

*Last Updated: June 2018*

## **SANDS REWARDS PRIVACY POLICY**

This is Sands Rewards Data Privacy Policy (“Privacy Policy”) and it applies to all personal data in any format or medium, relating to Sands Rewards Members. We are providing this notice to explain our information practices and the choices you can make about the way your information is collected and used. We expect all employees and those with whom we share personal data to adhere to this Privacy Policy. The Company is committed to protecting the information that you have entrusted to us.

### **NOTE TO EU AND NON-EU RESIDENTS**

The Company respects all individuals’ privacy rights under all the laws that apply to it, all over the world. Whenever possible, the Company accommodate privacy requests made by individuals. Each request is evaluated to determine whether it can be accommodated without violating Macao legal obligations the Company is subject to and without creating a risk to the security or integrity of the other information we hold.

For residents of the European Union (“EU”), European Economic Area (“EEA”), and Switzerland, the Company recognizes the legal privacy protections afforded to individuals located in the EEA, the EU, and Switzerland, with regard to personal data.

### **NOTICE TO RESIDENTS OF THE EU, EEA, AND SWITZERLAND**

If you reside or otherwise find yourself in the European Economic Area, European Union, or Switzerland, the Company is committed to respecting your rights as a data subject under the European General Data Protection Regulation (“GDPR”) and other applicable laws of these countries. If you have a privacy concern or questions about how your personal data is used, please contact us using the methods in the *Contact Us* section below.

## **PERSONAL DATA WE COLLECT AND USE**

### **General Information**

When you use the Internet to visit our Sands Rewards website or download our Sands Resorts Macao mobile application, your device may transmit certain information to the servers that host the Sands Rewards website or Sands Resorts Macao application. The information may include the type of Internet browser you are using, the type of computer operating system you are using, your Internet Portal (IP) address, the pages you visited on our websites, and how you arrived at our websites. When you visit our website or mobile application, we collect this information, and we use this information to create a better user experience, to identify areas for improvement on the website and mobile application, to enhance the security of our systems, and to provide information on our special offers and promotions.

### **Cookies**

*What Are Cookies?* A “cookie” is a small text file that a website can place on your computer by web browser to store information. Cookies are not personally identifiable by themselves, but they can be linked to personal data you provide to us.

*How We Use Cookies:* We may use cookies, including Google Analytics Cookie, so that we can improve your online experience, including to detect your browser’s capabilities, to track ads we display to you, to store login and purchase information of your choice, and to generate statistics on website usage.

*Your Control of Cookies:* Most web browsers allow some control of cookies through your browser settings. You can opt out of cookies and advertising related to the same by visiting the Network Advertising Initiative opt-out page: <http://www.networkadvertising.org/choices>.

According to its own policy, Google does not collect any personally identifiable information using Google Analytics. Nevertheless, if you do not want to use the remarketing feature from Google, you can disable it by changing the appropriate settings at <http://www.google.com/settings/ads>.

You have many choices to manage cookies on your computer. Most browsers allow you to block or delete cookies from your system, and you can set most browsers to prevent cookies from being placed on your devices. If you do this, however, you may have to manually adjust preferences every time you visit our websites and it may not be possible to use the full functionality of the websites. To learn more about your ability to manage cookies, please consult the privacy features in your browser.

## **Personal Data**

We only collect personal data that you provide to us, or that we are authorized to obtain by you or by law. For example, we obtain credit information to evaluate applications for credit, and we obtain background check information for casino patrons and Sands Rewards member. The type of personal data we collect from you will depend on how you are interacting with us using our website, products, or services. For example, we may collect different information from you when you make reservations, purchase gift certificates or merchandise, participate in a contest, or contact us with requests, feedback, or suggestions. The information we collect may include your name, title, email address, mailing information, phone number, fax number, credit card information, travel details (flight number and details, points of origin and destination), room preferences, and other information you voluntarily provide or the Company obtains when authorized or required by Law.

When you enroll in our loyalty program, we also may collect your name, title, date of birth, email address and any and all data generated by your use of the card and your membership.

When you use one of our mobile phone applications, we also may collect your name, username, password, email address and any and all data generated by your use of the application.

When you complete a credit application, we also may collect your credit information including your name, mailing address, email address, phone number, date of birth, credit score, Social Security number, employment information, financial information, including bank account and bank rating information, supporting your eligibility to receive credit, other lines of casino credit in your name, and other information you provide to us to assist us in making a determination concerning extending credit to you.

## **Information Collected During Your Stay**

*Check-In Information:* When you provide your personal data to make your reservation, whether it be through our websites, by phone, or in person at one of our properties, we may use that data to complete your reservation request. We also may need to collect information to comply with local laws, including your passport number, type of entry visa, date and place of birth, and driver's license number. If you choose to provide it, we also may collect additional information from you, including your frequent flyer or travel partner program information.

*Preferences and Marketing:* When you join Sands Rewards loyalty program or you check in, you may be asked whether you wish to receive promotional and other marketing materials, including your interest in participating in contests, promotional offers, or using certain services we can provide to you, such as membership in other loyalty program. We also may send surveys to you to learn more about your stay and preferences. You may withdraw your consent to receive marketing and promotional materials at any time.

*Itemized Spending:* During your stay, we record your itemized spending related to your reservation. This includes your room rate, other expenses billed to your room, food and beverage preferences, casino spending and preferences, and other special requests. We collect and record this information to keep a record of your expenses and preferences during your stay and provide it to you upon check-out.

*Facial Recognition and Video Surveillance:* We use a facial recognition system in all our casinos and gaming areas and a closed circuit television and other security systems to monitor all public areas of our properties for safety and security reasons. Facial recognition system and video surveillance cameras are used to protect us, our guests, and our employees. We monitor our cameras, and may share surveillance footage with local law enforcement and/or regulatory authorities.

### **Other Sources of Data**

When you join Sands Rewards loyalty program, others may provide your information to us so that we can provide products and services.

*Vendors, Suppliers, and Others Doing Business with Us:* We have strict rules in place to comply with the laws that apply to us. Before we do business with a third party, we take reasonable steps to make sure that they will prudently protect the information we share with each other, including your personal data they may collect or receive.

*Casino Credit:* For guests who request casino credit at our properties, we may collect/check, or hire a third party to collect/check, public records available about you. We must collect this information to comply with the law, and to protect against financial risk.

*Third Parties Authorized By You:* When someone else arranges for you to interact with our properties, they may provide us information so that we can provide you with products and/or services during your visit. For example, when your employer or a travel agent arranges for you to stay at one of our properties, they may provide us with the information listed above so that we can provide you with products and services.

### **LEGAL GAMING AGE POLICY**

Pursuant to Macau law, persons under the age of twenty one (21) are not permitted to enter into casino areas. The Venetian Macao-Resort-Hotel Site may contain general information about certain gaming facilities or activities and is not intended for persons under the age of twenty one (21). It is advised that persons younger than 21 years of age are not to use our site, accept offers, or win contests, and we do not knowingly collect information from such persons. If you are under 21 years of age, please leave this website now. Any offers we make or contests we conduct through this website are not open to persons under 21.

### **HOW WE MAY USE YOUR INFORMATION**

Your privacy is important to us. We collect and use information we believe is necessary to our business, and to provide you with the products, services, and experiences you expect when you interact with us. When we collect and use your information, we take your privacy and security very seriously.

We collect personal data to deliver superior quality of service. We will use the information you provide to us for the purpose you provided it to us (e.g., to make a reservation and book a suite at one of our properties), which is stated when information is collected. We may also use your information in other ways for our business purposes and to provide you with the products, services, and experiences you request and expect from us, including but not limited to the following purposes:

- to perform, manage and deliver an agreement we have with you;
- fully respond to your questions, requests, or communications
- to provide you with products and services, including but not limited to loyalty membership and benefits and display of content
- to check if you qualify for certain offers or services (e.g., casino credit, special events, promotional offers, etc.) and for payment and billing for products and services
- to develop new products and services
- to improve and personalize the guest experience for you and others
- to audit, research and conduct analysis in order to maintain and improve our services and protect our guests and patrons
- for guest reservations and/or requests for information or services
- for marketing and promotions planning and execution, market research and analysis, customer satisfaction and quality assurance surveys
- to ensure third parties protect your information
- to consider your job application
- to comply with applicable laws and regulations
- for safety and security, including working with third parties to help protect your information
- to ensure the technical functioning and security of our network
- to protect the rights or property of the Company, its employees, and its guests and patrons

#### **HOW WE SHARE INFORMATION**

We may share information about you to the third parties as indicated below:

*Promotions:* From time to time we may run promotions or marketing efforts, such as contests, sweepstakes, and/or giveaways with third parties. If you choose to participate in any such promotions, then any personal data you provide in order to participate may be shared with those third parties and be subject to their privacy policies.

*Affiliates:* We may share your personal data with our other properties, subsidiaries, and third parties if we need to. If we share your information, we will share only the information that is necessary and we will take reasonable steps to make sure that third parties take prudent steps to protect your information.

*Agents:* We use others to help us provide some of our products and services (e.g., maintenance, IT support, analysis, audit, payments, marketing, development, credit, reservations, and security). Unless we tell you differently or as described elsewhere in this Privacy Policy, our agents are expected not to have the right to use your information beyond what is needed to assist us.

*Legal Requests:* We may be required to respond to legal requests for your information, including from Macau Courts and other law enforcement authorities, regulatory agencies, third party subpoenas, or other government officials, including but not limited to authorities which regulate and/or have jurisdiction over gaming or non-gaming activities conducted by the Company.

*Compliance with Legal Obligations:* We may have to disclose certain information to auditors, government authorities, or other authorized individuals in order to comply with laws that apply to us or other legal obligations such as contractual requirements.

*Changes in Business Structure/Ownership:* We may disclose or transfer your personal data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of the Company's business, assets, or stock (including any bankruptcy or similar proceedings).

Your personal data may also be shared with third parties in exceptional circumstances, such as a *national emergency, security concern*, or other situation in which, the Company deems such disclosure is prudent

#### **INTERNATIONAL TRANSFERS OF DATA**

The properties, subsidiaries, affiliates, and service providers with whom we may share your personal data ("Recipients of the Data") may be located outside of Macau, when one the following applies:

- The Macau Office for Personal Protection Office has considered the jurisdiction to where the data is to be transferred offers an adequate level of protection when compared with Macau Personal Data Protection laws and authorizes the transfer;
- You have given us your consent;
- It is necessary for the performance of a contract between you and the Company or the implementation of pre-contractual measures taken in response to a request of yours;
- It is necessary for the performance or conclusion of a contract concluded or to be concluded in your interests between the Company and a Recipient;
- It is necessary or legally required on important public interest grounds, or for the establishment, exercise of defense of the Company court proceedings;
- It is necessary in order to protect your vital interests;
- It is made from a register which according to laws or administrative regulations is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate legitimate interest, provided the conditions laid down in law for consultation are fulfilled in the particular

We only share data with service providers that have entered into a written agreement with us that is substantially similar to our privacy policy. Prior to entering into a contract or disclosing personal data, we would have a reasonable basis for believing that the Recipient (a) is capable of maintaining reasonable safeguards for the personal data, and (b) maintains sufficient procedures to detect and respond to security breaches that could compromise personal information.

If you are located outside Macau and you interact with our website or our mobile application and provide your personal data, then your personal data may be transferred to Macao.

If you are located in the European Economic Area, European Union, or Switzerland, please note that Macao, while having very similar legislation to Europe in terms of Personal Data Protection currently is not on the list of countries that the European Commission considers adequate regarding the protection of personal data.

By having access to our websites and using our mobile application and services and products you are authorizing us to transfer your personal data to Affiliates, Agents and Service Providers, which may be located outside of Macau and/or Hong Kong, and that may have a different level of protection. The transfers hereby authorized may constitute an international transfer of Your Personal Data to other

jurisdictions and the different jurisdictions where the recipients are incorporated, including, without limitation, the United States of America and the People's Republic of China, may have different data privacy laws and protections.

## **YOUR CHOICES REGARDING YOUR INFORMATION**

For all personal data that we have about you, you have the following rights and/or choices that we will accommodate where your requests meet legal and regulatory requirements and do not risk making other data less secure or changing other data:

*Opt Out, Object, Withdraw Consent:* You can always choose not to disclose certain information to us. Where we rely on your consent to process your personal data, you have the right to withdraw or decline consent at any time. If you have provided us with your email address and you would like to stop receiving marketing emails from us, click on the unsubscribe link at the bottom of any of our email communications. If you do not wish to receive marketing communications from us via direct mail, or if you want to request that we do not share your contact information with our marketing partners, please contact us using the methods in the *Contact Us* section and include your name, address, and any other specific contact information that you wish to restrict.

*Automated Decision-making:* We may use automated decision-making to determine whether job applicants meet the required qualifications. You have the right to have a human involved in this process, to express your point of view, and to contest the decision. You may do so by using the methods in the *Contact Us* section below.

*Access, Correct, Update, Restrict Processing, Erase:* You may have the right to access, correct, and update your information. You also may request that we restrict processing of your information or erase it. To ensure that all of your personal data is correct and up to date, or to ask that we restrict processing or erase your information, please contact us using the methods in the *Contact Us* section below.

*Data Portability:* If you would like to request that we provide a copy of your information to you, please contact us using the methods in the *Contact Us* section below.

*Responding to Requests:* Each request to access, correct, restrict processing, erase, or provide a copy of data will be evaluated to determine whether the requested change meets legal regulatory requirements and does not risk making our other data less secure or changing our other data.

*Complaints to Supervisory Authority:* If you find yourself in the European Economic Area, European Union, or Switzerland, you have the right to lodge a complaint with a supervisory authority of the European Union or European Economic Area according to that authority's rules and procedures.

## **HOW WE PROTECT YOUR PERSONAL DATA**

We strive to take appropriate security measures to help safeguard your personal data from unauthorized access and disclosure. For example, only authorized employees are allowed to access personal data, and they may only access it for permitted business functions. We also use technology to protect your information, including encrypting sensitive personal data that is transferred to or from our systems and using firewalls to help prevent unauthorized persons from accessing information. If you have an online account with us, your account is also protected by a password for your privacy and security, and you must prevent unauthorized access to your account and personal data by selecting and protecting your password appropriately, limiting access to your devices, and by signing off after you have finished accessing your account.

While we cannot guarantee that loss, misuse, or alteration of information will never occur, we use reasonable efforts to prevent it. Please keep in mind that no method of storage or transmission over the Internet is completely secure, so your use of our products and services and provision of information to us is at your own risk.

Please be aware that our websites may contain links to other sites on the Internet that are owned and operated by third parties. The information practices of those websites linked to our websites are not covered by this Privacy Policy. We are not responsible for the privacy policies of websites to which our website links. If you provide any information to such third parties, different rules regarding the collection and use of your personal data may apply. We strongly suggest you review such third party's privacy policies before providing any data to them.

#### **PRIVACY PRINCIPLES WHEN COLLECTING OR PROCESSING YOUR PERSONAL DATA:**

Consistent with Macau Personal Data Protection Act (and with the GDPR), we observe the following privacy principles when collecting or processing your personal data:

- Data will be processed fairly and in accordance with applicable law.
- Data will be collected for specified and legitimate purposes, and will not be processed in ways that are incompatible with those purposes.
- Data collection and use will be limited to what is relevant for the specified purposes and will not be excessive. We will limit the amount and type of information gathered to what is necessary for the uses and purposes defined in this Privacy Policy.
- We will only collect and process personal data about you where we have a lawful basis. Lawful bases include consent (where you have given consent), contract (where we must process your personal data based on a contract we have with you, for example, to deliver requested products or services), and legitimate interests (where processing is necessary for the purposes of compelling legitimate interests of the Company that are not overridden by your rights).
- Data subjects are asked to provide their clear and unambiguous consent for collection, processing, and transfer of their personal data.
- We will keep your personal data as accurate, complete, and up-to-date as necessary, and we will take reasonable steps to correct or delete personal data that is inaccurate or incomplete. If you think that your information is inaccurate or incomplete, please contact us using the methods in the *Contact Us* section below.
- Data will only be kept where it is necessary for the purposes for which it was collected and processed. Those purposes are defined in this Privacy Policy.
- We are required by law to comply with many regulations that require us to keep information, including your personal data, for varying time periods. We must evaluate any request to change or delete information, including your information, prior to fulfilling such request to make sure that the requested change or deletion meets legal regulatory requirements and does not change our other data or make it less secure.
- Your data will be deleted or amended if we receive a relevant request from you, if we are permitted by law to do so, and if making the change does not risk making other data less secure or risk changing other data. Please contact us using the methods in the *Contact Us* section below to submit a request.
- We have taken appropriate measures to prevent unauthorized access, loss, use, or damage to your personal data.

#### **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to modify or change this Privacy Policy at any time. When we make a material change to this Privacy Policy, we will inform you by posting a prominent notice on the home page of our website or changing the date on this page noting when the Privacy Policy was last updated.

#### **CONTACT US**

For questions regarding this Privacy Policy or to submit any of the requests mentioned above relating to your personal data, contact us using any of the following options:

##### *Mail*

Legal Department - Privacy Office  
Venetian Macau Resort-Hotel – Executive offices, level 2  
Estrada da Baía de N. Senhora da Esperança, s/n,  
Taipa, Macau

##### *Email*

[privacy@sands.com.mo](mailto:privacy@sands.com.mo)