

Memoranda of Understanding (MoU)

What is a MoU?

- A MoU is an information sharing agreement between Betfair and a Sports Governing Body (SGB).
- The MoU agreement facilitates a two-way flow of information: It allows a SGB to provide Betfair with information and to request information on betting activity. It also allows Betfair to make the SGB aware of information that may represent a threat to the integrity of the sport in question.
- Crucially the MoU system allows Betfair to share with SGBs the names of customers placing suspicious bets and their transactional data and to do so in a manner that is consistent with data protection best practice. The sharing of this data is necessary for an effective investigation to be carried out into any alleged corruption.
- SGBs can use this information to help discipline those suspected of breaching integrity related rules of their sport.
- To date, Betfair has signed 66 MoU with SGBs around the world, the first of which was in 2003 with the Jockey Club (now the British Horseracing Authority).
- Betfair customers consent to their information being shared with relevant SGB's when accepting the terms & conditions¹ of operating a Betfair account. The policy on sharing customer data with MoU Partners is set out in the Betfair Privacy Policy².

General Terms Covered in Each MoU

Each agreement is unique but the following terms are covered in all MoU:-

Section	Description
Parties	Name and registered address of each party to the MoU
General Purpose	An agreed statement setting out the general purpose of the MoU. For example, <i>"To help maintain the integrity of the sport in question and to assist the investigation of any sporting rule breaches"</i>
Relevant Events	Identification of which events fall under the agreement. Typically this will be those sporting events falling under the MoU partner's jurisdiction.
Relevant Information	An explanation of what information relating to the Relevant Events will be shared with the MoU partner.
Information requests	Explaining under what circumstances the Relevant Information will be shared with the MoU partner. Relevant Information can either be volunteered by Betfair, or it can be disclosed following a formal request made by the MoU partner. Where information is requested by the MoU partner they must provide the grounds for their suspicion and Betfair will only release the Relevant Information if there is agreement that the grounds for suspicion are reasonable.
Confidentiality	Each agreement should contain confidentiality obligations on both parties. The

¹ <http://www.betfair.com/aboutUs/Terms.and.Conditions/>

² <http://www.betfair.com/aboutUs/Privacy.and.Data.Protection/#Privacy1>

	information shared under the MoU must be kept strictly confidential and shall not be passed to any third party (unless required by law).
Data Protection	The parties must comply with their respective obligations under relevant data protection legislation.
Security	In order to meet data protection obligations all parties should have adequate measures in place to prevent unauthorised or unlawful sharing of data and to protect against accidental disclosure.
Governing Law and jurisdiction	This provides information on what law the MoU is governed by and where any disputes relating to the agreement would be heard.

The MoU Process in Practice

There are many different scenarios that see the MoU process used however the two below are the most common. These scenarios demonstrate the fact that this is a two way process with information flowing both ways between the parties:

SGB Initiated Requests

- Information is sought by the MoU partner based on intelligence.
- Betfair are given an overview of the concerns of the MoU partner and are asked if betting information corroborates their intelligence.
- If it does then high level and non-customer identifiable betting information will be shared with the MoU Partner.
- If the MoU partner has concerns that an account or set of accounts may have breached the SGB rules or may pose a threat to the integrity of relevant events then the MoU Partner may formally request full details (personal and transactional data included) of the accounts in question. If Betfair agrees the concerns are reasonable then details of the accounts are shared.
- Following the sharing of the data, and until the investigation by the MoU partner is complete, ongoing dialogue is maintained between Betfair and the MoU partner.

Betfair Initiated Requests

- Suspicious betting or a potential rule breach on the MoU partners' sport is identified through Betfair monitoring and/or reporting.
- High level and non-customer identifiable betting information will be shared with the MoU partner to outline the concerns.
- If the MoU partner shares the concerns that an account or set of accounts may have breached the SGB rules or may pose a threat to the integrity of relevant events then the MoU partner will formally request full details (personal and transactional data included) of the accounts in question. Full details of the relevant accounts will then be shared.
- Following the sharing of data and until the investigation by the MoU partner is complete and ongoing dialogue is maintained between Betfair and the MoU partner.

In all scenarios, and in accordance with 15.1.2 of the UK Gambling Commission's Licence Conditions and Codes of Practice, the Sports Betting Intelligence Unit (SBIU) will be informed once Betfair has identified any betting which is a concern. Should the betting be on a UK event or by a UK registered customer then personal details of the relevant customers will automatically be shared with the SBIU.