

VEGAS GAMES INC.

PRIVACY POLICY

(Last updated on February 26, 2015)

Your privacy and the safekeeping of your personal information are very important to us at Vegas Games Inc. We're committed to protecting the privacy of those who elect to access and use our Site or Service (both as defined below) or any of our online and mobile games and/or other applications or related services, and who provide us with their information in order to participate in such endeavors. This Privacy Policy governs our online marketing, advertising, and promotion and distribution activities relating to our products, and describes how Vegas Games Inc., a Nevada corporation (hereinafter "Vegas Games" or the "Company" or "VG" or "us" or "we") collects, uses and discloses the personal and non-personal information we gather when you access and use any of our games or other applications, or content materials, or participate in any related activities (e.g., online purchases, downloads and/or streaming content) or other services offered by the Company or any of its affiliates, licensees or other business partners (collectively, the "Service"). The Service may be made available through our website, www.vegasgames.com (the "Site") or accessed through various third-party social networking websites, or as a mobile or social network game application (each an "App" and, collectively, the "Apps") on your PC, tablet, smart phone or other mobile or non-mobile device.

Please read our Privacy Policy carefully. This Privacy Policy describes how we protect your Personal Information, and also describes alternatives that you may prefer regarding the use of such information, including managing your information preferences and opting out of certain uses of your Personal Information.

BY ACCESSING, DOWNLOADING, INSTALLING, OR USING THE SERVICE, REGISTERING WITH VEGAS GAMES OR ANY OF ITS AFFILIATES, OR DOWNLOADING, INSTALLING, STREAMING OR OTHERWISE USING ANY OF OUR APPS, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE LEGALLY BOUND BY ALL OF THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, AND SHALL BE DEEMED TO HAVE PROVIDED YOUR CONSENT TO OUR COLLECTION, STORAGE, SHARING, AND USE OF YOUR PERSONAL INFORMATION, INCLUDING THE TRANSFER OF SUCH INFORMATION OUTSIDE THE STATE OF CALIFORNIA AND/OR THE UNITED STATES FOR STORAGE, PROCESSING AND/OR USE BY VEGAS GAMES OR ANY OF ITS AFFILIATES, IN ACCORDANCE WITH THE TERMS AND SUBJECT TO THE CONDITIONS REFERENCED IN THIS PRIVACY POLICY.

This Privacy Policy is incorporated into and made a part of our [Terms of Service](#) Agreement (the “Terms of Service”). Vegas Games reserves the right to amend this Privacy Policy at any time and from time to time, at our sole discretion, so please review it regularly. If Vegas Games makes any significant or otherwise material changes to this Privacy Policy, we will post such changes here so that you can be apprised of any such revisions that materially modify what information we gather, how we may use such information, and whether we will disclose any information obtained from or about you to any third parties). We want to provide those that register with us in order to obtain access to the Service, or use any of our casino games or other Apps, and/or to participate in any of the other related activities that we offer (collectively, our "Users") with a transparent view into the privacy principles and practices adopted by Vegas Games, so please refer to this Privacy Policy on an recurring basis. Should you have any questions, please get in touch with us and feel free to contact us. Your continued use of the Service or any of our Apps will indicate and shall be deemed to signify your acceptance of any then-effective changes to this Privacy Policy.

Please remember that our Privacy Policy applies only to the various types of information that are collected by us when you register with our Service or when you choose to access, participate in, or otherwise use any of our Apps or any other portion(s) or aspect(s) of the Service. We are not responsible for protecting or otherwise safeguarding the privacy of any information that you elect to divulge or post in any public forum (e.g., message board, blog, personal page, etc.), nor are we responsible for the privacy practices of websites that are owned or operated by any third parties.

This Privacy Policy and the certification seals located on our website confirm that Vegas Games is a valid licensee, and participating member, of the Entertainment Software Rating Board's Privacy Certified Program (“ESRB Privacy Certified”). The ESRB's Privacy Certified Program is designed to ensure that our information disclosure practices are responsible and appropriate. To help protect your privacy, we have voluntarily undertaken this privacy initiative and have had our website where this Privacy Policy is posted reviewed and certified by ESRB Privacy Certified to meet established online information collection and use practices. As a licensee in this privacy certification program, we are subject to frequent audits of our website and other enforcement and accountability mechanisms administered independently by the ESRB. All of our sites containing the ESRB certification seals have been reviewed, and certified, by ESRB to meet established online information collection and use practices.

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1. Introduction

Vegas Games Inc. develops and publishes casino games and other Apps that can be accessed or used in connection with certain mobile and non-mobile devices and/or that can be accessed via the Internet at various websites, including websites that are owned or controlled by Vegas Games, as well as third-party websites that are licensees or otherwise in a business relationship with Vegas Games or one or more of its affiliates.

If you have any questions regarding our Privacy Policy or regarding any of our practices pertaining to the collection, retention, storage, sharing or use of any information submitted by or

relating to you or any account that you create with Vegas Games or any of its affiliates, please feel free to contact us in the manner described in Section 15, below ("Contact Us").

If you use a third-party social networking site or "SNS" (e.g., Facebook, Google +, etc.) in order to access and use any of our Apps, you may be required to read and accept the applicable SNS's separate terms of service (or terms of use) and privacy policy. We strongly encourage all Users to carefully examine the appropriate terms of service (or terms of use) and privacy policies for any and all online services that they wish to use.

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2. Managing Your Information Preferences

We do not share your Personal Information with third parties for their direct marketing purposes without your consent. If you desire to opt out of having your Personal Information disclosed to third parties for their direct marketing purposes, please contact us and let us know by sending an email to support@vegasgames.com or by writing to us at Vegas Games Inc., Attn: Customer Service – Privacy, 850 Stanton Road, Suite D, Burlingame, CA 94010. If such a need should arise, we ask that you please include your full name, email address, mailing address, and a declaration stating that you do not want your Personal Information shared with third parties for their direct marketing purposes.

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3. Information We Collect

Personally Identifiable Information

We collect information that personally identifies you or that could be used to identify or contact you (collectively, "Personally Identifiable Information" or "PII"). Such Personally Identifiable Information includes your name, full address, e-mail address, telephone number, credit card number, billing information, devices' IP addresses, and other such individually identifiable information if and when you choose to provide it to us and/or that you provide in connection with your Vegas Games profile or account. For example, you will be required to provide us with certain PII when you register with the Service, or when you use any of our Apps or choose to make a purchase, and at other times when you elect to participate in any activities that are part of the Service. Please note that each time you use the Service, we automatically collect your devices' IP addresses. Your decision whether to provide the requested information (or not) is entirely optional. We only collect PII from you if you volunteer such information to us. Unless you give us authorization to do so, we will not share, license, lease, sell or trade your PII other than as referenced in this Privacy Policy. However, please understand that if you do not satisfy the minimum criteria for participation (e.g., minimum age requirements, residency requirements,

geographical restrictions, etc.) and provide the minimum information that's requested by the Company or any of its affiliates, you will not be authorized to use the Service or any particular App, and will not be able to participate in certain activities that are part of the Service or be able to use some or all of the features of the Service (e.g., be a contributor to a blog, or make a particular purchase, etc.).

Non-Personally Identifiable Information

We also collect information that by itself cannot be used to identify or contact you, which includes demographic information (e.g., your age, gender, profession, etc.) (collectively, "Non-Personally Identifiable Information"). Non-Personally Identifiable Information also includes information regarding browser types, domain names, and other statistical data, that is automatically collected through the actions you take in connection with the Service and in connection with any particular App (collectively, "Usage Data"). For example, in addition to your devices' IP addresses as previously mentioned, each time you use the Service we automatically collect the type of information regarding your web browser, operating system, internet service provider, webpages you view, and the time and duration of your visit to and use of the Service. This usage information is coupled with your username and profile, but we do not disclose the associated information to third parties. Non-Personally Identifiable Information is used to help us garner insights into our Users, their interests, and their preferences, so that we are better able to create effective content for advertising and promotional purposes and so that we can design and develop more compelling versions of our casino games and other Apps.

We use log files (e.g., server log files or web log files), along with state-of-the-art tracking technologies (e.g., browser cookies, clear GIFs, etc.) and third-party SNS and mobile device software development kits, in order to gather and analyze technical information and related data of or concerning the Service and our Apps. Some forms of the tracking technologies that we use are linked to the user ID number(s) of your personal computer or mobile device. For more information on our use of cookies and other such tracking technologies, please review the relevant portion of Section 4, below ("*How We Collect Information*").

Information You Provide to Us

We collect information that you choose to provide to us directly. For example, we collect information when you register with us and create an account, manage your user profile, participate in any interactive features of the Service, participate in a promotion or survey, request customer support, or choose to communicate with us for any other reason. Additionally, individuals who win prizes as a result of participating in any contests or sweepstakes may be required to provide certain PII (e.g., the winner's Social Security Number, street address, telephone number, etc.) for prize fulfillment and for tax purposes.

User Accounts

You are required to register with Vegas Games in order to access and use our Apps or to participate in certain activities and/or audiovisual content materials that are part of the Service. In completing the registration process, you must provide true, accurate, current, and complete information about yourself. The required information will vary depending on the activity and, for example, may include your age (or birth date), name, e-mail address, passwords, etc.

You may also create a user profile that is viewable by other users of the Service or any of our Apps or any related services that are offered by Vegas Games or any of our affiliates and that are subject to this Privacy Policy. Generally, a user profile includes a profile photo (or other digital image); user name(s); age and gender; miscellaneous information provided by you (e.g., hobbies, interests, etc.); particulars regarding your game play; and a user ID number (created by Vegas Games) that's used to identify your account and profile.

Vegas Games and its affiliates will only permit access to information that is considered "public" or that you have designated as "public" in your settings. Your name (including both your first and last names) and profile picture are considered "public" on Vegas Games' websites that offer direct access to the Service and our Apps, and, as is true of any publicly available information, third-party search engines may index such information.

You may choose to import your address book contacts and/or manually enter e-mail addresses into your user profile or account information in order to (i) identify and locate your contacts that are using any of our Apps or other aspects of the Service; and/or (ii) invite your contacts to join you when you play a particular App. Your designated contact information will be stored for the purpose of aiding you and your contacts to connect online so that you can play our Apps together and/or jointly participate in other aspects of the Service. If you do not want us to store your contacts, you must either refrain from sending requests to any of your contacts, or, if such a request has been sent, then you must terminate your account and create a new account where you refrain from sending any requests to any of your contacts.

We take your security seriously and will use diligent efforts to respect your privacy throughout our relationship. Please be advised that any password(s) that you choose to provide to Vegas Games so that we are able to access your address book contacts will not be stored or shared with any unaffiliated third parties.

Mobile Devices

Information collected from users through a mobile device (e.g., smartphone, tablet, or other mobile communications or computing device, etc.) includes the mobile device identifier(s) (e.g., IP address, MAC address, etc.), name associated with the device, type of device, mobile device model, mobile phone number, the mobile carrier used with the device, country, geo-location, and email address. We will, at our discretion, create and assign an account number or other such

identifier(s) to your device(s). If permission is granted, we will also access your contacts so that you may invite your friends to join you in playing one of our Apps or in connection with another aspect of the Service.

Social Networking Sites

The Service may be offered to you if you establish an account or profile for one or more of our Apps by using an SNS authentication option or applicable third-party authentication process. When you access or use one or more of our Apps through an SNS, or participate through an SNS in any other activity that's part of the Service, you are granting the SNS permission to share information with us. This includes information such as your name, address, zip code, gender, age, profile picture, occupation, hobbies, and interests. Whenever you access and use the Service or any of our Apps through an SNS, we collect information concerning your use in compliance with the applicable SNS' separate terms of service (or terms of use) and privacy policy, in addition to the information collected from your SNS profile. When you choose to play any of our Apps by means of an SNS, you thereby authorize Vegas Games to collect, store, and use such information in accordance with the provisions of this Privacy Policy. Additionally, this authorization will extend to the collection, storage, and use of the various types of information that you allow the SNS to provide to us through its Application Programming Interface ("API") in conformance with the SNS's platform guidelines and separate terms of service (or terms of use) and privacy policy. Vegas Games will access information that you allow depending on the particular App and the particular SNS that you choose to use in order to access and use the Service and/or any of our SNS-enabled Apps. Our ability to access and collect any such information submitted by or concerning you or any of your contacts is also affected by your privacy settings on the SNS, as well as those of your contacts. You can review and learn more about these settings by visiting the SNS that you use to play any of our Apps and reviewing their policies.

Billing Information

You will need to provide certain PII in order to make a purchase and/or pay for certain activities or aspects of the Service or any of our Apps. For example, such information will be required when acquiring a license for virtual currency, purchasing digital items, and/or obtaining upgrades or customized versions of any of our Apps. Vegas Games will collect your accurate, current, and complete billing information when it is necessary in order to complete a transaction. This may include your mailing address, as well as your e-mail address. If any update(s) to your billing information is required, you must make them promptly. For example, updates would include any changes with respect to your billing address, shipping address, credit card number, or credit card expiration date. Please review our [Terms of Service](#), which describes the relevant terms and conditions regarding our billing practices and related activities, including, but not limited to, our billing practices.

User Content

Your information will also be collected when you submit, disclose or share information within the context of any of our Apps, or any related message boards, forums, and/or other aspects or activities of the Service. The Service allows you to create, submit, post, display, transmit, perform, publish, distribute, broadcast or otherwise disseminate audio and/or visual content materials to Vegas Games or any of its affiliates. This includes text, graphics, comments, forum posts, chat posts, messages, profiles, suggestions, recommendations, links, e-mails, music, sounds, sound effects, pictures, photos, drawings, caricatures, videos, technology, software, code modules, tools, utilities, and any other materials and/or information displayed or otherwise made available to and/or by means of the Service (collectively "Content"). Content also includes any feedback, comments, suggestions, recommendations and/or proposals that you may provide regarding the Service, or any of the Apps, and/or any other Content, including, without limitation, any responses that you may elect to provide in connection with any user surveys.

Customer Support

Your interactions with our team will require that we collect and store certain contact information that you provide so that we can efficiently and effectively respond to your questions and requests relating to the Service and/or any of our Apps. Other information that may be collected and stored could include information concerning your game play, and your activities when accessing and using the Service, any of our Apps, and/or participating in any related activities. Any such communications may also be retained for future reference, including any information that is contained within such communications.

SMS Notifications, Push Notifications & Local Notifications

If you choose to sign up to have SMS notifications sent to your smartphone or other mobile device, please be aware that we will store the information that you provide, which may include, but is not limited to, your telephone number. You will have access to certain options in your notifications settings that allow you to choose the form of notifications that you would like to receive and the timing of such messages. This can be done by accessing the "Settings" page after logging into your account.

We also use what are commonly referred to as "push notifications" to provide updates and other messages to interested Users who access and use the Service or any of our Apps. Your settings for such push notifications can be adjusted by accessing the Settings page within any of our Apps. Your device's Settings page may also provide you with the opportunity to manage such settings and controls.

We also send local notifications to your mobile device to provide you with updated information regarding the Service and our Apps and related activities and service offerings. You can manage your settings for local notifications from the Settings page within the relevant App.

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4. How We Collect Information

We will collect information from you and other Users of the Service and/or any of our Apps, such as the number of Users of the Service, feature usage, game play statistics, user rankings, click paths, and other such information and related data. Please be advised that we collect information and data in the following ways:

Information about Users and their Experiences with the Service and our Apps

When you play or otherwise participate in any of our casino games or other Apps, Vegas Games collects and stores particular information that is provided by you directly, or provided by means of the SNS (or other third-party website you may be using) that offers access to any of our Apps. In order to provide better Apps, as well as more engaging and enjoyable social experiences, we also gather information that relates to your specific gameplay, interactions with other Users, and experiences within the Service and in connection with our Apps. This information is collected and stored through the use of log files, which includes IP addresses, browser types, domain names, and other anonymous statistical data involving the use of the Service and/or any of our Apps.

Cookies and Other Tracking Technologies

Unless you decline, we use cookies (a small file placed on your computer to identify you and to obtain information regarding your personal computer or mobile device, browser, and use of the Service) when you access or use the Service and/or any of our Apps. Our servers may automatically collect and store information about you through built-in tracking features (e.g., web beacons (an electronic file placed on a website that monitors traffic and usage of the site), tracking pixels, local shared objects, or tags). We use cookies and web beacons to improve Users' experiences with the Site and the Service, such as, for example, pre-populating your username for an easier login experience. We collect certain technical information about your computer system or mobile device, and your interactions with the Service in order to (i) monitor website and device traffic; (ii) analyze trends; (iii) troubleshoot technical problems; (iv) enhance our operations and administration of the Service and our Apps; (v) report aggregated information to third-party sponsors, advertisers and other business partners; (vi) gather general demographic information; (vii) ensure website security; (viii) provide Users with improved experiences when accessing and using the Service and our Apps; and (ix) manage third-party sponsorships, and advertising and marketing activities. We also monitor network traffic in order to make the Service available to all Users, and to identify unauthorized attempts to upload or change information, or otherwise attempt to cause damage or to undermine the security or integrity of the Service and/or any of the Apps. We use mobile device application development kits (which include both hardware and software), metrics tools, and other analytics technologies to collect

usage information. We, and various third-party service providers acting on our behalf, use log files and other tracking technologies, such as cookies, to collect and analyze certain technical information and data about your hardware system, including, without limitation, IP addresses, hard drive serial number, device types, device identifiers, browser types, browser language, referral and exit pages, website usage and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and ordering of such pages, the amount of time spent on particular pages, game state, the date and time of activity on our Site or within any of our Apps, and other such information that relates to your access and use of the Service and/or any of our Apps. In certain cases, we associate this information with your specific user ID number for our internal use. We link this information to Personally Identifiable Information for these and other purposes, such as improving your experiences while using the Service or any of our Apps, and/or evaluating any future Apps and related services.

We do not use cookies or other tracking technologies to collect PII unrelated to your device. Most web browsers are initially set up to accept cookies. We hope that all of our Users are aware that they can adjust the settings of their particular web browser so that a warning is provided when attempts are made to place cookies on your computer or mobile device. You can reset your web browser to reject or decline all cookies or to indicate when a cookie is being sent to your computer or mobile device. These settings may also allow you to limit the type of cookies that you allow. Please also be aware that flash cookies operate differently than browser cookies. Therefore cookie management tools that are made available in a particular web browser might not remove flash cookies. In order to learn more about managing flash cookies, we recommend that you visit adobe.com and make the appropriate changes to your privacy settings. However, please be aware that if you disable cookies, certain features of the Service may not work, and you may lose access to certain features or functionality that are offered as part of the Service and/or that are offered in connection with playing any of our Apps. This is because Vegas Games' cookies are an important technology that allow us to monitor your activities when you elect to use the Service or any of our Apps, which information is, in turn, used by us to make improvements to the Service, to make updates and other modifications to our Apps, and to enhance your experience when using the Service and/or any of our Apps. Additionally, please take note that unaffiliated third parties that display or perform advertisements in or around our Apps, or on our Site, may also use cookies or other tracking technologies. Please note, however, that the policies and practices of such third parties are outside of the control of Vegas Games and are subject to the separate privacy policies of each third-party advertising company or other persons or entities that are not affiliated with Vegas Games.

Google Analytics

Vegas Games uses [Google Analytics](https://www.google.com/analytics/) to collect statistical information in connection with how the Site is used. This information is not personally identifiable.

If you wish to prevent your data from being used by Google Analytics, Google provides a Browser Add-on for all major browsers that allows you to opt-out of data collection by Google Analytics. The Add-on can be found [here](#). Alternatively, you can prevent the Site (vegasgames.com) from sending information to Google Analytics by disabling JavaScript in your browser for vegasgames.com (Google Analytics requires JavaScript to work).

Communications Features

You will be able to communicate or share information with not only Vegas Games and its affiliates, but also with other Users and with third-parties that are licensees, sponsors, advertising networks, or other business partners of Vegas Games. You may disclose information about yourself when contributing Content, playing any of our Apps, participating in chat rooms, writing on message boards, submitting or updating user profiles, or engaging in similar forums or other online activities that are part of the Service or any of the Apps. Any information that you choose to disclose in any of these forums is public information, and there is no expectation of privacy or confidentiality with respect to any and all such information.

The Service allows Users to interact with one another, and, consequently, your friends and contacts on a particular SNS may see, for example, your name, profile photo, App name, game-related activity, game-related profile, game-related stats, and even your SNS ID number. This information allows others to view public information associated with your SNS account or your account with Vegas Games or any of its affiliates. Other Users may send you "friend requests" or game requests by means of a particular SNS.

Please be aware that any PII that you submit while using the Service can be read, collected, and used by other Users, and may be used to send unsolicited messages to you and/or to your account. Vegas Games is not responsible, and shall have no obligation or liability, for any PII that you choose to submit in any such public forums. Please refer to our [Terms of Service](#) for further information regarding User-generated Content.

We reserve the right to record and store archives of these communications on servers that are owned or controlled by Vegas Games or any of its affiliates. To protect the safety and well-being of our Users, to preserve and maintain the security and integrity of the Service and our Apps, and to protect and enforce Vegas Games' rights and interests in and relating to the Site, the Service and the Apps, Vegas Games expressly reserves the right to record and store archival copies of any and all communications that are undertaken and/or otherwise occur on any and all servers that are owned or operated for the benefit of Vegas Games or any of its affiliates. You acknowledge and consent to the recording and storage of such communications for any such purposes. If you do not wish for Vegas Games or any of its affiliates to have access to any particular information, please do not submit or otherwise contribute it by means of our Site or the Service or any of our Apps. While we encourage all of our Users to avail themselves of our Service, the Site and our Apps to its/their full potential, we also want our Users to be aware of

their privacy rights and to take reasonable steps to safeguard their privacy rights by, for example, managing their activities and disclosures of PII in an appropriate and responsible manner.

Other Sources

Vegas Games and its affiliates also collect or receive information from other sources including (i) other Users who upload information regarding their email contacts or SNS contacts; and (ii) third-party information providers. Such information is used by Vegas Games and its affiliates to supplement your profile (e.g., to help you and your contacts connect with one another to jointly experience the Service or any of our Apps) and will be combined with other information that we collect to help us better understand your activities and experiences with the Service, the Site and our Apps, as well as those of other Users.

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5. How We Use Collected Information

In most cases we use the information that we collect in order to better understand our Users, to help us improve the Site and our Apps, along with the marketing and promotional materials regarding our Apps. In this way we can provide a safe, efficient, and customizable experience that will stay abreast of changing consumer demands that arise in connection with this rapidly evolving technological age. We use PII for internal purposes only, for example, providing Users with access to and use of the Service on various mobile and non-mobile devices, responding to specific requests, processing transactions, responding to your inquiries, providing notifications, soliciting feedback and input, improving our Apps, the Site and/or the Service, fulfilling your orders, notifying you of new products and services, and to otherwise communicate with you about the Service, the Site and our Apps.

We also use information that we collect to perform statistical analyses of our Users' preferences, and for troubleshooting issues and evaluating and improving our marketing and advertising activities, enforcing our Privacy Policy and Terms of Use, improving the Service, the Site and our Apps, developing future implementations of the Service, the Site and new versions of our Apps, and to protect the functioning, security and integrity of the Service, the Site and our Apps. We also combine non-personal information with PII in order to assist us in determining what kind of content materials and/or related services our Users would likely enjoy, to assist third-party sponsors and advertisers in targeting their communications regarding particular products or services, and to enable the Service and our Apps, and your activities and experiences in connection with the Service and our Apps, to be customized by interested Users.

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6. Sharing and Disclosing Information

We do not disclose PII to third parties without your consent (e.g., third-party direct marketing purposes) except as expressly set forth in this Privacy Policy. We may disclose to third parties certain Usage Data regarding the Service. However, in such cases, your particular Usage Data will be aggregated with the Usage Data of other Users and would not identify you individually.

Third-Party Providers

We may establish a business relationship with other persons or entities whom we believe are trustworthy and who have confirmed that their privacy practices are capable of maintaining the confidentiality, security, and integrity of information that is provided to them and who provide assurances that they will maintain the information in such a manner (collectively, "Third-Party Providers"). For example, we may contract with Third-Party Providers to undertake a particular service on our behalf (e.g., responding to requests, order fulfillment, payment processing, data analysis, e-mail services, hosting services, data storage, customer service, to provide marketing and promotional information, and to enhance your activities and experiences while accessing and using the Service, the Site and/or our Apps. If any Third-Party Provider needs to have access to any PII that you provide to us, we will provide the applicable Third-Party Provider with only the information that is needed to perform the corresponding services. Each Third-Party Provider must comply with our privacy policies and maintain the confidentiality of the information that we share with them by using reasonable security procedures and practices that are suitable according to the nature of the information involved, and that are capable of protecting your PII and maintaining the confidentiality, security and integrity of such information from unauthorized access, use or disclosure. Third-Party Providers are prohibited from using PII for any purpose other than providing their contracted service(s) on our behalf.

In some situations, we provide services in cooperation with another company or other such entity. In such cases it may be necessary to share your PII with such Third-Party Providers in order to facilitate the performance of the affected services. However, before we do so, we will identify the Third-Party Provider and request your permission to share your PII.

Friends and Other Vegas Games Users

The Service is designed, supports and encourages interaction among our Users and other individuals who access and use the Service, the Site and/or any of our Apps. For that reason, your SNS friends may be allowed to see your name, profile photo and your game-related activities. Within our Apps, your SNS friends and other Users are able to see your game profile, which may include your name or a "game name" (e.g., a made-up, anonymous account name) and your profile photo and related information, which in some cases may reveal your device ID, SNS User ID number or Vegas Games ID. For example, in Vegas Games' Texas Hold 'Em Poker App, any User may encounter your game profile if you are playing at the same table.

Access to a Vegas Games ID or your SNS User ID allows other Users to view the public information associated with your related SNS account or the account that you choose to establish with Vegas Games. Other Users may also be able to send you requests asking you to join in playing a particular App at a given time or may contact you with friend requests through the applicable SNS's communication channels.

Third-Party Advertisers

We care about our Users' privacy concerns and do not actively share PII with third-party advertisers, search providers or online advertising networks (collectively, "Third-Party Advertisers") for their direct marketing purposes, unless you provide us with your consent to disclose such information for such purposes. These companies collect and use information about your visits to the Site or your use of the Service and/or our Apps in order to provide you with advertisements regarding certain goods and services that may be of interest to you.

Advertisements may be shown on and within the Site, the Service and the Apps, and by means of third-party websites. Third-Party Advertisers collect information about your online activities through the use of cookies and other tracking technologies that are used in connection with the advertising and other content materials provided by such companies. Please be mindful that our Privacy Policy only covers the use of cookies and other such tracking technologies by Vegas Games and its affiliates (as distinguished from the activities undertaken by any Third-Party Advertisers). The information gathering practices of any and all such third parties are subject to their own policies, and we encourage our Users to read and become familiar with the applicable third-party privacy policies. You can visit the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#) web sites, which offer information about Internet advertising companies, as well as methods for opting-out of their information collection practices.

Please be aware that our collection, use and disclosure of anonymous, aggregated data and related information that does not personally identify any specific individuals are not subject to any of the restrictions described in this Privacy Policy.

Special Offers

Our Apps or their respective webpage(s) within the Site or the Service may display one or more special offers that are hosted by a third-party sponsor. Such special offers typically allow third-party sponsors (which may include Third-Party Advertisers) to provide virtual currency to our Users in exchange for such individuals completing a particular marketing offer.

Please be aware that any such special offers are not made or otherwise provided by Vegas Games. These offers will be displayed to you as the result of certain information being collected regarding you or your mobile or non-mobile device (e.g., anonymous demographic information, etc.). If a User chooses to click on one of these special offer advertisements, he or she will, in all likelihood, be directed to a site that is not owned or operated by Vegas Games or a partnering SNS. In order to properly credit the relevant User's account and to prevent fraud, a unique

identifier (e.g., an email address, account ID number, etc.) will be shared with the sponsor or other originator of a special offer advertisement.

Safety, Security and Compliance with Law

Vegas Games cooperates with government and law enforcement officials and private parties to enforce and comply with all applicable laws and regulations. You understand and agree that we may disclose to relevant governmental agencies and authorities PII that we have collected from and about you, and that your PII may be accessed and monitored in connection with the provision of the Service, the Site and/or the Apps. Such information will be disclosed to law enforcement or appropriate civil authorities if and as required by law, and to comply with legal processes. We will also disclose information if, in our sole discretion, we believe that such disclosure is necessary or appropriate in order to respond to legal requests, to avoid liability, to prevent potential or actual injury, loss or damage, to protect the rights and interests of Vegas Games or the safety of any third party, to prevent or stop any illegal, unethical or legally actionable activity, or to comply with any applicable laws or regulations. You acknowledge and agree that Vegas Games is not required to contest the validity or provide notice of any search warrant, subpoena or other governmental request of a similar nature.

Transfer of Information

We share Personal Information and Usage Data with business entities that are “affiliates” of Vegas Games (i.e., entities that control, are controlled by, or are under common control with the Company). You acknowledge and agree that we have the right to transfer your PII to a successor-in-interest or assignee should a transfer of ownership, merger, consolidation or other form of acquisition be made with another company, or the sale of all or a portion of our assets relating to the Service be undertaken, or some other form of business transfer occur. If Vegas Games is sold, merged, consolidated, or otherwise acquired, or in the event of a transfer of some or all of our assets, we may assign and transfer PII and Usage Data in connection with such transaction. In such an event, we will notify you when your PII is assigned and transferred and becomes subject to the privacy policy of our successor-in-interest or other such assignee. You will be provided with the opportunity to opt-out of any such assignment and transfer if, in our reasonable judgment, the new entity discloses to us its intentions to handle and process your PII in a way that differs materially from the provisions of our Privacy Policy.

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7. Our Policies Regarding Children

Neither the Site, the Service nor any of Vegas Games’ Apps, are intended for children under the age of 13. We do not knowingly collect any PII from such children. Children under the age of 13 should not access or use the Site or our Service or any of our casino games or other Apps at any time. If we learn that we have unintentionally collected any PII from a child under the age of 13,

we will take reasonable measures to rectify such situation, including the deletion of such information from our records.

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8. Accessing and Updating Your Information

You can access, correct or update your user account information, or may elect to terminate your user accounts, at any time by contacting us at support@vegasgames.com. Any such updates, corrections, changes and/or deletions will not have an effect on other information that we maintain, or the information provided to third parties in accordance with this Privacy Policy prior to the effective date of any such update, correction, change or deletion request.

You should be aware that it is not technically possible to remove each and every record of the information that you provide to us from our systems, specifically, or from the Internet, in general. We need to regularly back-up our networked computer systems in order to protect information from inadvertent loss, which means that copies of information that is collected from or about you, including Personal Information, may exist in a form that will be difficult or impossible for us to locate. However, once we receive your request, Personal Information stored in databases that we actively use will be updated, corrected, changed or deleted, as appropriate, as soon as reasonably practicable.

We reserve the right to retain the information in our files that we have obtained from and about you following the termination of your use of the Site, the Service and our Apps in order to resolve disputes, enforce our Privacy Policy or related Terms of Use, for technical purposes, to comply with legal requirements, and for the security, integrity and operability of the Service. If you choose to post or otherwise contribute any User-generated Content that is displayed on or in connection with the Service, the Site and/or any of our Apps, we may not be able to delete it. Please be advised, however, that you can adjust and manage certain aspects of the information that is collected by using the settings of your device (whether mobile or non-mobile) and/or the privacy management tools of an SNS that you elect to use to access the Service or any of our Apps.

Information We Receive From an SNS

Please be aware that you can manage the information that Vegas Games receives about you from an SNS that you use to access the Service and participate in any of our casino games or other Apps. Please follow the directions at the SNS's website regarding the management of your privacy settings and the updating or deletion of your information. To facilitate you becoming more familiar with the relevant privacy settings, the privacy management tools for Facebook can be found [here](#), while the privacy management tools for Google+ can be found [here](#). You may also manage certain aspects of the information collection and use practices by means of the

settings that are offered by your particular mobile or non-mobile device service provider and adjusting the permissions specified for each application.

In the event that Vegas Games receives information relating to you from an SNS, such information will be maintained, used and potentially shared by us in accordance with this Privacy Policy. You will also be offered the opportunity to update such information, and may request that we delete any particular information, in the manner referenced below. Please be aware that App accounts, or any other form of account, that you elect to establish with Vegas Games, are treated as active until we receive a User's request to delete or otherwise deactivate any particular account(s).

Additional Methods for Access and Control of your Information

- If you decide that you want to terminate an account that you established with Vegas Games and no longer want us to make active use of your information, please submit an email to terminate@vegasgames.com. The subject line should be titled "Delete My Account", and in the body of your email message, please provide your first and last name, and then-current email address. Please understand that, in light of the number of requests that we may receive from any and all interested Users during any given timeframe, it may take up to thirty (30) days to respond to email correspondence. As importantly, please be advised that it is necessary for us to retain some records, (e.g., those relating to payments, customer service matters, etc.) for legal and bookkeeping reasons. Additionally, if you have sent or posted any User-generated Content (e.g., chat, posts, forum comments, etc.) at any time or from time to time when you access and use the Service, the Site and/or any of our Apps, we may not be able to remove such materials from the Service.
- If you would like to review and/or desire to change any information that we have collected from or concerning you, please send an email to support@vegasgames.com.
- You can choose to modify or otherwise manage your email options and/or settings by visiting the "settings" menu within the applicable App.
- You can choose to turn off push notifications that are intended for a particular App by means of the "options" or "settings" menu within the applicable App. You can also turn off local notifications that are intended for a particular App by means of the "options" or "settings" menu within the applicable App.
- You can choose to discontinue the use of your geo-location (e.g. which would otherwise indicate your desire to "check-in" with regard to a particular App) in connection with any of our Apps through your device's settings for the relevant App or through the "settings"

page for the relevant App. Alternatively, you can always choose, at your discretion, to simply stop “checking in” with respect to any particular App.

- In the event that you should have any further questions regarding any aspect of our Privacy Policy, please feel free to contact us at legal@vegasgames.com.

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9. Options Regarding Sharing and Messaging

Please be aware that whenever you provide any information or other User-generated Content on a publicly available page or other public forum that is part of the Site, the Service, or any SNS or other Internet website(s), or by means of any of our Apps, such information and other content materials may be accessed, copied, collected, retained, shared, and otherwise exploited by other persons or entities. In addition, please remember that when you share information in your communications with any third parties, that information may be passed along or made public by such third parties and by others with whom such information or content materials are shared or otherwise distributed. This means that anyone with access to any such information or content materials, including any such information or content materials that you choose to submit, post, disclose, share, or otherwise provide in connection with the Site, the Service and/or any of our Apps, can potentially use it for any purpose, including, but not limited to, sending unsolicited communications.

Information We Receive from Third-Party SNS

If you access the Service and/or play any of our Apps through a third-party SNS, Vegas Games will be granted access and allowed to store information concerning you that is part of your account and/or profile with the relevant SNS. The form of information that will be shared with us depends, in part, on the scope of authorization that you grant us, as well as on the privacy settings that you choose to establish with the SNS that is used by you to access the Service and/or any of our Apps. Please be advised that we do not offer an "opt out" option with respect to the types of information shared with us by the SNS that you choose to use in order to access and use the Site, the Service and/or any of our Apps.

How to Opt Out of Promotional Communications

You can choose to opt-out of receiving any further promotional emails from Vegas Games by clicking on the "unsubscribe" link that appears at the bottom of any promotional email that you may receive from us or on our behalf. Please understand that, in light of the number of requests that we may receive from interested Users during any given timeframe, it may take up to ten (10) business days (after the date on which we receive any such request in writing) for your opt-out request to become effective.

How to Opt-Out of Other Vegas Games Communications

You can choose to opt-out of receiving SMS messages by replying to the number that was used to send you any SMS and texting “STOP”. For certain Apps, you may also be offered a preference management page, which may also be found under the "Help" menu of the App, and that offers Users the opportunity to use such SMS features and functionality. Please be advised that when we receive an opt-out message from you indicating that you no longer desire to receive SMS messages in connection with a particular App, we may send a message to you to confirm that we have received your opt-out request.

When you choose to install one of our Apps on your mobile or non-mobile device, you will be presented with an option as to whether you want (or do not want) to receive "push" notifications. By visiting the "options" or "settings" page, you will be able to turn off push notifications. You may also choose whether (or not) you would like to receive local notifications, and you can turn off local notifications by visiting the "options" or "settings" page within the affected App.

Please note that if you opt-out of our promotional messages or other communications, we may nevertheless email or otherwise communicate with you from time to time if you elect to establish an account that allows you to access and use the Site, the Service and/or any of our Apps. For example, if we need to provide you with any particular information, or in the event that we need to request any information from you regarding your activities or experiences when accessing and using the Site, the Service and/or any of our Apps), or regarding any transactions in which you choose to become involved, and/or for any other reason or purpose unrelated to direct marketing or commercial advertising.

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10. International Safe Harbors

Personal information collected on our website(s) will be stored and processed in the United States. By using our website(s) you consent to any such transfer of information outside of your country. Vegas Games complies with the U.S.-E.U. Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Vegas Games has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement. To learn more about the Safe Harbor program, and to view Vegas Games' certification, please visit <http://www.export.gov/safeharbor/>.

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11. Third-Party Privacy Policies

The Site, the Service, and our Apps, as well as any particular SNS that you choose to use to access the Service and/or any of our Apps, may include advertisements that link to websites that are not owned, operated or otherwise controlled by Vegas Games or any of its affiliates. Please be advised that Vegas Games and its affiliates are not and will not be deemed (for any intents or purposes) to be responsible for the privacy policies, terms of service (or terms of use), content standards, or for any other matter or dispute arising in connection with the activities or practices of any such third-party websites. If you have any questions concerning the policies, principals, procedures or standards of any third-party website regarding its collection, retention, use, and/or sharing of any information provided by or concerning you that may be collected by any such website(s), we encourage you to carefully read and evaluate the policies of the companies that own or operate any such third-party website(s), and we advise you to get in contact with them directly.

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12. Information Security

Vegas Games is committed to enhancing our Users' enjoyment of the Site, the Service, and our Apps and related Content, and we recognize the importance of protecting and safeguarding our Users' privacy and their PII. In order to protect the security and integrity of the information submitted by or about you, we have adopted security measures that we believe are reasonable and appropriate to secure your PII. We strive to enable the secure transmission of information concerning you (whether submitted by you or collected by us or in our behalf), and we employ industry-standard techniques that are designed and intended to protect your information from unauthorized access, use or disclosure. When you send sensitive information, we encrypt that information using secure socket layer technology ("SSL"). We also take steps to secure the PII that you choose to provide to us on servers that are located in controlled, secure environments that are protected from unauthorized access, use, alteration or disclosure. Only employees or contractors of Vegas Games or one or more of its affiliates, who have a bona fide need to have access to your information on behalf of Vegas Games or its affiliates or other business partners are provided with access to such information. In addition, any employee or contractor of Vegas Games or any of its affiliates or business partners who violates any of the material terms or conditions of this Privacy Policy is subject to disciplinary action, up to and including termination of his or her employment or contractor relationship.

However, notwithstanding our best intentions and commitments (as expressly set forth in this Privacy Policy) to guard your information and prevent unauthorized access, use, damage, loss, modification, alteration, misappropriation or disclosure by third parties, please be advised that there is always risk involved in transmitting information over the Internet and/or by means of

mobile devices (e.g., smartphones, tablet computers, personal digital assistants, or other handheld computing or communications devices). No method of transmission over the Internet is (or indeed is ever likely to be) completely secure, and there can be no guarantee that any information that is submitted by or collected about you is completely safe from any human or machine processing error, damage, loss, modification, alteration, misappropriation, or unauthorized use or disclosure. There is always a risk that others could find a way to bypass or otherwise defeat our security systems. As a result, despite our adopted security measures and practices for preventing possible breaches of our systems or records, we cannot provide any guarantee of absolute security, nor can we guarantee that we will never experience any act of unauthorized access, hacking, data loss, or other form of breach, or warrant the security and privacy of any information that you choose to transmit to Vegas Games or any of its affiliates via the Internet, and you do so at your sole risk and expense (e.g., fees for Internet services, etc.). We would like to encourage you, along with all other Users who access the Site or the Service, and who choose to use the Service and/or any of our Apps, to take precautionary measures to protect their PII (e.g., protect all account passwords, log out of an account when ending a session, etc.). The unauthorized use of any account that you elect to establish with Vegas Games or any of its affiliates may occur as a result of your SNS account being hacked or otherwise compromised, so please be careful to safeguard your account information for any SNS or third-party service provider that you elect to use in order to access and use the Service and/or any of our Apps. If you have questions regarding any of the security measures that we have adopted and implemented, please feel free to contact us at legal@vegsgames.com.

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13. Changes to This Privacy Policy

We may elect to change this Privacy Policy at any time and from time to time, and we hereby reserve the right to change this Privacy Policy, at our sole discretion, at any time or times and in any way that we may deem appropriate. If we decide to change this Privacy Policy, we will attempt to give you notice in advance by posting on the Site or within the Service or the affected App, or by sending a message informing you of the modified terms or conditions with a link to the updated Privacy Policy on the Site or within the Service or the affected App. However, we reserve the right to make changes immediately, as determined in our sole discretion. You agree to periodically check the Site, the Service and/or the particular App (or Apps) that you have elected to access and use, and to read and familiarize yourself with any additions, deletions or other modifications to this Privacy Policy. Any applicable changes will go into effect on the corresponding Revision Date displayed in the revised Privacy Policy. Your continued use of the Site, or the Service, and/or any of our Apps will be deemed to indicate and to have confirmed that you expressly agree and consent to our revised Privacy Policy. If you do not agree to this Privacy Policy or to any future changes to this Privacy Policy, you shall no longer be authorized

to use the Service and you must immediately discontinue accessing the Site and the Service, and cease making any further use of the Service or any of our Apps.

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14. California Privacy Rights

Under California law, residents of the State of California who have an established business relationship with Vegas Games may choose to opt-out of the disclosure of his or her PII to third parties for direct marketing purposes. However, as noted above, our policy is not to share a User's PII that is collected online or disclose such information to any third parties for direct marketing purposes without the User's consent. This can be done by "opting in" to receive such marketing or advertising information from a third party at the time that the User chooses to participate in a particular marketing event or promotional activity through Vegas Games in connection with the Site, the Service, and/or any of our Apps (e.g., a sweepstakes or contest, etc.). Furthermore, should a User ask us to share his or her information in connection with the direct marketing purposes of any third party (or third parties), we will endeavor to make sure that we only share such information in connection with the direct marketing purposes and related promotional activities approved by the relevant User, as we do not have a policy of sharing information with any third party (other than our service providers) on an ongoing and recurring basis. Please do not opt-in if you want to avoid the disclosure of your PII to a third party for its direct marketing efforts. As importantly, if you would like to opt-out of the disclosure of your PII to any third party for its direct marketing efforts at any time after initially giving your approval, please contact us at support@vegasgames.com.

Right to Access

Under the applicable laws and regulations of certain jurisdictions, some of our Users have the right to access and review the PII about them that has been collected online and that is retained in our server networks and computer databases. If you would like to exercise your right to access and review your information, so that you may subsequently correct or request the deletion of any of such information, please submit a request for access in writing to legal@vegasgames.com.

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15. Contact Us

Should you have any questions, comments or concerns, please feel free to send us an email message (and please describe the matter that you'd like to discuss in reasonable detail) to legal@vegasgames.com.

Vegas Games Inc.
850 Stanton Road
Burlingame, CA 94010

Vegas Games is a licensee of the ESRB's Privacy Certified Program. If you believe that we have not responded to your privacy-related inquiry or your inquiry has not been satisfactorily addressed, please contact the ESRB at http://www.esrb.org/privacy_wc_hotline.asp. Please note that the ESRB is not affiliated with Vegas Games and cannot help you with non-privacy-related issues.

ESRB
Attn.: Privacy Certified Program
420 Lexington Avenue, Suite 2024
New York, NY 10170
privacy@esrb.org

BY REGISTERING WITH VEGAS GAMES OR ANY OF ITS AFFILIATES, OR ACCESSING THE SITE OR THE SERVICE, AND/OR USING THE SERVICE OR ANY OF OUR APPS, WILL BE DEEMED TO INDICATE AND TO HAVE CONFIRMED THAT YOU EXPRESSLY AGREE AND CONSENT TO THIS PRIVACY POLICY FOR ALL INTENTS AND PURPOSES. YOUR ONGOING ACCESS OF THE SITE OR THE SERVICE, AND/OR YOUR CONTINUING USE OF THE SERVICE OR ANY OF OUR APPS, FOLLOWING THE POSTING OF ANY CHANGES TO THIS PRIVACY POLICY WILL SIGNIFY AND CONFIRM YOUR ACCEPTANCE OF ANY AND ALL SUCH CHANGES TO THIS PRIVACY POLICY THAT MAY BE ADOPTED BY US, AT OUR SOLE DISCRETION.

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