

Last Revised: July 2021

## OVERVIEW

Spectrum Gaming Group FL, LLC ("SPECTRUM") respects individual privacy and values the confidence of its customers, employees, vendors, consumers, business partners and others. SPECTRUM strives to collect, use and disclose Personal Information (as defined below) in a manner consistent with the laws of the countries in which it does business, and has a tradition of upholding the highest ethical standards in its business practices worldwide.

SPECTRUM complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries, the United Kingdom and Switzerland transferred to the United States pursuant to Privacy Shield. SPECTRUM has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

SPECTRUM has appointed a Chief Security Officer who is responsible for SPECTRUM's compliance with and enforcement of this Policy. SPECTRUM educates its employees concerning compliance with this Policy and has self-assessment procedures in place to assure compliance. SPECTRUM's Chief Security Officer, Tim Tangye, is available to any of its employees, customers, vendors, business partners or others who may have questions concerning this Policy or data security practices. Relevant contact information is provided herein.

## SCOPE

This Policy applies to all Personal Information received by SPECTRUM in any format including electronic, paper or verbal. SPECTRUM collects and processes Information concerning visitors to its website and client requests for services, through its Internet websites, electronic mail and manually. SPECTRUM is the sole owner of information it collects from visitors to its website. Information collected from clients is owned by SPECTRUM's client unless otherwise specified in a contractual agreement between SPECTRUM and the client. SPECTRUM will not sell or share this information with third parties in ways different than what is disclosed in this Privacy Policy. On a global basis, SPECTRUM will, and will cause its affiliates to, establish and maintain business procedures that are consistent with this Policy.

The Personal Information collected by Spectrum is maintained at its corporate office in Horsham, Pennsylvania. Spectrum collects Personal Information for legitimate due diligence business reasons such as vendor background investigations on behalf of government clients, pre-employment background checks, litigation support and satisfying governmental reporting and records requirements. SPECTRUM does not request or gather information regarding political opinions, religion, philosophy or sexual

preference. All Personal Information collected by SPECTRUM will be used for legitimate business purposes consistent with this Policy. To the extent SPECTRUM maintains information on an individual's medical health or ethnicity (as legally required), SPECTRUM will protect, secure and use that information in a manner consistent with this Policy and applicable law.

## DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

"Agent" means any third party that uses Personal Information provided by SPECTRUM to perform tasks on behalf of or at the instruction of SPECTRUM.

"Data Subject" means the person whose personal information is obtained.

"SPECTRUM" means its predecessors, successors, assigns, subsidiaries, divisions and groups.

"Personal Information" means any information or set of information that identifies or could be used by or on behalf of SPECTRUM to identify an individual. Personal Information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public Personal Information.

"Sensitive Personal Information" means Personal Information that reveals race, ethnic origin, trade union membership, or that concerns health. In addition, SPECTRUM will treat as sensitive Personal Information any information received from a third party where that third party treats and identifies the information as sensitive.

NOTICE: Where SPECTRUM collects Personal Information directly from individuals, it will inform them about the purposes for which it collects and uses Personal Information about them, the types of non-agent third parties to which SPECTRUM discloses that information, and the choices and means, if any, SPECTRUM offers individuals for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to SPECTRUM, or as soon as practicable thereafter, and in any event before SPECTRUM uses the information for a purpose other than that for which it was originally collected. SPECTRUM may disclose Personal Information if required to do so by law or to protect and defend the rights or property of SPECTRUM.

CHOICE: We will provide an individual opt-out choice (for personal data) or opt-in choice (for sensitive data) before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [privacy@spectrumgaming.com](mailto:privacy@spectrumgaming.com).

SPECTRUM will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

**DATA INTEGRITY:** SPECTRUM will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. SPECTRUM will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete and current. Data will be retained only for as long as it serves its relevant purpose and in consideration of correlated compliance and legal considerations.

**TRANSFERS TO AGENTS:** SPECTRUM, from time-to-time, utilizes in-country investigative Agents, where required to obtain local information relevant to the services requested by its clients. SPECTRUM will obtain assurances from its Agents that they will safeguard Personal Information consistently with this Policy and transfer such data only for limited and specified purposes. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the relevant Privacy Shield Principles, being subject to EU Directive 95/46/EC (the EU Data Protection Directive), Privacy Shield certification by the Agent, or being subject to another European Commission adequacy finding (e.g., companies located in Switzerland). Where SPECTRUM has knowledge that an Agent is using or disclosing Personal Information in a manner contrary to this Policy, SPECTRUM will take reasonable steps to prevent or stop the use or disclosure. SPECTRUM holds its Agents accountable for maintaining the trust our employees and customers place in the company. In cases of onward transfer to third parties of data of EU individuals received pursuant to the EU-US Privacy Shield, SPECTRUM is potentially liable.

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

**ACCESS AND CORRECTION:** Pursuant to the Privacy Shield Frameworks, EU and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to [privacy@spectrumgaming.com](mailto:privacy@spectrumgaming.com). If requested to remove data, we will respond within a reasonable timeframe.

**SECURITY:** SPECTRUM will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. SPECTRUM protects data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies of sensitive Personal Information. Electronic security measures continuously monitor access to our servers and provide protection from hacking or other unauthorized access from remote locations. This protection includes the use of firewalls, restricted access and encryption technology. SPECTRUM limits access to Personal Information and data to those persons in SPECTRUM's organization, or as agents of SPECTRUM, that have a specific business purpose for maintaining and processing such

Personal Information and data. Individuals who have been granted access to Personal Information are aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so.

ENFORCEMENT: SPECTRUM will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy and the Privacy Shield Principles. Any employee that SPECTRUM determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

SPECTRUM is subject to the investigatory and enforcement powers of the Federal Trade Commission in connection with the processing a Data Subject's Personal Information under the Privacy Shield Framework.

#### DISPUTE RESOLUTION

In compliance with the Privacy Shield Principles, SPECTRUM commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact SPECTRUM's Chief Security Officer, Tim Tangye, by email at [privacy@spectrumgaming.com](mailto:privacy@spectrumgaming.com)

SPECTRUM has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints> for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

#### INTERNET PRIVACY

SPECTRUM sees the Internet, intranets and the use of other technologies as valuable tools for communicating and interacting with consumers, employees, vendors, business partners and others. SPECTRUM recognizes the importance of maintaining the privacy of Personal Information collected through websites that it operates. In general, visitors can reach SPECTRUM on the Web without revealing any Personal Information. Visitors on the Web may elect to voluntarily provide Personal

Information via SPECTRUM websites but are not required to do so. SPECTRUM collects information from visitors to the websites who voluntarily provide Personal Information by filling out and submitting online questionnaires requesting products or services. The Personal Information voluntarily provided by website users is contact information limited to the user's name, business address, phone numbers and email address. SPECTRUM collects this information so it may answer questions and forward requested information. SPECTRUM uses the information it collects from a visitor's online application or form submittal to fulfill the research or services requested, and this information is not disclosed to non-agent third parties. SPECTRUM also uses the information it collects from a visitor for network security purposes and to assess the usage of its Website to determine the areas of its Website that are most frequently visited. This information is used to assist SPECTRUM in protecting its Website and network and in making the site more useful to its visitors. SPECTRUM does not sell or share this information with non-agent third parties. SPECTRUM may, however, disclose relevant information to authorities or other non-agent third parties regarding abusive or unauthorized activity taking place on its network or sites, or in the event of a legal obligation such as a subpoena or court order. SPECTRUM may also collect anonymous information concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are small files that websites place on users' computers to identify the user and enhance the website experience. None of this information is reviewed at an individual level. Visitors may set their browsers to provide notice before they receive a cookie, giving the opportunity to decide whether to accept the cookie. Visitors can also set their browsers to turn off cookies. If visitors do so, however, some areas of SPECTRUM websites may not function properly.

None of SPECTRUM's websites are directed toward children. Nevertheless, SPECTRUM is committed to complying with applicable laws and requirements, such as the United States' Children's Online Privacy Protection Act ("COPPA").

SPECTRUM website users have the option to request that SPECTRUM not use information previously provided, correct information previously provided, or remove information previously provided to SPECTRUM. Those that would like to correct or suppress information they have provided to SPECTRUM should forward such inquiries to:

Spectrum Gaming Group FL, LLC  
Address: 200 Lakeside Drive, Suite 250, Horsham, PA 19044  
Attn: Tim Tangye, Chief Security Officer  
Phone: (609) 926-5100  
E-Mail: [privacy@spectrumgaming.com](mailto:privacy@spectrumgaming.com)

The inquiries should include the individual's name, address, and other relevant contact information (phone number, email address). SPECTRUM will use all reasonable efforts to honor such requests as quickly as possible.

SPECTRUM websites may contain links to other "non-SPECTRUM" websites. SPECTRUM assumes no responsibility for the content or the privacy policies and practices on those websites. SPECTRUM

encourages all users to read the privacy statements of those sites; their privacy practices may differ from those of SPECTRUM.

#### CHANGES TO THIS PRIVACY POLICY

The practices described in this Policy are current personal data protection policies. SPECTRUM reserves the right to modify or amend this Policy at any time consistent with the requirements of the Privacy Shield Principles. Appropriate public notice will be given concerning any such revisions.

In order to access SPECTRUM's website, you must first agree to be bound by this Privacy Policy and the Terms of Use.

Spectrum Gaming Group FL, LLC shall have the right, at its sole discretion, to modify, add or remove any terms or conditions of this Privacy Policy without notice or liability to you. Any changes to this Privacy Policy shall be effectively immediately following the posting of such changes on this website. The most recent version of this Privacy Policy may always be found at <https://www.spectrumgaming.com/privacy/>. You agree to review this Privacy Policy from time to time and agree that any subsequent use by you of this website following changes to this Privacy Policy shall constitute your acceptance of all such changes.