

GOLDEN TICKET ONLINE ARCADE

PAYOUT PORTAL PRIVACY POLICY

How Information Is Collected and Protected in Reward Redemption

Golden Ticket Online Arcade gtoarcade.com

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NO PURCHASE NECESSARY. 21+. ELIGIBILITY RESTRICTIONS APPLY. VOID WHERE PROHIBITED OR RESTRICTED BY LAW.

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1. ABOUT THIS POLICY

1.1 Scope

This Payout Portal Privacy Policy (this "Portal Policy") describes how Golden Ticket Online Arcade ("GTOA," "we," "us," or "our") handles information provided through the GTOA Payout Portal (the "Portal").

The Portal is a separate, secured environment in which an eligible Participant registers a redemption method, provides the identity and payment information required to verify a redemption, and submits a redemption request. Participants reach the Portal through a link from the Platform. The Portal operates on infrastructure provided and secured by our payment service provider.

1.2 Relationship to Our Other Policies

This Portal Policy supplements and should be read together with GTOA's Privacy Policy, Terms and Conditions, Official Sweepstakes Rules, and Age & Eligibility Policy. Capitalized terms not defined in this Portal Policy have the meanings given to them in the Terms and Conditions or the Official Sweepstakes Rules.

Where this Portal Policy conflicts with GTOA's Privacy Policy with respect to information collected through the Portal, this Portal Policy controls as to that information. GTOA's Privacy Policy continues to govern information collected through the Platform. The Official Sweepstakes Rules control with respect to redemption eligibility, verification requirements, and reward determination.

1.3 Who May Use the Portal

The Portal is available only to Eligible Participants who are at least twenty-one (21) years of age and who satisfy the eligibility requirements set out in the Official Sweepstakes Rules. The Portal is not directed to any person under twenty-one (21) years of age.

2. WHO HANDLES YOUR INFORMATION

2.1 Payment Credentials

Financial account credentials — including bank account numbers, routing numbers, and debit or credit card numbers — are collected directly by our payment service provider through their secured systems and are transmitted over an encrypted connection.

GTOA does not receive, view, or store full financial account numbers. For each registered

redemption method, GTOA receives only a secure token, the payment method type, and the final four digits, which allow us to identify the method without holding the underlying credentials.

2.2 Identity Documentation

Identity documentation submitted through the Portal, including images of government-issued identification, is received and stored by GTOA. GTOA retains this documentation to verify Participant identity and eligibility, to satisfy anti-money-laundering and fraud-prevention obligations, to evidence that verification was properly performed, and to establish or defend legal claims.

Identity verification partners engaged by GTOA may process this documentation to confirm age, identity, address, and location, and to perform sanctions and watchlist screening. These partners act solely on GTOA's instructions and are contractually prohibited from using the information for any purpose of their own.

2.3 No Biometric Collection

The Portal does not collect biometric identifiers or biometric information. GTOA does not use facial recognition, facial geometry scanning, selfie capture, liveness detection, fingerprint scanning, or voiceprint analysis in the Portal, and does not derive biometric identifiers from any identification document submitted.

2.4 GTOA's Role

For information collected through the Portal and used to administer redemption, GTOA is the business and controller responsible for that information. Our payment service provider and verification partners act as service providers and processors on GTOA's behalf, under written agreements restricting their use of the information to the services they provide to GTOA.

3. INFORMATION COLLECTED

3.1 Identity and Eligibility Information

- Full legal name as shown on government-issued identification
- Date of birth
- Residential address
- Email address and telephone number

- Government-issued identification, including the document number, expiration date, and images of the document
- Taxpayer identification number or Social Security number, where required for tax reporting
- State and country of residence, and physical location at the time a request is made

3.2 Payment and Redemption Information

- Redemption method type and the method selected for a request
- A secure token representing the registered payment method, and its final four digits
- Redemption request amounts, dates, and status
- Records of completed, rejected, pending, or reversed redemptions

3.3 Verification and Compliance Information

- Results of identity, age, address, document, and location verification checks
- Sanctions and watchlist screening results
- Fraud and risk indicators generated by GTOA systems or those of our verification partners
- Records of any account review, restriction, or determination affecting redemption eligibility

3.4 Technical Information

- IP address and derived approximate location
- Device type, operating system, and browser
- Session identifiers, access timestamps, and system logs
- Information necessary to detect automated access, account sharing, or the use of location-masking technology

3.5 Communications

- Correspondence with Customer Support, verification, appeals, or legal personnel relating to a redemption
- Documents submitted in support of a verification request or an appeal

3.6 Sensitive Personal Information

Certain information collected through the Portal is treated as sensitive personal information or sensitive data under applicable state privacy law, including government identification numbers and document images, taxpayer identification numbers, financial account information, and precise geolocation where collected.

GTOA uses and discloses sensitive personal information only for the purposes described in Section 4 — verifying identity and eligibility, processing redemptions, preventing fraud and securing the Platform, and complying with legal obligations. GTOA does not use sensitive personal information to infer characteristics about any Participant, and does not use or disclose it for any purpose that would require an opportunity to limit that use under applicable law.

4. WHY INFORMATION IS COLLECTED

Information collected through the Portal is used only for the following purposes:

Verifying eligibility. Confirming that a Participant is at least twenty-one (21) years of age, resides in and is physically located in a Permitted Territory, is the owner of the Customer Account, and is the owner of the redemption method submitted.

Processing redemptions. Evaluating, approving, rejecting, paying, and reconciling redemption requests.

Preventing fraud and money laundering. Detecting duplicate or unauthorized accounts, account compromise, payment fraud, promotional abuse, prohibited automation, attempts to circumvent jurisdictional or eligibility controls, and transaction patterns associated with money laundering or other unlawful activity.

Meeting legal and tax obligations. Information reporting and withholding where required by law, sanctions screening, responding to lawful requests from governmental authorities, unclaimed property compliance, and records retention required by applicable law.

Administering disputes. Handling complaints, appeals, chargebacks, payment disputes, and any proceeding arising from a redemption.

Operating the Portal. Maintaining security, diagnosing technical issues, and preserving the reliability and integrity of the redemption process.

Information collected through the Portal is not used for advertising, marketing, promotional targeting, or profiling, and is not used for any purpose unrelated to redemption administration, platform integrity, and legal compliance.

5. WE DO NOT SELL YOUR INFORMATION

GTOA does not sell personal information collected through the Portal.

GTOA does not share personal information for cross-context behavioral advertising.

GTOA does not disclose Portal information to advertisers, data brokers, marketing networks, or any third party for that party's own purposes.

GTOA does not use Portal information to build advertising or marketing profiles, and does not license, rent, trade, or otherwise make Portal information available for commercial use by others.

Identity documentation submitted through the Portal is never disclosed for any commercial purpose and is used only for verification, compliance, and the purposes stated in Section 4.

Where any GTOA activity would constitute a sale or sharing of personal information under applicable law, GTOA provides the opt-out method described in our Privacy Policy and honors opt-out preference signals, including the Global Privacy Control, where GTOA is able to receive and process them.

6. LIMITED DISCLOSURES REQUIRED TO OPERATE AND COMPLY

A redemption cannot be verified or paid without involving the parties identified below. These are the only circumstances in which Portal information leaves GTOA, and in each case the information disclosed is limited to what is necessary for the stated purpose.

Our payment service provider, to register a redemption method and to process and settle a redemption request.

Identity verification partners, to confirm age, identity, address, and location, and to perform sanctions and watchlist screening. These partners process information solely on GTOA's instructions.

Tax authorities and governmental bodies, where required by applicable law, including information returns and withholding.

Law enforcement, regulators, and courts, in response to a subpoena, court order, or other lawful request, or where GTOA reasonably believes disclosure is necessary to prevent fraud or harm, or to establish, exercise, or defend legal claims.

Professional advisors, including attorneys, auditors, and accountants, under obligations of confidentiality.

A successor entity, in connection with a merger, acquisition, financing, reorganization, or sale of assets, subject to this Portal Policy continuing to apply to the transferred information.

Every service provider engaged by GTOA is bound by a written agreement requiring it to protect the information it processes, to use that information only for the services it provides to GTOA, and to refrain from selling it or using it for its own purposes.

7. HOW LONG INFORMATION IS KEPT

GTOA retains Portal information for as long as necessary to fulfill the purposes described in Section 4, and thereafter only as required or permitted by applicable law.

Redemption and transaction records are retained for the period required by applicable tax, financial recordkeeping, and unclaimed property law.

Identity documentation, including government-issued identification images, is retained for the duration of the Customer Account and for the period thereafter reasonably necessary to satisfy anti-money-laundering and fraud-prevention obligations, to evidence that verification was properly performed, and to establish or defend legal claims. When that period ends, the documentation is securely deleted or destroyed.

Verification records other than document images are retained for the duration of the Customer Account and for the period thereafter reasonably necessary to support eligibility determinations and prevent fraud.

Access and security logs are retained for the period reasonably necessary for security monitoring and incident investigation.

Communications and appeal records are retained for the duration of the matter and the applicable limitations period.

Where information is subject to a legal hold arising from an actual or anticipated dispute, investigation, or proceeding, it is retained until the hold is released, regardless of the periods above.

When a retention period ends, information is deleted, securely destroyed, or de-identified so that it can no longer reasonably be associated with a Participant.

8. HOW INFORMATION IS PROTECTED

The Portal operates on infrastructure provided and secured by our payment service provider. Financial account credentials are transmitted directly to that provider over an encrypted connection and are not held by GTOA.

GTOA maintains administrative, technical, and physical safeguards designed to protect Portal information, including encryption of information in transit, restricted storage of identity documentation, access controls limiting internal access to personnel with a business need, authentication requirements for administrative access, logging of access to verification records, contractual security obligations imposed on service providers, and periodic review of these practices.

No method of transmission or storage is completely secure, and GTOA cannot guarantee absolute security. In the event of a security incident affecting Portal information, GTOA will provide notice to affected Participants and to any applicable authority as and when required by applicable law.

9. YOUR PRIVACY RIGHTS

9.1 Rights Available

Depending on your state of residence, you may have the right to:

- **Access** — confirm whether GTOA processes information about you and obtain a copy
- **Correct** — request correction of inaccurate information
- **Delete** — request deletion, subject to the limitations in Section 9.2
- **Obtain a portable copy** — receive your information in a portable, readily usable format
- **Limit use of sensitive information** — direct GTOA to limit use of sensitive personal information to permitted purposes
- **Opt out** — of the sale of personal information, sharing for cross-context behavioral advertising, or profiling producing legal or similarly significant effects. As set out in Section 5, GTOA does not engage in these activities
- **Freedom from retaliation** — GTOA will not deny a reward, alter an amount, or provide a different level of service because a privacy right was exercised

9.2 Limitations on Deletion

GTOA may be unable to delete certain information where retention is necessary to complete a transaction requested by the Participant, detect or prevent fraud, satisfy anti-money-laundering obligations, comply with a legal obligation including tax and financial recordkeeping requirements, establish or defend a legal claim, or comply with a legal hold. Where a deletion request cannot be fulfilled in full, GTOA will identify the categories of information retained and the basis for retention.

9.3 Submitting a Request

Requests may be submitted to privacy@gtoarcade.com or by mail to the address in Section 13.

GTOA will verify identity before acting on a request, using information already associated with the Customer Account, and may request additional information where a request concerns sensitive information. An authorized agent may submit a request on a Participant's behalf on provision of written authorization and verification of authority.

GTOA will acknowledge a request within ten (10) business days and respond within forty-five (45) days. Where an extension of up to a further forty-five (45) days is reasonably necessary, GTOA will notify the Participant before the initial period expires.

9.4 Appeals

Where GTOA declines a request, the Participant may appeal by writing to privacy@gtoarcade.com with "Privacy Appeal" in the subject line. GTOA will respond in writing within forty-five (45) days, stating its decision and the reasons for it. Where an appeal is denied, GTOA will provide information on how to submit a complaint to the applicable state attorney general.

Use of this process is free of charge and is not a precondition to any right or remedy available under applicable law.

10. TAX INFORMATION

Rewards may constitute reportable income. Where required by applicable law, GTOA collects taxpayer identification information, issues information returns, reports redemptions to taxing authorities, and performs withholding.

GTOA does not provide individual tax advice. Participants are responsible for determining and satisfying their own federal, state, local, and other tax obligations arising from a reward or redemption, as set out in Section 6.7 of the Official Sweepstakes Rules.

11. CHILDREN AND AGE RESTRICTIONS

The Portal is restricted to persons who are at least twenty-one (21) years of age. GTOA does not knowingly collect information through the Portal from any person under that age.

Where GTOA determines that a person under the applicable minimum age has registered an Account or completed a purchase, the provisions of the Official Sweepstakes Rules, the Age & Eligibility Policy, and the Refund Policy apply, and any associated Portal information is deleted except where retention is required by applicable law.

A parent or legal guardian who believes a minor has provided information through the Portal should contact eligibility@gtoarcade.com.

12. CHANGES TO THIS POLICY

GTOA may update this Portal Policy from time to time. The current version is available through the Portal and states its effective and last-updated dates.

Where a change materially affects a Participant's rights and applicable law requires notice or consent, GTOA will provide the required notice or obtain the required consent. Except where earlier action is reasonably necessary to comply with applicable law, a regulatory or governmental directive, a court order, a security or fraud-prevention requirement, or a service-provider requirement, GTOA will ordinarily provide at least thirty (30) days' notice before a materially adverse change takes effect, consistent with the notice provisions of the Terms and Conditions.

Changes apply prospectively and will not retroactively alter the treatment of information handled before the change took effect.

13. CONTACT INFORMATION

- **Privacy requests and appeals:** privacy@gtoarcade.com
- **Redemption and verification:** verify@gtoarcade.com
- **General Support:** support@gtoarcade.com
- **Account appeals:** appeals@gtoarcade.com
- **Age & Eligibility:** eligibility@gtoarcade.com
- **Legal and Compliance:** legal@gtoarcade.com

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This Payout Portal Privacy Policy is effective as of September 10, 2026 and supersedes all prior versions.

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