

# Privacy Policy

**NOTICE: This Privacy Policy explains how your information may be collected, used, and/or shared when using or accessing this website and/or or any affiliated mobile sites, services, applications or platforms. Note that this Privacy Policy differs substantially from the policy governing other websites, mobile sites, services, applications or platforms operated by the Commonwealth of Pennsylvania. Please review this Privacy Policy carefully. If you are under the age of 18, please exit immediately and discontinue all use.**

**Revised November 14, 2018.**

The Pennsylvania Lottery (“PAL”) is dedicated to protecting your privacy and security when using or accessing palotteryinsiders.com (“Insiders website”) and/or any mobile sites, services, applications, or platforms (collectively, “Insiders mobile platforms”), which are linked to the Insiders website. This Privacy Policy explains how the PAL may collect, use, and/or share information gained when you use or access the Insiders website or Insiders mobile platform(s), as well as your choices relative to how such information is used.

For information on the terms and conditions governing your use of the Insiders website or Insiders mobile platform(s), please refer to the **Terms of Use**.

This Privacy Policy will address the following topics:

- **Information Collected by the PAL or Third-Party Contractors or Suppliers**
- **Use of Information by the PAL or Third-Party Contractors or Suppliers**
- **Sharing of Information by the PAL or Third-Party Contractors or Suppliers**
- **Access to Information and Choice**
- **Security**
- **External Linking**
- **Modifications or Revisions to Privacy Policy**
- **Contact Information**

## **Information Collected by the PAL or Third-Party Contractors or Suppliers**

There are two general types of information that will be collected through the use of the Insiders website and Insiders mobile platforms: (1) information collected automatically by using the Insiders website and Insiders mobile platforms; and (2) information that you as a member of the

Insiders website and Insiders mobile platforms voluntarily provide. Descriptions of each are provided below.

- **Information that is collected automatically:**

The PAL and/or its third-party contractors or suppliers may automatically collect the following information when you use or access the Insiders website or Insiders mobile platform(s):

- Your domain name; for example, "xcompany.com" if you use a private internet access account, or "yourschool.edu" if you are connecting from a university domain;
- Your IP address, a number automatically assigned to your device when you are using the internet;
- The type of browser and operating system used to access the Insiders website or Insiders mobile platform(s);
- The internet address of the website from which you linked directly to the Insiders website or Insiders mobile platform(s);
- The pages you visit within the Insiders website or Insiders mobile platform(s); and
- The links used to access other websites from the Insiders website or Insiders mobile platform(s).

Additionally, in order to administer the website services and to optimize the user experience for customers, the Insiders website and Insiders mobile platforms automatically employ the use of cookies. A "cookie" is a small piece of information that a website stores in a user's web browser. The website can then retrieve this information and recall the user's previous interactions with the website. Both "session" cookies, which expire once you close your web browser, and "persistent" cookies, which remain on your device, sometimes until you delete them, may be used. If you would prefer not to accept cookies, most browsers will allow you to block or delete cookies. Please note, however, that by disabling cookies, certain features of the Insiders website or Insiders mobile platform(s) may no longer work properly.

- **Information that is collected based on your voluntary provision of the same:**

The PAL and/or its third-party contractors or suppliers may also collect certain information that you voluntarily provide when you:

- Create or maintain a PA Lottery Insiders account on the Insiders website or Insiders mobile platform(s);

- Sign up for newsletters, notifications, or promotional material through the Insiders website or Insiders mobile platforms;
- Contact the PAL for any reason;
- Participate in PAL-sponsored programs, events, or services, including but not limited to customer rewards programs, lotteries, product clubs, subscription services, sweepstakes, surveys, or promotions;
- Connect with the Insiders website or Insiders mobile platform(s) through social media services; or
- Otherwise submit personal information.

The information collected by the PAL may include personally identifiable information, which generally refers to information that can be used to distinguish or trace an individual's identity, such as your name, year of birth and email address. The information collected may be in the form of text characters, videos, audio, photographs, data files, or may involve various other formats. Any information collected is retained only to the extent authorized by applicable laws, Commonwealth polices, and/or applicable standards or agreements governing the PAL's operations.

### **Use of Information**

Any information that is collected by the PAL or its third-party contractors or suppliers when you use or access the Insiders website or Insiders mobile platform(s) will generally be used as follows:

- **To send invitations to participate in research projects.** This includes, for example, sending invitations via email to members who meet certain demographic criteria like age, gender, and county of residence. You may opt out of the Insiders community by following the instructions contained in those messages.
- **To better understand customer preferences and enhance PAL-related products and services.** Non-personal information may be used by the PAL, or its third-party contractors or suppliers, for statistical analysis via standard third-party software. Such information may also be used, in the aggregate, to determine what types of information customers find most beneficial or interesting and to identify system performance or problem areas.
- **To make marketing decisions.** The PAL, along with its third-party contractors or suppliers, may use your information to establish marketing priorities and plans to make decisions regarding the marketing of PAL products.

- **To satisfy other operational needs.** The PAL, or its third-party contractors or suppliers, may also use any information that is collected to satisfy other operational needs of the PAL. Any personal information that is collected by the PAL or any third-party contractors or suppliers will not be used, under any circumstances, to satisfy the operational needs of any private business or interest, including those of a third-party contractor or supplier, beyond the scope of a specific contract or service being provided to the PAL.

## **Sharing of Information**

Any information collected by the PAL or its third-party contractors or suppliers when you use or access the Insiders website or Insiders mobile platform(s) will not be shared or disclosed with anyone, except as specifically set forth herein.

Please note that pursuant to applicable law, the PAL is strictly prohibited from selling addresses, and/or any other information that would identify individual members.

The Pennsylvania Lottery is subject to the terms of Pennsylvania's Right-to-Know-Law, 65 P.A. §§ 67.101, et al. Users of the website should be aware that information collected by the PAL may be subject to public disclosure if such information is a public record, or may be subject to other examination and inspection if the information is not otherwise protected.

The PAL may share non-personal information, such as aggregate usage data, with third-party contractors or suppliers to improve the Insiders website or Insiders mobile platform(s). Third-party contractors or suppliers may use the non-personal information to improve their own services, consistent with their own privacy policies.

With the exception of the information you choose to share yourself through the use of the Insiders website, Insiders mobile platform or Insiders community opportunities, the PAL will only share personally identifiable information under the following circumstances:

- **To enable a third-party contractor or supplier to perform contracted services.** The PAL may contract with third-party contractors or suppliers to perform various services related to the operation of the Insiders website or Insiders mobile platform(s), including but not limited to hosting or operating services, assisting with advertising, analyzing data, and providing platform maximization. The PAL is not responsible for the privacy practices of its third-party contractors or suppliers, although all vendors are contractually bound to ensure the privacy of any personally identifiable information received.

- **To satisfy legal obligations.** The PAL may share or disclose certain personally identifiable information in instances where it is legally obligated to do so, such as if the information is requested pursuant to a valid subpoena or court order, or if the information is requested by law enforcement or other governmental authorities for purposes of enforcing a violation of law.

## **Access to Information and Choice**

Any information that you enter or provide when creating a member account through the Insiders website or Insiders mobile platform(s) will be open and accessible to you for review and modification at any time simply by logging into your customer account. You are free to choose to discontinue your use of the Insiders website or Insiders mobile platform(s) at any time.

Additionally, certain settings are available within your account settings to limit the information visible to other users Insiders website, Insiders mobile platform and the Insiders community. It is your responsibility to ensure that you select the account settings which best address your privacy concerns.

Please note that it may not always be possible to completely remove or delete all of your information from the PAL's databases without some residual data remaining in back-up storage. The PAL may also retain and use your information as needed to comply with legal obligations, to resolve disputes, or to enforce agreements and policies.

Please note that the PAL does not control the privacy settings and preferences maintained by social media platforms such as Facebook, Twitter, Pinterest, and YouTube. If you wish to make changes to those accounts, you may do so by visiting the settings pages of those sites.

## **Security**

As part of the PAL's continuing commitment to the security of electronic content as well as the electronic transmission of information, it has a variety of physical, electronic, and administrative procedures in place to protect your personally identifiable information across the Insiders website or Insiders mobile platform(s). This includes using Transport Layer Security (TLS) to encrypt your information as it is transmitted between servers and your browser.

The PAL and its third-party contractors and suppliers generally adhere to many of the detailed technology and security policies set by the Commonwealth of Pennsylvania's Office of Administration (OA), which can be viewed at OA's Office for Information Technology website at <http://www.oa.pa.gov/Policies/Pages/itp.aspx>, with some exceptions.

Nonetheless, no security system is perfect or impenetrable. While the PAL will continue to maintain and improve the above measures to safeguard your information, it cannot guarantee that your information will not be accessed through the unauthorized acts of others.

You are responsible for protecting the username and password associated with your Insiders account. You should not divulge your username or password to anyone; the PAL will never ask you for your password in an unsolicited phone call or email. It is further recommended that you log out (where applicable) and close the web browser when you have finished using or accessing the Insiders website or Insiders mobile platform(s).

When contacting the PAL through any method of communication (phone call, email, text or SMS message, web form, etc.), you must determine whether the method of communication is adequately secure for your purposes prior to providing any confidential or personally identifiable information. Any information sent by you to the PAL is sent at your own risk; the PAL cannot guarantee that the information you supply will not be intercepted while being transmitted to the PAL.

### **External Linking**

The Insiders website and/or Insider's mobile platforms may link or interact with third-party websites, content, or services that are not owned, controlled, or operated by the PAL, including but not limited to social media websites or platforms. The PAL does not endorse any specific third-party websites, content, or services, and the PAL is not liable for any harm or damages related to your use of the same. Please review the privacy policies applicable to any third-party websites, content, or services carefully prior to using the same. Questions or complaints regarding third-party websites, content, or services should be directed to the applicable third-party.

### **Modifications or Revisions to Privacy Policy**

The PAL reserves the right to modify or revise this Privacy Policy at any time. Any modifications or revisions that are made to this Privacy Policy will become effective upon being posted to the Insiders website or Insiders mobile platform(s). You are responsible for reading and understanding the Privacy Policy that is posted and in effect each time you use or access the Insiders website or Insiders mobile platform(s). Your use of the Insiders website or Insiders mobile platform(s) constitutes your acknowledgement of and consent to the posted Privacy Policy. Therefore, you are encouraged to review the Privacy Policy regularly. The PAL, in its discretion, may also provide additional notices regarding changes to the Privacy Policy.

### **Contact Information**

If you have any questions or comments about the information presented in this Privacy Policy, you can contact the PAL as follows:

By Email: [RA-RVLOT-PA-INSIDERS@pa.gov](mailto:RA-RVLOT-PA-INSIDERS@pa.gov)

By Mail: 1200 Fulling Mill Rd, Suite 1, Middletown, PA 17057