

# PRIVACY POLICY

**Effective Date: December 5, 2017**

## **Introduction:**

Thank you for visiting the Seneca Resorts & Casinos® (“SR&C”, “we” or “us”), a registered trademark of the Seneca Gaming Corporation, a governmental arm and instrumentality of the Seneca Nation of Indians. SR&C owns and operates three casinos and two resort properties: Seneca Niagara Resort & Casino, located in Niagara Falls, NY, Seneca Allegany Resort & Casino, located in Salamanca, NY, and Seneca Buffalo Creek Casino, located in Buffalo, NY.

This policy applies to information we collect:

- On this Website
- In email and other electronic messages between you and this Website, and
- Through any SR&C-operated applications or social media destinations.

It does not apply to information collected by any third party, including through any application or content that may link to or be accessible from this Website. In addition, this policy does not apply to employee and patron data generally.

By accessing or using this Website, you agree to this privacy policy. We reserve the right to make changes to this policy. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy regularly for updates.

## **Our Privacy Principles:**

- We value our patrons, guests and employees, and take their privacy seriously.
- We protect all nonpublic personal information we collect about our patrons, guests, customers, employees and job applicants using strict standards of security and confidentiality.
- We maintain physical, electronic and organizational safeguards to protect this information.
- Within our company, we limit access to nonpublic personal information to authorized employees and contractors.
- We require persons and organizations who provide services to us, our patrons, guests, and employees, to use personal information provided to them solely to enable them to provide these services, and to employ similar standards of security and confidentiality.

## **Age Policy:**

Persons under the age of twenty-one (21) are not permitted to engage in gaming activities at our properties or online or through any web or mobile application. Any offers we make or any contests we conduct, unless otherwise noted, are not open to persons younger than 21 years of age. Persons under age 21 are not allowed to use website features intended for gaming patrons, accept offers, or win contests, and we do not knowingly collect information from such persons for gaming-related offers. We reserve the right to verify age at any time for any reason and may decline to provide products, services or access rights to any person who does not have valid age identification.

Hotel reservations, online job applications and the iPlaySeneca.com free play website are available to individuals age 18 and over.

**Information We May Collect and How We Use it:**

We collect and use information necessary to manage our business and to provide you with the products and services you request. We may collect and maintain both personal and non-personal information for these purposes.

“Personal information” includes any information by which you may be personally identified, including your name, address, home, work or mobile-phone number; email address, credit and debit card information, social security number, passport number, driver’s license, date of birth, reservations, and other purchase information, gaming activity, and personal preferences. If you apply for credit or check cashing privileges with us, we may collect additional information, including banking and financial information.

We use the personal information you provide for the specific purposes for which you provided the information and for the following purposes: (a) to process and fulfill your reservations, purchases and other transactions; (b) to administer the Social Club by Seneca® loyalty program and any other promotion or event you sign up for; (c) for our own marketing purposes, including notifying you of special offers, promotions and events; (d) to tailor our offerings to your personal preferences; (e) to improve customer service; (f) for debt collection purposes; (g) to respond to questions, comments or concerns you may have; (h) in accordance with any other consent you have given us; (i) in response to written requests by law enforcement, for use in their investigations; (j) for identification and verification purposes, payment processing, and analyzing fraud and credit risk; and (k) as required by law or for compliance with regulatory requirements, the terms and conditions applicable to our websites and loyalty programs, or otherwise with your consent.

We may also share your personal information with third parties if we believe this is necessary to protect our guests, patrons, employees, our property and that of our business partners, or the public from harm.

**Information We Collect Through Automatic Data Collection Technologies:**

When you visit our Websites, our servers may collect non-personal information, including details of your visits to our Websites and information about your computer and internet connection, including your IP address, operating system, and browser type.

In SR&C’s case, this type of non-personal information is collected through automatic data collection technologies such as cookies and web beacons (also known as clear gifs, pixel tags and single pixel gifs). Cookies are small files stored on the user’s computer that measure usage of various pages on our website. Cookies help us to tailor information to your needs and make it easier for you to find what you need on our website. Web beacons provide us with statistical information relating to use of the various pages of our websites. When you visit various websites, including ours, certain information about your visit is automatically logged, such as server name, browser type, and IP address, date and time you accessed our Websites, pages you visited, and the internet address of the website, if any, from which you linked directly to our Websites.

**Information Disclosure to Affiliated Entities:**

For business purposes, we may share with our affiliates, including our various casino, resort and hospitality properties, as well as with our regulatory authority, the Seneca Gaming Authority, personal and non-personal information we receive from you and about your transactions with us.

**Information Disclosure to Non-Affiliated Entities:**

Both personal and non-personal information may be shared by us with or collected by the third party service providers who provide us with services necessary to enable us to serve you. Examples of such services include payment card processing, on-line hotel reservation companies, rewards and purchase fulfillment, and various

marketing-related activities. We require these service providers to exercise reasonable care to protect your personal information and restrict the use of your personal information to the purposes for which it was provided to them.

**Security:**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. However, the transmission of information via the internet is not completely secure. Because we cannot guarantee the security of personal information transmitted to our Website, any transmission of personal information is at your own risk.

The safety and security of your information also depends on you. Where you have chosen a password for access to certain parts of our Website, you are responsible for keeping this password confidential. Please do not share your with anyone. Be careful about giving out information in public areas of the Website like message boards, as the information you share in public areas may be viewed by any user of the Website. Because we cannot control the security of the computers, devices or service providers (for example, email or cell-phone providers) you use to send personal information to us over the internet, we are not responsible for the disclosure or interception of information you send before we receive it. For your own safety and privacy, we recommend that you not include sensitive personal information (such as credit card data or social security number) in any email you may send to us.

**Non-U.S. Residents:**

Our Website and its contents are provided solely for promoting products, programs and services within the United States. If you are not a U.S. resident and you provide personal information to us, it will be transferred and processed on computers in the United States and may be transferred to computers in other countries. Do not provide your personal information to us if you do not want this information to be transferred outside your country, or if the laws of your country restrict these types of transfers. We will handle your personal information in the same way as we handle the personal information of U.S. residents. We do not guarantee that this privacy policy and our practices comply with the laws of your country.

**Updating Your Information:**

If you need to update or correct personal information, please contact us at 1-877-8-SENECA (1-877-873-6322) or 716-299-1100. You will be referred to the appropriate department. Online job applicants may correct or update the information they previously submitted by going to their profile page and updating it. **Note that not all information may be changed.** In addition, we may not accommodate a request to change information if we believe the change would violate the law or legal requirements or cause the information to be incorrect.

**Unsubscribing and opting out from marketing communications:**

If you receive or have received marketing communications from us by email and wish to opt out, you may use the opt-out method indicated in the email.

If you no longer wish to receive promotional materials by direct mail, you may visit a Social Club booth at any SR&C property or contact us at 1-877-8-SENECA (1-877-873-6322).

Please note that you may continue to receive marketing communications from us for a limited time after you opt out or unsubscribe, as there is a short delay between when you submit your request to opt out and when the request is processed. Please note that unsubscribing and opting out of using and sharing of information for marketing purposes does not prevent us from using and sharing your information for other purposes, as outlined in this Privacy Policy. In addition, we are not responsible for removing your information collected by or shared by us with our business partners prior to your opt-out.

**Changes to this Policy:**

We reserve the right to modify this Privacy Policy at any time. The revised Privacy Policy will be posted on our Website. The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes and for ensuring we have an up-to-date email address for you.

**Special Provisions for Finance Services Patrons:**

If you are a patron who has applied for a credit account with us through the “Apply for Credit” link on our website - hosted by National Cred-A-Chek, Inc. (“NCC”) - or who has received credit from us, there are additional categories of information we may collect from or about you. These categories include the following:

\* Information we receive on your application for credit or other financial services, such as your name, address, telephone number, social security number, and other identifying information.

\*Information we receive about you from others, including credit bureaus, financial institutions, and other casinos, relating to your credit history and financial transactions with others, as authorized by you on your credit application.

\*Information about your transactions with us, including your payment history and/or gaming activity within any of SR&C’s properties.

We may also share such information with credit bureaus, financial institutions, and other casinos, as authorized by you on your credit application. Please carefully review the link to the NCC privacy policy at <https://www.nccreports.com/index.php?privacy>- from the “Apply for Credit” link in our website, as it contains additional details relevant to credit applications.

**Special Provisions for Job Applicants**

If you are an individual age 18 or over with the legal right to work in the United States, you may search for current job openings and submit an online application for employment with our company through our [senecagamingcorporation.com/join-the-team/](http://senecagamingcorporation.com/join-the-team/) webpage, which is accessible through the careers link at the bottom of the SR&C homepage. You will be asked to complete your profile with your name, home address, telephone, email, and to upload your resume. You will then be able to apply for the job opening that interests you, or, in addition to that particular job opening, make your resume available for consideration for other employment opportunities at Seneca Resorts & Casinos. SR&C on-line job applications are governed by our third- party provider’s privacy policy found at <https://www.cornerstoneondemand.com/client-privacy-policy>.

**iPlaySeneca.com**

The iPlaySeneca.com free play website is available to individuals age 18 or over. The website contains a link to the privacy policy of its host, Williams Interactive LLC, found at [https://iplayseneca.play4funnetwork.com/legal/privacy\\_policy/](https://iplayseneca.play4funnetwork.com/legal/privacy_policy/).