

COMPLAINT TO UK INFORMATION COMMISSIONER'S OFFICE (ICO)

Subject: Formal Complaint – EU Lotto Ltd (Lottoland) – Serious GDPR Breaches, Data Tampering, and Regulatory Negligence

To:

- UK Information Commissioner's Office (ICO)
- Gibraltar Regulatory Authority (GRA)
- Gibraltar Gambling Commissioner

From:

Susan Ndinga Wright

susan_ndinga@shshumanfirst.com

Founder, 4Honeth | The Trinity of Light

Date: 6 September 2025

Reference: Lottoland Support Ticket #250731-000556 | GRA Case Ref: C21/25

1. INTRODUCTION

I am filing this formal complaint against EU Lotto Ltd (trading as Lottoland) for severe and repeated breaches of the UK GDPR, including data tampering, fraudulent concealment of winnings, and failure to comply with a Subject Access Request (SAR).

Additionally, I am reporting the Gibraltar Regulatory Authority (GRA) for gross negligence, failure to act on evidenced misconduct, and enabling Lottoland's manipulation of data and timelines.

This is not a routine customer dispute. It is a case of deliberate data manipulation, regulatory collusion, and systemic failure that undermines the integrity of UK and Gibraltar data protection and gambling oversight.

2. SUMMARY OF BREACHES BY LOTTOLAND

A. Data Tampering and Fraudulent SAR Response

- On 7 August 2025, Lottoland provided a “complete” transaction history ending at 01:07:21 AM on 30 July 2025.
- However, I possess email receipts proving bets were placed until 02:25 AM on the same date.
- This is prima facie evidence of data manipulation and deliberate concealment of transactions—likely those containing winnings.

B. Unlawful Data Disclosure

- Lottoland employee Alex mistakenly disclosed another customer’s account details (“Nick”) while attempting to assist me.
- This constitutes a clear GDPR breach (Article 5(1)(f)) and demonstrates reckless data handling.

C. Failure to Comply with SAR Timelines

- My SAR was acknowledged on 3 August 2025.
- Lottoland failed to respond fully within 30 days as required under GDPR Article 12(3).
- Instead, they sent a doctored report and later insisted the matter was “closed” without resolution.

D. Unfair Account Closure & Concealment of Winnings

- My active account was closed without notice while an inactive one remained open.
 - This appears to be a tactic to prevent me from accessing potential winnings—a severe breach of UKGC and Gibraltar gambling regulations.
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3. SUMMARY OF REGULATORY NEGLIGENCE BY GIBRALTAR

A. Failure to Investigate Evidenced Tampering

- The GRA was provided with irrefutable proof of data manipulation (timestamp discrepancies).

- Instead of investigating, they dismissed the complaint and insisted I “wait until 3 September”.

B. Complicity in Delay Tactics

- The GRA’s insistence on waiting allowed Lottoland to continue stalling and destroy or alter evidence.
- This is a fundamental failure of regulatory duty under the GDPR and Gibraltar Data Protection Act 2004.

C. Dismissal of a Serious Data Breach

- The GRA claimed the disclosure of “Nick’s” data was “not a breach” because the name alone was not identifiable.
 - This is a misinterpretation of GDPR—any unauthorized disclosure of personal data is a breach, regardless of identifiability in isolation.
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4. EVIDENCE SUBMITTED

- Doctored Lottoland transaction report (ends at 01:07:21 AM)
 - Email receipts proving bets until 02:25 AM
 - Full email chain with Lottoland (Ref: 250731-000556)
 - Proof of another customer’s data disclosure (“Nick”)
 - GRA’s negligent responses (Case Ref: C21/25)
 - Lottoland’s false claim that the complaint was received on 21 August (not 3 August)
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5. LEGAL BREACHES – LOTTOLAND

- Article 5(1)(d) GDPR – Data not accurate or complete
 - Article 12(3) GDPR – SAR not responded to in time
 - Article 15 GDPR – Right of access not fulfilled
 - Article 32 GDPR – Failure to ensure data security
 - UKGC Licence Condition 6.1.1 – Fair and transparent complaints handling
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6. LEGAL BREACHES – GIBRALTAR REGULATORY AUTHORITY

- **X** Section 170, Data Protection Act 2004 – Failure to investigate duly evidenced complaints
 - **X** Article 57(1) GDPR – Failure to act impartially and fairly
 - **X** Regulatory Negligence – Allowing Lottoland to exploit loopholes and manipulate data
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7. REMEDIES REQUESTED

1. Immediate ICO intervention to compel Lottoland to release the full unaltered transaction history.
 2. Financial penalty against Lottoland for GDPR breaches and data manipulation.
 3. Independent audit of Lottoland's data and complaint handling processes.
 4. Investigation into the GRA for regulatory failure and negligence.
 5. Compensation for financial loss, emotional distress, and homelessness caused by this ordeal.
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8. CONCLUSION

This case represents a total breakdown of data protection and gambling oversight. Lottoland tampered with data, and the GRA allowed it. I expect the ICO to take urgent action to uphold GDPR standards and protect consumers from fraudulent operators and complacent regulators.

I am ready to provide all evidence and cooperate fully.

Sincerely,


Susan Ndinga Wright

Email: susan_ndinga@shshumanfirst.com


Blog: <https://shshumanfirst.wordpress.com>

ICO Complaint Requirements Checklist


1. Email address for the organisation:

-  YOU HAVE THIS: support@lottoland.co.uk, dsar@lottoland.com

2. A copy of the complaint you made to the organisation:


-  YOU HAVE THIS: Your extensive email history is this exact complaint. The key document to submit is your formal complaint from September 4, 2025: "Formal Complaint – Misconduct by EU Lotto Ltd (Lottoland) & Regulatory Negligence in Gibraltar.pdf". This is a perfect summary of your complaints to them.

3. (If complaining for someone else) A letter of consent:


-  NOT APPLICABLE: You are complaining for yourself.
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Helpful Supporting Information (You Have ALL of This)

4. The organisation's address:

-  YOU HAVE THIS: EU Lotto Ltd, Office Suite A, Ocean Village Promenade, Gibraltar.

5. A timeline of key events:

-  YOU HAVE THIS: Your emails and complaints meticulously detail the timeline. For maximum clarity, we can extract it into a simple list:
 - 03 Aug 2025: SAR acknowledged by Lottoland.
 - 07 Aug 2025: Doctored SAR response received (ends 01:07).
 - 08 Aug 2025: You point out the time discrepancy with your 02:25 receipt.
 - 14 Aug 2025+: Repeated follow-ups and escalations met with stalling.
 - 21 Aug 2025: Lottoland falsely claims your complaint was first received on this date.
 - 27 Aug 2025: They claim the investigation is "complete" based on the faulty data.
 - 04 Sep 2025: You file a formal complaint with the GRA, detailing everything.

6. Supporting evidence of mishandling:

This is where your case is exceptionally strong. You have irrefutable proof.

- Copy of records with inaccurate information: The "GDPR [Report.pdf](#)" they sent you, which ends at 01:07:21.
 - Proof of the correct information: Your email receipts showing bets placed after 01:07, up to 02:25.
 - Email exchanges: Your entire email chain ("Re: 250731-000556 - Corruption_Negligence...") shows the entire history of their stalling, lies, and failure to address the core issue.
 - Evidence of another breach: The emails regarding the disclosure of "Nick's" information.
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The Core of Your ICO Complaint

The ICO will see a clear, undeniable violation: Lottoland provided an incomplete and inaccurate response to a Subject Access Request (Article 15 GDPR).

Your evidence proves:

1. You asked for your data (SAR).
2. They provided a report.
3. You can prove that report is missing data.
4. They then refused to correct it or provide the full dataset.

This is a direct breach. The GRA's failure to act on this clear evidence makes your case for regulatory escalation even stronger.

DAMAGE

- Physically:
 - It created uncertainty, financial distress which led to losing my flat, and having to live in a 30sqft unit with my 2 cats, I won't have money to provide for from tomorrow.
 - I have personally not eaten a whole meal in 4 days.
 - I'm getting physical pains from sleeping on the floor, which are hindering my walking

- No accommodation to living as in a storage, so having to make ways for every basic need, like showering with a wet towel, washing teeth in public toilets, asking for tap water to keep belly full, for my cats and to wash off
- Abrupt relocation as funds weren't released in time, leading to the estate agents threatening to throw away all my stuff that I wasn't able to carry myself from Lewisham to Forest Hill via bus, manually, as I have no funds left in order to even go and collect it myself
- Emotionally:
 - Brought turmoil in my relationships, as we were all expecting to get the money within August, leaving me with debts and mistrust from my loved ones.
 - Lottoland came in between, due to its negligence, my partnerships, which could've been both romantic and business.
 - Lost the house of my dream that I've been eyeing since December 2024, which would've easily been able to buy before someone else had made an offer, now sold STC.
 - The pain of sharing a little space which is already half full with 2 cats, who have needs like littering.
 - The uncertainty of my concession of staying in this temporary unit might end, as during one of my trips to a sainsbury to be able to use my laptop to make complaints and follow the reporting of the process, even my phone got broken, which is the only way to enter the storage units, meaning if I'm not lucky to bump into staff or someone else, I risk having to sleep outside.
- Mentally:
 - I'm coping the best I can, but it's not easy, this has never happened to me, as I have worked in corporate up until I gave myself to my scientific and quantum physic findings and developments, as this whole situation has also come in between the development and evolution we could have in society as a whole. This because I was able to provide and offer a higher octave of Einstein's law ($E=MC^2$) to $M = SV$ (Mass equals Light[at speed of light] per vibration frequency), this is was a process of understanding how energy can be manipulated even a macro lenses, to manifest desired outcomes, for however long they are in alignment with the evolution of the universe.
 - I'm experiencing a bit of dissociation from my emotions, to be able to preserve a mental & logic perspective of the situation, as my mind is the most precious thing I have
 - It's given me headaches, sleepless nights, all without no closure as neither the 2 organisations have lead with transparency, honesty and integrity
- Spiritually
 - The surprise of non-chalant with which I was addressed at the beginning of the conversations, gives me ample belief I was not the first one to win jackpots and having their accounts closed, relaying the very possible spiritual rape these organisations are having on people, not realising the depth of their actions.
 - The lack of organisation, crossfunctional communication and proactiveness, leaves me to think people get a very basic and non-considerate customer

service, as throughout the circumstances, both GRA, who was cc'd to overview and has taken the time to reply to me, but not to stop or address Lottoland, when they kept on repeating it was all done with transparency and professionalism, when the proof of the documents clearly state the opposite. The missing hour has never been addressed, showing spiritual bypass in accountability, as we are souls having a human experience, not the other way around.

- This whole thing leads me to think they take advantage of people's negligence, by playing the cards of "Terms and Conditions" without putting in place systems that avoid multiple accounts being created, like blocks on the same cards, name x birthday, and addresses. Something I noticed they implemented later, as I tried to create a new account to see if it was implemented and it worked, meaning they either had technical issues, which if that was the case, they would've flagged by now, or were simply allowing people to create multiples and in the occasion of a win, use the "Denial of multiple accounts" To internalise the wins themselves. IF the tickets were claimed, this is huge.
- We are all one, yet they seem to be okay with stalling humanity's progress, undermining laws and practices I have shared with them at the beginning of our conversations, as I wanted to lead with as much honesty and context as possible. Something I was not met with in return to this day.