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VIA EMAIL

August 21, 2020

[applicant information]

Dear

Re: Request for Records: BCLC File 20-039

British Columbia Lottery Corporation (BCLC) writes further to your July 28, 2020 request, received by BCLC on July 29, 2020, under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and correspondence between you and BCLC on July 30, 2020.

Your original request was for:

"...all written policies, notes, discussions, and all documents referencing the closing of an account at the player's request."

You clarified this request via email on July 30, 2020 to be for:

"...all written policies, notes, discussions, and all documents referencing the closing of a PlayNow account at the player's request."

For context in relation to the records sought, Clause 4.08(a) of the PlayNow.com Player Agreement states that an intent to close a PlayNow account "must be done via telephone call or web chat to Customer Support. An email request is not sufficient."

In addition, Clause 4.08(b) of the PlayNow.com Player Agreement states that a player "will be required to validate information on the account (including answering the security questions) and update the bank account on record."

BCLC is providing four pages of records in response to your request.

These records will be published a minimum of five business days after release at:

<https://corporate.bclc.com/who-we-are/corporate-reports/reports-disclosures.html>

If you have any questions or concerns regarding BCLC's processing of your request, please contact me at ksimcoe@bclc.com, via mail or at (250) 852-5228.

Additionally, under section 52 of FIPPA, you may ask the Information and Privacy Commissioner to review this reply to your request for information. You have 30 business days from the receipt of this notice to request a review by writing to:

Office of the Information and Privacy Commissioner for British Columbia
P.O. Box 9038, Station Provincial Government
Victoria, BC V8W 9A4

T (250) 387-5629 F (250) 387-1696
Email info@oipc.bc.ca Online www.oipc.bc.ca

Sincerely,
[original signed by]

Kevin Simcoe
Senior Freedom of Information Analyst

Enclosure

Notes: We no longer are able to disable a player's account through an email request as they are not being identified. Provide the email support response requesting the player contact back via phone or Live Chat.

Only use Closed per Player's request option as players are notified with the reason entered. No Case number required.

A player may close the account regardless of whether or not Occupation is listed, as upon reinstatement, Occupation will be required at next deposit.

1. Identify Player

2. Review Player History

Agent reviews any previous cases in SalesForce and the Customer Notes field in OpenBet. Continue based on the status of the Openbet account.

New Registrant – Deferred/Failed or 'verif fail (old)' status flag

- Add a "Pending Closure" flag to the player's OpenBet account (Reason: **Closed per Player's request**).
- Update Customer Notes Summary advising case has been closed per player's request and include Case Number
- If player requests for an email confirmation to be sent to them, please email them the Email Response located under Support Response.

----end----

Existing Registrant

Continue to Step 3

3. Check for Account balance.

Note: If the player has active ticket(s), they will play out naturally. Once the ticket(s) have validated any winnings will be sent to via the payment method on the account (cheque or bank transfer).

If the player has an account balance, ensure occupation is on file.

Account balance is \$0.00

- Add a "Pending Closure" flag to the player's OpenBet account (Reason: **Closed per Player's request**).
- Update Customer Notes Summary advising case has been closed per player's request and include Case Number
- If player requests for an email confirmation to be sent to them, please email them the Email - Confirmation of Closure Response located under Support Response.

----end----

Account balance is between \$0.01 and \$4.99

- Advise the player that balances under five dollars (\$5.00) are returned by direct deposit only. (per the player agreement)
- If player wishes to receive funds, player may update their profile with their banking information, or you may add it on their behalf.
- Add a "Pending Closure" flag to the player's OpenBet account (Reason: **Closed per Player's request**.)
- Update Customer Notes Summary advising case has been closed per player's request and include Case Number

- If player requests for an email confirmation to be sent to them, please email them the Email - Confirmation of Closure Response located under Support Response.

Note: If a player does not wish to add their banking details, the amount will stay in the player's account should the player choose to re-enable their account.

----end----

Account balance is between \$5.00 and \$499.99

Funds Originated from Credit Card Deposit without play

- Advised the player that the funds will be refunded back to their credit card
- Refer to [PlayNow: Withdraw Funds Transfer to Credit Card](#) article. Once eGaming Finance has notified CS that the player's Credit Card has been refunded, add a "Pending Closure" flag to the player's OpenBet account (**Reason: Closed per Player's Request**)
- Update Customer Notes Summary advising case has been closed per player's request and include Case Number

----end----

Advise the player that the funds will be returned via the withdrawal method listed on the account.

Determine if the player has an active bank transfer.

Active Bank Transfer

- Confirm the banking information listed on the account with the player to ensure it is correct.
- Advise the player the account balance will be sent electronically to the bank account listed on the account.
- Add a "Pending Closure" flag to the player's OpenBet account (Reason: **Closed per Player's request**).
- Update Customer Notes Summary advising case has been closed per player's request and include Case Number
- If player requests for an email confirmation to be sent to them, please email them the Email - Confirmation of Closure Response located under Support Response.

----end----

No Active Bank Transfer

- Offer to update player's account with banking information so funds can be sent via EFT. For information on how to do this, see article [Openbet Module - Update/Remove Bank Account](#)
- Add a "Pending Closure" flag to the player's OpenBet account (Reason: **Closed per Player's request**).
- Update Customer Notes Summary advising case has been closed per player's request and include Case Number

Player refuses to provide banking information

- Advise player withdrawals less than \$100,000 must be withdrawn to their bank account. If needed, direct player to section [5.03 of the PlayNow Player Agreement](#), if the player is persistent they don't have a bank account dispatch a work order to eGaming Investigations and tell player they will be contacted back.

----end----

1. Identify Player

2. Review Player History.

- Review any previous cases in SalesForce and the Customer Notes field in OpenBet.
- If the player has active ticket(s), they will play out naturally. Once the ticket(s) have validated any winnings will be sent to via the payment method on the account (cheque or bank transfer).

Continue to step 3

3. Review transaction history to determine the source of funds.

Note: Ensure the player's "Occupation" is listed on the account balance include \$1,000.00 or more with the source being from eCasino wins.

FINTRAC requires declaration of Occupation for any deposits to bank of \geq \$1000.

Source of funds NOT from Credit Card deposits

continue to Step 4.

Source of funds from Credit Card deposits

Add "Blocked" status flag to Player's account and update Customer Notes Summary with case number. Refer to Blocking an Account procedure for how to do this.

Collect and copy/paste the following information into the Case Description:

Date/Time of Incident:

Total Redemption Amount:

Source of Funds (Prize/Deposit):

Product/Draw # Won On (For Lottery Wins):

Draw Date Won On (For Lottery Wins):

Occupation, as provided by player (If Required):

Dispatch to **eGaming Investigations**.

----end----

4. Determine Player's withdrawal preference

Note: Once a Pending Closure flag is added to an account, the funds will automatically be withdrawn from their account the following morning and processed as per the appropriate Pending Withdrawal procedure.

Funds to be sent via EFT

Review Payment Methods portion of the player's account in OpenBet to determine whether or not there is a bank transfer payment method. Continue based on result.

Active Bank Transfer Payment

- Confirm the banking information listed on the account with the player to ensure it is correct.
- Advise the player the account balance will be sent electronically to the bank account listed on the account.
- Add a "Pending Closure" flag to the player's account in Openbet (Reason: **Closed per Player's request**)
- If player requests for an email confirmation to be sent to them, please email them the Email Response located under Support Response.

----end----

No Active Bank Transfer Payment

- Offer to update player's account with banking information so funds can be sent via EFT. For information on how to do this, click [here](#)
- Add a "Pending Closure" flag to the player's account in Openbet (Reason: **Closed per Player's request**)
- If player requests for an email confirmation to be sent to them, please email them the Email Response located under Support Response.

----end----

Player refuses to provide banking information

- Advise player withdrawals less than \$100,000 must be withdrawn to their bank account. If needed, direct player to section [5.03 of the PlayNow Player Agreement](#).

Player persists does not have a bank account

Dispatch to **eGaming Investigations**

Advise player they will be contacted back within 2 business days.

Provide case number to player

----end----