

## **INTRODUCTION**

Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) is committed to maintaining the accuracy, confidentiality and security of your Personal Information. Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) 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 (Operator of Casino Rama Resort) operations include activities related to the provision of casinos and related services (including, for example, the operation of restaurants and entertainment services). As such, Gateway (Operator of Casino Rama Resort) may also collect Personal Information from individuals participating in and / or impacted by those activities.

As a general rule, Gateway (Operator of Casino Rama Resort) 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 (Operator of Casino Rama Resort) 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.

## **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. In addition, we may share your Personal Information with other parties who require such information to assist us to 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, and as a result, your Personal Information may be collected, used, processed, stored or disclosed in the United States of America or other jurisdictions where it may be subject to the laws of that jurisdiction, including laws regarding the disclosure of personal information to government authorities.

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 (Operator of Casino Rama Resort) 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 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:

- to process payments

- to conduct credit checks and collect unpaid debts
- to administer payment to tour operators who receive remuneration based on individual gaming and transaction activity
- to participate in a province-wide self exclusion program
- to share Personal Information with the Ontario Lottery and Gaming Corporation (the “OLG”) for informational, legal or regulatory compliance purposes (OLG is governed by its own privacy statement, which can be found at [www.olg.ca](http://www.olg.ca).)
- to share information with third parties for investigation, audit, legal or regulatory compliance purposes
- during emergency situations or where necessary to protect the safety of a person or group
- to protect the rights and property of Gateway (Operator of Casino Rama Resort)
- as part of our affiliates' regular reporting activities to one another
- as permitted or required by applicable law or regulatory requirements
- any other reasonable purpose to which you consent

For a more detailed description of how we collect, use and disclose Personal Information in operating various aspects of our business, please see the appendix to this policy.

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

To comply with our informational, legal and regulatory requirements, any Personal Information that we collect through or otherwise in connection with our operations in Ontario may be collected by or on behalf of 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* for the following purposes:

- to develop, provide for, organize and conduct and manage lottery schemes and gaming in the province of Ontario, and to develop and administer responsible gaming programs;
- to develop, administer, and improve OLG’ products, services, and offerings, including by conducting marketing campaigns, engaging in market research, and receiving and responding to customer service inquiries;
- to meet legal requirements, including sharing your information with regulatory bodies when required; and to develop, administer and improve integrity, security, compliance and risk management programs for games and gaming operations;
- to share the information with third parties including police services for law enforcement, investigation or audit purposes;
- for any other purpose permitted by the *Freedom of Information and Protection of Privacy Act* (Ontario) or required by law.

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 Freedom of Information and Privacy Office 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](http://www.olg.ca).

## **THE AGCO AND FACIAL RECOGNITION TECHNOLOGY**

The AGCO is an agency of the Government of Ontario that is responsible for ensuring that gaming in this province is conducted with honesty and integrity. This involves overseeing the operation of Ontario's gaming facilities. Officers of the Ontario Provincial Police ("OPP") are seconded to the AGCO to carry out law enforcement activities within gaming facilities.

Regulations made under provincial gaming laws require that gaming facility operators install video surveillance in certain parts of their facilities. OPP Officers monitor the video surveillance in order to identify any illegal activity. In cases where illegal activity is suspected, OPP Officers carry out an investigation.

In some investigations, the AGCO may compare a facial scan to a database of known or suspected criminals. Patrons of gaming facilities do not automatically have their face recognition information gathered by the OPP when they enter a gaming facility. Face recognition information is gathered and used strictly in the course of police investigations. Access to information gathered by OPP officers is restricted to the officers who are assigned to work in the gaming facility. All information gathered is protected by sophisticated systems. Once an investigation is completed, the relevant face recognition information is removed from the OPP database.

The AGCO gathers Personal Information in accordance with the *Freedom of Information and Protection of Privacy Act* (Ontario). If you have any questions or would like more information about the role of the AGCO and its use of face recognition information, please contact:

Alcohol and Gaming Commission of Ontario  
90 Sheppard Avenue East, Suite 200  
Toronto, Ontario  
M2N 0A4

1-800-522-2876  
[www.agco.on.ca](http://www.agco.on.ca)

## **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 (Operator of Casino Rama Resort) 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 (Operator of Casino Rama Resort) 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 (Operator of Casino Rama Resort) 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.

Please note that you may be denied entry to gaming premises or may not be able to take advantage of certain products and services if you do not consent 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 (Operator of Casino Rama Resort) 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:

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 (Operator of Casino Rama Resort)  
4331 Dominion Street,  
Burnaby, BC V5G 1C7  
Canada

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

## **REVISIONS TO THIS PRIVACY POLICY**

Gateway (Operator of Casino Rama Resort), 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 January 11, 2019.

## **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 (Operator of Casino Rama Resort) 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.

## APPENDIX TO PRIVACY STATEMENT

### DESCRIPTION OF CERTAIN PRACTICES

We will generally endeavour to collect Personal Information directly from you through a number of ways. For example, Gateway (Operator of Casino Rama Resort) may obtain and collect your Personal Information through the following means:

**Identification (“ID”) Verification.** Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) is required to verify the government-issued photo ID of all individuals who appear under 30 years of age at the entrances, to ensure that no one under the legal gambling age of 19 is permitted entry. No information is recorded when ID is verified at the doors.

Casinos are also required, under provincial and federal laws, to verify government-issued photo ID and to record certain information, including name, date of birth, address, type of ID, and ID reference number, before conducting certain types of transactions. These transactions include foreign exchange transactions of \$3,000 or more, cash transactions of \$10,000 or more, casino disbursements of \$10,000 or more, electronic funds transfers of \$1,000 or more, credit extensions of any amount, and opening a front money account in any amount. Where cash is received or casino disbursements are made, this includes multiple cash transactions or disbursements by or on behalf of the same person, amounting to \$10,000 or more during the gaming day.

Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) also requires government-issued photo ID before issuing a Players Card, or issuing complimentary, or setting up a PIN number for your Players Card. This requirement helps to protect customers who may lose or misplace their cards from having someone else redeem their complimentary or marketing offers

**Identification Verifiers.** Security Guards posted at the entrances of the casino and the entrance to the Entertainment Centre use identification verifiers to scan any ID they believe may have been tampered with or altered. The identification verifiers display the date of birth and recognize ID that has been falsified. Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) does not keep a permanent record of any information displayed as a result of scanning information through an identification verifier.

**Photography.** To protect your privacy, photography is prohibited on the gaming floor. The only exceptions to this prohibition are photographs of jackpot winners who consent in writing to their picture being taken. Except for your spouse or significant other, no other customers will be included in the photographs. Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) may also take photographs inside the casino for publicity and marketing purposes such as advertising campaigns. In these cases, only actors are used in the photographs, and clearly visible signage is posted to advise customers of the photo shoot. In some cases, entertainers will have their performances in the Entertainment Centre videotaped and photographed. When this is happening, we will notify you through signage and/or an announcement at the beginning of the performance. Photography is permitted in the hotel and restaurants.

**Video Surveillance.** In order to comply with the regulations made pursuant to provincial gaming laws, Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) is required to have surveillance systems to monitor all gaming and sensitive areas of the casino. Video surveillance cameras are used to protect Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited), its customers and employees against potential violations of criminal and/or civil laws. Only Casino Rama

Resort (operated by Gateway Casinos & Entertainment Limited) Surveillance personnel, authorized Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) officers or directors, Ontario Provincial Police and regulatory authorities monitor surveillance camera output and do so from a protected and secure room.

**Tracking and Reward Programs.** Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) has established various player tracking and reward programs. You may choose to become a member of our Players Passport Club so that you can redeem your slot points for cash back, qualify for complimentary and many other marketing offers, and receive invitations to parties and events. If you are a table games player, you may wish to have your play rated. If you choose to join the Players Passport Club or to have your play rated, we may collect certain information about you including name, address, telephone number, e-mail address, interests, gaming history, number of visits to the casino, level of play, and other information of a similar nature. Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) uses this information to understand better the interests of its customers, to provide you with valuable marketing information, and to assess your eligibility for cash back, complimentary, and other promotional offers, and to invite you to parties and events.

**Credit Applications.** Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) may extend credit to interested and eligible customers. To assess your eligibility for credit and determine a line of credit that corresponds with your financial means, we will first have to obtain information about you and verify your financial history. You will be required to provide us with your personal, employment, financial, and banking information. To determine your eligibility for credit, we may disclose your Personal Information to credit reporting agencies, financial institutions and other casinos. The information on our credit application is required under regulations made under provincial gaming laws and is similar to the type of information a bank would require before extending a consumer loan.

**Other Financial Services.** Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) may open a front money account for you, advance you cash on your credit card or transfer your funds by wire to a financial institution. Before we can facilitate these services, we will require certain Personal Information. To determine your eligibility for these financial services, we may disclose your Personal Information to credit reporting agencies, financial institutions and other casinos. Depending on the type of service you are interested in, the Personal Information may include your name, address, date of birth, signature, and other information of a similar nature. Where these transactions amount to \$10,000 or more in a consecutive 24-hour period, a Large Cash Transaction Record or a Large Casino Disbursement Record is required under provincial and federal laws.

**Large Transaction or Disbursement Reports.** Under provincial and federal laws, casinos are required to complete a Large Cash Transaction Report ("LCTR") before conducting any cash transactions of \$10,000 or more (including multiple transactions, where cash is received from the same person, amounting to \$10,000 or more during a consecutive 24-hour period) and a Large Casino Disbursement Report ("LCDR") before conducting any disbursements of \$10,000 or more (including multiple disbursements to the same person, amounting to \$10,000 or more during a consecutive 24-hour period). The LCTR and LCDR reports include Personal Information such as your name, address, date of birth, business or principal occupation, type of ID, ID reference number, and ID expiry date. Where we determine that the transaction or disbursement is being completed on behalf of a third party, Personal Information of the third party is also required, including the third party's name, address, date of birth, business or principal occupation, and the relationship between the third party and person completing the transaction. We are required to file these reports with the Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC").

**Electronic Funds Transfers Reports.** Under provincial and federal laws, casinos are required to report to FINTRAC all electronic funds transfers amounting to \$10,000 or more internationally during a consecutive 24-hour period. The Electronic Funds Transfer report includes Personal Information such as your name, address, date of birth, and business or principal occupation.

**Suspicious Transaction Reports.** Under provincial and federal laws, when we suspect, on reasonable grounds, that a transaction (regardless of the amount) or attempted transaction is related to the commission of, or attempted in the commission of, a money laundering offence or a terrorist activity financing offence, a Suspicious Transaction Report must be filed with FINTRAC. Certain Personal Information about the person conducting the transaction is required on such a report. Federal law prohibits us from disclosing that a Suspicious Transaction Report has been completed or reported, or the content of such a report.

**Ontario Lottery and Gaming Corporation for Anti-Money Laundering and Counter-Terrorist Financing Programs.** As described above, Ontario casinos are required to report certain transactions to FINTRAC. For casinos like Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) that are operated by a third party operator on behalf of OLG, the operator may file reports to FINTRAC on behalf of OLG. As a result, any report sent by the Operator to FINTRAC will also be shared with OLG. OLG has responsibilities under federal law to develop and administer anti-money laundering and counter-terrorist financing programs. Such programs are required to assess and evaluate information and activities taking place across all casinos in Ontario, whether operated by OLG itself or by a third party operator on behalf of OLG. As a result, in addition to providing OLG with reports sent to FINTRAC, all third party operators of casinos in Ontario are required to provide additional Personal Information relating to their customers to OLG in certain circumstances. This information may include name and contact information, date of birth, employment information, casino assigned player number or risk level, government issued identification numbers, information about accounts, transactions and gaming activity, and any other Personal Information that is reasonably required by OLG to effectively administer its anti-money laundering and counter-terrorist financing program. OLG uses the information it receives from all casino operators for the purposes of administering its anti-money laundering and counter-terrorist financing programs. OLG may also disclose Personal Information received from the operator to FINTRAC. OLG is governed by its own Privacy Policy which can be found at [www.OLG.ca](http://www.OLG.ca) and includes contact information to reach an OLG representative in case you have any questions regarding the OLG Privacy Policy.

**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 Ontario will use their best efforts to deny you entry. We will also remove your name from our mailing list and from lists of persons receiving invitations to player parties and events. The form requires that you disclose your name, address, date of birth, and a piece of government-issued photo ID, and that you allow us to take a photograph of you. This information is shared with OLG and all gaming premises in the province for the purposes of the Self-Exclusion program.

**Security Incidents.** Details of security incidents, such as assaults, thefts, drunkenness or disorderly conduct, etc., are 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. If you prefer to provide us with your Players Passport Club card, we can obtain your name, address and telephone number from our computer system. 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 Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited), we may ask you to provide us with

your contact information, health history, physician and next of kin for risk management purposes. Other information may be documented depending on the nature of the medical incident or accident.

**Ticket Purchase.** When you purchase tickets for concerts or other events at Casino Rama Resort's (operated by Gateway Casinos & Entertainment Limited) Entertainment Centre through Ticketmaster, Ticketmaster will ask for your consent to receive communication from Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited). If you consent to receive communications from Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited), Ticketmaster will release certain Personal Information to Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited), including your name, email, address, and telephone number. Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) will then use this information to subscribe you to the Casino Rama Resort (operated by Gateway Casinos & Entertainment Limited) Entertainment Newsletter. We send emails about our entertainment offerings on a periodic basis to individuals who have subscribed to our "entertainment newsletter". We do so based on express consent and otherwise in compliance with Canadian anti-spam legislation. Our emails are sent by a mailing agent who we deal with in accordance with the "service provider" provision above.

**Online Entertainment Newsletter.** If you voluntarily register on our website for the Online Entertainment Newsletter, we may collect certain Personal Information about you, including your name, contact information, gender, age, and recreational and entertainment related interests and preferences. We send emails about our entertainment offerings on a periodic basis to individuals who have subscribed to our "entertainment newsletter". We do so based on express consent and otherwise in compliance with Canadian anti-spam legislation. Our emails are sent by a mailing agent who we deal with in accordance with the "service provider" provision above.

**Players Passport™ Club.** The Players Passport™ Club is our loyalty program. Members gain access to special offers in exchange for their agreement to allow certain transactions at the Casino to be tracked and to be marketed to in a tailored fashion based on those transactions. We allow members to choose how they wish to be contacted and, in general, communicate with members based on express consent and in compliance with Canadian anti-spam legislation. Our emails are sent by a mailing agent who we deal with in accordance with the "service provider" provision above.

**Website.** Our website (at [www.casinorama.com](http://www.casinorama.com)) provides information to our customers about gaming promotions, career opportunities, services and activities available at our gaming facilities, hotels, restaurants and entertainment venues. Our website has cookies which allows us to track information using google analytics for marketing purposes such as shows booked, confirmed or cancelled, etc. However, 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.