



PlayOLG.ca PRIVACY POLICY

Overview

Ontario Lottery and Gaming Corporation (OLG) is committed to protecting the personal information entrusted to us by visitors to PlayOLG.ca and our players. We protect your personal information in accordance with Ontario's *Freedom of Information and Protection of Privacy Act*, Canadian anti-spam legislation and other applicable laws (the "Acts").

The Acts govern how OLG can collect, use, disclose and retain your personal information when it is in the custody or under the control of OLG. OLG's commitment to privacy is also based upon 10 internationally recognized principles that form the basis of privacy legislation in Canada.

This policy governs the collection, use, disclosure and retention of personal information in relation to the conduct, management and operation of OLG's iGaming business through PlayOLG.ca.

iGaming Privacy

Log Files

As is true of most websites, through PlayOLG.ca OLG will gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser technical specifications, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We do use this information to identify individual users, we use it to analyze trends, to administer PlayOLG.ca, to track movement patterns around the site and to gather demographic information about our user base as a whole.

We associate an IP address with every transaction on PlayOLG.ca for the purpose of troubleshooting, dispute resolution, and to comply with our legal and regulatory requirements. IP address is also used to verify that players are logging in to their player account from geographic locations within Ontario to comply with our legal/regulatory requirements.

Cookies

We use a third-party tracking service that uses tracking technologies (e.g., cookies and web beacons) to track non-personal information about visitors to PlayOLG.ca in the aggregate for the purpose of providing usage and volume statistics which are used to improve PlayOLG.ca.

PlayOLG.ca uses cookies to understand the usage of the web site by visitors and players. This information may be used to further improve the user experience. Cookies are not mandatory for the use of PlayOLG.ca and may be disabled by users of the web site. For further details, refer to our Cookies Policy at <https://wcr.playolg.ca/content/dam/olg/documents/cookies-policy.pdf>.

Social Media Features

PlayOLG.ca includes social media features, such as the Facebook "Like" button and the Twitter "Tweet" button. These third party features may collect your IP address, information about which page you are visiting on PlayOLG.ca, and may set a cookie to enable the feature to function properly. Social media features are hosted by third parties, and your interactions with these features are governed by the privacy policy and other terms of use of the companies that provide them, not by OLG.

Players may have the option of making public postings on or through PlayOLG.ca including to third party social media sites. If a player makes use of any such social media features, posts will be publicly available. OLG is not liable, and does not assume responsibility, for the disclosure of personal information through player postings or the accuracy of any such postings.

iGaming and your Personal Information

Personal information means information about an identifiable individual. This includes, for example, an individual's name, home address, phone number, personal email address, gender, date of birth, information relating to employment or financial transactions (e.g., credit card information). On PlayOLG.ca, personal information also includes your PlayOLG.ca player account number, and player history and transactions identifiable as being undertaken by a specific individual through PlayOLG.ca.

Principle 1 – Accountability

OLG is responsible for all personal information in our custody and control and for personal information that we share with persons who operate or provide services on our behalf (e.g. information technology providers).

Our employees participate in privacy training and sign a Code of Conduct to help ensure they are protecting the personal information of users of PlayOLG.ca in compliance with this PlayOLG.ca Privacy Policy. Our agreements with our third party service providers also include provisions that require our service providers to protect the personal information of PlayOLG.ca users.

PlayOLG.ca users can contact Player Support with questions, comments, or complaints relating to the use and protection of their personal information and other privacy-related matters concerning PlayOLG.ca. Please refer to Principle 10 for further details on how to contact Player Support.

Principle 2 – Identifying Purposes

We inform PlayOLG.ca users, before or at the time of collecting personal information, of the purposes for which we are collecting the personal information. We make this information available through various mechanisms including, for example, through this PlayOLG.ca Privacy Policy, our PlayOLG.ca website, and the Player Agreement – Terms and Conditions for PlayOLG.ca.

We do not collect, use or disclose personal information for a new purpose that was not previously identified without explaining the new purpose and obtaining consent, unless otherwise permitted by law.

Personal information is collected by OLG under the authority of section 3 of the *Ontario Lottery and Gaming Corporation Act, 1999* and is collected, used or disclosed for the following purposes:

1. To verify that you are permitted to access and/or use PlayOLG.ca and the services that are made available through PlayOLG.ca (the “Sites and Services”), including to verify your registration details with trusted third party service providers and financial institutions;
2. To provide you with your access to and/or use of the Sites and Services, and verify your entitlement to any prize or giveaway and any other benefits associated with the Sites and Services;
3. To investigate unauthorized use of your username or your password (for registered players only);
4. To permit OLG and its third party service providers to provide to you during your use of the Sites and Services: technical support and Player support and the use of chat and other communications features;
5. To assist OLG and its third party service providers with managing, responding and reacting to player communications and other incidents involving our players;
6. To enforce your Player Agreement – Terms and Conditions for PlayOLG.ca.
7. To administer marketing campaigns that you have agreed to receive and facilitate commercial email communications;
8. To provide a better entertainment experience for PlayOLG.ca users;
9. To improve products and services, help OLG better understand its customers' needs, bring other products and services to your attention, and for OLG's other business development purposes;
10. To conduct research, including compiling of gaming statistics;
11. To carry out surveys and contests in which you have agreed to participate;
12. To administer responsible gambling programs including the PlayOLG.ca self exclusion program and other responsible gambling tools (such as limit setting, enforced time outs, personal risk assessment, and player data analytics);

13. To provide you with personalized marketing and responsible gambling feedback based on your playing patterns and behaviors;
14. To expedite signup for any other services or offers provided by OLG and/or its third party service providers who act on OLG's behalf;
15. To post winner stories on PlayOLG.ca and OLG's other website(s) that may contain personal information, such as your PlayOLG.ca player nickname and your city of residence. Player consent is governed by the Player Agreement – Terms and Conditions for Use for PlayOLG.ca that is acknowledged and agreed upon when registering for an iGaming account prior to play.
16. To display on PlayOLG.ca in connection with specific games, player nicknames and/or location of winners, or to display the names or nicknames of participants in a specific game in accordance with applicable game rules or conditions, and related chat participants;
17. To comply with our legal and regulatory requirements; and
18. To facilitate the funding of your player account that is maintained through PlayOLG.ca (registered players only) and the withdrawal of funds from your player account.

OLG may disclose personal information to OLG's third party service providers for one or more the above stated purposes as deemed necessary by OLG and to OLG-approved third parties for the following purposes:

1. To your financial institution or credit card provider in connection with the funding of your player account through PlayOLG.ca, including in the case of any credit card chargeback or other dispute;
2. To your banking institution to verify your entitlement to any prize or giveaway and any other benefits associated with the Sites and Services; and
3. To research organizations (with your express consent only) to allow these researchers to contact you directly to request your participation in a research study.

OLG may also disclose your personal information as required or permitted by law or as we may otherwise advise you from time to time, including pursuant to the Player Agreement – Terms and Conditions for PlayOLG.ca.

Principle 3 – Limiting Collection of Personal Information

OLG collects only the personal information that we believe we need for the purposes of providing the Sites and Services to visitors to PlayOLG.ca and our players. For example, we limit the collection of financial information by only collecting information deemed necessary to process financial transactions and payments relating to the Sites and Services (taking into account our desire to prevent fraudulent, unauthorized or ineligible financial transactions), and to investigate financial transactions as permitted by law or as set out in the Player Agreement – Terms and Conditions for PlayOLG.ca (e.g., fraud, credit card chargebacks).

We normally collect your personal information from you. We may collect your information from other persons with your consent or as permitted by law in connection with your accessing or use of PlayOLG.ca.

Principle 4 – Consent

OLG asks for consent to collect, use or disclose your personal information, except in specific circumstances where collection, use, or disclosure without consent is permitted or required by law. By registering for a player account or by using any of the Sites and Services, you are consenting to the terms of this Privacy Policy. We may assume your consent in cases where you volunteer information for an obvious purpose including, for example, when you voluntarily share your personal information on forms (e.g., name, email address, phone number, home address) to participate in a survey or contest or to receive promotional materials.

We ask for your express consent for the purposes stated above and for other purposes which you expressly consent to from time to time and we may not be able to provide certain services if you are unwilling to provide consent to the collection, use, or disclosure of certain personal information (for example, the registration of a player account with PlayOLG.ca). We will inform you about this at the time of collection, including as part of the Player Agreement – Terms and Conditions for PlayOLG.ca.

You can withdraw your consent to OLG using or disclosing your personal information, at any time, if you no longer want to receive:

- Marketing communications relating to PlayOLG.ca
- Specific types of promotional materials, including marketing sent via:
 - Mail
 - Email
 - Phone (Home and Cell/Mobile)
 - SMS

You can change your preferences by accessing the My Account – My Personal Info section of PlayOLG.ca or by contacting Player Support as indicated under Principle 10 below.

You can also make informed choices about our use of cookies on PlayOLG.ca by resetting your browser to either notify you when you have received a cookie or to refuse to accept cookies. See our Cookies Policy at <https://wcr.playolg.ca/content/dam/olg/documents/cookies-policy.pdf>.

Principle 5 – Limiting Use, Disclosure, and Retention

OLG uses and discloses personal information only for the purpose for which the information was collected, except as permitted or otherwise required by law.

If we wish to use or disclose your personal information for any purpose not previously consented to by you, we will ask for your consent. We may not seek consent if the law allows this (e.g., the law allows organizations to use personal information without consent for the purpose of collecting a debt).

OLG retains (or requires its third party service provider(s) to retain) your personal information only as long as required in order to fulfill the purposes for which the information was collected and to fulfill OLG's legal requirements. OLG maintains or causes to be maintained this personal information in accordance with the iGaming Records Retention Policy and once the personal information reaches its retention period, it is securely destroyed.

Agents/Service Providers

We use third party service providers in the provision of the Sites and Services, such as credit and identity verification services, an email service provider to send emails on our behalf and an online payments processing company to permit you to deposit funds into, and withdraw funds from, your PlayOLG.ca player account.

We will share your personal information (e.g., name, home address, phone number, email address, and financial information) as necessary with such third party service providers to allow them to provide services on our behalf.

Certain third party service provider(s) will store personal information (including payment information, such as credit card details and bank account information) on servers that are located outside of Ontario, but in Canada, in connection with your use of your PlayOLG.ca player account.

PlayOLG.ca may use third party service providers to deliver marketing materials to potential players using the Internet. The service providers may use their own information and intellectual property to determine to whom they will deliver the marketing materials. OLG does not disclose any personal information to this type of service provider.

Principle 6 – Accuracy

We use reasonable efforts to ensure that your PlayOLG.ca player personal information is accurate and complete. We rely on users of PlayOLG.ca to notify us if there is a change to their personal information that may affect their relationship with OLG. If you are aware of an error in our information about you, we request that you change the information directly in your player profile by accessing the My Account – Personal Info section of PlayOLG.ca. If you are unable to do so, please let us know by contacting Player Support (see Principle 10 for contact details) and we will correct it on request wherever possible. For some aspects of your relationship with PlayOLG.ca, you are required to ensure that your personal information that is provided to us through PlayOLG.ca is up-to-date. These matters are addressed in the Player Agreement – Terms and Conditions for PlayOLG.ca.

Principle 7 – Safeguarding Personal Information

We protect personal information in a manner that we consider appropriate for the sensitivity of the information. We use our reasonable efforts to prevent any loss, misuse, unauthorized disclosure or modification of personal information, as well as any unauthorized access to personal information.

OLG's efforts to protect personal information in its custody or control through PlayOLG.ca include, for example:

- *Administrative Safeguards:* We employ administrative safeguards, such as this PlayOLG.ca Privacy Policy, confidentiality agreements, and contracts, to help ensure that all OLG employees, third party contractors and service providers access, use or disclose personal information for authorized purposes only.
- *Technical Safeguards:* We employ technical safeguards, such as passwords, audit logging, encryption, and role-based access controls for information systems from which personal information may be accessed for PlayOLG.ca purposes.
- *Physical Safeguards:* We employ physical safeguards to protect personal information by locking filing cabinets, restricting physical access to offices and data centres, and securely disposing of paper and electronic records that we no longer need.

No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee the absolute security of your personal information in connection with your access or use of PlayOLG.ca.

Principle 8 – Openness

We make available to users of PlayOLG.ca specific information about our policies and practices that relate to the management of personal information. We make this information available in this PlayOLG.ca Privacy Policy, the Player Agreement – Terms and Conditions for PlayOLG.ca and through Player Support (see Principle 10 for contact details below).

This information describes, for example:

- How we collect, use, and disclose personal information, and for what purposes, in connection with PlayOLG.ca;
- How we endeavour to protect personal information in our custody and control;
- How you may gain access to and correct the personal information we have about you;
- How to opt out of specific uses and disclosures of personal information; and
- How to contact Player Support with an inquiry or complaint.

Principle 9 – Individual Access

PlayOLG.ca provides a player with readily available access to most of that player's personal information collected by PlayOLG.ca through the player account page, including:

- Transactions information;
- Deposit/withdrawal history, and current balance;
- Log in time, last log in time and last log out time;

- Gaming event and transaction history;
- Method and source of funds used for transactions;
- Total monies wagered for session and/or period of time;
- Total monies won or lost for session and/or period of time; and
- Account balance.

You may also request access to personal information about you in the custody or under the control of OLG that may not be accessible through the player account page. Requests for personal information that is not accessible through your PlayOLG.ca player account page can be made in writing and must include the following information:

- That the request is being made under the *Freedom of Information and Protection of Privacy Act*;
- Details about the records requested so OLG can easily locate them;
- Your name, mailing address and telephone number so OLG can contact you if OLG has any questions; and
- A \$5 non-refundable application fee in the form of a cheque or money order payable to Ontario Lottery and Gaming Corporation.

Individuals may also submit their request using the FOI Request Form available on the Information and Privacy Commissioner's web site at <http://www.ipc.on.ca/images/Resources/up-1request.pdf> .

Individuals must submit their access requests by mail to the following address:

Program Coordinator
 Information Access and Privacy Services
 Ontario Lottery and Gaming Corporation
 70 Foster Drive, Suite 800
 Sault Ste. Marie, ON P6A 6V2

We will respond to your request within 30 calendar days, unless an extension is required. If we refuse a request in whole or in part, we will provide the reasons for the refusal. In some cases where exceptions to access apply, we may withhold part of the requested information and provide you with the remainder of the record.

In addition, you may request a correction of an error or omission in your personal information. We will record in your record details about your correction request and communicate this information to relevant third parties, where required and feasible.

Principle 10 – Questions and Complaints; Changes

If you have a question or concern about any collection, use or disclosure of personal information by OLG in relation to PlayOLG.ca and related services, or about a request for access to your own personal information relating to PlayOLG.ca, please contact Player Support by email at Playersupport@playolg.ca or by phone at

1-855-978-PLAY (7529). All correspondence should be directed to the attention of PlayOLG.ca.

If you are not satisfied with the response you receive, you can contact the Information and Privacy Commissioner of Ontario filling out a complaint form available at <http://www.ipc.on.ca/english/Resources/Forms/> http://www.priv.gc.ca/I_I/form_e.cfm and submitting the completed form by mail to:

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

If we change our privacy practices, we will post those changes to the on-line version of this privacy policy, and provide notice on the home page of PlayOLG.ca or in other places on the Sites so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify our privacy policy at any time, so please review it frequently. Your continued use of any of the Sites and Services will signify your acceptance of the changes to our privacy policy.

If you have any questions regarding this privacy policy, please contact Player Support

External Links Disclaimer: In some cases, we link to other sites created and maintained by other public and/or private sector organizations. We provide these links solely for your information and convenience. When you link to an outside website, you are leaving PlayOLG.ca and our information management policies no longer apply.

This PlayOLG.ca Privacy Policy was last updated on August 28, 2014