# **Privacy Statement**

The Lottery Mobile Application ("Application") allows you to register for an account, purchase lottery tickets, deposit and withdraw funds, check draw results, scan your lottery tickets and discover information about British Columbia Lottery Corporation ("BCLC") products. Your personal information is important to us and we are committed to protecting your privacy.

BCLC is required to comply with the *Freedom of Information and Protection of Privacy Act*, British Columbia, when collecting, using, managing and safeguarding personal information. This Privacy Statement outlines how BCLC collects, uses, shares and secures your personal information and the choices you have regarding use, access and correction of your personal information while using this Application. Effective on the date you register for an account on the Application, you consent to the collection, use, access, disclosure and storage of your personal information by BCLC and its service providers, inside and outside of Canada, as outlined in the then current Privacy Statement.

## 1. What are the purposes for collecting my personal information?

Your personal information will be collected, used, accessed, disclosed and stored by BCLC and its service providers inside and outside of Canada:

- to register you for the Application, which includes: ensuring you meet the age (19+) and residency (BC residents only) requirements and accessing your credit file (only for identity verification and not as a credit check. This will not affect your credit rating or credit score);
- to identify you when you first register, subsequently log in or make queries about your account;
- to administer your account, complete transactions and provide you with information and access to the Application and the products you have requested;
- to facilitate deposits into your account on the Application and to facilitate withdrawals from your bank account (if you request this);
- to provide assistance and support to you when you contact customer support or are using the Application;
- to communicate with you about your account, including providing you with security information, transaction information and to respond to your requests;
- to send you electronic promotional communications (if you consent);
- to administer promotions and contests that you enter (including, contacting you if you win);
- for conducting and inviting you to participate in research and surveys (including, compiling research
  and survey results to better understand our players so that we may enhance our products, services and
  the Application);
- to administer and improve responsible gambling programs;
- for winner publicity purposes including publishing winners' names, photographs, amounts won and geographical location of residences in accordance with the terms of the PlayNow.com Player
   Agreement and the Rules and Regulations Respecting Lotteries and Gaming. Additional details may be published for marketing purposes;
- to customize the content and delivery of our products, services and marketing;
- to maintain the security of the Application, including ensuring only you access your account and for investigating fraudulent activity;
- to determine your location to ensure you are accessing your account from BC as we are required by law to ensure you are playing within BC; and
- to enforce agreements, to comply with applicable laws and legal processes, including, providing information as required by regulators, law enforcement or other agencies.



### 2. What Information do we collect?

We collect information about you when you register for an account, log into your account, access and use the Application, and when you communicate with Customer Support. Some of the information collected is personal information (i.e., information about an identifiable individual) and other information is collected in aggregate.

### Personal and other information

If you register for, or log into, your account, on the Application, we collect the following types of information:

- Contact: Name; address; telephone number; email address.
- Identity verification and registration: date of birth; gender; user name; government-issued identification, photograph, biometrics, answers to security questions; password; credit card information.
- Transaction: Bank account information, if you deposit or withdraw funds from your account); transaction and play data, including information about your purchases; play preferences.
- Location: internet protocol (IP) address and location coordinates when you log into your account and during a login session, such as when you purchase a ticket.
- Contests: Contest entry and contact information.

When you access or use the Application, whether or not you register or log into your account, we collect the following types of information:

- Scanned lottery tickets: date and time of scan; ticket control number; ticket result (win or lose, amount of win); type of product played. This is used for analytics purposes and may be used as supplemental information during the ticket validation process. If you register for or log into your account on the Application, this information will be linked to your account.
- Communication: Customer Support questions and requests, if you contact Customer Support.
- Publicity: Photograph, name, geographical location of residence of winners.
- Surveys and feedback: Survey responses, demographic information (such as postal code and age group), feedback, contact information.
- Device: device brand, type and model, device operating system and operating system version. If you register for or log into your account on the Application, this information will be linked to your account.
- identifierForVendor: A randomly generated identifier that is linked to your device and is unique to each application publisher. This information helps BCLC determine when the Application is installed on different devices. If you register for or log into your account on the Application, the information associated with your device's identifierForVendor will be linked to your account.
- Application usage: when the Application was opened, time spent on the Application, total number of
  installations, crash reports, screen related metrics such as screens accessed, screens abandoned and time
  spent on screens. This information is used to be understand Application usage, troubleshoot and help us
  improve the Application.

We use tools such as Google Analytics, Google Play Console, Firebase, Crashlytics and Apple App Analytics to collect device information, information about application usage and information about your scanned lottery tickets. BCLC collects this information and links it to the identifierForVendor associated to your device. The identifierForVendor does not identify your device or you as an individual unless you register for or log into your account on the Application.

By proceeding to use the Application, you acknowledge and consent to the above.



### Mobile Device Permissions

#### **Location Services**

When you register for an account, log into your account and periodically while you are logged in, we acquire location information to ensure you are accessing your account from within British Columbia due to our legal obligations, and where necessary, to assist security and fraud investigations. This information may also be collected in aggregate format for analytical purposes.

When you access the Application for the first time, we will request your permission to enable location services for the Application. In order to register for and log into your account location services on your device must be turned on and you must permit the Application to access and use the location services.

You have the option to turn off location services on your device or deny the permission request to access and use your location when logging into the Application. This will result in you not being able to access your account but you will still be able to view the Application, check draw results and scan lottery tickets.

#### Camera

In order to scan your lottery ticket, you will need to allow the Application to access the camera on your device. We will not capture, access or store any images on your device.

### Cookies and other Technologies

#### Cookies

BCLC uses cookies, which are small text files that are stored in a folder of your web browser on your device when you visit the Application to distinguish you from other users accessing the Application. Information is transmitted between our web server and the browser you are using. Cookies help in identifying a device and the browser that is used to access the Application. We employ session and persistent cookies. Session cookies expire when you close your browser and are helpful so that you are remembered during a browsing session. Persistent cookies last for an extended period of time (or until you delete them) and are useful to retain your settings.

Cookies are intended to enhance your experience on the Application and the administration of the Application. Different types of cookies are used for different reasons, including:

- Personalizing and retaining your settings: if you are remembered as a visitor to the Application, your settings may be retained whenever you access the Application.
- Log in credentials: we store an encrypted cookie once you have logged in. These cookies allow you to navigate screens on the Application without repeatedly logging in again.
- Customize content and advertising: cookies enable us to serve you customized content and advertising, and provide social media features, that are aligned with your browsing habits and compatible with your interests. Cookies also helps us to manage advertisement frequency.
- Analytics: information is collected in aggregate to gauge the effectiveness of the Application and to better understand our visitors, such as which screens of the Application are visited, how many visitors access the screens on the Application, which areas of the Application are accessed more frequently and to analyze traffic to the Application. This information helps us to make improvements to the Application. We use tools such as Google Analytics and Firebase for this purpose.

BCLC and its partners use cookies or similar technologies to analyze trends, administer the Application, track visitors' movements around the Application, and to gather demographic information about our visitor base as a



whole. You may control and disable cookies using your browser settings. If you disable some or all cookies you may still use the Application; however, your ability to use the Application will be limited and you won't be able to log in.

For more information on how Google Analytics collects and processes data, please visit <a href="www.google.com/policies/privacy/partners">www.google.com/policies/privacy/partners</a>. If you'd like to opt out of having your information tracked by Google Analytics while on PlayNow.com, install the Google Analytics browser add-on.

### Behavioural Targeting

We partner with third party marketing and advertising organizations, including Facebook, Google Analytics and Firebase, to either display advertising on the Application or to manage our advertising on other websites and applications. Our third party partners may use technologies such as cookies and eTags to gather information about your activities on the Application and other websites and applications in order to provide you with advertising based upon your browsing activities and interests. If you do not wish to have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking here. Please note that you will continue to see advertisements, but they will no longer be tailored to your interests.

#### Web Beacons

We use Google Analytics and Firebase to employ a software technology called clear gifs, also known as web beacons, web bugs or tracking tags, to understand the usage on the Application and inform us what content is effective. Clear gifs are tiny graphics with a unique identifier that are embedded invisibly on the Application's various screens. We use this tool to help us deliver cookies and to understand how our visitors use the Application (e.g. which screens are being accessed more frequently). This helps us to better manage content on the Application. We do not identify individuals when using clear gifs on screens on the Application.

We also use clear gifs in our HTML-based email and newsletters to let us know which emails have been opened by recipients. This allows us to gauge the effectiveness of our marketing campaigns and make improvements where necessary. If you would like to opt-out of receiving our emails or newsletters, please see "How do I set my Communications preferences and opt-out."

#### Log Files

We gather certain information automatically and store it in log files, such as IP addresses, location coordinates, operating system, date/time stamp, device make and model, identifierForVendor and transaction activities and winnings. This information is used to monitor activity on our systems for security and fraud investigation purposes, to ensure we comply with applicable laws and as outlined in "What are the purposes for collecting my personal information." We use Google Analytics for this purpose.

#### Location Information

We acquire location information (i.e. IP addresses and location coordinates) when you log in and periodically while you are logged, as described in "Mobile Device Permissions section." You have the option to turn off location services on your device or deny the permission request for location when logging in into the Application. This will result in you not being able to access your account but you will still be able to view the Application or scan lottery tickets. For more information, please see "Mobile Device Permissions."

#### Biometric Verification

With your consent we may use facial image scan services provided by our service providers to help verify your identity, to authenticate you as an authorized user of our services, and to investigate, detect and prevent fraud. These biometric identity verification providers compare facial scan data extracted from your photo on your



government-issued identification to the facial scan data extracted from a selfie photo you upload, and then report back to us if there is a match. These scans and associated results may constitute biometric information or biometric identifiers (collectively referred to in this Privacy Statement as 'biometric data') under applicable laws. Any biometric data will be managed by our biometric identity verification providers.

You may decline to use the biometric verification process and verify your identity with BCLC through other means, such as contacting BCLC Customer Support, but this may limit our ability to complete the verification process required to use our Sites in a timely manner.

#### Links to Other Sites and Social Media Features

The Application may contain links to and content of other websites, and social media features (such as the Facebook Like button and the Twitter Tweet button) that are not owned or controlled by BCLC. These third party websites and social media features may collect information such as your IP address, location co-ordinates or which screen you are accessing on the Application, and may set a cookie to enable the features to function properly.

These other websites, content and features are governed by the respective third party's privacy policies and BCLC is not responsible for the privacy practices of such other websites, content and features.

## 3. Who has access to my personal information and where is it stored?

We will disclose your personal information to those individuals and organizations who need to access your information in order to provide services related to the Application. This includes third parties who we contract with, including an online betting platform provider, identity verification provider, payment processor, email service solution, a mobile vendor and research companies. We will not sell your personal information.

The authorized third party service providers and the third party services we use are located inside and outside of Canada and/or store and access information both inside and from outside Canada. Your consent is obtained for the disclosure and storage of, and access to, your personal information from outside of Canada when you register for the Application and when agree to the PlayNow.com Player Agreement. If you have questions or concerns relating to the location of your personal information, please contact <a href="Customer Support">Customer Support</a>.

In addition, we may be required to disclose your personal information to specific parties when required by law, such as to comply with a subpoena or a request by public authorities to meet national security or law enforcement requirements, to protect our rights, protect the security of the Application and the security of our players, protect your safety and the safety of others, and to investigate fraud. In these limited cases, we may be unable, or are not permitted, to provide prior notice of such disclosure.

Aggregate identifiable information is disclosed to our marketing and advertising partners as described in the Behavioural Targeting section above.

We may also disclose your personal information to any other third party with your prior consent.

# 4. How do I access and update my personal information?

You may log into your account at any time to access your information. Upon request, BCLC will provide you with information about whether we hold any of your personal information. We will respond to your request within a reasonable timeframe.

To update your information, such as your email address, telephone number and communication preferences, simply log into your account. For assistance in updating your information, or for all other updates, viewing, deleting or other questions about accessing your personal information, please contact Customer Support.



If you wish to review additional records containing your personal information, you may be required to submit a formal request by following the steps on the <u>Freedom of Information Requests</u> page.

## 5. How do you ensure my personal information is secure?

We follow generally accepted industry standards to protect the personal information submitted to us. When you enter sensitive information (such as a credit card number), the transmission of that information is encrypted using transport layer security (TLS) and our payment processor is required to handle the data in a manner consistent with the Payment Card Industry's Data Security Standards (PCI-DSS).

We ensure there are access controls in place to restrict the viewing and access of your personal information to those individuals who need to know the information and to protect the confidentiality of your information.

To safeguard information within our network, we have implemented and employ network security controls, intrusion detection and intrusion prevention systems, logging and monitoring, and vulnerability management. We also employ anti-malware programs, use industry standard encryption, firewalls, store data in secure servers and physically restrict access to our buildings to ensure our systems are reasonably secure.

All employees undergo mandatory privacy and security training and must comply with privacy and information security policies.

BCLC's contracts with third party service providers who handle personal information contain privacy protection provisions to ensure our service providers protect your personal information in an appropriate manner.

To maintain the security of your account, there are also some measures you can take, such as keeping your password and security questions confidential, not sending any sensitive personal information by email, maintaining up-to-date virus protection software and regularly monitoring your account activity.

Still, no system can be guaranteed to be 100% secure. If you have questions about the security of your personal information, or if you have reason to believe that the personal information that we hold about you is no longer secure, please contact us immediately as described in this Privacy Statement.

## 6. How do I set my Communications preferences and opt-out?

Upon registration, you can choose whether or not you wish to receive promotional communications about our products and services. You are able to change this preference at any time by accessing your profile under the account menu.

If you require assistance to change your preferences, please contact <u>Customer Support.</u>

By unsubscribing you will no longer receive promotional emails from PlayNow, Encore Rewards or BCLC lotto!.

We will also send you service-related email announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email. You do not have an option to opt out of these emails, which are not promotional in nature.

## 7. How long do you retain my personal information?

We will retain your information for as long as your account is active and as needed to provide services to you. If you decide to cancel your account or if we need to cancel your account (e.g. if you are not complying with the terms of the PlayNow.com Player Agreement), we will retain and limit use of your information as



necessary to comply with the applicable retention periods, our legal obligations, to resolve disputes and to enforce agreements.

### 8. Who do I contact if I have a privacy concern or other questions?

Contact Customer Support by:

• Telephone: 1-877-706-6789

Contacting BCLC <u>Customer Support</u>

Mail: BCLC Customer Support at 74 West Seymour Street, Kamloops, BC V2C 1E2

If we are unable to resolve your privacy concerns, you may contact the Office of the Information and Privacy Commissioner for British Columbia (OIPC).

This Privacy Statement was last updated on: December 14, 2023

## 9. Changes to this Privacy Statement

We may update this Privacy Statement to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on the Application prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

