THE CROISSANT PILLOW LOTTERY - 2026

PRIVACY POLICY

Any capitalized terms used in this Privacy Policy are to be attributed with the same meaning attributed thereto under THE CROISSANT PILLOW Lottery's Terms and Conditions available at https://www.lidl.com.mt/croissantpillow-lottery-TC *unless otherwise defined herein.*

For the purposes of this Privacy Policy, the terms "**We, "Us**", "**Our"** refer to LIDL Malta Limited.
This Privacy Policy applies to your participation in Our *THE CROISSANT PILLOW* Lottery.

For the protection of your and Our rights and to ensure compliance with any and all applicable legal requirements, we may update and/or amend this Privacy Policy in our sole discretion and, should We elect to do so, We shall publish the updated version in accordance with clause 12 below and, where you have provided Us with your email address following the Draw, We shall also notify you of any material change by email.

1. Controller Details

The controller of your personal data is Lidl Malta Limited, a company registered in Malta, bearing company registration number C36317 and registered office at Vassallo Business Park, Burmarrad Road, Naxxar NXR 6345, Malta.
We may be contacted at the abovementioned address, by email at info@lidl.com.mt or via the form found at the following link: https://customer-service.lidl.com.mt/SelfServiceMT/s/contactsupport
Our Data Protection Officer may be contacted by post at Data Protection Office, c/o Lidl Malta Limited., Vassallo Business Park, Burmarrad Road, Naxxar NXR 6345 or by email at privacymt@lidl.com.mt.

2. Categories of Personal Data

The term "personal data" refers to any and all personally identifiable information about you and includes all the information you provide to Us, and which is identifiable by Us, when participating in Our Lottery, as well as all other information which may arise that can be identified with you personally.
This include:

a. Your Instagram username/handle and user ID;
b. the date, time, and text of your Instagram comment;
c. the Instagram username of any user whom you tag in your comment (see clause 8 below).

If your name is drawn as a Winner or as a Reserve, you will be asked to provide additional information in order to validate your entry and to claim and receive your Prize. This will include your name and surname, date of birth, email address, mobile number and postal address, as well as a self-declaration stating that you are not an employee of Lidl and that you have reached the age of 18 before entering the Lottery. Where you scan the QR code included with your Prize, We will also process the identifier of the LIDL Plus account to which the coupon is served. We will only request a copy of your identity document where We have reason to doubt that you have attained the age of 18, as set out in clause 1.5 of the T&Cs. We may also ask you to present an identity document at the checkout if you redeem a substitute voucher issued in your name under clause 4.4 of the T&Cs, in which case the document will be inspected only and no copy will be taken.

3. Purposes of Processing

Your data will only be processed for "the Intended purposes" under this policy or as may be required to defend any legal claim that may be brought against Us or any of the listed processors of your personal data; or as may be ordered by any judicial or quasi-judicial authority or any government authority.

The intended purposes of processing of your personal data are:

(i) Giving effect to the Terms & Conditions (T&Cs) concluded with Us (including the taking of any and all steps necessary to enter into the T&Cs or to implement any updates or amendments thereto) with regard to your participation in the Prize Draw or anything relative or ancillary thereto;

(ii) verifying that the conditions of entry set out in clause 1.2 of the T&Cs have been met, including by reference to the Instagram username of any user tagged in your comment;

(iii) validating your entry and your eligibility (including your age, only in the circumstances set out in clause 1.5 of the T&Cs), and arranging the delivery of your Prize by courier and the service of the coupon to your LIDL Plus account;

(iv) publishing your name and/or Instagram username as a Winner, only where you have consented to this through the Consent Form; and

(v) complying with Our legal obligations, including those arising under the Gaming Act (Cap. 583 of the Laws of Malta) and the conditions of the permit issued by the Malta Gaming Authority.

4. Legal Basis

Our legal bases of processing your personal data are:

(i) Entering into and performance of a contract as a result of your participation in Our Lottery and subsequent entry into Our Prize Draw. Providing such Personal Data is necessary for your participation in Our Prize Draw. The consequence of not carrying out such Processing would be that you would be unable to participate in the Prize Draw;

(ii) Your consent (namely, for the publication of your details as a Winner) – in which case, Our Processing shall be limited to the purposes specifically indicated when your consent was requested;

(iii) Compliance with legal obligations imposed on Us; and

(iv) Our or a third party's legitimate interest, including Our legitimate interest in verifying that the conditions of entry have been met by reference to the Instagram username of any user tagged in a comment (see clause 8 below).

We might also have to process your data to exercise or defend legal claims. Such processing would be carried out in reliance on Our, or a third-party legitimate interest. In such a scenario, We shall ensure that your interests and fundamental rights and freedoms which require protection of personal data are respected.

5. Recipients

The recipients of your personal data will be:

a. selected individuals within Our company;

b. our intra-group companies and affiliates who process the personal data as data processors, including Lidl Italia S.r.l. a socio unico located at Via Augusto Ruffo 36, 37040 Arcole (VR), Italy, Lidl Stiftung & Co. KG located at Stiftsbergstraße 1, 74172 Neckarsulm (Germany);

c. our agents and third parties that provide services to Us as data processors, including but not limited to JP Advertising Limited located at JPA, Msida Valley Road, Msida MSD 9020, Malta;
d. the Malta Gaming Authority as independent data controller, located at the Malta Gaming Authority Building SCM 02-03, Level 4, SmartCity Malta, Ricasoli SCM 1001; and
e. third parties to whom disclosure may be required for your participation in the Prize Draw. (e.g. relevant courier services).

Individuals with access to your personal data shall be subject to the same limitations under this Privacy Policy and are located within the European Union (EU) or the European Economic Area (EEA), including Ireland and the Netherlands where the server hosting the Customer's personal data is located.

The general public who visit the competition section of Our website or Our Facebook and Instagram social media pages will **only** be able to access your data if you have consented to your data being published there.

6. Processing Requirement

The processing of your personal data is not a statutory requirement: it is a requirement in order to register your participation in the Prize Draw. Failure to provide your personal data impedes Us from being in a position to register you and allow you to participate in the Prize Draw.

7. Automated Decision-Making and Profiling

Your personal data will not be used for any automated decision-making or profiling. The Winners and Reserves are selected at random by means of an anonymous random key generator operated under the supervision of an official representative of the Malta Gaming Authority, as described in clause 3.3 of the T&Cs. This random selection does not involve any evaluation of your personal aspects and does not produce any decision within the meaning of Article 22 GDPR.

8. Source of the Data

As part of your successful participation in Our Lottery, you may have been requested to submit personal data pertaining to another individual. We have a right to inform said individual that you were the person who passed on his or her personal data to Us in compliance with the T&Cs of the Lottery.

9. Information for Tagged Users

This clause is addressed to Instagram users who have been tagged by a participant in a comment on the Lottery post, and sets out the information due to them under Article 14 GDPR.

(a) Controller: Lidl Malta Limited, whose details are set out in clause 1 above.

(b) Personal data processed: your Instagram username, as it appears in the participant's comment.

(c) Source: the participant's publicly visible comment on the Lottery post published on the LIDL MT Instagram profile.

(d) Purpose and legal basis: your username is processed solely in order to verify that the participant has satisfied the conditions of entry set out in clause 1.2 of the T&Cs, on the basis of Our legitimate interest in the proper and fair administration of the Lottery (Article 6(1)(f) GDPR). It is not used for any other purpose and We will not contact you.

(e) Recipients: JP Advertising Limited and Our intra-group companies listed in clause 5 above, acting as Our processors.

(f) Retention: your username is deleted once the validation process described in clause 3 of the T&Cs has been completed.

(g) Your rights: you have the rights set out in clauses 10 and 11 below, including the right to object to this processing.

10. Data Retention Period

Your personal data shall be held throughout the duration of the Prize Draw and in any event, until no later than 30th March 2027. Thereafter, it shall be immediately and irrevocably erased unless We need to keep your personal data to comply with any legal obligation, or to exercise or defend any legal claim. Where a copy of your identity document is requested in the circumstances set out in clause 1.5 of the T&Cs, it will be deleted immediately after the confirmation of the data without any copy being retained. Where you are asked to present an identity document at the checkout on redeeming a substitute voucher, it will be inspected only and no copy will be taken. The Instagram username of any user tagged in a comment will be deleted once the validation process has been completed.

10. Your Rights

For as long as We retain your personal data, you may (where applicable):

a. request access to and rectification of personal data where incomplete or inaccurate;
b. request erasure of your personal data;
c. request restriction of the processing of your personal data;
d. object to the processing of your personal data;
e. request to be informed of the source from which your personal data originates, if your personal data was not provided to Us directly by you;
f. request that we provide you with any personal data you have provided us, in a structured, commonly used and machine-readable format; and
g. request that we transmit your personal data directly to you or to another controller indicated by you.

To the extent that the legal basis for our processing of your personal information is your consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing by Us at any point prior to the withdrawal nor Our right to retain your personal data in terms of Clause 9 above.

11. Complaints

If you have any complaints regarding our processing of your personal data, please note that you may contact Us or Our Data Protection Officer at the details indicated above. You also have a right to lodge a complaint with the Office of the Information and Data Protection Commissioner in Malta (www.idpc.gov.mt).

12. Changes to this Privacy Policy

We will keep this privacy notice under regular review. If there are any changes to this Policy, we will replace this page with an updated version on our website on www.lidl.com.mt. At the start of this page, we will tell you when it was last updated.

We suggest that you check on the Policy any time you access our website so as to be aware of any changes which may occur from time to time.

13. Instagram and LIDL Plus

This Lottery is in no way sponsored, endorsed or administered by, or associated with, Instagram or Meta Platforms Ireland Limited. Your comment is posted on Instagram, which processes your data as an independent controller in accordance with its own terms and privacy policy.

The coupon element of the Prize is served to, and redeemed through, your LIDL Plus account. The processing of your personal data within the LIDL Plus app is governed by the LIDL Plus Privacy Policy.