

## Online Social Gaming Privacy Policy

POKAGON GAMING AUTHORITY D/B/A FOUR WINDS CASINO RESORT (“FOUR WINDS”) offers social gaming, which can be found at <https://playfourwinds.playgames4funnet.com/> (hereafter referred to as the “Website”), pursuant to a contractual relationship with our partner vendor, PALA INTERACTIVE INC. (“PALA”). Unless the context indicates otherwise, FOUR WINDS and PALA are hereinafter referred to collectively as the “Company”, “We”, “Us”, or “Our”.

We know You (hereinafter referred to as “You”, “Your”, or the “User”) have a choice among many social gaming sites, and We are glad You have chosen to play with Us. Because We value You as a customer, We take your personal privacy seriously. We also believe in being transparent about the information We collect and the steps We take to keep Your information safe and secure. For these reasons, We are providing You with the following information regarding Our Online Social Gaming Privacy Policy (“Social Gaming Privacy Policy”).

Unless otherwise specified, the Website and material provided on the Website are exclusively for social products, programs, and business operations within the State of Michigan. This Privacy Policy addresses operation of the Website and operating and offering online social gaming services (hereinafter referred to as the “Services”) on the Website. This Privacy Policy addresses Our practices regarding information collected from visitors of the Website and only addresses information collected directly through or from the Website – it does not address or govern any information-gathering, use, or dissemination practices related to information collected from You other than directly through or from the Website, such as from telephone, facsimile, postal mail, personal delivery, or additional offline means or media. **PLEASE NOTE THAT, BY USING THE SERVICES, YOU REPRESENT THAT: (I) YOU ARE TWENTY-ONE (21) YEARS OF AGE OR OLDER (THE “LEGAL AGE”); AND (II) YOU ACCEPT THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, AS MAY BE MODIFIED FROM TIME TO TIME AT OUR SOLE DISCRETION, AS A CONDITION OF YOUR USE OF THE WEBSITE.**

### Legal Social Gaming.

We take gambling age restrictions seriously. Persons under the Legal Age are not permitted to gamble (social or otherwise) in a casino or online through any website or mobile application. Any contests We conduct, offer, or make are not open to persons younger than the Legal Age. Persons younger than the Legal Age are forbidden from using the Services on Our Website or mobile applications, and they cannot accept offers, participate in gaming, or win contests. We do not knowingly collect information from persons under the Legal Age for gaming (social or otherwise) related offers. From time to time, We may ask Our customers to verify their age, for any reason, and may decline to provide products, services, or access rights as to any person who does not provide Us with valid identification confirming that they are of Legal Age.

We take responsible gaming seriously. If You or someone You know has a gambling problem, please call 1-800-GAMBLER.

## **Information We May Collect.**

The information that We collect is used to administer Our business and to provide You with the products and services made available through the Website. We may collect and maintain both Personal and Non-Personal Information necessary for these purposes. You may be required to provide Us with Personal Information when You use the Website by completing online forms or entering information where requested, or by sending Us emails.

“Personal Information” includes any information that identifies You personally, including Your first name, last name, address, telephone or cellphone number, email address, credit card information, social security number, date of birth, purchase information, gaming information, secret security question(s), banking information, and other similar information. We may ask for these types of Personal Information at various times, such as when You submit information to Us through the Website, sign up for email or text messages, enter an online promotion, sign-up or log-in to play one of Our real money online games, request information, request withdrawal of funds, provide feedback in a survey or when You talk to Our employees or support staff. We may also acquire certain Personal Information from third-party service providers, as further described below.

“Non-Personal Information” includes any information about You that does not personally identify You. For the most part, We gather this type of information as You use Our Website, including the Website, and visit Our business.

## **Traffic Data.**

When You visit the Website(s), We automatically track and collect general login information, which may include Your: (i) Internet Protocol (IP) address; (ii) domain server; (iii) operating system; and (iv) Web browser type, as well as the pages that You visit on Our Website and mobile applications (collectively, “Traffic Data”). We track and collect this information both to improve Your overall experience as You navigate the Website and for marketing purposes. Traffic Data collected does not personally identify You. We may also use Traffic Data for fraud prevention purposes. The collection of Traffic Data also helps Us:

- Estimate Our audience size and usage pattern;
- Learn what information is of most and least interest;
- Speed up Your searches; and
- Learn of any possible performance problems with the Website.

Traffic Data is collected through various technologies including, but not limited to, cookies, IP addresses, and transparent GIFs (Graphics Interchange Format, also commonly known as a pixel tag).

## **Cookies.**

We use “cookies” and other technologies on the Website. Cookies are small text files offered to Your computer by servers and used by a variety of websites. We use cookies to keep track of

Your browser as You navigate the Website. Cookies may be stored on Your hard drive until you delete them. In some instances, cookies are stored in temporary memory and deleted when You shut down Your browser or turn off Your computer. We may use cookies and similar technologies to identify the computer from which You are accessing the Website as well as who You are. We may use them when You visit the Website or click on Our advertisements. We may also make use of them when You open Our emails. Cookies also improve Your user experience by allowing Us to remember Your user preferences for the Website. If You choose to provide Us with Personal Information, We may store some items of Your Personal Information and use it with the Traffic Data to better personalize Your experience as You use the Website. Cookies and other technologies may also be used for maintenance and analysis, authenticating Users, performing network communications, serving contextual advertisements, and protecting against fraud and theft. You may block or remove cookies using Your Internet browser settings at any time. However, doing so means that Your ability to perform certain transactions, use certain functionality, and access certain content on the Website may be affected. If You need help disabling cookies, review the 'Help' section of Your browser for instructions. Also, keep in mind that flash cookies do not operate the same way as browser cookies, which means that the cookies management tools available in most web browsers may not be set up to remove flash cookies. Adobe.com has more information on how to make changes at the privacy settings panel. Please keep in mind that cookies are necessary to track and enhance some of Our game activities. Therefore, if You disable cookies, You may lose some of the features and functionality of playing Our games and be required to re-enter basic information every time You visit the Website.

### **Access and Opting Out.**

To make sure Your Personal Information is accurate and up to date, please feel free to review Your profile whenever You like. You can do so by logging into Your account on the Website. You can make changes to Your profile on <https://playfourwinds.playgames4funnet.com>, or by contacting [playonlinesupport@fourwindscasino.com](mailto:playonlinesupport@fourwindscasino.com). Except as necessary to obtain the services or information requested, You may opt out of having Your Personal Information that You voluntarily provided to Us through email, or other online avenues, prospectively retained by Us or used by Us for secondary purposes, by contacting Us at [playonlinesupport@fourwindscasino.com](mailto:playonlinesupport@fourwindscasino.com) with respect to the Website.

The 'Help' portion of the toolbar on the majority of browsers will direct You on how to prevent Your browser from accepting new cookies, how to command the browser to tell You when You receive a new cookie, or how to fully disable cookies. We do not override these settings or options, including any 'Do Not Track' settings, however, We encourage You to use them to enhance Your choices and personalize Your experience.

Please note, however, that in order to access certain content, features, services, products, or benefits on the Website, You may be required to provide Us with certain information, including Personal Information. If You do not wish to provide such information or if You opt to use the aforementioned privacy features, You may be unable to obtain certain content, features, services, products, or benefits on the Website.

The provisions of this section related to ‘Access and Opting Out’ do not apply to collection of information regarding the type of Web browser used to visit the Website or to information provided or collected that is not Personal Information or Non-Personal Information as defined in this Privacy Policy.

### **How We May Use Your Information.**

When We collect information during Your initial registration, it will be used to create an online gaming account. Additionally, We will always let You know what it is for when We ask for information. Here is a look at some other ways that We might use Your information to administer Our business and improve Your experience with the products and services You request.

- Notifying You about promotions and special offers regarding products and services provided by Us or Our affiliates or other associated third parties;
- Improving products and services We provide You and developing new products and services;
- Improving the Website;
- Tracking Your use of the website for Our internal market research;
- Generating aggregate statistical studies about Our customers;
- Contacting You in response to Your inquiries, comments, and suggestions;
- Providing You with a safe and secure environment;
- Protecting and defending Our rights or property or enforcing Our agreements with You;
- Processing Your credit card, or other Financial Services transactions;
- Contacting You when necessary;
- For identification and verification purposes;
- Processing financial transactions (as applicable);
- Analyzing fraud; and
- Otherwise with Your consent or as permitted or required by applicable law or for compliance with applicable regulatory requirements.

### **Sharing Your Information.**

We reserve the right to disclose any information as necessary to satisfy any applicable law, regulations, or governmental request, to avoid liability or to protect Our rights or property, or as detailed in this Privacy Policy and by providing Your personal information to Us, registering with Us, or logging into the Website, You expressly consent to the collection, processing, and disclosure of Your Personal Information for the purposes set forth in this Privacy Policy.

Certain features of the Website, including any chat or comment features, may allow you to contribute materials and information for access, use, viewing and commentary by other Users or customers of the Website. **ANY PERSONAL OR NON-PERSONAL INFORMATION SUBMITTED BY YOU TO THE WEBSITE THROUGH THESE FEATURES IS PUBLIC AND MAY BE READ, COLLECTED, OR USED BY OTHER USERS OR CUSTOMERS OF THE WEBSITE. WE ARE NOT AND SHALL NOT BE RESPONSIBLE FOR THE PRIVACY OF ANY PERSONAL INFORMATION OR NON-PERSONAL INFORMATION THAT YOU CHOOSE TO SUBMIT VIA THESE FEATURES.**

### **Affiliated Entities.**

From time to time, We may share certain Personal Information, Non-Personal Information, or portions thereof that We collect from You about Your transactions with Us, exclusively for business purposes. The third parties with whom We may share this information include Our employees, employees of Our affiliates, Our agents, partners, licensors, and third-party service providers who use Your Personal Information to provide services to Us in respect of Your being a customer of the Website. Sharing this information allows Us to provide the products and services You have requested and quickly respond to applications for services.

### **Non-Affiliated Entities.**

Your Personal Information and Non-Personal Information may be shared with or collected by third-party services providers who provide Us with a variety of services, including credit/debit and prepaid card processing, and other financial services. Your Privacy is Our top concern, so We request that these services providers 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.

We may share certain limited information about You with other companies, including those with whom we have joint marketing agreements or other businesses with which We have a contractual relationship. They may contact You as part of a third-party promotional program or loyalty program. At times, We may share Your Personal Information with third parties for a number of reasons, including:

- As required by law or regulation and/or to comply with the legal, regulatory, or administrative requirements of any governmental authorities;
- To comply with a court order, subpoena, search warrant, or other valid legal processes;
- In connection with any legal action, claim, or dispute, including, but not limited to, the collection of debts; or
- For the protection of persons or property.

### **External Links and Third-Party Websites.**

We use industry-standard safeguards to make sure the Personal Information that We collect from You stays private and is not compromised through unauthorized access. However, due to the nature of communications and transmissions via the Internet, We cannot guarantee that the connection between You and Our servers will be completely secure or free from unauthorized access by third parties. We are not responsible for the security of information transmitted via the Internet. Further, please safeguard Your personal desktop or mobile devices against any viruses that may compromise the privacy of Your Personal Information, as this is also Your responsibility.

### **Changes in Privacy Policy.**

From time to time, We may need to revise, modify or supplement this Privacy Policy for various reasons. As part of Our commitment to keeping You informed, We will post these changes to the

Website(s) and add the change date to the bottom of this Privacy Policy. The amended or new Privacy Policy will be effective as soon as it is posted to the Website. To ensure You are aware of the latest Privacy Policy, we encourage you to visit the Website from time to time. By providing Us with information and by using the Website following the posting of changes to the Privacy Policy, You accept the changes and Our use of Your Personal Information and Non-Personal Information in accordance with the Privacy Policy in effect at that time.