



Woodbine Entertainment Group ("we" or "our") offers a range of racing, gaming and entertainment products, which are available across North America and worldwide through our various Internet sites. Neither this web site nor any of our other Internet sites or applications are intended for use by children.

We maintain a firm commitment to the privacy of our customers' and our employees' Personal Information (defined below under the heading "What is Personal Information?"). The following outlines our commitment to you:

- **Purpose and Consent:** At the time of collection we will explain to you the purpose of collecting your Personal Information and obtain your consent to collect, use and disclose your Personal Information.
- **Limiting Collection:** We limit the collection of Personal Information to what is reasonable under the circumstances and your Personal Information will only be used for the purposes for which it is collected.
- **Security:** Your Personal Information is kept strictly confidential and is not disclosed outside of our operations without your consent, unless required or permitted by law.
- **Access:** You have the right to access the Personal Information that we maintain about you and to correct any inaccuracies.

We have adopted the 10 privacy principles established by the Canadian Standards Association's Model Code for the Protection of Personal Information. These principles form a part of the Personal Information Protection and Electronic Documents Act ("PIPEDA" or the "Act") which establishes the rules governing the collection, use and disclosure of Personal Information in Canada. It should be noted that certain provinces (Alberta, British Columbia and Québec) have privacy legislation that governs the collection, use, retention, protection and disclosure of personal information in those provinces. We will periodically review our principles in order to ensure that they remain relevant and current with changing technologies and laws and the evolving needs of our customers and employees.

Our 10 Principles:

- 1. Accountability:** We are responsible for maintaining and protecting Personal Information under our control. We have appointed a Chief Privacy Officer to oversee our compliance with the Act and our 10 principles.
- 2. Identifying Purposes:** We will identify the purposes for which Personal Information is collected, either before or at the time of collection.
- 3. Consent:** We will only collect, use and disclose your Personal Information with your knowledge and consent, except where otherwise required or permitted by law.
- 4. Limiting Collection:** We will limit the collection of your Personal Information to only those items of information that are necessary for the purposes for which the information is collected.
- 5. Limiting Use, Disclosure and Retention:** Your Personal Information will only be used or disclosed for the purposes for which it was collected, unless you have otherwise consented, or where it is required or permitted by law. We will retain your Personal Information only as long as necessary to fulfill the purposes identified.

6. Accuracy: We will keep Personal Information that we collect accurate, complete and up-to-date to fulfill the purposes for which it was collected.

7. Safeguards: We will protect your Personal Information with security safeguards appropriate to the sensitivity of the information.

8. Openness: Specific information about our policies and practices relating to the management of Personal Information will be made available to you upon request.

9. Access: At your request, we will inform you of the existence, use and disclosure of your Personal Information and give you access to your Personal Information. You have the right to verify the accuracy and completeness of your Personal Information and to have it amended as appropriate.

10. Verifying Compliance: You may contact us with any questions, complaints or suggestions with respect to the above principles and this Privacy Policy.

What is Personal Information?

Personal Information is broadly defined as information about an identifiable individual, but does not include the name, title, business address or business telephone number of an employee of an organization. Personal Information with personal identifiers removed (removing the identity of the individual from the information) so that it can no longer be identified with a particular individual is not considered Personal Information.

Personal Information We Collect

We may collect Personal Information from you in person, either by telephone, by mail, by intercept survey or through the Internet. We also collect information about you when you use our WIFI services, visit our website(s), use our application(s) or wager using your HPIbet account. Such information may include device information, usage information and/or location information. We may also collect information regarding your wagering activity and rewards earned through our loyalty programs so that we may better serve you.

For the purposes of providing account wagering services to you, we collect and maintain the following:

Name
Mailing Address
Email Address
Telephone Number
Date of Birth

We collect this information in order to provide services to you, to develop and improve our products and service offerings, and provide you with tailored offers and information.

- Several of our products and services (e.g. telephone account and Internet wagering) are governed by federal and provincial regulations that require specific Personal Information be collected and maintained by us.
- Some of our products and services can only be delivered to you if we can collect, use and disclose your Personal Information (e.g. HPIbet Rewards program).



How We Use Your Information

Relationships With Our Customers Are Important To Us

We want to provide you with our various services on an ongoing and efficient manner to establish a long lasting relationship which will meet your changing needs.

We collect Personal Information about you to:

- Provide you with products, services or information that you request, including opening and administering accounts and account transactions and related purposes
- Assist in identifying your preferences
- * Enable use of social networking features and media
- Provide you with information about upcoming events, promotions and new and improved services
- Protect you, and us, against error and fraud
- Comply with legal requirements
- Comply with our internal risk management and related policies
- * Collect usage and user data, including screen recordings
- * Conduct and promote contests, including awarding prizes, etc.
- * Conduct and inform indirect, targeted or interest-based marketing activities
- * Provide you with the opportunity to participate in additional product offerings (such as, without limitation, partial cash out opportunities)

Your Personal Information may also be used to provide us with business statistics. These statistics do not contain any information which identifies you personally.

Marketing

In accordance with Canada's Anti-Spam Legislation, you must provide your consent in order to receive information from us about our events, promotions or services by email or other electronic means. We may otherwise inform you about our events, promotions or services by mail, telephone or other means. If you wish to receive email correspondence from us, or if you do not wish to receive direct marketing by mail, telephone or other means, you may contact us using the contact information provided below.

Consent

Key to protecting the privacy of your Personal Information is consent. We collect, use and disclose your Personal Information only with your consent except where otherwise permitted or required by law. You may decline to provide us with your Personal Information. However, this choice may make it impossible for us to provide you with certain products or services. For example, we cannot set up a telephone wagering account with Internet access without the Personal Information which is required by the Canadian Pari-Mutuel Agency, the agency which regulates pari-mutuel wagering, on behalf of the Ministry of Agriculture, Food and Rural Affairs (OMAFRA).

Privacy and Access Choices

Should you wish to limit access to certain types of information, you may block cookies and/or similar technologies as permitted by your device. You may also opt out of receiving targeted advertising by visiting the Network Advertising Initiative, Digital Advertising Alliance and/or Digital Advertising Alliance of Canada.

Withdrawing Consent

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. If you wish to withdraw your consent we will inform you of the implications. To withdraw your consent, simply contact us and tell us of the Personal Information which you no longer wish us to collect, use and/or disclose. See below for contact details.

Security and Disclosure of Your Personal Information

We recognize your concerns about the security of the Personal Information which you provide to us. Our processes and procedures keep your Personal Information safe and secure. We have different safeguards in place (physical, technological and organizational). While we use reasonable efforts to protect your Personal Information, we cannot guarantee the security of your Personal Information or of any information that is transmitted via the Internet. In the event that your Personal Information is inadvertently disclosed, you may be subject to financial loss, identity theft, negative effects on credit records and damage to or loss of property, damages to reputation, and other potential consequences.

We will only use and disclose your Personal Information to fulfill the purposes for which it was collected or as otherwise identified in this Privacy Policy. Other uses of your Personal Information will only be undertaken after we have obtained your additional consent, or as may be required or permitted by law. We will only keep your information for as long as needed for the stated purposes.

We may transfer your Personal Information to a third-party service provider or agent who provides services to us or on our behalf such as hosting, data management and storage services, market analysis and retention services. We may also share your personal information with our affiliated companies, social media services providers, companies that provide content, advertising or functionality, or other third parties as required or permitted by law. We may, or any such third-party service provider may, use servers for such purposes which are located outside of Canada. Your Personal Information may be processed in a location outside of Canada, and the laws of any such foreign jurisdiction may apply such that the governments, courts, law enforcement or regulatory bodies of any such foreign jurisdiction may be able to obtain disclosure of your Personal Information.

Non-Personal Information

We may collect and use non-personal information including but not limited to your IP address to help identify you, gather statistics regarding our customers and/or the users of our website(s) and/or application(s), diagnose problems with our website(s) and/or application(s) and to administer our website(s) and/or application(s). In addition, our messages and/or website(s) and/or application(s) may use various technologies, such as cookies, pixels or anonymous identifiers, which may then be stored on your hard drive so that we can learn more about you to enable us to serve you better, so that our website(s) and/or application(s) can recognize you when you return and so that we may analyze traffic to our website(s) and/or use of our application(s). This non-personal information may be used by us to learn more about our customers' preferences and web-related and/or application-related activities in order to better inform our marketing efforts. We will not provide this information to any third party except our service providers or affiliates, and we will only use such non-personal information in accordance with this Privacy Policy and applicable laws.

Third Party Websites

Our website(s) may contain links to other sites that we do not own or operate. Such links are provided as a convenience to you; we do not endorse or exercise any control over such third party websites, and therefore have no responsibility or liability for the manner in which such third parties may collect, use, retain, protect and/or disclose your Personal Information. Such third party websites have separate and independent privacy policies, notices and terms of use, which you should read carefully. Except as specifically provided herein, we do not provide your Personal Information to the owners or operators of such third party websites without your consent.



Your Personal Information will not be sold to any organization for any purpose.

We will not disclose your Personal Information to any third party without your approval, except that we reserve the right to disclose your Personal Information: (a) to any of our affiliates, subsidiaries, third party service providers or advisers that we deem appropriate; (b) if such disclosure is made pursuant to a legal proceeding or as required or permitted by law; or (c) to organizations involved in a merger, transfer or sale of our assets or business. In the event that we disclose your Personal Information as set out above, we will require third party organizations who have access to your Personal Information to protect and maintain your Personal Information in compliance with the terms and conditions of this Privacy Policy.

Access and Update of Your Personal Information

You may access and verify your Personal Information. At the time of your request we will need specific information to verify your identity before we can provide you with the Personal Information we hold. In some instances, we will not be able to provide you with the Personal Information you request, for instance where that information:

- Contains references to other persons
- Has already been destroyed due to legal requirements or because the information has served its purposes
- Cannot be disclosed for legal reasons (e.g. when subject to solicitor-client or litigation privilege)

If we are unable to provide you with access to your Personal Information, we will explain why and advise you as to any recourse available to you.

Updating or Deleting your Personal Information We are committed to maintaining the accuracy of your Personal Information. To help us keep your Personal Information up-to-date we encourage you to notify us of inaccuracies or corrections. Timely notification of a change of address, telephone number and/or email address helps us in providing you with the best possible service. In order to verify or update your Personal Information, please contact us via our Web Site at www.woodbine.com or telephone our call centre at (416) 675-8886.

You may request deletion of certain personal information maintained by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be legally or otherwise required to keep such information and not delete it, or to keep such information and not disclose it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). As an example, we may refuse access where providing the personal information would reveal confidential commercial information that cannot be redacted from the requested personal information. Where we do not provide access, we shall explain why. Deletion requests may be made by contacting us via our Web Site at www.woodbine.com.

We reserve the right to amend this Privacy Policy at any time. If we decide to amend this Privacy Policy, we will provide you with notice of such amended terms by posting the amended terms on this web site so that you will always know what information we gather, how we might use that information, and whether we will disclose it to anyone. All amended terms shall be effective immediately upon such notice.

Contact Us

If you have any questions, concerns or complaints regarding the privacy of your Personal Information or this Privacy Policy, you may contact us at the address listed below. We will inform you of our complaint procedures and assist you in resolving the situation. If a complaint is found to be justified, appropriate steps will be taken including, if necessary, revisions to our practices and procedures.

Please write or e-mail:

Chief Privacy Officer
Woodbine Entertainment Group
P.O. Box 156, 555 Rexdale Blvd
Toronto, Ontario M9W 5L2

privacy@woodbine.com

For more information on the Woodbine Entertainment Group's commitment to privacy, contact the Woodbine Entertainment Group through our website: www.woodbine.com

For copies of the CSA Model Code for the Protection of Personal Information contact the Canadian Standards Association or visit their Website at www.csa.ca/standards/privacy/Default.asp.

For copies of the Personal Information Protection and Electronic Documents Act (PIPEDA) contact the Department of Justice or visit laws.justice.gc.ca/en/P-8.6