



# Privacy Policy

## Introduction

This policy governs the collection, use, disclosure, retention, and other processing of personal information by Jackpot Time, including through Jackpot Time products, and services, on Jackpot Time websites, and via any mobile applications (collectively, the "Services"). It explains what types of personal information are collected from our customers, how they may be used, and how you can ask us questions about our privacy practices.

Jackpot Time is running Jackpot Time website(s) and providing Jackpot Time offerings as part of Charitable Gaming in Ontario conducted and managed by OLG and is collecting, using, and disclosing personal information on behalf of, and as a Service Provider to OLG. In the course of providing services:

- (a) Jackpot Time collects, uses, and discloses personal information on behalf of and as a Service Provider of OLG.
- (b) Jackpot Time collects person information in accordance with the Freedom of Information and Protection of Privacy Act (FIPPA) and other applicable privacy laws, and as a service provider for OLG, any personal information collected by or on behalf of OLG is collected under the authority of the Ontario Lottery and Gaming Act, 1999 other applicable laws.

If you do not want us to collect, use, or share your information in the ways described by this Policy, please do not use the Services. By using the Services, you consent to the collection and use of your information (including personally identifiable information) by us as identified herein, in compliance with this policy and the terms and conditions of the services, where applicable.

This policy is separate and distinct from any privacy policies that govern the gaming services offered by any affiliates of Jackpot Time, including those offering online or land-based gaming.

## Definitions

**Cookies:** A packet of data sent by a web server to a browser, which is returned by the browser each time it subsequently accesses the same server, used to identify the user, or track their access to the server.

**Device:** A piece of portable electronic equipment that can connect to the internet, such as a smart phone, tablet, or laptop computer.

**FIPPA:** Freedom of Information and Protection of Privacy Act (Ontario) provides a right of access to records held by public bodies and regulates how personal information is managed.

**HIO:** Person who currently holds or has held within the last 5 years the specific office or position of head of an international organization.

**PCMLTFA:** Proceeds of Crime (Money Laundering) and Terrorist Financing Act implements specific measures to detect and deter money laundering and financing of terrorist activities to facilitate the investigation or prosecution of money laundering and terrorist financing offences.

**PEP:** Politically Exposed Person is an individual who has a high-ranking job in government or some other type of political position.

**SMS:** text messaging service component of most telephone, internet, and mobile devices.

## What is Personal Information?

Personal information is defined by applicable privacy laws, but typically means information about an identifiable individual. In general, Jackpot Time collects the following types of personal information, although different types of information may be collected depending on the purpose of collection or if the collection is required by law:

- (a) Identity information, such as full name, driver's license number, or other official ID number, etc.
- (b) Demographic information, such as your age.
- (c) Contact information such as your email address and phone number.
- (d) Location information such as your address and the location of a device you may use to access our website or applications.
- (e) Transaction information such as play history, customer service history, or other information related to transactions between you and Jackpot Time.

## Why does Jackpot Time Collect Personal Information?

Jackpot Time collects, uses, and discloses personal information on behalf of and as a Service Provider for OLG for which Jackpot Time provides a "Notice of Collection" which explains the specific purposes of collection for a given program, service, or offering. In general, the most common purposes for Jackpot Time's collection of personal information can be categorized as follows:

- (a) For program, service, or product administration – to provide you with a service you have requested to administer your participation in a particular program we may use personal information. That may include using personal information for the following purposes:
  - (i) Uniquely identifying and authenticating players to provide them access to their account(s) and to be sure that prizes, payments, or other features of a service are properly administered.
  - (ii) To deliver marketing and promotional material, including offerings (in accordance with applicable laws) tailored to the recipient.
  - (iii) To administer loyalty or responsible gaming programs.
  - (iv) To provide customer service, facilitate payments and awarding prizes, and otherwise respond to player requests, inquiries, comments, and concerns.
  - (v) To customize the presentation of our products, services, webpages, and applications to individual users and
  - (vi) As otherwise described in a Notice of Collection and/or permitted under the Acts.
- (b) To analyze and improve upon our products, services, programs, offerings, and processes- in addition to day-to-day administration of the services you engage with, we may also use personal information to assist us in evaluating and improving our products services, programs, offerings, and processes. That may include using personal information or purposes such as:
  - (i) To research the operational effectiveness and business viability of current and prospective products, programs, campaigns, and services.
  - (ii) To better understand the interests of current and prospective players.
  - (iii) To tailor or personalize offers and information (in accordance with the Acts) to receiving players.
  - (iv) To engage in responsible gaming research.
- (c) To help Jackpot Time comply with applicable law and to maintain the integrity of Jackpot Time's operations- in certain circumstances, Jackpot Time may be permitted or required to collect, use, or disclose personal information so that it can comply with applicable law, or to maintain the integrity of its business. That could include using personal information for purposes such as:
  - (i) Collecting, organizing, and assessing player information and transaction data to meet record keeping, player monitoring, risk mitigation and reporting requirements under applicable law, including the Proceeds of Crime (Money Laundering) and Terrorist Financing Act.
  - (ii) Administering responsible gaming programs.
  - (iii) As otherwise required or permitted under applicable law, regulation or as detailed in a Notice of Collection.

## Persons Under 18

Services offered by Jackpot Time are for use by persons who are 18 or older (19 if alcohol is served). You may not access, attempt to access, or use our Services if you are under 18. We do not knowingly collect or allow the collection of personal information for our Services from persons under 18. If a parent or guardian becomes aware that his or her children under the age of 18 has provided us with personal information, the parent or guardian may contact us at the details set out below in the "Contact Us" section to have such personal information deleted.

## Does Jackpot Time Disclose Personal Information?

For time to time, Jackpot Time may disclose personal information to service providers acting on Jackpot Time's behalf to enable them to perform specific types of processing and other specialized services in accordance with applicable laws.

Service providers may collect, use, and disclose personal information on Jackpot Time's behalf as described in this policy. Service providers who process personal information on behalf of Jackpot Time are contractually obligated to protect the privacy of Jackpot Time customers and to only process personal information for specific purpose(s) for which Jackpot Time provides instruction or permission.

## How is personal information retained?

Personal information collected by Jackpot Time is retained in accordance with applicable law and Jackpot Time's and OLG's Records Retention Policies and Schedules. After the applicable retention period for records containing personal information has elapsed, the records are securely disposed of in accordance with Jackpot Time's Information and Technology Security Policy. Through the retention period, Jackpot Time will make reasonable efforts to ensure personal information in our custody or under our control is kept accurate, complete, and up to date.

Please contact Jackpot Time management in person or as described below under "Contact Us," to advise of Jackpot Time of any updates or corrections you would like to make regarding your personal information. Jackpot Time will use reasonable efforts to ensure your personal information is up to date and accurate. We ask that you update your information, either in person at a Jackpot Time location, or as described below under "Contact Us" whenever your information is incomplete, out of date or otherwise changes. Subject to applicable law, you have the right to access, update, and correct inaccuracies in your personal information which is in our custody and control by contacting us in person, or as described under "Contact Us." We may request certain personal information for the purpose of verifying the identity of the individual seeking access to his or her personal information records. Additionally, certain personal information may only be accessible via OLG's FOI process.

## Security

Non-gaming information and non-live gaming data collected by use is stored on secure servers and Microsoft/Azure and is protected by firewalls and other industry standard security measures. Our employees and other authorized contractors have restricted access to personal information on a need-to-know basis and are required to take reasonable measures to ensure the unauthorized persons cannot view or access your personal information. Employees and contractors who violate our privacy policies are subject to disciplinary action, up to and including termination of employment.

We cannot enforce or control the security of the computers, electronic devices, or electronic communication method that you may use to send emails and submit information to use over the internet. You are responsible for ensuring that the computers, electronic devices and electronic communication methods you use will provide adequate security for communication with us. Passwords should be strong and kept private. Any account information supplied or received by Jackpot Time will be considered confidential and not shared without your prior consent. We are not responsible for the disclosure or interception of information that you send us before we receive it.

As a standard security practice, Jackpot Time will take reasonable steps which are generally recognized in the industry to ensure that the communication methods used to support services do not permit collection or communication by methods that have known security weaknesses.

In situations where your personal information is collected by third parties under contact with Jackpot Time for performance of contractual duties and other purposes, we require such third parties to exercise reasonable care to protect that information and restrict the use of your personal information to the purposes for which it was provided. When we share your personal information with Jackpot Time affiliates or third parties in accordance with the policy, we require them to exercise reasonable care to protect such information and restrict the use of such information to the purposes for which it was provided to them.

These security measures are intended to protect our servers from unauthorized access. However, no security system is impenetrable, and these systems could become accessible in the event of a security breach. Jackpot Time and its vendors has the controls in place that are designed to detect potential data breaches, contain, and minimise the loss of data, and conduct forensic investigations of a breach. No method of transmission over the internet, or method of electronic storage is 100% secure. Jackpot Time therefore does not warrant, represent, or guarantee the absolute security of personal information in our custody or under our control. The risks associated with a data breach are dependant on the nature of the information and who can access the information. We remind everyone to use unique passwords (not to use the same password with other services or platforms) do not share your passwords and always be vigilant for suspicious emails and other communications.

## Cookies and Website Data

In addition to any information that you choose to submit to us, we or selected third parties may use a variety of technologies that store, or access information already stored on your personal computer, laptop, tablet or mobile phone (each a "device") whenever you visit or interact with our website or applications.

Jackpot Time uses both session cookies (used only during your visit and expire when you close your browser) and persistent cookies (stored on your device for longer than just your visit) on its internet website. Cookies used by Jackpot Time collect certain information about your device, such as its IP address, operating system, and browser specifications, but do not collect personal information such as your name or email address.

Jackpot Time installs first party cookies on devices that accesses its websites unless the browser used by the device has disabled the installation of cookies. The first party cookies that Jackpot Time ensure the website functions as intended, and in some circumstances are necessary for Jackpot Time to provide services requested by Jackpot Time visitors; for example, enabling first party cookies are required to log into any web accounts that you may use as first party cookies are used to support the log-in process.

Jackpot Time also may install third-party cookies on devices that access its website unless the browser used by the device has disabled the installation of cookies. Third-party cookies are used by Jackpot Time to analyze and improve the performance of our websites, offerings, and advertisements.

Jackpot Time may use web analytics services, including Google Analytics, to understand the interests of our visitors, to market products and services, and for another internal business purposes. You can opt out of installation of cookies or delete cookies that were previously installed by updating your settings in the browser you use to visit Jackpot Time websites.

## Wi-Fi and Location Information

In your use of the Services, we may collect information (directly or through third-party service providers) that includes the used, etc. We and our service providers utilize several current technologies and may use future technologies in order to:

- (a) Improve the location-based services. Tracking technologies report your physical location from the computer or Internet-connected device that you choose and from which you are accessing the services.
- (b) Send marketing and advertising via push notifications.

Tracking technologies obtain your physical location by accessing your IP address, MAC address, RFID, hardware embedded coordinate/production number, embedded software number (such as UUID), Wi-Fi positioning system or device GPS coordinates. The tracking technologies report to us, our service providers, and/or vendors the physical and geographic location of the computer or Internet-connected device from which you are accessing our websites. Your physical location will be reported to us, our service providers, and/or vendors when you visit our websites. You may withdraw this consent at any time by turning off your location settings or by notifying us in writing that you would like to withdraw such consent (see the Section below on "Opting Out and Withdrawing Consent" for information on how to do this). If you turn off the location settings or withdraw such consent, it may affect the delivery of location-based services and tailored marketing and advertising options.

Your location information is retained for no longer than is necessary to provide the aforementioned purposes. Location coordinate data is transmitted via Transport Layer Security (TLS) technology and stored in secured server(s) managed by us and/or our vendor. Neither we nor our partners, vendors, or service providers will pass on or resell your location information to any third party, except that we reserve the right to provide location information as necessary to satisfy any law, regulation, or government agency request.

## Service Providers

We may engage service providers to provide certain services to us or to perform certain services on our behalf, including analytics, marketing, etc. In some cases, service providers may collect or be provided with access to your information as reasonably necessary to perform such services on the condition that they do not use or disclose your personal information for other purposes.

## Certain Business Transactions

We may share the information we collect, and is reasonably necessary, with any successor to all or part of our business in connection with a transaction involving a sale, purchase, reorganization, merger, or transfer of any of our assets or the assets of affiliates and/or partners.

## Your Rights

You have certain rights in relation to Jackpot Time's handling of your information, including the following:

- (a) You have the right to request access or correct personal information and player information retained by Jackpot Time. Upon request, Jackpot Time will make reasonable efforts to catalogue and summarize the personal information related to you that is in its custody or under its control. Access to certain information may require that OLG's Freedom of Information process be undertaken, which may include a nominal fee.
- (b) You have the right to request the correction of any personal information in Jackpot Time's custody or under its control. If, in Jackpot Time's sole and absolute discretion, the correction cannot be made, you may require that a statement of disagreement be attached to the information reflecting any correction that was requested but not made.
- (c) Subject to certain limitations, you have the right to opt out, or withdraw your consent, from certain information handling practices. Details of how to opt out or withdraw your consent is provided immediately below in the section called "Opting Out and Withdrawing Consent."

## Opting Out and Withdrawing Consent

If you wish to opt out of certain of Jackpot Time's information handling practices, please use the "Contact Us" information provided below.

Privacy@JackpotTime.ca  
Telephone: 1-(800) 263-9466  
Bingo Country Holdings Limited- Corporation  
3300 Merrittville HWY Unit 2  
Thorold, ON L2V 4Y6  
Canada

Depending on your request, opting out may mean that Jackpot Time cannot provide you with certain of the Services. At the time of the request, Jackpot time will let you know if the request impacts its ability to provide you with the Services.

You can also unsubscribe from texts messages by replying "Stop" to any text message you receive from Jackpot Time. You may unsubscribe from emails sent by Jackpot Time by either updating your preferences at a physical location, by calling a Jackpot Time location and speaking with a Manager or simply by clicking the "unsubscribe" link embedded in each email. Although you may opt-out of the use and sharing of personal information for marketing purposes, we may still use and share information we collect for non-marketing purposes as described in the above policy.

The impact of opting out, withdrawing your consent, will be to information handling practices going forward and not to practices which have occurred based on prior consent or rights to use the information.

## Changes to this Policy

Jackpot Time reserves the right to modify this policy at any time, so please review it frequently. Whenever we do so, we will post the updated version on our websites, as well as at our physical locations, along with the last revision date noted at the beginning of this policy.

## Questions, Concerns and Compliments

Jackpot Time is here to answer any questions about the collection of personal information and other privacy concerns. Questions, concerns, or complaints in regard to the privacy policy should be addressed to: Jackpot Time Management at [privacy@stuartgaming.ca](mailto:privacy@stuartgaming.ca). All complaints will be processed, recorded and addressed in a timely, fair, transparent, and appropriate fashion. In the event a player or other individual makes a privacy related complaint to Jackpot Times process without what they believe to be a satisfactory resolution, the player may contact OLG (see "Contact Us"),

## Contact Us

### Bingo Country Holdings Limited Corporation

3300 Merrittville HWY Unit 2,  
Thorold ON L2V 4Y6  
Phone: 1.800.263-9466

### OLG

OLG Support Centre  
70 Foster Drive, Suite 800,  
Sault Ste. Marie, Ontario P6A 6V2  
1.800.387.0098