### **Player Privacy Statement**

Your personal information is important to us and we are committed to protecting your privacy. This Player Privacy Statement outlines how British Columbia Lottery Corporation ("BCLC") collects, uses, shares, secures and stores your personal information and the choices you have regarding use, access and correction of your personal information while on PlayNow.com, mobile.PlayNow.com, or while using any BCLC application requiring login with an account (collectively, the "Account Based Platforms").

By using the Account Based Platforms, you are agreeing to the terms of the then current Player Privacy Statement.

For BCLC websites, devices, products, services, and applications without use of an account, refer to BCLC's general <u>Privacy Statement</u>.

### 1. What Information do we collect?

We collect information about you when you register, when you communicate with Customer Support, when you sign in, and when you use the Account Based Platforms. Some of the information collected is personal information (i.e., information about an identifiable individual) and other information is collected in aggregate. 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.

#### PERSONAL AND OTHER INFORMATION

We collect the following types of information on the Account Based Platforms:

- Contact: Name, address, telephone number, email address.
- Identity verification and registration: date of birth, gender, user name, government-issued identification, photograph, biometrics, employment information, answers to security questions, password, credit card information.
- Transaction: Bank account information, transaction and play data, session details, play preferences.
- Communication: Customer support questions, requests and records, in-game chats.
- Publicity: Photograph, name, geographical location of residence, and prize details of winners.

- Location: IP address, geolocation, location coordinates.
- Survey and contests: Survey responses, demographic information (such as postal code and age group), feedback, contest entry and contact information.

#### **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 Account Based Platforms for the first time, we will request your permission to enable location services. To register for and log into your account, location services on your device must be turned on and you must permit the use of location services.

You have the option to turn off location services on your device or to deny the permission request to access and use your location when logging in. This will result in you not being able to access your account but you will still be able to view the Account Based Platforms.

We do not use or combine this information with other identifiable information we collect about you without your consent unless required for security and fraud investigations or to comply with applicable laws.

#### Camera

To utilize the scan functionality available on the Account Based Platforms you will need to allow access to the camera on your device. We will not capture, access or store any images on your device.

#### 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 Account Based Platforms in a timely manner.

#### **COOKIES AND OTHER TECHNOLOGIES**

#### Cookies

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

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

- Personalizing and retaining your settings: If you are remembered as a visitor to the Account Based Platforms, your settings may be retained whenever you access the Account Based Platforms (e.g., game preferences).
- Log in credentials: We store an encrypted cookie once you have logged in. These cookies allow you to navigate pages on the Account Based Platforms without repeatedly logging in.
- Customize content and advertising: Cookies enable us to serve you customized content that is aligned with your browsing habits, e.g., if you indicate an interest in sports products by clicking on sports-related pages, we may make suggestions on new sports games or serve you advertisements compatible with this interest. It also helps us to manage advertisement frequency.
- Analytics: Information is collected in aggregate to gauge the effectiveness of the Account Based Platforms and to better understand our visitors, such as which pages of the Account Based Platforms are visited, how many visitors access the pages on the Account Based Platforms, which areas of the Account Based Platforms are clicked on more frequently and

the referral websites from which visitors arrive at the Account Based Platforms. This information helps us make improvements to the Account Based Platforms. We use tools such as Google Analytics and/or Firebase for this purpose.

BCLC uses cookies or similar technologies to analyze trends, administer the Account Based Platforms, track users' movements around the Account Based Platforms, and to gather demographic information about our user base as a whole. You may control and disable cookies using your browser or device settings. If you disable some or all cookies you may still use the Account Based Platforms; however, your ability to use the Account Based Platforms will be limited and you will not be able to log in.

For more information on how Google Analytics/Firebase collects and processes data, please visit www.google.com/policies/privacy/partners. If you would like to opt out of having your information tracked by Google Analytics on a web browser, download the <u>Google Analytics Optout Browser Add-on</u>.

#### **Behavioural Targeting**

We partner with third party marketing and advertising organizations, including Facebook, to either display advertising on the Account Based Platforms or to manage our advertising on other websites. Our third party partners may use technologies such as cookies and eTags to gather information about your activities on the Account Based Platforms and other websites 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**

Web beacons, also called clear gifs, are tiny graphics with a unique identifier that are embedded invisibly on pages on the Account Based Platforms. We use this tool to help us deliver cookies and to understand the usage on the Account Based Platforms, e.g., which pages are being accessed more frequently. This helps us to better manage content on the Account Based Platforms. We also use web beacons in our HTML-based emails 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.

#### **Log Files**

We gather certain information automatically and store it in log files, such as internet protocol (IP) addresses, location coordinates, operating system, date/time stamp, device make and

model, player ID and transaction activities and winnings. This information is only used to monitor activity on our systems for security and fraud investigation purposes and to ensure we comply with applicable laws. We do not use or combine this information with other identifiable information we collect about you without your consent.

#### Flash LSO's

We use local shared objects, also known as Flash Cookies, to store your preferences (such as volume control) or to display content based upon what you view on our Account Based Platforms to personalize your visit. Our third party vendors use LSOs such as HTML 5 or Flash to collect and store information to provide certain features on our Account Based Platforms or to display advertising based upon your web browsing activity.

Various browsers may offer their own management tools for removing HTML5 LSOs. You can also follow <u>Adobe's instructions for managing Flash LSO</u>.

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

Our Account Based Platforms may contain links to and content of other websites, and social media features (such as the Facebook Like button and the X Post button) that are not owned or controlled by BCLC. BCLC provides these links solely for your convenience and is not responsible for the privacy practices of websites or social media features not administered by or on behalf of BCLC.

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.

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

Your personal information is collected and used primarily to enable you to enjoy playing on the Account Based Platforms and to maintain the security of the Account Based Platforms.

In greater detail, your personal information is used to conduct and manage gaming, including for the following purposes:

 To register you for the Account Based Platforms, 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 Account Based Platforms and the products you have requested.
- To facilitate deposits into and withdrawals from your account, including withdrawals from your bank account, if you request this.
- To ensure players are eligible to participate in lottery schemes or to claim a prize.
- To provide assistance and support to you when using the Account Based Platforms, such as when you initiate a live chat session.
- 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 display on the Account Based Platforms 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 Rules or conditions, and in related chats.
- To administer loyalty programs, 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 Account Based Platforms.
- To administer and improve player health programs and tools.
- 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 analyze, improve upon, and customize the content and delivery of our products, services, processes and marketing.
- To expedite enrolment in other programs and services provided by BCLC that may be of interest to you.
- To maintain the security of the Account Based Platforms, 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.

- To collect, organize, and assess your information and transaction data to meet record keeping, patron monitoring, risk mitigation and reporting requirements under applicable laws, including the Proceeds of Crime (Money Laundering) and Terrorist Financing Act, which may include coordinating your play history with your BC Casino or Community Gaming Centre (CGC) play history.
- To enforce agreements, comply with applicable laws and legal processes, including, providing information as required by regulators, law enforcement or other agencies.

Your personal information is also used to help support, deliver and improve player health programs and align with GPEB's Responsible Gaming Standards. BCLC, with the support of its service providers, engages in play tracking and analysis of every player's play activity on the Account Based Platforms. The information gathered under this section is for information purposes only and is not a clinical assessment of any kind. However, depending on your activity on the Account Based Platforms, the information gathered in accordance with this section will be relied on for the following purposes:

- · providing information to assist in promoting responsible gambling and support resources;
- tailoring communications to you and other players in support of player health and responsible gambling;
- adjusting marketing and promotional activities and product offerings; and
- making other adjustments to BCLC's player health programs from time to time as deemed necessary by BCLC.

For more information about our player health program and responsible gaming tools, please refer to: <a href="https://www.gamesense.com">https://www.gamesense.com</a>.

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

We will only disclose your personal information to those individuals and organizations who need to access your information to provide services related to the Account Based Platforms. This includes third parties who we contract with including:

- an online betting platform provider,
- identity verification provider,
- payment processor,
- · banking provider,

- email service solution,
- a mobile vendor,
- research companies,
- · geolocation provider, and
- other third parties as permitted or required under applicable law as indicated below.

We will not sell your personal information. These third parties are authorized to use your personal information only as necessary to provide these services to us. In such cases, these third parties must abide by our data privacy and security requirements and are not allowed to use personal information they receive from us for any other purpose.

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

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 Account Based Platforms and the security of our players, protect your safety and the safety of others, and to detect, prevent, and investigate fraud or other prohibited or illegal activities. In these limited cases we may be unable to, or are not permitted to, provide prior notice of such disclosure. In complying with these requirements BCLC may disclose your personal information to law enforcement, regulators, and other third parties as permitted or required by law, including any BC Casino or CGC you visit as needed to comply with applicable law, including the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

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?

Upon request BCLC will provide you with information about whether we hold any of your personal information. You may log into your account at any time to access your 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 address updates, after logging in, you must also provide your credit card information which will help us to verify that only the correct person is updating these details. For all other updates, viewing, deleting or other questions about accessing your personal information, please contact <a href="Customer Support">Customer Support</a>.

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 (you may use the Site's contact form to securely send information to us), 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 you wish to receive promotional communications about our products and services. You can change this preference at any time under Edit Profile on your My Account page or by following the unsubscribe instructions included in these emails.

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

By unsubscribing you will no longer receive promotional communications from the selected product or service channel.

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:

- Completing the <u>contact form</u> on PlayNow.com
- Telephone: 1-877-706-6789
- Using the <u>Live Chat</u> feature
- Mail to: BCLC Customer Support at 74 West Seymour Street, Kamloops, BC V2C 1E2

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

This Privacy Statement was last updated on: October 16, 2025. We amended this Privacy Statement to include all account-based play with BCLC.

### 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 email address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.