

# **Golden Ticket Online Arcade Privacy Policy**

Last Updated: November 2025

Golden Ticket Online Arcade ("we," "us," "our," "Company") is committed to protecting your privacy and maintaining transparency in how we handle your personal information. This Privacy Policy explains how we collect, use, store, share, and protect information when you use our online arcade platform ("Platform").

We are committed to complying with all applicable United States data privacy laws, including but not limited to the California Consumer Privacy Act (including the California Privacy Rights Act), the Colorado Privacy Act, the Connecticut Data Privacy Act, the Delaware Personal Data Privacy Act, the Iowa Consumer Data Protection Act, the Florida Digital Bill of Rights, the Maryland Online Data Privacy Act, the Minnesota Consumer Data Privacy Act, the Nebraska Data Privacy Act, the New Hampshire Privacy Act, the New Jersey Data Protection Act, the Oregon Consumer Privacy Act, the Tennessee Information Protection Act, the Texas Data Privacy and Security Act, the Utah Consumer Privacy Act, and the Virginia Consumer Data Protection Act.

#### 1. Definitions

Aggregate Information means information about groups or categories of users that does not identify and cannot reasonably be used to identify an individual user.

Anonymous Information means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual. When anonymous information is directly or indirectly associated with Personal Information, the resulting information is treated as Personal Information.

Artificial Intelligence (AI) refers to systems and intelligence tools (including machine learning or otherwise automated tools) that can learn from data and experiences and can help computers complete tasks that normally require human intelligence.

Behavioral Advertising means advertisements that may be sent to you based on your data through the use of technologies such as cookies to gather information about your activities on our Platform and other websites.

Personal Information means any information about you, whether true or not, that can reasonably be used to identify you or otherwise make you identifiable.

Platform means the Golden Ticket Online Arcade website, mobile applications, and any subdomains, subpages, successor sites, or applications accessible via our services.

#### 2. Data Controller

The business responsible for managing data collected through your use of the Platform is Golden Ticket Online Arcade, located at 2186 Jackson Keller Rd Suite 2269, San Antonio, TX 78213.



#### 3. Information We Collect

We collect three types of information:

- Personal Information
- Anonymous Information
- Aggregate Information

#### 3.1 Information You Provide to Us

Account Information: Name, email address, username, date of birth, phone number, mailing address, and password.

**Identity Verification Information:** Government-issued identification documents, proof of address, and biometric data (such as facial recognition data) for age verification and anti-fraud compliance purposes.

**Payment & Transaction Information:** Billing details, payment method information, transaction history, and redemption information. We do not store complete credit card numbers. Gold Coins are for gameplay only and have no cash value. Sweeps Coins, which may be earned through gameplay, promotions, or Alternative Methods of Entry (AMOE), may be redeemed for rewards subject to applicable rules.

Communication Information: Messages, emails, customer support inquiries, survey responses, and any other communications with us.

Sensitive Information: Government-issued identity numbers (including driver's license, passport, and social security numbers), biometric data including facial image data, keystroke data to verify human participation and prevent fraud, and financial information for compliance purposes.

### 3.2 Information We Collect Automatically

Device & Usage Data: IP addresses, device identifiers, browser type, operating system, mobile device information, login timestamps, pages visited, time spent on pages, and referral sources.

Gameplay Activity: Games played, session duration, transaction history, gameplay patterns, preferences, and interaction data.

Location Information: General location information derived from IP address and, with your explicit consent, precise geolocation information through GPS coordinates, Wi-Fi networks, and device signals where permitted by law.

Cookies & Tracking Technologies: Information collected through cookies, pixel tags, web beacons, and similar tracking technologies.

#### 3.3 Information from Third Parties

Third-Party Games & Services: Data shared by game providers, payment processors, and other service providers. When you play third-party games through our Platform, those providers may collect usage or device data directly. We encourage you to review their privacy policies, as their practices are independent of GTOA.



Social Media & Referrals: Information from social media platforms and referral programs.

Verification Services: Information from identity verification and fraud prevention services.

#### 4. How We Collect Your Information

## 4.1 Information You Provide Directly

We collect information when you register for an account, make transactions, contact customer support, participate in surveys, enter promotions, or communicate with us through any channel.

#### **4.2 Automatic Collection**

We collect information automatically through cookies, analytics tools, and other tracking technologies when you use our Platform.

## **4.3 Third-Party Sources**

We may receive information from trusted sources to update or supplement information you've provided, including for verification and validation purposes.

# 5. Personal Information Collected via Technology

# **5.1 Tracking Technologies**

We and our service providers use industry-standard identifiers including:

**Cookies:** Small text files that store preferences and enable enhanced functionality. You can manage cookie preferences through your browser settings or our cookie preference center.

**Pixel Tags/Web Beacons:** Code embedded on our Platform that collects engagement information.

**Mobile Device Identifiers:** Advertising identifiers and device information for mobile users.

**APIs:** Application programming interfaces that facilitate communication between different software systems.

### **5.2** Analytics and Performance

We use analytics tools to understand Platform usage, measure performance, and improve user experience.

#### 6. How We Use Your Information

We use collected information for the following purposes:

### **6.1 Platform Operations**

- Providing and managing Platform services
- Processing transactions and redemptions



- Customer support and communication
- Account management and security

## 6.2 Legal and Regulatory Compliance

- Age verification and identity confirmation
- Anti-money laundering (AML) compliance
- Fraud prevention and detection
- Compliance with applicable laws and regulations

# **6.3 Security and Safety**

- Monitoring for suspicious activities
- Preventing unauthorized access
- Protecting user accounts and Platform integrity

# **6.4 Marketing and Communications**

- Sending promotional content and updates (with opt-out options)
- Personalizing content and recommendations
- Conducting market research and analytics

### **6.5 Platform Improvement**

- Analyzing usage patterns and trends
- Enhancing features and functionality
- Developing new services

#### 6.6 Automated Decision Making and Profiling

We may use automated systems for fraud prevention, eligibility verification, and content personalization. Where these processes significantly affect your access to services, we apply human review and provide options for challenge.

# 6.7 Artificial Intelligence and Machine Learning

We may use AI technologies to enhance user experience through personalized recommendations, customer support optimization, fraud prevention, and Platform performance improvements.

#### 7. How We Share Your Information

We do not sell or rent your Personal Information.



We may share your information in the following limited circumstances:

#### 7.1 Service Providers

- Trusted third-party vendors who process data on our behalf for:
- Payment processing and verification
- Identity verification and fraud prevention
- Customer support services
- Marketing and analytics
- Technical infrastructure and security

## 7.2 Legal Requirements

When required by law, regulation, legal process, or to:

- Respond to government requests
- Enforce our Terms of Service
- Protect rights, property, and safety
- Prevent fraud or illegal activities

We may also share Personal Information with auditors, legal advisors, or regulators to ensure compliance with sweepstakes and promotional gaming laws.

### 7.3 Business Transfers

In connection with mergers, acquisitions, or asset sales, with appropriate safeguards for your information.

## 7.4 Consent-Based Sharing

When you explicitly consent to sharing for specific purposes, such as promotional partnerships or social features

### 7.5 Behavioral Advertising

We may share certain identifiers and usage data with advertising partners for targeted advertising purposes. You can opt out of such sharing through our preference center or device settings.

### 8. Your Privacy Rights

#### 8.1 General Rights

You have the following rights regarding your Personal Information:



**Right to Access:** Request access to your Personal Information and information about our processing activities.

Right to Rectification: Request correction of inaccurate or incomplete Personal Information.

**Right to Deletion:** Request deletion of your Personal Information, subject to certain exceptions.

**Right to Data Portability:** Request your Personal Information in a portable format.

Right to Object: Object to certain types of processing, including direct marketing.

**Right to Restrict Processing:** Request limitation of processing under certain circumstances.

Right to Opt-Out of Sharing: Opt out of sharing Personal Information for Behavioral Advertising.

# 8.2 State-Specific Rights

SECTION 8.2 (State-Specific Rights)

California Residents have additional rights under the CCPA, including:

• Right to know categories and specific pieces of Personal Information collected

# **8.3 Exercising Your Rights**

To exercise your rights, contact us at privacy@gtoarcade.com or complete our Privacy Request Form. We will verify your identity before processing requests and respond within the timeframe required by applicable law.

# 9. Data Security and Protection

We implement comprehensive security measures including:

- Industry-standard encryption for data transmission and storage
- Secure third-party payment processors
- Multi-factor authentication options
- Regular security assessments and updates
- Employee training on data protection
- Incident response procedures

If we experience a data breach that may affect your Personal Information, we will notify you as required by applicable law.

#### 10. Data Retention

We retain Personal Information for as long as necessary to:



- Fulfill the purposes outlined in this Privacy Policy
- Comply with legal, regulatory, and business requirements
- Resolve disputes and enforce agreements
- Maintain Platform security and integrity

We will securely delete or anonymize Personal Information when no longer needed, except where retention is required by law.

Account information is retained for the duration of your account relationship plus seven (7) years following account closure. Transaction records are retained for seven (7) years to comply with financial reporting and anti-money laundering requirements. Identity verification records are retained as required by applicable law.

### 11. Third-Party Services

#### 11.1 Payment Processors

We use secure third-party payment processors for all financial transactions. These providers have their own privacy policies and security measures.

#### 11.2 Game Providers

Some games on our Platform are provided by third-party developers who may collect additional information. Please review their privacy policies.

### 11.3 Analytics and Advertising

We work with third-party analytics and advertising partners. You can opt out of certain data collection through:

- Browser settings and ad blockers
- Industry opt-out tools (NAI, DAA)
- Platform preference settings
- Device-level advertising controls

#### 11.4 Social Media Integration

If you connect social media accounts, those platforms may share information according to their privacy policies and your privacy settings.

#### 12. Children's Privacy

Our Platform is intended for individuals 21 years of age or older. We do not knowingly collect Personal Information from individuals under 21. If we discover that we have collected information from an individual under 21, we will promptly delete it.



#### 13. International Data Transfers

We may transfer Personal Information to countries outside your residence for processing and storage. We ensure appropriate safeguards are in place for international transfers, including standard contractual clauses and adequacy decisions where applicable.

## 14. International Players / Restricted Jurisdictions

Our Platform is not available in certain jurisdictions where sweepstakes operations are restricted. We may block or restrict access based on geolocation information.

## 15. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices, technology, or legal requirements. Material changes will be communicated through:

- Email notification to registered users
- Prominent notice on our Platform
- Updated "Last Modified" date

Continued use of our Platform after changes constitutes acceptance of the updated Privacy Policy.

### 16. Contact Information

**Privacy Inquiries** 

Email: privacy@gtoarcade.com

Privacy Request Form: [Available on our website]

General Contact

Email: support@gtoarcade.com

Address: 2186 Jackson Keller Rd Suite 2269, San Antonio, TX 78213

**Data Protection Officer** 

For complex privacy matters or complaints, you may contact our Data Protection Officer at <a href="mailto:dpo@gtoarcade.com">dpo@gtoarcade.com</a>.

This Privacy Policy was last updated on September 13, 2025, and supersedes all previous versions.