



November, 2017

GATEWAY CASINOS & ENTERTAINMENT LIMITED PRIVACY POLICY

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; e-mail address and government-issued identification number(s);
- credit and financial information, such as your credit card number and banking information;
- 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, bingos, video lotteries and related services (including, for example, the operation of restaurants and entertainment services). As such, Gateway may also collect Personal Information from individuals participating in and / or impacted by those activities.

As a general rule, Gateway collects Personal Information directly from you, unless: (i) you have consented to our collection of your Personal Information from other sources; or (ii) applicable laws or regulations require or allow our collection of your Personal Information from other sources.

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 endeavour to use this information to contact you at that number);
- to enable us to improve our products and services;
- 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 may collect your Personal Information through a number of different ways. For example, Gateway may obtain and collect your Personal Information through the following means:

1. **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). Generally, 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.
2. **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. Generally, there is no permanent record made of any Personal Information displayed from your scanned ID.
3. **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. Certain transaction information and Personal Information related to such transactions may be electronically reported to the Financial Transactions and Reports Analysis Centre of Canada (also known as "FINTRAC").
4. **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" or a "casino disbursement report". These documents may 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.

5. **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 from their "Players Card" account. This requirement helps to protect customers who may lose or misplace their cards from having someone else redeem their points.
6. **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 may not be photographed: (1) table games; (2) cage area; (3) cashier cages; (4) surveillance equipment; or (5) other patrons or employees (without their express permission).
7. **Video Surveillance.** In the course of conducting our business, we may monitor our facilities and equipment. For example, some Gateway's locations are equipped with surveillance cameras. These cameras are generally in high-risk areas and gaming areas. Where in use, surveillance cameras are there: (i) for the protection of employees and third parties; (ii) to enable us to comply with applicable laws, and (iii) to protect against theft, vandalism, cheating and damage to Gateway's goods and property. This is not meant to suggest that all individuals visiting our facilities will in fact be monitored or their actions subject to surveillance. It is meant to bring to your attention that such monitoring *may* occur and *may* result in the collection of Personal Information from you. Generally, recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.
8. **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, our gaming premises in the province in which you completed the form will endeavour to deny you entry. Your name will also be removed from our mailing lists. The form requires that you: (i) disclose your name, address, date of birth, and a piece of ID; and (ii) allow us to take a photograph of you.
9. **Security Incidents.** Details of security or criminal 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.
10. **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.

11. **Website.** We may collect information related to your visit to our website (at www.gatewaycasinos.com), including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page within our website that is viewed by that IP address and what country you are from. We use this information to monitor our website's performance (such as number of visits, average time spent, page views) and for our business purposes such as working to continually upgrade our website. We may place a "cookie" on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows our website to identify you and to record your passwords and preferences. The cookie allows us to track your visit to the website so that we can better understand your use of our website so that we can customize and tailor the website to better meet your needs. Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (i) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (ii) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to access a number of web pages found on the website.

USE OF PERSONAL INFORMATION

We may use or disclose your Personal Information:

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

Please note that we may use and disclose your Personal Information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

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 manage, maintain, and develop our operations, including: (i) third parties that provide services to us; (ii) third parties that assist us in the provision of services to you; and (iii) third parties who conduct businesses or services on our behalf (e.g. external payroll processing).

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.

Further, your Personal Information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of our affiliates' regular reporting activities to one another;
- to protect the rights and property of Gateway; or
- during emergency situations or where necessary to protect the safety of a person or group.

DISCLOSURE TO ONTARIO LOTTERY AND GAMING CORPORATION

To comply with our legal and regulatory requirements, any Personal Information that we collect through or otherwise in connection with our operations in Ontario may be collected and used on behalf of 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 the OLG's collection, use or disclose of your Personal Information, you may contact our Privacy Officer (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.

DISCLOSURE TO BRITISH COLUMBIA LOTTERY CORPORATION

To comply with our legal and regulatory requirements, any Personal Information that we collect through or otherwise in connection with our operations in British Columbia may be collected and used on behalf of British Columbia Lottery Corporation (the "**BCLC**") and thus shared with the BCLC. Any such collection, use and disclosure is under the authority of the BCLC and the British Columbia *Gaming Control Act*.

If you have any questions about the BCLC's collection, use or disclose of your Personal Information, you may contact our Privacy Officer (using the contact information below) or BCLC's Customer Support at 1-866-815-0222 or 74 West Seymour Street, Kamloops, BC V2C 1E2. The BCLC's privacy policy can be accessed here: <http://corporate.bclc.com/customer-support/privacy.html>.

DISCLOSURE TO ALBERTA GAMING AND LIQUOR COMMISSION

To comply with our legal and regulatory requirements, any Personal Information that we collect through or otherwise in connection with our operations in Alberta may be collected and used on behalf of Alberta Gaming and Lottery Commission (the "**AGLC**") and thus shared with the AGLC. Any such collection, use and disclosure is under the authority of the AGLC and the Alberta *Gaming and Liquor Act*.

If you have any questions about the AGLC's collection, use or disclose of your Personal Information, you may contact our Privacy Officer (using the contact information below) or AGLC's Customer Support at 1-800-272-8876 or 50 Corriveau Avenue, St. Albert, AB T8N 3T5. The AGLC's privacy policy can be accessed here: <https://www.aglc.ca/privacy-statement>.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. Gateway is not responsible for how such third parties collect, use or disclose your Personal Information. You should review the privacy policies of these websites before providing them with Personal Information.

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 our "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. You may always opt-out of receiving such 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.

Where your consent was required for our collection, use or disclosure of your Personal Information, you may, at any time, subject to legal or contractual restrictions and reasonable notice, withdraw your consent. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

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.

The security of your Personal Information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of Personal Information that is in our custody or control.

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 or if we do not agree with your request to change 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 applicable privacy regulator, including:

Office of the Information and Privacy Commissioner for British Columbia
PO Box 9038 Stn. Prov. Govt.,
Victoria, BC, V8W 9A4

Office of the Information and Privacy Commissioner of Alberta
#410, 9925 - 109 Street NW,
Edmonton, AB, T5K 2J8

Information and Privacy Commissioner of Ontario
2 Bloor Street East,
Suite 1400,
Toronto, ON, M4W 1A8

Office of the Privacy Commissioner of Canada
30, Victoria Street,
Gatineau, QC, K1A 1H3

PRIVACY OFFICER

We have 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

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 November 17, 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.