## **FULL HOUSE RESORTS, INC. PRIVACY POLICY**

## **Scope of Policy**

The privacy of our users is important to Full House Resorts, Inc. ("Full House") ("we," "us," or "our"). We know you care how information about you is used and shared, and we appreciate your trust that we will use such information about you carefully and sensibly. This Privacy Policy (the "Policy") describes the privacy practices with respect to the information collection, use, protection and sharing practices of Full House websites, and all of the products, services, electronic communications, mobile applications, and websites of the properties ("Resorts") and services owned or operated by us, our subsidiaries in the United States, unless otherwise indicated (collectively, "Website and Resort Services"). "Full House" may also refer hereinafter to Full House and its Resorts collectively.

### **Privacy Principles**

- 1. We make every effort to protect, as stated in our internal controls and standard operating procedures, all personal sensitive information about our casino patrons.
- 2. We conduct business using physical, electronic, and organizational controls to protect sensitive information.
- 3. We limit access to this information to only authorized employees and vendors and require that any vendor, organization, or individual that provides products and/or services on our behalf protects the confidentiality of this information.
- 4. The protection of sensitive information is exercised for former casino patrons, as well as existing casino patrons.

#### **Your Consent**

By accessing this website and/or utilizing our Resort Services, you are consenting to the collection, retention, use, processing and disclosure of your personal information and sensitive personal information as provided for in this Policy and to the extent permitted under applicable law. You further acknowledge that our Privacy Policy is part of our Websites' Terms of Use, which you also agree to be bound by its terms and conditions. If you do not agree with our Privacy Policy and our Terms of Use, please discontinue use of this Website and Resort Services.

Please note, to the extent our Resorts offer shops and services provided by third parties, this Policy does not apply to those third parties. Should you utilize those services by third parties, we encourage you to review their privacy policies and practices.

### **Categories of Personal Information Collected**

Generally, we do not collect information that personally identifies individuals except when individuals knowingly and voluntarily provide such information to us. Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Examples of means in which we collect data include (but are not limited to): when individuals

submit comments, questions or requests for information to us through the website, patron comment cards, promotional prize records, reservations, social media information, RSVPs, surveys, registration with our Resorts player reward clubs, applications for credit and information gathered for government required reporting.

**Personal Identifiers**: Personal information may include any information by which you can be personally identified such as your first name, last name, address, date of birth, gender identity, employment information, and unique personal identifiers such as your phone number, email address, social security number, date of birth, driver's license number, passport number, license plate number, patron account number, , gaming information and other related information.

**User Generated Content:** We may collect user-generated content that you provide us voluntarily, which includes messages and comments submitted to our Website and Resort Services.

**Biometric Information:** We may collect personally identifiable information about you that includes biometric data, such as digital photographs, video, and other biometric information (collectively, "Biometric Information"). Collection of Biometric Information may be through technological means including, but not limited to, identification document scanners and digital cameras. In such cases, we will only use these technologies as permitted by applicable law. Full House will not use Biometric Information for marketing purposes.

**Information from your browser or electronic devices:** The Resorts may collect information that is sent to us by your web browser or electronic device. This information may include your IP address, operating system, the name and version of browser, the date and time of your visit, and the webpages you visited and such information is dependent upon your browser or electronic device settings. The information we receive from web browsers and electronic devices may or may not be personally identifiable. However, we may combine it with other information in an attempt to identify you, or we may combine it with information that does identify you.

**Transaction Information**: The Resorts may collect transaction information such as bank information, credit card and account numbers, and reservation information.

**Player Information:** We may collect your player activity information, which includes system generated player identifiers.

**Commercial Information**: We may collect certain commercial information, which includes services and/or products considered, used, or purchased.

Cookies and Web Tracking: Like most companies, we use "cookies" and other internet technologies on our Websites. "Cookies" are computer files that are temporarily stored on the device you are using when you visit our Websites. We do not link information from cookies to personally identifiable information without your permission and do not use cookies to collect or store information about you. Cookies do not identify a person, but instead provide information such as how many users visited our Websites, the pages accessed, and technical problems. Some cookies are also used to ensure integrity when making purchases and are essential for the Websites to function properly. Other cookies simply enhance your user experience while visiting a Website. You can decline the use of cookie features on the Websites through your web

browser settings. However, please understand that doing so may limit certain features on our Websites. By using our Websites, you agree we can place cookies on your electronic devices unless you limit them using your browser settings.

Other types of third-party cookies are used in connection with marketing and advertising activities. These help us identify your preferences and your online experience to your specifications. You may also decline these types of cookies through your web browser settings.

We may use certain third-party cookies such as analytics and demographics to monitor web traffic and related trends regarding our Websites. This information does not identify the Website visitor, but only provides us statistical information so that we can continue to improve your Website and Resort Services experience. For example, we use Google Analytics, a web analytics tool that helps Full House understand how visitors engage with our Websites. To learn more about Google Analytics, visit <a href="https://marketingplatform.google.com/about">https://marketingplatform.google.com/about</a>. To learn more about how Google uses data collected through partner sites and applications, visit <a href="https://policies.google.com/technologies/partner-sites">https://policies.google.com/technologies/partner-sites</a>. For information on how to opt out of Google Analytics and certain ad functions, please see the section titled Right of Access, Correction, Deletion of Information and Request to Opt-Out below.

Your browser may have a "Do Not Track" or "DNT" signal. However, our systems do not have the necessary programming to honor these browser signals.

Further, we cannot guarantee that the current limitations of our online applications or programming will address every browser setting or honor every personal browser preference.

#### Other Sources of Information

While we may collect the above mentioned categories of personal information directly from you, we may also receive the same categories of personal information from other sources, including our affiliates, other users of the Website and Resort Services, advertising partners, data analytics providers, publicly available sources, social media, and other sources as permitted under applicable privacy laws.

#### Potential Employment with Full House and its Resorts

Our Resort Websites may contain a Careers section which posts career opportunities with Full House and/or its Resorts. If you would like to submit an application for employment with a specific Resort, you may do so on its website. When submitting an application, we will ask you to provide your name, email and postal address, phone number, employment history and/or educational background. We will use the information you submit in your application to evaluate your candidacy and to correspond with you regarding your application. We may share your application and other information about you with our affiliates and service providers. At our discretion, we may keep your application on file for a commercially reasonable period of time and also may contact you regarding other positions at our Resorts which we believe may be of interest to you. If you apply for employment with one of our Resorts, you agree to: (a) provide current, complete, true and accurate information; (b) maintain and update your information as required to keep it current, complete and accurate; and/or (c) provide additional information about yourself as may be requested by our Resort from time to time.

# Non-Personally Identifiable Information & Aggregated Information

This refers to information that does not identify a specific individual. Your non-personally identifiable information may be aggregated and used for our internal purposes, creating reports for third party advertisers and partners, or otherwise shared with third parties for any lawful purpose. As a guest, you may also participate in customer surveys; surveys are anonymous unless otherwise so stated. We reserve the right to perform statistical analysis in order to measure various interest and utilization of our Website and Resorts Services. We may provide aggregated data from these sources to third parties for further review and evaluation.

## **Sharing Your Information**

Within Full House: Consistent with applicable laws and requirements, the personal information you provide to us through this Website and Resort Services may be combined with other information we possess about you from other sources. To the extent you have not asked us to refrain from doing so, we may use that information for marketing and promotional purposes within our Resorts. This will allow us to inform you about special offers or promotions that might be of interest to you in relation to our Website and Resort Services. We use such information to respond to comments, questions and requests and to improve the content of our website, as well as activities and promotional offerings at our Resorts. We also gather information for the filing of IRS required W2Gs, Title 31 reporting, patron credit issued, other regulatory reporting required by gaming authorities, and our patron rewards programs.

With our Third-Party Business Partners: We may share some of your information with business partners and vendors that we utilize to assist us in providing Website and Resort Services. We do not, however, disclose your personal information to third parties for their direct marketing purposes. When we provide personal information to third-party business partners, they are required to exercise reasonable care in the protection of your personal information, and the use of your personal information is limited to the purposes for which it was provided to them. We do not rent or sell your information or otherwise share it with any non-affiliated third-party for their own use. However, if you do not want us to share your personal information with third parties for marketing purposes, you may opt-out by notifying us in accordance with the Right of Access, Correction, Deletion of Information and Request to Opt-Out Section in this Policy.

#### Links

Our Websites may contain links to third party websites. We do not endorse or make any representations or warranties with respect to the content or accuracy on these websites. We are not responsible for the privacy practices of other websites that we do not control or own. It is your responsibility as the website user to review the privacy policies of each website you visit through a link or advertisement.

### **Disclosure of Information**

Even if you choose to opt-out of sharing personal information with third parties for marketing purposes, there may be instances where Full House, in its sole discretion, may disclose your personal information to third parties. When we do, we limit the transfer to the information that is relevant under the circumstances and, to the extent possible, require the recipient to uphold an

equivalent level of protection for the data. Examples of situations where Full House may share your personal information include the following:

- Business transactions wherein we sell or otherwise transfer assets of our businesses and Resorts in which user and patron information is a transferred asset;
- Enrollment in any responsible gaming exclusion, Resort exclusion or other eviction or exclusion programs;
- Legal matters, including but not limited to complying with court orders, subpoenas and other legal processes; to protect and defend Full House and its Resorts in connection with legal matters, claims and disputes; to engage in debt collection process;
- Complying with government requests, including law enforcement, administrative and regulatory requirements;
- For security purposes and for the safety of our guests, employees, stakeholders, community and public;
- To third parties to process credit card transactions;
- To enforce this Policy and our Websites' Terms of Use;
- To prevent illegal activities, including but not limited to fraud;
- To prevent minors from unlawfully using our Resorts;
- To comply with contractual or auditing requirements;
- As part of our information systems' backups, as a precaution against system failures.

## Safeguarding Your Information

As part of our business practices and consistent with applicable laws, we have implemented commercially reasonable and appropriate policies and procedures to safeguard the confidentiality of your information relating to our Website and Resort Services. Despite our efforts, please note that we cannot guarantee that unauthorized access or theft of data will not occur. Please take appropriate steps to protect your computer, other electronic devices, login and password information from unauthorized access.

### **Minimum Age Requirements**

Pursuant to applicable law, individuals under the age of 21 are not permitted to participate in any gaming activities at our Resorts. If you are under the age of 21 and not seeking potential employment (for positions not requiring you to be the age of 21), do not use our Websites or applicable Resort Services. With the exception of users seeking employment at Full House or one of its Resorts in positions approved for individuals under the age of 21, our Websites are intended for use only by persons 21 years of age or older. We will not knowingly allow anyone

under the age of 21 to use or access our Websites, except for potential employment in applicable positions.

## Right of Access, Correction, Deletion of Information and Request to Opt-Out

Full House does not control how third parties use your information, but you can opt-out of certain third-party activities by visiting the following links below:

To opt-out of Google Analytics, visit HYPERLINK "https://tools/google/com/dlpage/gaoptout" <a href="https://tools/google/com/dlpage/gaoptout">https://tools/google/com/dlpage/gaoptout</a>
To opt-out of certain ad activity, visit <a href="https://youradchoices.com/control">https://youradchoices.com/control</a>

If you do not wish to receive periodic mailings, emails, or telephone contact regarding our Websites and Resort Services, you may opt-out of receiving such marketing and promotional communications by sending us a written request to the address or email address listed below.

You can ask to review, correct, update, or delete the information that we maintain about you, including your preferences, at any time by sending a written request to the postal or e-mail address set out below, or following the instructions in any promotional e-mail you receive from us. We may take a reasonable period of time to respond. If you request the deletion or change of information on our system, such information may be retained for a period in our backup systems as a precaution against systems failures. Some information may be retained for longer periods as required by applicable law, contract or auditing requirements.

To make a request, please write to:

Full House Resorts, Inc. Attn: Company Compliance Officer 1980 Festival Plaza Drive Suite 680 Las Vegas, Nevada 89135

Or email: <a href="mailto:fhri@fullhouseresorts.com">fhri@fullhouseresorts.com</a>

# **Retention of Personal Information**

Your personal information will be retained for so long as reasonably necessary to fulfill the purpose for which it was collected or a related and compatible purpose and to comply with applicable laws, regulations, contractual or auditing requirements. No mobile information will be shared with third parties for marketing or promotional purposes.

# **Changes to this Policy**

We encourage you to review this Policy periodically when you return to our Websites, as we may update it from time to time, consistent with changes to our operations, business practices, new requirements, risks and safeguards. The changes become effective upon posting and those that relate to the use of personal information apply to information collected after posting. We reserve the right to modify or amend this Policy at any time and for any reason.

### **NEVADA RESIDENTS**

Nevada state law provides Nevada residents the right to opt-out of the sale of their data. While we do not currently rent or sell personal information, or "covered information" as defined under Nevada law, to third parties, you can submit an opt-out request to prevent any future sales of your personal information in the event we begin selling data in the future. To submit a request to opt-out, please email us at <a href="mailto:fhri@fullhouseresorts.com">fhri@fullhouseresorts.com</a> Please note that we will need to verify your identity in order to process this request. When sending your request, please provide your complete legal name, street address, city, state, and zip code and any email addresses and phone numbers you wish to include in the opt-out request.

#### CALIFORNIA AND COLORADO CONSUMERS

# California Consumer Privacy Act ("CCPA")

If you are a California resident, you have certain rights with respect to the collection, use, transfer and processing of your "personal information" as defined by the California Consumer Privacy Act ("CCPA"). We reserve the right to limit these rights where permitted by law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others.

If you are a California resident, you have the right to:

- (A) Know what categories of personal information we have collected about you during the preceding 12 months, including the categories of sources from which the information was collected, the business or commercial purpose, and the categories of third parties with whom the information was shared;
- (B) Request to know what personal information we have collected, used disclosed and sold about you during the preceding 12 months;
- (C) Request that we delete your personal information; and
- (D) Opt-out of the sale of your personal information to third parties.

These are subject to some important exceptions, which are intended to protect the integrity and privacy of your personal information.

You have the right not to be discriminated against for exercising your rights. In the event you exercise any of your rights under the CCPA, we will not discriminate against you, including but not limited to: denying you goods or services, charging different prices for goods or services (or discount or benefit offerings), or provide a lower level of quality of goods or services.

You also have the right to designate an authorized agent to exercise your CCPA rights on your behalf.

**Shine the Light:** California residents who provide certain personal information in connection with using the Website and Resort Services can request and obtain from us once per calendar year information about their personal information we shared, if any, with other businesses for their own direct marketing purposes. This information would include the categories of customer information shared and the names and addresses of the businesses with which we share the information during the previous calendar year.

# Colorado Privacy Act ("CPA")

As a Colorado consumer, you have the following rights under the Colorado Privacy Act (CPA) regarding our use of your Personal Information:

- 1. **Right of access**. You have the right to confirm whether we are processing your personal information and to access your Personal Information.
- 2. **Right to correction**. You may request that we correct inaccuracies in your Personal Information that we maintain.
- 3. **Right to delete**. You may request that we delete any of your Personal Information we have collected or maintain.
- 4. **Right to data portability**. You may request to obtain your Personal Information in a portable, and to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance. However, you may not exercise this right more than twice per calendar year.
- 5. **Right to opt out**. Consumers have "the right to opt out of the processing of personal data concerning the consumer for purposes of:
  - targeted advertising;
  - the sale of personal data, or
  - profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer."
- 6. Right to Appeal. You also have the right to appeal our decision or inaction regarding your data subject requests. If you are a Colorado consumer and wish to request deletion of your Personal Information, please visit <a href="http://www.fullhouseresorts.com">http://www.fullhouseresorts.com</a> or call 1-800-327-3910 and indicate that you wish to delete your Personal Information and provide the identifying information requested.

Please note that in the preceding 12 months, we have not collected or sold any personal information about our Website users or patrons.

(A) **Information Collected:** When California and Colorado consumers access Full House Websites and Resort Services, we may collect the following personal information:

Categories of Personal Information (including Sensitive Personal Information):	Source of Personal Information:	Business or commercial purposes:	Categories of third parties with whom information was shared:
Personal Identifiers: (Name, alias, postal address, unique personal identifier, email address, account name, social security number, driver's license number, passport number)  Customer Records Information: (Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or State ID, education or employment information, bank account information, credit card number, other financial information)  Characteristics of protected classifications: age, race, gender  Audio, electronic, visual, or similar information	Directly from you or through our interactions with you.	Operate reward programs, provide services and products you request, access and improve our products and services, track your use of our Website and Resort Services, create and update customer profiles, notify you of promotions and offers, predict your future preferences, interests, gaming and spending activities, security and safety incident reports, protect and defend our rights and/or property, respond to inquiries, conduct background checks, assess candidates for potential employment, employment application data, process financial transactions, issue credit, ensure regulatory compliance with all applicable laws and regulations, to satisfy internal policies, procedures, and required filings and to fulfill contractual obligations.	Third party service providers, third party business partners, governmental entities.

Professional or employment-related information  Education information  Inferences drawn from Personal Information			
Commercial Information: records of personal property, products or services purchased, obtained or considered, consumer tendencies Inferences drawn from Personal Information	Directly from you or through our interactions with you.	To provide you with marketing promotions and offers relating to our Services, to communicate with you about your account and provide you targeted offers; to improve our overall service and products	Third party service providers, third party business partners
Biometric Information: hair color, eye color, fingerprints, height, voice or other biometric data Inferences drawn from Personal Information	Directly from you or through our interactions with you.	For security and safety, to protect and defend our rights and/or property, ensure regulatory compliance with all applicable laws and regulations, to satisfy internal policies, and procedures.	Third party service providers, governmental entities, and law enforcement (if necessary).
Internet or other electronic network activity information: Browser history, search history and information regarding a consumer's interaction with an Internet website application	We collect your internet or other electronic activity information from your interactions with our Websites and social media platforms.	To enforce this Policy and Terms of Use, applications and services; to provide you with marketing and promotional offerings, to optimize, develop and improve our sites and applications, to detect security incidences, to investigate or prevent activities that may	Third party service providers, third party business partners, digital advertising providers, government entities (if requested or required).

Inferences drawn from Personal Information	violate our policies, location information.	

## **B.** Request to Know About Your Personal Information:

You have the right to request that we disclose to you, for the 12-month period preceding the date we receive your request, the following: (1) the categories of personal information we have collected about you, (2) the categories of sources from which personal information was collected about you, (3) the business or commercial purpose for which your personal information was collected or sold, and (4) the categories of third parties to whom we have sold or disclosed your personal information, if any.

In addition, you have the right to request that we disclose to you the specific pieces of personal information we have about you. If you are a California or Colorado resident, and wish to request this information, please visit <a href="http://www.fullhouseresorts.com">http://www.fullhouseresorts.com</a> or call 1-800-327-3910 and indicate that you wish to request this information and provide the identifying information requested. All requests are subject to verification of your identity to protect the privacy and security of your personal information. We are required to fulfill these requests no more than twice within a 12-month period.

You may also make a request in writing to Full House at the following address:

Full House Resorts, Inc. Attn: Compliance Officer 1980 Festival Plaza Drive Suite 680 Las Vegas, NV 89135

### C. Request to Delete Your Personal Information

You have the right to request that we delete your Personal Information, subject to certain exceptions such as our need to comply with legal obligations, fulfill orders, complete transactions, etc. If you are a California or Colorado resident, and wish to request deletion of your Personal Information, please visit <a href="http://www.fullhouseresorts.com">http://www.fullhouseresorts.com</a> or call 1-800-327-3910 and indicate that you wish to delete your Personal Information and provide the identifying information requested. All deletion requests are subject to verification of your identity. If we verify your request, we will also instruct our service providers (if any) to delete your personal information from their records. All deletions are subject to applicable legal requirements and exceptions.

You may also making this request in writing to Full House at the following address:

Full House Resorts, Inc. Attn: Compliance Officer 1980 Festival Plaza Drive Suite 680 Las Vegas, NV 89135

# D. Requests to Opt-Out of Sale of Your Personal Information

You have the right to opt-out of having your Personal Information sold to third parties. Note that Full House does not sell any personal information of California or Colorado residents.

Universal Opt-Out Mechanism (California, Colorado, and Connecticut Residents): Please note that our systems are unable to receive and process Global Privacy Control (GPC) signals, which allow consumers the ability to send a request to opt-out of the processing of their personal information, for the purposes of sale or targeted advertising, across multiple websites at a time rather than having to make opt-out requests through individual websites. If you prefer not to receive targeted advertising, please follow the steps described in the section titled Right of Access, Correction, Deletion of Information and Request to Opt-Out above.

#### E. Verification Procedures

In order to verify requests made pursuant to the CCPA or CPA, we may require at least two (2) pieces of identifying information that match information maintained by us. In some cases, we may require additional identifying information and a signed declaration attesting to your identity. In situations where we receive a request from an authorized agent on your behalf as permitted under the CCPA, we may require written proof that the agent is, in fact, authorized to act on your behalf and we may take additional steps to verify your identity and the authorized agent's identity. In certain circumstances, we may decline a request to exercise your rights under the (B) Right to Know or (C) Right to Delete provisions described above if we are unable to verify your identity. If we are unable to comply with all or a portion of your request, we will provide you a written explanation as to why we cannot comply with the request.