

Publishing Winner Information

Purpose

Provides guiding principles and establishes requirements that govern why, when and how BCLC may publish information about winners of prizes administered by BCLC.

Scope

This policy applies to any game, promotion or contest where BCLC administers the prize, regardless of prize amount or gaming channel (i.e., lottery, casino and eGaming). This includes corporate sponsorship promotions and contests.

This policy applies to any BCLC employee who:

- intends to Publish Personal Information pertaining to a Winner of a prize;
- proposes, designs, administers, or supports a system, project, program or activity that involves publicly disclosing Personal Information pertaining to a Winner of a prize; or
- enters into contracts on BCLC's behalf with third parties that involve Publishing Personal Information pertaining to a Winner of a prize.

It applies to Winner's Personal Information that is within BCLC's Custody and Control, including circumstances where BCLC has a legal responsibility for the ongoing maintenance, security, accessibility and disposition of the information, and associated costs. For clarity, this includes Winner's Personal Information that physically resides with a third party but is owned by BCLC.

Policy Statement

BCLC Publishes Winner's Personal Information for three purposes:

- to demonstrate transparency by showing that there are Winners;
- to support player trust and confidence in the integrity and security of BCLC's games, promotions and contests by informing the public that a prize has been paid to the rightful person(s) and by Publishing the identity of Winners; and
- to effectively market BCLC and its products as part of BCLC's mandate to optimize its financial performance and sustain net income to the Province of British Columbia.

When BCLC Publishes Winner's Personal Information for any game, promotion, or contest, regardless of prize amount, it will do so in accordance with the following guiding principles.

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Principles

Intent Principle. BCLC may Publish Winner's Personal Information to achieve its legitimate purposes as described within the policy statement.

Amount of Information Published Principle. When Publishing information about Winners, BCLC considers the circumstances of the win (e.g., game, Winner's story), the location of the Winner, prize amounts and other factors as deemed relevant by BCLC. BCLC may Publish more information about Winners of larger prizes given there is greater public interest in knowing who the rightful Winner is of these prizes.

Duration Principle. BCLC will Publish information about Winners for a time period that is reasonably long enough to inform other players that a prize BCLC has promoted has been won and by whom and to achieve BCLC's marketing objectives, but is limited in order to balance these objectives with protecting the privacy of Winners.

Consent Principle. BCLC must obtain written consent from Winners in order to Publish their Personal Information. Consent must be meaningful such that Winners are provided the opportunity to fully understand how BCLC will use their information.

Privacy Principle. BCLC respects the privacy of its Winners and will only collect and Publish the minimal amount of Personal Information required to achieve its legitimate purposes as described above in the Intent Principle.

Context

FIPPA governs how BCLC may collect, use, and disclose Personal Information. FIPPA applies to Personal Information collected from Winners.

BCLC's Rules and Regulations Respecting Lotteries and Gaming and the Interprovincial Lottery Corporation Rules and Regulations Respecting Lottery and Gaming (collectively, the Rules) provide that BCLC has no obligation to pay a prize to a Winner unless the Winner gives BCLC the right to Publish certain prescribed information. BCLC's Rules and Regulations Respecting Lotteries and Gaming apply to Winners of all gaming channels (i.e., lottery, casino and eGaming).

Canada's Anti-Spam Legislation (CASL) governs how BCLC may use the internet, email, social media, instant messaging or short message service (SMS) to send out commercial electronic messages, including messages sent out to Winners.

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This policy supplements, and does not supersede, other BCLC corporate policies, including the:

- Privacy Management and Accountability Policy, which governs the collection, use, disclosure, disposal and storage of Personal Information, including Personal Information belonging to Winners;
- Access to and Correction of Personal Information Standard, which outlines the requirements that must be followed prior to correcting or annotating an individual's Personal Information upon request;
- Media Relations Policy, which establishes a protocol for responding to media inquiries, including those concerning Winners; and
- Signing Authority Policy, which provides employees with direction on their responsibilities when negotiating or finalizing a contract, including those contracts involving the Publishing of Personal Information pertaining to Winners.

Policy Details

The following sections address BCLC's requirements and parameters for Publishing Winner's Personal Information, including why, when and how BCLC publicizes Winners of prizes. These sections may not address every possible scenario or policy issue related to the disclosure of Winner's Personal Information. For any matter not specifically covered in the following sections, the guiding principles outlined above should be applied to determine whether, in BCLC's sole discretion, Publishing a Winner's Personal Information is reasonable, appropriate and/or necessary.

INFORMATION PUBLISHED

BCLC may Publish the following Winner's Personal Information in accordance with BCLC's privacy policies and FIPPA:

- name (given, middle, and surname)*
- place of (current) residence*
- photograph (of true current appearance)*
- Prize details*
- the Winner's story
- play/bet details
- occupation
- employer**
- marital status
- personal quote
- other Personal Information, as volunteered by Winners

** Under the Rules, BCLC has no obligation to pay a Prize to a prize claimant who refuses consent to publication of this information.*

*** BCLC does not typically publish employer information, except in the case of a suspected insider win or group win where publishing serves a legitimate purpose (as described in the policy statement).*

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BCLC must not Publish the following Winner's Personal Information:

- address*** or other contact information
- Personal Information belonging to a third party

*** *Despite the Rules speaking of address, BCLC only Publishes place of residence.*

SENSITIVE PERSONAL INFORMATION

During the prize claim process, BCLC may incidentally collect sensitive pieces of Personal Information about its Winners or other persons. BCLC will endeavour to protect this sensitive Personal Information. In the event there is a legitimate purpose (as described in the policy statement) to Publishing sensitive Personal Information, BCLC confers with Winners to address their concerns or objections prior to Publishing.

For clarity, sensitive pieces of Personal Information may include, but are not limited to, financial or banking information or information that reveals a person's citizenship, ethnicity, political opinions, religious or philosophical beliefs, trade-union membership, health condition or sex orientation.

REMOVING PERSONAL INFORMATION

Prior to Publishing, BCLC must edit, delete, or otherwise remove content containing Personal Information that must not be Published, in accordance with this policy, including any Personal Information that is collected without consent to Publish (e.g., Personal Information belonging to a third party). This applies to any content within BCLC's Control and Custody, including content created by third parties on behalf of BCLC.

DURATION

As part of the prize claim process, BCLC may Publish Winner's Personal Information for no longer than two years, starting from the date when the Winner is first declared publicly.

After this initial period for Publishing concludes, BCLC must not Publish new material containing a Winner's Personal Information, unless the Winner's express written consent is obtained (see 'Additional Consent') or BCLC is required to disclose to comply with statutory authority. This applies to BCLC and third parties that may publish on behalf of BCLC.

BCLC must endeavour where feasible and practicable to remove or otherwise prevent further dissemination of Published Winner's Personal Information when the initial period for publishing concludes and/or when a Winner's written consent is no longer applicable (see 'Additional Consent'). This applies to content within BCLC's Custody and Control, including content disseminated by third parties on behalf of BCLC (e.g., original posts uploaded to BCLC's corporate digital channels, such as BCLC.com).

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Winner's Personal Information republished or disseminated by third parties not acting on behalf of BCLC is considered beyond the Custody and Control of BCLC. In these cases, the publishing and dissemination of Winner's Personal Information is subject to the privacy policies of those third parties. BCLC is not responsible for content republished or otherwise disseminated by third parties.

MEDIA

BCLC may Publish any text, audio, image, or video containing Winner's Personal Information, as permitted in accordance with this policy, through any digital or traditional communication channels. Media includes broadcasting through radio and television, Publishing through print, internet or social media platforms, phone or mobile messaging, signage (digital, placards or otherwise), and point-of-sale materials.

PUBLISHING EXCEPTION

A Winner may request that an exception be made to the type and extent of Winner's Personal Information that is Published. BCLC, in its sole discretion, will determine whether the basis for the Winner's request, such as a serious threat to a Winner's safety, is well founded.

In cases where an exception is approved, BCLC must determine the type and extent of information Published about the win in accordance with this policy's guiding principles. BCLC should Publish, at a minimum, that a Winner has been verified, paid and granted anonymity in accordance with BCLC policy.

Administration

Requests from Winners to remain anonymous to the public must be assessed on a case-by-case basis, in accordance with this policy's guiding principles. Requests must be substantiated with evidence that is verifiable and capable of independent confirmation. Granted requests must be documented in writing and include the rationale for approval.

Approvals

The Chief Social Purpose Officer and Vice President, External Relations, or their designate, may approve exceptions. Prior to each and every approval,

- the Vice President, Legal, Compliance, Security must be consulted; and
- the Chief Executive Officer and President must be notified.

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CONSENT DURING PRIZE CLAIM

Except where a Winner has already provided their consent to Publish their Personal Information, BCLC must obtain express written consent from Winners to Publish their Personal Information during the administration and processing of prize claims. Such consent must reflect and adhere to this policy and the Privacy Management and Accountability Policy. If a prize claimant refuses such consent, a Prize may be withheld in accordance with the Rules.

As part of the prize claim process, BCLC may ask a Winner for consent to future contact for the purpose of obtaining additional consent to use Personal Information as described below. A Prize cannot be withheld if a prize claimant refuses consent to such future contact. Requests for additional consent must not be made when consent to future contact is refused or otherwise not obtained.

ADDITIONAL CONSENT

Additional express written consent from a Winner must be obtained in the event BCLC plans or anticipates using their Personal Information beyond that provided for in the prize claim process. Additional consent must be obtained in relation to a specific campaign, promotion, event or effort planned or anticipated by BCLC. Publication must be limited in duration to what is reasonably necessary to carry out such activity. Additional consent must reflect and adhere to this policy and the Privacy Management and Accountability Policy. Additional consent may be sought at any point in time after the administration and processing of a prize claim. Winners are not obligated to provide additional consent.

Roles and Responsibilities

Contest Owners are responsible for:

- Collecting Winner's Personal Information during the prize claim process for Winners of promotions or contests;
- Obtaining consent from Winners of promotions or contests to Publish their Personal Information as part of the prize claim process;
- Presenting the Winner of a promotion or contest with the option to voluntarily provide additional express written consent for future contact or publication;
- Storing and maintaining all consent records for their promotion or contest;
- Receiving requests from Winners of promotions or contests to remain anonymous or requests for an exception to the type or extent of Personal Information that BCLC collects or Publishes, and escalating to appropriate Organizational Unit for collecting evidence, reviewing and assessing requests, forwarding requests for approval, and coordinating approvals;

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- In the event a request to remain anonymous is not granted, notifying Winners of promotions or contests of BCLC's decision;
- Determining the type and extent of Winner's Personal Information to be Published in accordance with the requirements of this policy for promotions or contests; and
- Coordinating BCLC's communication of contest or promotion wins intended for publicity purposes.

Player Services or for Winners of casino games, the BCLC Organizational Unit accountable for oversight of the prize claim process, is responsible for:

- Collecting Personal Information from the Winner of a lottery, eGaming or casino game (a Game Win) during the prize claim process or ensuring completion of this by a Service Provider on BCLC's behalf;
- Obtaining consent from Winners to Publish their Personal Information as part of the prize claim process for Game Wins or ensuring completion of this by a Service Provider on BCLC's behalf;
- Presenting the Winner with the option to voluntarily provide additional express written consent for future contact or publication for Game Wins or ensuring completion of this by a Service Provider on BCLC's behalf;
- Storing and maintaining all consent records for Game Wins;
- Receiving requests from Winners to remain anonymous, or requests for an exception to the type or extent of Personal Information that BCLC collects or Publishes, and escalating to appropriate Organizational Unit for collecting evidence, reviewing and assessing requests, forwarding requests for approval, and coordinating approvals for Game Wins; and
- In the event a request to remain anonymous is not granted, notifying Winners of BCLC's decision for Game Wins.

Senior Manager, External Communications and Government Relations is responsible for:

- Determining the type and extent of Winner's Personal Information to be Published in accordance with the requirements of this policy for Game Wins;
- Coordinating BCLC's communication of Game Wins intended for publicity purposes; and
- Responding to media inquiries about Winners of games, contests or promotions, in accordance with BCLC's Media Relations Policy.

Organizational Units that plan promotions, events or other efforts (marketing or publicity) are responsible for:

- Confirming with Player Services, the Contest Owner, or the BCLC Organizational Unit accountable for oversight of the prize claim process for a Winner of a casino game, as applicable, that additional consent for future contact or publication was obtained from the Winner, as appropriate.

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Organizational Units that create or Publish content for a BCLC communication or marketing channel are responsible in their respective areas for:

- Publishing Winner’s Personal Information in accordance with the requirements of this policy;
- Editing, deleting, or otherwise removing content containing Personal Information, as necessary; and
- Removing or otherwise preventing the dissemination of content in BCLC’s Control and Custody, in accordance with this policy.

Legal, Compliance, Security is responsible for:

- Providing assistance in assessing requests from Winners to remain anonymous to the public or requests for an exception to the type or extent of Personal Information that BCLC collects or Publishes, including validating documented evidence and corroborating rationales provided by Winners.

Compliance

EXCEPTIONS

Exceptions to this policy may be granted on a case-by-case basis and at the discretion of this policy’s Approving Body, unless otherwise directed by this policy. Requests for an exception must be submitted in writing.

NON-COMPLIANCE

The publication of Winner’s Personal Information is governed by FIPPA and BCLC’s Privacy Management and Accountability Policy. Failure to comply with an aspect of this policy may result in a privacy breach and/or a complaint to the Office of the Information and Privacy Commissioner, which may conduct an investigation and subsequently issue BCLC an order to comply with FIPPA. Employees may also be personally subject to administrative, civil, or criminal sanctions if they willfully, recklessly or negligently disclose Personal Information to unauthorized persons. Each case will be handled on an individual basis with full review of all pertinent facts. Severity of the violation will determine action taken.

Definitions

Defined (capitalized) terms and acronyms used but not defined in this Publishing Winner Information Policy have the meaning attributed to them in the [Policy Glossary](#).

Contest Owner Means the Organizational Unit that has initiated the development of the contest or promotion and retains responsibility for the contest or promotion throughout the process.

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Control (of information)	Has the meaning ascribed to it in BCLC's Privacy Management and Accountability Policy. As at the date of this Publishing Winner Information Policy, Control means the power or authority to manage the information during its life cycle, including restricting, regulating and administering its use or disclosure. In the event of a conflict between this definition and the Privacy Management and Accountability Policy definition, the Privacy Management and Accountability Policy definition will prevail.
Custody (of information)	Has the meaning ascribed to it in BCLC's Privacy Management and Accountability Policy. As at the date of this Publishing Winner Information Policy, Custody means having physical possession of information. Physical possession normally includes responsibility for access, managing, maintaining, preserving, disposing, and providing security. In the event of a conflict between this definition and the Privacy Management and Accountability Policy definition, the Privacy Management and Accountability Policy definition will prevail.
Prize	Has the meaning ascribed to it in the Rules. As at the date of this Publishing Winner Information Policy, Prize means a sum of money, merchandise, property, service or any benefit to which a Winner is entitled. In the event of a conflict between this definition and the Rules definition, the Rules definition will prevail.
Publish	Means disseminating Winners' Personal Information to an audience outside of BCLC, through any digital or traditional communication channel.
Winner	Has the meaning ascribed to it in the Rules and includes Winners of all gaming channels (i.e., lottery, casino and eGaming). As at the date of this Publishing Winner Information Policy, Winner means the holder of a winning ticket or an individual (and for greater certainty, a Winner cannot be a corporation) entitled to a Prize under a lottery according to the conditions established by the Corporation. In the event of a conflict between this definition and the Rules definition, the Rules definition will prevail.

Policy Ownership

Contact Position	Senior Manager, External Communications and Government Relations
Policy Owner	Director, Communications and Government Relations
Approving Body	Chief Social Purpose Officer and Vice President, External Relations

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Revision History

Version	Effective	Approved by	Amendment
3.0	Jun 12, 2023	Chief Social Purpose Officer and Vice President, External Relations	Major amendments to broaden the scope of the policy, which now applies to all games, contests or promotions for all gaming channels and corporate sponsorship contests where BCLC administers the prize. Roles and responsibilities for contest owners and any organizational unit with accountability for oversight of a prize claim process are included.
2.2	Mar 17, 2021	Vice President, Player Experience	Minor amendments to update titles throughout.
2.1	Oct 27, 2020	Vice President, Player Experience	Update to the Approving Body title to reflect changes following the organizational restructure for OneBCLC.
2.0	Jun 8, 2020	Vice President, Social Purpose and Stakeholder Engagement	Major amendments to clarify roles and responsibilities related to additional consent for future contact or publication, and refused requests to remain anonymous; removal of age from list of Winner's Personal Information BCLC shall not publish; updates to BCLC titles throughout.
1.1	Mar 3, 2017	Director, Communications	Minor amendment to remove reference to the Contract Approval Policy which has been superseded by the Signing and Spending Authority Policy.
1.0	Oct 18, 2016	Vice President, Social Responsibility and Communications	Initial Release.