

## PRIVACY POLICY COMMITTED TO YOUR PRIVACY

### INTRODUCTION

At Gateway Casinos & Entertainment Limited and at each of our affiliates (collectively, "**Gateway**"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. Gateway respects your privacy.

### WHAT IS PERSONAL INFORMATION?

For the purposes of this Privacy Policy, Personal Information is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities ("**Personal Information**").

### WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect and maintain different types of Personal Information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number and e-mail address;
- product and service related information concerning the products and services that we provide to, or receive from, you; and
- any other information described in this Privacy Policy.

Gateway's operations include activities related to the provision of casinos and related services. As such, Gateway may also collect Personal Information from individuals participating in and / or impacted by those activities.

### WHY DO WE COLLECT PERSONAL INFORMATION?

Gateway collects Personal Information to enable us to manage, maintain, and develop our operations, including for example:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;
- to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to enable us to undertake our environmental, health and safety activities, including incident planning, response and investigation;

- to protect us against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable law or regulatory process (for example, we may collect Personal Information to satisfy the obligations imposed on us by our various regulators);
- for the purposes stated in this Privacy Policy; and
- any other reasonable purpose to which you consent.

## HOW WILL GATEWAY COLLECT PERSONAL INFORMATION?

We will generally endeavour to collect Personal Information directly from you through an number of ways. For example, Gateway may obtain and collect your Personal Information through the following means:

**Identification Verification.** Our gaming facilities verify the photo ID of all individuals who appear under 30 to ensure that no one under the legal gambling age is permitted entry (i.e. 19 in British Columbia; 18 in Alberta; and 19 in Ontario). No information is recorded when ID is verified at the doors unless you are "Voluntarily Self-Excluded" or barred from the gaming facility for any other reason.

**Identification Verifiers.** Security Officers posted at the entrance of the some of our gaming facilities use identification verifiers to scan ID for age verification. The identification verifiers display the customer's name, date of birth and whether you have a current Subject ID profile in our Casino Reporting System. There is no permanent record made of any Personal Information displayed from your scanned ID.

**FINTRAC.** Our gaming facilities are required, under provincial and federal laws, to verify government-issued photo ID and to record certain information, including name, date of birth, address, principal occupation, type of ID, and ID reference number, before conducting certain types of transactions. These transactions include foreign exchange transactions of \$3,000 or more, and cash transactions of \$10,000 or more. Transaction information and Personal Information related to such transactions are electronically reported to the Financial Transactions and Reports Analysis Centre of Canada ("**FINTRAC**").

**Large Cash Transaction and Casino Disbursement Report Records.** Under provincial and federal laws, our gaming facilities are required to complete a Large Cash Transaction, Foreign Exchange and Disbursement Record ("**LCTR**") or a Casino Disbursement Report ("**CDR**"), as applicable, when customers conduct cash transactions of \$10,000 or more (including multiple transactions amounting to \$10,000 CDN or more during the gaming day) and foreign transactions of \$3,000 CDN or more. These records must include Personal Information such as your name, date of birth, address, principal, type of ID, ID reference number, and ID expiry date, which must be confirmed before completing transactions where a customer will reach the reporting threshold. Where we determine that the transaction is being completed on behalf of a third party, Personal Information on the third party is also required, including the third party's name, address, business or principal occupation. All completed paper LCTRs and CDRs are kept on site for a minimum of 5 years.

**Points Redemption.** Our gaming facilities are required to verify government-issued photo ID before issuing a "Players Card" and before permitting a customer to redeem points off his/her "Players Card". This requirement helps to protect customers who may lose or misplace their cards from having someone else redeem their points.

**Photography or Filming.** Patrons are permitted to take personal photographs or personal videos/films while in the gaming facility with a personal camera or cell phone. The following areas shall not be

photographed: (1) Table Games; (2) Cage Area; (3) Cashier cages; (4) Surveillance equipment; or (5) Other patrons or employees, without their permission. Photographs will be taken of promotion and jackpot winners who consent in writing to their picture being taken. We may also take photographs inside our gaming facilities for publicity purposes and advertising campaigns. No picture of any customer will be included in any publicity or advertising photograph without his/her written consent.

**Video Surveillance.** In order to comply with applicable laws, our surveillance systems may monitor all gaming and sensitive areas within each our facilities including hotels and restaurants. Any such video surveillance is used to protect us, our customers and our employees against potential violations of criminal and/or civil laws.

**Self-Exclusion Forms.** If you have a gambling problem or addiction, you may wish to complete a Self-Exclusion Form. If you sign such a form, all gaming premises in British Columbia, Alberta and Ontario will use their best efforts to deny you entry. Your name will also be removed from mailing lists. The form requires that you disclose your name, address, date of birth, and a piece of ID, and that you allow us to take a photograph of you. This information is shared with all gaming premises in the province.

**Security Incidents.** Details of security incidents, such as assaults, thefts, and intoxication, may be recorded. If you are involved in or witness a security incident, you may be asked to provide us with your name, address, and telephone number. The information is used for risk management and law enforcement purposes.

**Health and Safety.** If you or a family member become ill or are involved in an accident while visiting one of our gaming facilities, we may ask you to provide us with your contact information, health history, physician and next of kin. Other information may be documented depending on the nature of the medical incident or accident.

**Website.** Our website (at [www.gatewaycasinos.com](http://www.gatewaycasinos.com)) provides information to our customers about gaming promotions, career opportunities, services and activities available at our gaming facilities, hotels, restaurants and entertainment venues. Visitors who browse this website may do so on an anonymous basis. We have not configured this website to collect any information from your computer without your input. This means that, unless you voluntarily and knowingly provide us with information, we will not know your identity, your e-mail address, or any other information identifiable to you.

When we need to collect information from you, we will generally ask you to voluntarily supply us with the information we need. For example, if you would like to make a reservation at one of our hotels, we will ask you for information such as name, address, telephone number, e-mail address, credit card type, credit card number, expiration date and room preference (non-smoking room or no preference) to process your reservation. We will use your e-mail address to send a confirmation and, if necessary, might use the other information to contact you for help to process the reservation. The same type of information would be requested to complete a gift certificate transaction. For our email community, we will use your name, address, telephone number, and e-mail address to process your subscription and to also unsubscribe from the mailing list.

When we ask you for personal data when making a reservation or purchasing a gift certificate, including your name, address and credit card data, it is transferred over a Secured Sockets Layer (SSL) line provided you are using a SSL enabled browser. This ensures that your information is encrypted as it travels over the Internet. This secure mode is enabled before any such information is transmitted from

your computer.

We may also ask you to fill out an online customer survey, to obtain your suggestions or comments about your use of Gateway services, or for similar purposes. Providing this information is voluntary.

The Personal Information you provide to us for making a reservation is made available to the applicable hotel for the purpose of meeting your reservation request. If you cancel your reservation, the information is stored for recordkeeping purposes only and is not accessed again. After completing your stay at a Gateway, the information you provide may be used for direct marketing by Gateway. Gateway may use the services of a third party mail house for the sole purpose of mailing materials.

#### USE OF PERSONAL INFORMATION

We may use or disclose your Personal Information:

- for the purposes described in this Privacy Policy;
- for any additional purposes for which we have obtained your consent to the use or disclosure of your Personal Information.

#### INTERNET PROTOCOL (IP) ADDRESS

An IP address is a number that is automatically assigned to your computer every time you browse the Internet. When users request a page from our site, our servers log the user's current IP address. We use IP addresses to help diagnose problems. We do not link IP addresses to anything personally identifiable. Thus, each user session is anonymous.

#### EMPLOYMENT OPPORTUNITIES

When you submit an application or a profile for potential employment, you authorize Gateway to transmit and/or store your information for future consideration. The information collected will be accessible by Gateway employees or agents relevant to the recruitment process. The information collected will be used to (i) assess qualifications and personal experience to determine if it meets specific job requirements; and (ii) help us inform candidates of future openings at Gateway.

#### DISCLOSURE OF PERSONAL INFORMATION

We may share your Personal Information with our employees, contractors, consultants, affiliates and other parties who require such information to assist us with managing our relationship with you, including third parties that provide services to us or on our behalf.

For example, our third party service providers may provide certain information technology and data processing services to us from time to time so that we may operate our business, and as result, your Personal Information may be collected, used, processed, stored or disclosed in the United States of America.

In addition, Personal Information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of Gateway through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required

to use or disclose your Personal Information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

#### DISCLOSURE TO THE ONTARIO LOTTERY AND GAMING CORPORATION

Any Personal Information that we collect through or otherwise in connection with our operations in Ontario may be collected on behalf of the Ontario Lottery and Gaming Corporation (the "**OLG**") and thus shared with the OLG. Any such collection, use and disclosure is under the authority of the *Ontario Lottery and Gaming Corporation Act, 1999* and/or the *Ontario Gaming Control Act, 1992*.

If you have any questions about any such disclosure, you may contact our Privacy Office (using the contact information below) or a supervisor at OLG's Information Access and Privacy Services at 705-946-6750 or 70 Foster Drive, Suite 800 Sault Ste. Marie, ON, P6A 6V2. The OLG's privacy policy can be accessed here: [www.olg.ca/privacy.jsp](http://www.olg.ca/privacy.jsp).

#### LINKS TO OTHER SITES

Gateway is not responsible for the privacy policies or content of any third party websites, nor is Gateway responsible for the cookies those sites might deposit on your hard drive.

#### EMAIL COMMUNITY AND OPT-OUT

It is our intention to only send you e-mail communications that will be useful to you and that you want to receive. When you join Email Community, and provide your e-mail address, we may periodically contact you via e-mail and provide information about Gateway special offers and promotions that may be of interest to you. We may use a third party e-mail service provider to send e-mails. This service provider is prohibited from using your e-mail address for any purpose other than to send Gateway related email. In addition, every time you receive an e-mail you will be provided the choice to opt-out of future e-mails.

#### CONSENT

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Kindly note, however, that Gateway may collect, use and disclose your Personal Information without your consent when permitted or otherwise required by law.

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

#### HOW IS YOUR PERSONAL INFORMATION PROTECTED?

Gateway will endeavor to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.

#### ACCESS TO YOUR PERSONAL INFORMATION

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

#### INQUIRIES OR CONCERNS?

If you have any questions about this Privacy Policy or concerns about how we manage your Personal Information, please contact our Privacy Officer in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

#### PRIVACY OFFICER

We have appointed a Privacy Officer to oversee compliance with this Privacy Policy. The contact information for our Privacy Officer is as follows:

Gateway Casinos & Entertainment Limited  
4331 Dominion Street,  
Burnaby, BC V5G 1C7  
Canada

E-mail: [privacyofficer@gatewaycasinos.com](mailto:privacyofficer@gatewaycasinos.com)

#### REVISIONS TO THIS PRIVACY POLICY

Gateway, from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your Personal Information. We will post any revised version of this Privacy Policy on our website, and we encourage you to refer back to it on a regular basis. This Privacy Policy was last updated on May 8, 2017.

#### INTERPRETATION OF THIS PRIVACY POLICY

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples;

therefore where the word "including" is used, it shall mean "including without limitation".

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Gateway any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal and provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.