

## Privacy Policy

This Policy was last modified on: September 1, 2011. We reserve the right to modify this policy - any modifications will be posted at Spielo.com, so be sure to check the "last modified" date periodically.

### Scope

This policy applies to the Canadian facilities of Spielo International Canada ULC incorporated in Canada (the "Company").

### Purpose

The purpose of the Company's Privacy Policy is to: (a) describe how the Company respects customer and third party privacy rights and protect their individually identifiable personal information ("Personal Data") in our custody and management in accordance with relevant Canadian laws and regulations, and consistent with the Personal Information Protection and Electronic Documents Act ("PIPEDA"), and (b) describe to customers the information we collect, how that information may be used, with whom it will be shared and their choices about such uses and disclosures. The Company may from time to time, and to the extent necessary, issue implementing procedures to address specific Canadian federal or Provincial statutes or regulations consistent with the requirements of those statutes or regulations, and in that case, this policy shall not be construed as prohibiting compliance with more specific procedures to protect the privacy rights of all persons whose Personal Data is within the custody and management of the Company.

### Basic Principles

The Company is committed to respecting individual privacy rights, and we recognize the responsibility we have to protect the privacy rights of all persons whose Personal Data are within our custody and management. The Company's privacy policy is expressed in the following five basic principles:

- We do not intentionally collect or maintain Personal Data that is not necessary to us in conducting our business, or stated purposes for which the Personal Data is collected, and we will take reasonable steps to assure the accuracy of the Personal Data in our custody and management.
- We safeguard all Personal Data in our custody and management as appropriate to the sensitivity of the data, and take reasonable precautions designed to prevent inappropriate or unauthorized access, use or disclosure of Personal Data.
- We do not use Personal Data in our possession for purposes other than those purposes related to our business which have been disclosed to those persons from whom the Personal Data has been collected and from whom appropriate consents have been obtained.
- We do not transfer Personal Data to third parties, except to our affiliated company, GTECH Corporation or other related companies of GTECH Corporation, and/or Atronic International GmbH (“Atronic”) or other related companies of Atronic or the Company ("the Related Companies") and to our service providers, employment consultants, business partners, vendors, subcontractors, strategic partners, gaming regulators and gaming commissions and government entities as required in our business, and described in further detail below, and provided the Related Companies and these other third parties safeguard the Personal Data as provided for herein, and use it only for the consented purposes for which it has been provided.
- We deal openly and fairly with customers whose Personal Data is in our custody and management, providing them with reasonable access to their Personal Data and notification of their options for correction or deletion of the Personal Data or to raise a complaint.

The term “Personal Data” means information in any form that is identifiable to a specific individual or by which specific individuals can be identified, such as name, address, Internet addresses, telephone

number, invoicing information, financial information, purchasing information, purchasing preferences, and consumer opinions.

### Collection and Retention

We collect Personal Data from the Company's customers for the purposes of: conducting and managing our business, processing transactions, providing promotional information on the company's products and services, to send promotional information, to respond to third party requests and products and service inquiries, or as otherwise specified at the time of collection. We will not intentionally collect or maintain Personal Data from customers that is not necessary for these purposes, and we will take reasonable steps to assure the accuracy and security of the Personal Data in our custody and management.

The Company will not intentionally collect any Personal Data from our customers or other third persons that is not necessary to the conduct of our business and the above purposes, which we have disclosed. If we find that we have received Personal Data that is not necessary to these purposes, we will refrain from its use, return it to its source or delete it from our systems. We will not keep Personal Data longer than reasonably necessary to fulfill the purposes for which it was collected or as required or permitted by law.

We rely upon our customers, as well as other third persons who give us Personal Data, to be sure that the Personal Data they provide to us is complete and accurate.

### Consent

By using the Company website and/or providing Personal Data to the Company, our customers and any other third persons consent to our collection and use of their Personal Data for the purposes set out

herein, and for any other purposes that are identified or apparent at the time of their collection. The Company only uses Personal Data for purposes that have been specified and consented to prior to use.

By using the Company website and/or providing Personal Data, our customers and any other third persons also consent to our use and disclosure of their Personal Data for the following:

- a) In response to any legal requirements, including in response to a subpoena, a court order, or a request from law enforcement or other government agency;
- b) To establish or exercise our legal rights;
- c) As reasonably necessary to protect the rights, property or safety of the Company, our users, or our employees, including investigations or preventative actions regarding suspected illegal activity, suspected fraud or other wrongdoing, to enforce our website's terms and conditions or other agreements or policies and to protect the Company and other visitors to the website or users of services or products provided by the Company;
- d) In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Under some circumstances, the Company might consider using Personal Data for additional purposes. However, before doing so, the Company will give individuals the opportunity to choose not to have their Personal Data used for these purposes, or in the case of sensitive or financial information, we would not use the Personal Data for those other purposes without express permission.

### Choices about the Collection and Use of Personal Data

Customers or other third persons can choose not to provide us with certain information, but that may result in being unable to use certain features of the Company's website, purchase products or services, participate in a promotion, ask a question, or initiate other transactions on the Company's website.

When anyone provides their email address on our website, they will be given a choice as to whether they want to receive emails about promotions or special offers from the Company or from third parties, as identified herein, to whom we send your Personal Data. They may modify their choices with regard to receiving communications from the Company at any time by contacting our Company's representative. They also will be given the opportunity, in any promotional email that we send to them, to opt out of receiving such messages in the future. It may take up to 10 days for us to process an opt-out request. Please note that choices about Personal Data will only affect future activities or communications from the Company.

They will not have the ability to opt-out of receiving transactional and relationship emails from the Company, as for example, service announcements.

The Company will give customers an opportunity to opt out of receiving optional emails, such as promotional emails and opinion survey emails.

### Safeguards

The Company will safeguard all Personal Data in our custody and management as appropriate to the sensitivity of the data, and take reasonable precautions, including physical measures such as locked and restricted access to our premises, technical tools including passwords and encryption, and organizational controls, including confidentiality agreements for relevant employees needing access to

financial or sensitive Personal Data and adequate staff training, designed to prevent unauthorized access to or disclosure of Personal Data.

Personal Data in the Company's custody is protected by these policies and procedures to prevent unauthorized use of or access to our information systems and to maintain the integrity, availability and privacy of confidential information, and to prevent loss or destruction.

#### Sharing and Storage of Personal Data and Anonymous and/or Aggregate Data

From time to time, the Company may make certain Personal Data available to business partners, gaming commissions and government entities if required by the law or a license or for transaction processing on our behalf. The Company also maintains collaborative relationships with vendors, subcontractors, gaming regulators, strategic partners and others who assist us, and our customers in the conduct of our respective businesses. We transfer Personal Data to these parties to enable them to work with us, and our customers with the understanding that they will also maintain the privacy of Personal Data by providing the same or similar level of safeguards as provided by the Company hereunder in respect of Personal Data.

The Company may also make information about our customers available to others within the Related Companies for consented to purposes related to its business and to process Personal Data on the Company's behalf. In such cases, the Company remains in control and accountable for the Personal Data, which the Related Companies will process and retain on the Company's behalf, for the consented to purposes. In the event the Company intends to provide the Related Companies with any Personal Data for any other purpose(s), we shall seek the express consent of any persons who provided such Personal Data. Any research or analytics conducted by the Related Companies shall be done solely with aggregated or anonymized data. The time period that the Related Companies may retain any Personal Data shall be the same as for the Company.

The Company will not transfer Personal Data to these third parties, except for its business, and provided those third parties safeguard the Personal Data as provided for herein, and use it only for the purposes provided and consented to. The Company will take all reasonable steps to safeguard the Personal Data when transferred to any of these third parties and limit the Personal Data transferred to that required for the authorized purposes for which it is being transferred.

#### Where Personal Data may be Stored

Persons providing Personal Data are advised that, in accordance with sharing this Personal Data with these third parties, such Personal Data may be maintained on servers outside of Canada, including in the United States. Accordingly, the Personal Data may be subject to the privacy laws of such foreign jurisdictions, which may not be as comprehensive or protective of privacy rights as those in Canada.

#### Anonymous and/or Aggregate Data

The Company and Related Companies may combine anonymous data and/or aggregate data collected with additional anonymous information collected from other sources. The Company may share anonymous data (including aggregate data) we collect regarding our customers with third parties (such as advisors, advertisers and investors) for various business purposes including developing and delivering targeted advertising on our website and on websites of third parties, conducting general business analysis, and developing website content and services.

#### Accessing and Updating Personal Information

The Company will deal openly and fairly with persons whose Personal Data is in our custody and management.

Upon reasonable written request, the Company will, for no or minimal cost and within a reasonable time of receiving the request, inform any person of what Personal Data the Company has about him or

her generally, provide him/her with reasonable access to the Personal Data and take steps to correct or delete any inaccuracies in Personal Data pointed out to it, either directly or through making available self-service mechanisms. However, the Company may limit access, corrections or deletions if the burden and expense would be prohibitively costly to provide, the Personal Data contains information on other individuals or, when applicable laws or regulations would be violated. The Company may establish reasonable rules for providing access to Personal Data, and/or set reasonable limits on the frequency of access requests.

#### Compliance Enforcement

Persons who believe their Personal Data is not being handled in accordance with this Privacy Policy or the law should contact the Company's representative, at the address below, who will discuss the issue with the complainant, conduct an investigation, and report back to the complainant, all in an effort to resolve the issue quickly and amicably, including, where justified, amending the Company's policies and practices.

Tammy Godfrey-Sauveur

Human Resources Manager

Spielo International Canada ULC

328 Urquhart Avenue

Moncton, New Brunswick

Canada E1H 2R6

Tammy.Godfrey-Sauveur@SPIELO.com

If the complaint cannot be resolved between the parties, complainants can direct further complaints to the appropriate Canadian Privacy Commissioner. Links to the websites for the Privacy Commissioners' Officers are below:

- Office of the Privacy Commissioner of Canada (<http://www.privcom.gc.ca/>)
- Office of the Information and Privacy Commissioner of Alberta (<http://www.oipc.ab.ca/home/>)
- Office of the Information and Privacy Commissioner of British Columbia ([http://www.oipc.bc.ca/sector\\_private/public\\_info/index.htm](http://www.oipc.bc.ca/sector_private/public_info/index.htm))
- Commission d'accès à l'information du Québec (<http://www.cai.gouv.qc.ca/index-en.html>)

#### Additional Policy Considerations

This Privacy Policy is designed to protect privacy rights concerning Personal Data, in Canada, as they are currently understood, and to satisfy the related regulations that are applicable to the Company in the course of conducting our business. However, the Company realizes that the text of this Privacy Policy cannot address every potential issue and circumstance. It is the general policy of the Company to adhere to the personal information protection laws and regulations of Canada and any countries in which we do business, and applicable employment laws and regulations that affect our maintenance and handling of Personal Data.

#### Legal Requirements and Limitations

This Privacy Policy is subject in all respects to applicable legal and regulatory requirements and limitations that would dictate actions or policies different from those set forth herein.

This Privacy Policy is issued by the Company and applies exclusively to the Company and its subsidiaries incorporated in Canada.

### Notification of Changes

The Company may change this Privacy Policy from time to time, as we deem appropriate consistent with the principles described above. The Company will reflect all changes in updated versions of this policy made available publicly through the Company's website and various policy documents. Persons providing Personal Data are encouraged to review this Privacy Policy frequently to receive notice of any changes.

### Compliance

In order to verify that the attestations and assertions the Company has made about protection of Personal Data are true and that our privacy practices have been implemented as presented, the Company will:

- Publish this policy so that it is accessible to all interested persons.
- Maintain responsibility for designing and implementing a compliance program and verifying compliance with it.
- Implement procedures to execute these policies in the conduct of our business and discipline employees for breach of these policies and procedures.
- On an annual basis, (i) review the policy to ensure that it continues to comply with PIPEDA, and any other relevant Canadian privacy statutes or regulations (ii) review our compliance with the policy.

### Other information collected using our website

The Company uses various technologies to collect information about visitors to our website, such as about their computer and activities on our site.

The Company automatically collects information from visitors' browsers when they visit our website. This information includes: IP address, browser type and language, access times, the content of any undeleted cookies that a visitor's browser previously accepted from us (see "Cookies" below), and the referring website address.

**Cookies.** We may assign a "cookie" (a small, unique identifier text file) or series of cookies to visitors' browsers, to facilitate access to our site and to personalize their online experience. For security purposes, we encrypt any usernames, passwords, and other user or member account-related data that we store in such cookies. In the case of sites and services that do not use a user or member ID, the cookie will contain a unique identifier. Through the use of a cookie, we also may automatically collect information about online activities on our site, such as web pages visited, links clicked, and searches conducted. Most browsers automatically accept cookies, but usually can be set to decline cookies. If a visitor declines cookies, they may not be able to sign in or use some of the interactive features offered on our website. The "Help" portion of the toolbar on most browsers provides guidance on preventing the browser from accepting new cookies, how to have the browser notify the visitor when a new cookie is received, or how to disable cookies altogether.

**Other technologies.** The Company may use standard Internet technology, such as pixel tags, web beacons and other similar technologies, to track visitors' use of our site. The Company also may include web beacons in promotional emails or newsletters to determine whether messages have been opened and acted upon. A web beacon is a small file placed on a webpage that allows a website to perform various tasks, including count users who have viewed that page or to access cookies. The Company also may receive an anonymous identification number if you come to our site from an online advertisement displayed on a third-party website. The information obtained in this manner enables the Company to

customize the services offered to our website visitors, to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, or other activities.

The Company may allow third-party advertising companies, including ad networks, to display advertisements on our website. These companies may use tracking technologies, such as cookies, to collect anonymous information about visitors who view or interact with their advertisements. Our website does not provide any Personal Data to these third parties, but they may collect information about where visitors to our website, or others who have used their computer, saw and/or clicked on the advertisements they deliver, and possibly associate this information with subsequent visits to the advertised websites. They also may combine this information with personal information they collect from visitors. The collection and use of that information is subject to the third-party's privacy policy. This information allows them to deliver targeted advertisements and gauge their effectiveness. Some of these third-party advertising companies may be advertising networks that are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies ([www.networkadvertising.org](http://www.networkadvertising.org)).

#### Posting

This Privacy Policy will be available on the Company's website, and otherwise upon request to the Company's representative.