

PERSONAL INFORMATION AND PRIVACY PROTECTION AT CASINO RAMA

Important Information about Personal Information Protection and Privacy

CASINO RAMA is committed to protecting your privacy and maintaining the integrity of any identifiable information (“Personal Information”) we collect. The purpose of this brochure is to inform you about how and why we collect Personal Information, to outline the steps we take to keep your Personal Information confidential, and to provide you with a CASINO RAMA contact number, should you have questions or concerns about our Personal Information protection practices. The brochure also describes the manner in which the Alcohol and Gaming Commission of Ontario (“AGCO”) may use face recognition technology, and identifies a contact person if you have any questions regarding the role of the AGCO and its use of face recognition technology. The brochure does not apply to Personal Information collected about employees.

Why does CASINO RAMA collect your Personal Information?

CASINO RAMA collects certain Personal Information and uses it for the following reasons:

- to identify you;
- to comply with legal requirements;
- to protect us both against fraud;
- to ensure that minors do not gain entry to the casino;
- to ensure a secure and safe environment for customers and employees;
- to co-operate with law enforcement and to protect against violations of criminal or civil laws;
- to assess your eligibility for cash back, retail items and complimentaries, such as meals, hotel accommodations, transportation and concert tickets;
- to provide you with information about activities, new games, tournaments and events at CASINO RAMA;
- to provide you with promotional offers, and invitations to player parties, concerts, sporting and other events; and
- to better understand your interests and improve service delivery.

What type of Personal Information does CASINO RAMA collect and how?

CASINO RAMA may obtain and collect your Personal Information through the following means:

- **Identification (“ID”) Verification.** Casinos are required to verify the photo ID of all individuals who appear under 25 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,* credit extensions of any amount, and opening a front money account in any amount.

CASINO RAMA also requires government-issued photo ID before issuing a Players Card, or permitting a customer to redeem points on their cards. This requirement helps to protect customers who may lose or misplace their cards from having someone else redeem their points.

- **Identification Verifiers.** Security Officers posted at the entrance of the casino 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 which has been falsified. CASINO RAMA 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. With the permission of the AGCO, CASINO RAMA may also take photographs inside the casino for publicity purposes and 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 *Gaming Control Act Regulations*, CASINO RAMA 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, its customers and employees against potential violations of criminal and/or civil laws. Surveillance camera output is monitored only by CASINO RAMA Surveillance personnel, authorized CASINO RAMA officers or directors, Ontario Provincial Police and regulatory authorities in a protected and secure room.
- **Manual and Electronic Forms.** During your visit to CASINO RAMA, you may be asked to provide information for various forms, releasing different types of Personal Information. The

information you supply to us, either verbally or in writing, may be stored electronically. The forms fall into the following principal categories:

- ***Customer Tracking and Reward Programs:*** CASINO RAMA 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 or gift items, qualify for complimentary and many other promotional 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, etc.. CASINO RAMA uses this information to better understand 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:*** As a service to eligible customers, CASINO RAMA may extend you credit to facilitate gaming. 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 name, address, income, banking information and credit history. 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 applications is required under the *Gaming Control Act Regulations*, and is similar to the type of information a bank would require before extending a consumer loan.
- ***Other Financial Services:*** As a service to customers, CASINO RAMA may open a front money account for you, advance you cash on your credit card, transfer your funds by wire to a financial institution, or permit you to use a Safety Deposit Box. Before we can facilitate these services, we will require certain Personal Information. Depending on the type of service you are interested in, the Personal Information may include your name, address, date of birth, signature, etc.. Where these transactions (excluding use of Safety Deposit Box) amount to \$10,000 or more in the gaming day, a Large Cash Transaction Record is required under the federal law.
- ***Large Transaction Records:*** Under provincial and federal laws, casinos are required to complete a Large Cash Transaction or Disbursement Record 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 the gaming day). These records include Personal Information such as your name, address, business or principal occupation. 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. Effective January 31, 2003, we will be required to report to the Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC"), all transactions where \$10,000 or more in cash is received (including multiple cash transactions, by the same person, amounting to \$10,000 or more during the gaming day). The recording and reporting requirements for large cash

transactions apply not only to all casinos/slot facilities in the country, but also to all financial institutions, foreign exchange dealers, etc.

- ***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 ID, and that you allow us to take a photograph of you. This information is shared with all gaming premises in the province in order to enforce the voluntary self-exclusion.
- ***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, 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.
- **Concert Ticket Purchase.** When you purchase tickets for concerts or other events at CASINO RAMA's Entertainment Centre through Ticketmaster, Ticketmaster releases certain of your Personal Information to Casino Rama, including your name, address, and telephone numbers. CASINO RAMA may use this information to notify you of other concerts or events at our Entertainment Centre.

When you accept complimentary tickets to a concert or event at CASINO RAMA's Entertainment Centre, you provide us with certain Personal Information including your name, address and telephone number. CASINO RAMA may use this information to notify you of other concerts or events at our Entertainment Centre.

- **Website.** The CASINO RAMA website www.casinorama.com provides information to our customers about the services, events and other activities available at CASINO RAMA. Our Internet servers may passively and automatically collect certain information about website visitors' traffic patterns, which may be linked to their Internet Protocol (IP) addresses (which are unique Internet "addresses" assigned to all Internet users by their Internet Service Providers). Server logs may record statistical information, such as visitors' IP addresses, type of operating systems, time and duration of visit, pages requested, and identify categories of visitors by items such as domains and browser types. These statistics are generally collected and used on an aggregate basis.
- ***Online Entertainment Club and Players Passport Club:*** If you voluntarily register on our website for the Online Entertainment Club or Players Passport Club, we may collect certain Personal Information about you, including your name, contact information,

gender, age, and recreational and entertainment related interests and preferences. Such Personal Information is used to help us learn more about our customers' interests and preferences, and to provide you with Website content suited to your stated interests and preferences. If you choose to receive periodic communications (e.g. about our services, events, concerts, special offers and promotions), such communications may also be tailored to your stated interests and preferences.

- ***Cookies:*** Our website makes use of cookies. Cookies are small text files offered to your computer by servers in order to keep track of your browser as you navigate the website. Cookies may be stored on your hard drive, or in temporary (cache) memory in which case they are deleted when you shut down your browser or turn off your computer. We may use cookies to record session information, such as your browsing habits and past activity, to enable us to provide you with improved services such as customised Web page content. You can disable cookies using your Internet browser's settings. Please consult your browser's help function for information on how to disable cookies. Note that if you disable cookies, certain features of our website may not function properly.
- ***Links to Third Party Websites:*** Our website may contain links to other websites that are provided as a convenience only, and which may have different privacy policies and practices than CASINO RAMA. CASINO RAMA has no responsibility for such third party websites, and individuals are advised to review the privacy policies of any third party websites they visit.

The Disclosure of Personal Information

CASINO RAMA does not sell to third parties any Personal Information it collects. CASINO RAMA does not disclose Personal Information to third parties without your written consent, unless we are required to do so by law or in a medical emergency.

Service Providers

Your Personal Information may be transferred to third party service providers to provide website hosting, database and information management, data processing, or other processing services on our behalf. We take reasonable measures to ensure that your Personal Information that may be collected, used, disclosed or otherwise processed by these service providers on our behalf is protected and not used or disclosed for purposes other than as directed by CASINO RAMA.

How CASINO RAMA Protects Your Privacy

CASINO RAMA uses various means to help safeguard the Personal Information it collects about you. Only authorized employees and agents have access to this Personal Information. CASINO RAMA employees who have access to Personal Information receive training regarding privacy protection. All computers on which Personal Information is stored are password protected. CASINO RAMA uses data encryption to increase the security of the information you provide online. Access to surveillance videotapes is restricted to authorized CASINO RAMA personnel, law enforcement, legal and regulatory authorities, and our insurers.

Your Consent/Verifying and Amending Personal Information

If you don't want CASINO RAMA to send you mail or telephone you about events, concerts, and promotional offers, please contact CASINO RAMA's Legal Department. You can also access and review your Personal Information held by CASINO RAMA and make changes to it by contacting CASINO RAMA's Legal Department. You may be required to put your request in writing and show us identification. The reason we ask for identification is to ensure that we do not unintentionally change or release your personal information to a third party who is representing him/herself as you. CASINO RAMA's Legal Department can be reached

by writing to:

CasinoRama
R.R.#6,P.O.Box178
Rama,Ontario
L0K 1T0

Attention: Legal Department

by telephone at:

1-800-832-7529, ext. 5181

on line at:

privacyofficer@casinorama.com

You may update or make changes to the Personal Information maintained as part of the Online Entertainment Club or Players Passport Club by using our website or by calling the number above. In addition, you may request access to, or correction of, your Personal Information by writing to CASINO RAMA's Legal Department at the address provided above.

Resolving Your Concerns

If you would like more information about CASINO RAMA's Personal Information collection, use and disclosure practices, or if you would like to better understand and verify what Personal Information we have collected about you, please contact our Legal Department. Please let us know about your questions or concerns and we will do our best to help you. CASINO RAMA's Chief Privacy Officer is the Vice President of Legal and Administration.

Who is the Alcohol and Gaming Commission of Ontario (AGCO)?

The AGCO is an agency of the Government of Ontario. The Commission 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 Commission to carry out law enforcement activities within gaming facilities.

Use of Face Recognition Technology?

Regulations made under the *Gaming Control Act, 1992* require that gaming facility operators install video surveillance in certain parts of the 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. Some investigations may involve use of face recognition information comparing 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.

How do I obtain more information?

The Commission gathers personal information in accordance with the *Freedom of Information and Protection of Privacy Act* for the purpose of law enforcement. Anyone seeking access to the information must meet the requirements set out in the *Freedom of Information and Protection of Privacy Act*. If you have any questions or would like more information about the role of the Commission and its use of face recognition information, please contact:

Alcohol and Gaming Commission of Ontario
20 Dundas Street West
Toronto, Ontario
M5G 2N6

1-800-522-2876