, direction, management, monitoring, supervision and auditing of the service, all of which entail aggregated statistical analysis, process improvement, information protection, compliance with regulations and the protection of personal data, always respecting due confidentiality and privacy and the principles of data minimisation, pseudonymisation and anonymisation where and as soon as it is feasible.

<i>Designation of processing</i>	Clients and the general public	Employees	Commercial network	Staff of collaborating and equivalent companies	Directors	Legal representatives of the interested parties with whom there is conflict
"Clients and users"	X	-	-	-	-	
"Data analysis and dashboard"	X	X	X	X	X	
"Rights of the interested parties"	X	X	X	X	X	X
"Promotions, commercial notification and advertising campaigns"	X	-	-	X	-	

3.2 DESCRIPTIVE TABLES OF THE RECORD OF PROCESSING ACTIVITIES

Clients and users

Clients and users							
Legal terms & conditions	<p>Contractual issues through the gaming contract for registered customers</p> <p>Legitimate interest to respond to inquiries from the general public or website visitors</p> <p>Consent in the case of the use of cookies by visitors to SELAE's website.</p> <p>Legal compliance: identification of the large prize winners and prohibition of gambling through being listed on the General Register of Gaming Access Bans</p> <p style="padding-left: 40px;">Detection and actions related to unsafe gambling behaviour pursuant to Royal Decree 958/2020, Articles 34 and 35</p>						
Main (categories of) stakeholder groups	<p>Clients (people with a business relationship):</p> <ul style="list-style-type: none"> • Individuals registered on SELAE's Digital Gaming Platform: <div style="padding-left: 20px;">www.loteriasypuestas.es</div> <div style="padding-left: 20px;">Associated apps: a description of these can be found at https://www.loteriasypuestas.es/es/appselae</div> • Individuals or representatives of legal entities participating in lottery syndicates. • Individuals or representatives of legal entities receiving prizes equal to or greater than those designated as "large". • Individuals or representatives of legal entities – applicants who identify themselves in the commercial network, to request the payment of prizes on damaged or non-existent platforms, or any other claim or management issue including certification of purchases or prizes or any other request for attention, be it complaint, claim, request or congratulation). <p>Users of SELAE services that do not require registration:</p> <ul style="list-style-type: none"> • Virtual visitors to SELAE informative websites and apps • Public – natural persons who make use of SELAE's customer service, either in person at SELAE's premises, remotely by phone or by email, at points of sale, or through any other channel that SELAE puts in place. 						
Personal data categories	<p>Registered on the game's digital platform (black, green or blue)</p> <p>In the case of syndicate members and large prize winner data in green or blue</p> <p>In the case of applicant personal data, only in blue.</p> <p>Finally, to distinguish the sub-processing of gambling risk related to Royal Decree 958/2020, in gold</p>						
Collected/processed	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Identification</td> <td>Name and surname(s), national identity card or foreign residency document number, tax identity number, nationality, country of residence, home address, post code, province, home phone, private email, signature, IP addresses + time, cookies</td> </tr> <tr> <td>Personal situation</td> <td>Date of birth/gender/alive/deceased</td> </tr> <tr> <td>Physical identification</td> <td>Photographs (of the national identity card), video or voice audio, signature</td> </tr> </table>	Identification	Name and surname(s), national identity card or foreign residency document number, tax identity number, nationality, country of residence, home address, post code, province, home phone, private email, signature, IP addresses + time, cookies	Personal situation	Date of birth/gender/alive/deceased	Physical identification	Photographs (of the national identity card), video or voice audio, signature
Identification	Name and surname(s), national identity card or foreign residency document number, tax identity number, nationality, country of residence, home address, post code, province, home phone, private email, signature, IP addresses + time, cookies						
Personal situation	Date of birth/gender/alive/deceased						
Physical identification	Photographs (of the national identity card), video or voice audio, signature						

Clients and users

	Financial-employment situation	Bank details (if these have been given), credit card token (if used)
	Personal circumstances	Game participation information (tickets, claim text etc.), prizes won, associated point of sale, notification language Associated player ID, associated B-ID, General Register of Gaming Access Bans block/historic status (only yes/no and date/time check – data is provided by the Directorate General for the Regulation of Gambling, not collected from the person concerned)
Categories of Spanish and cross-border recipients, third countries and international organisations	REGISTERED	Tax administration, other public administration bodies, General Directorate for Gambling Regulation, police forces and security bodies, banks, savings banks and rural savings banks, public administration bodies with powers in the matter, lawyers, attorneys, courts and tribunals. Internal assignment to the processing of anti-money laundering data
	SUB-PROCESSING: UNSAFE GAMING BEHAVIOUR	
	SYNDICATE MEMBERS	Tax administration, other public administration bodies, General Directorate for Gambling Regulation, police forces and security bodies, banks, savings banks and rural savings banks, public administration bodies with powers in the matter, lawyers, attorneys, courts and tribunals. Internal assignment to the processing of anti-money laundering data
	LARGE PRIZE WINNERS	Tax administration and tax provinces, other public administration bodies, General Directorate for Gambling Regulation, public administration bodies with powers in the matter Internal assignment to the processing of anti-money laundering data
	APPLICANTS	National mint (FNMT)
	VIRTUAL VISITORS	Not applicable.
Period provided for deletion		Conservation terms (until the end of commercial promotion/five years anti-money laundering 1/six years under gaming law/ten years anti-money laundering 2 etc.)
	Clients: Registered	When a participant permanently leaves the SELAE gambling website, complying with the necessary requirements: not having money in the Lotobolsa account, not having any active bets etc., their data will be blocked for a period of ten years, in the case of compliance with the requirements of the Gaming Law, with the gaming contract automatically cancelled. This does not prevent the interested party from being able to re-register and accept the gaming contract again.
	Detection of unsafe gaming behaviour	When a participant permanently leaves the SELAE gambling website, complying with the necessary requirements: not having money in the

Clients and users		
		Lotobolsa account, not having any open bets etc. – one year is proposed to limit the profiling period carried out
	Clients: Applicants and claims	Six years
	Clients: Large prize winners	Ten years
	Clients: Syndicate members	Ten years
	User Name	Two years
Applied security measures	<p>SELAE has certificates in force as an accredited entity that comply with the information security management systems standard ISO/IEC 27001 and the WLA, covering the entire organisation in scope. The Security Management System documents all the organisational and technological processes of authorisation, access control, protection of confidentiality, integrity and availability of information.</p> <p>The measures corresponding to the Basic and Medium Level of Royal Decree 1720/2007 are also applied.</p>	

Data analysis and dashboards

Data analysis and dashboards						
Legal terms & conditions	Legitimate and contractual interest					
Main (categories of) stakeholder groups		Clients and the general public	Employees	Commercial network	Staff of collaborating and equivalent companies	
	Data analysis and dashboard	X	X	X	X	
Personal data categories	Bank details, geolocation					
Collected/processed	Activities and businesses, commercial licenses. Income					
Recipient categories	Game participation data					
Period provided for deletion	<p>Reports:</p> <p>In principle, neither the non-identifying data in the reports nor the dashboards are destroyed.</p> <p>☒ Surveys: indefinite, as they do not include identifying data.</p> <p>☒ Information extracted from SIGILO and pseudonymised: Five years after the termination of the contract with the point of sale</p>					
Applied security measures	<p>SELAE has certificates in force as an accredited entity that comply with the information security management systems standard ISO/IEC 27001 and the WLA, covering the entire organisation in scope. The Security Management System documents all the organisational and technological processes of authorisation, access control, protection of confidentiality, integrity and availability of information.</p> <p>Additionally, the measures corresponding to the Intermediate Level of Royal Decree 1720/2007 are applied.</p>					

Rights of the interested parties

Rights of the interested parties					
Legal terms & conditions	Data protection legal obligations – General Data Protection Regulation, the Protection of Personal Data and Guarantee of Digital Rights Act, Organic Law 3/2018, and concordant provisions related to assisting the rights of the interested parties				
Main (categories of) stakeholder groups	Clients and the general public	Employees	Commercial network	Staff of collaborating and equivalent companies	Representatives of companies or individuals for whom rights are addressed
	X	X	X	X	X
Personal data categories Collected/processed	PERSONAL DATA CATEGORY		PERSONAL DATA		
	Identification		Name and surname(s), national identity card or foreign residency document number, tax identity number, home address, personal email address, signature		
	Physical identification		Signature		
National recipient categories	<p>To the Spanish Agency for Data Protection in the event of a requirement or request for information by this regulatory body.</p> <p>To possible representatives of the interested parties who wish to exercise a right</p> <p>In the case of a response by post, transfer to the Post Office of the data required in order to send the letter.</p>				
Period provided for deletion	They will be kept for the period of prescription for very serious infringements (three years) one month after the receipt of the request to exercise rights				
Applied security measures	<p>SELAE has certificates in force as an accredited entity that comply with the information security management systems standard ISO/IEC 27001 and the WLA, covering the entire organisation in scope. The Security Management System documents all the organisational and technological processes of authorisation, access control, protection of confidentiality, integrity and availability of information.</p> <p>Additionally, the measures corresponding to the Basic Level of Royal Decree 1720/2007 are applied.</p>				

Promotions, commercial notification and advertising campaigns

Promotions, commercial notification and advertising campaigns						
Legal terms & conditions	In the case of: Commercial promotions: the legitimacy of the processing is contractual. Commercial notification: based on the consent of the interested party or acceptance of the terms & conditions of the promotion Advertising campaigns Contractual, related to actors and contracts with agencies					
Main (categories of) stakeholder groups		Clients and the general public	Employees	Commercial network	Staff of collaborating and equivalent companies	
	Commercial promotions.	Participants and promotion winners	-	-	-	
	Commercial notification	Clients enrolled in commercial promotions	-	-	-	
	Advertising campaigns	-	-	-	Actors	
Personal data categories	Identification	Name and surname(s), national identity card or foreign residency document number, tax identity number, nationality, address on the national identity card, private telephone number and email address, social network profile				
Collected/processed	Personal situation	Age				
Categories of Spanish and cross-border recipients, third countries and international organisations	The images and videos collected by SELAE as transferee of the content of advertisements and advertising campaigns are made to media agencies in order to manage television and radio broadcasts, press and social networks etc.					
Period provided for deletion		Conservation terms (until the end of commercial promotion/five years anti-money laundering 1/six years under gaming law/ten years anti-money laundering 2 etc.)				
	Commercial promotions:	Period during which the specific promotion is in force and a reasonable period to deal with possible complaints or claims related to the promotion. During this reasonable period, no commercial notifications are issued.				
	Notifications	Period during which the specific promotion is valid				
	Advertising campaigns	According to the advertising campaign contract				
Applied security measures	SELAE has certificates in force as an accredited entity that comply with the information security management systems standard ISO/IEC 27001 and the WLA, covering the entire organisation in scope. The Security Management System documents all the organisational and technological processes of authorisation, access control, protection of confidentiality, integrity and availability of information.					

Promotions, commercial notification and advertising campaigns

Additionally, the measures corresponding to the Basic Level of Royal Decree 1720/2007 are applied.

4 REGULATORY APPENDIX

Article 30 – Registration of processing activities

1. Each data processor and, where appropriate, their representative will keep a record of the processing activities carried out under their responsibility. This record shall contain all the information indicated below:

- (a) the name and contact details of the data processor and, where appropriate, the joint processor, the processor's representative, and the data protection officer;
- (b) the purposes of the processing
- (c) a description of the categories of data subjects and personal data
- (d) the categories of recipients to whom the personal data were or will be disclosed, including recipients in third countries or international organisations
- (e) where appropriate, transfers of personal data to a third country or an international organisation, including the identification of this third country or international organisation and, in the case of transfers indicated in Article 49, Paragraphs 1 and 2 – documentation of adequate guarantees
- (f) where possible, the terms provided for the deletion of the different categories of data
- (g) when possible, a general description of the technical and organisational security measures referred to in Article 32, Paragraph 1.

2. Each data processor and, where appropriate, their representative shall keep a record of all the categories of processing activities carried out on behalf of a controller that contains:

- (a) the name and contact details of each data processor, controllers or person of whose behalf the manager acts, and, where appropriate, the representative of the manager and the data protection officer
- (b) the categories of processing carried out on behalf of each controller;
- (c) where appropriate, transfers of personal data to a third country or an international organisation, including the identification of this third country or international organisation and, in the case of transfers indicated in Article 49, Paragraphs 1 and 2 – documentation of adequate guarantees
- (d) where possible, a general description of the technical and organisational security measures referred to in Article 30, Paragraph 1.

3. The records referred to in Sections 1 and 2 shall be in writing, including in electronic format.

4. The data processor and, where appropriate, their representative or their manager shall make the record available to the authority that so requests it.

5. The obligations set forth in Sections 1 and 2 shall not apply to any company or organisation that employs fewer than 250 people, unless the processing may involve a risk to the rights and freedoms of the interested parties, is not occasional, or include special categories of personal data indicated in Article 9, Paragraph 1, or personal data related to convictions and criminal offenses referred to in Article 10.