



## **PRIVACY POLICY**

Wahta Maple Farm (referred to in this Privacy Policy as “Wahta Maple Farm,” “us,” “we,” and/ or “our”) values you as a guest and customer and take your personal privacy seriously. In the course of providing you with products and services, we may collect certain information from or about you. We are providing this Privacy Policy to explain our practices and policies for collecting, using and sharing information collected from or about you when you visit, access, or use, or provide information to us (referred to together as the “Services”). By visiting, accessing, or using, or providing information to us in connection with the Services, you expressly consent to our collection, storage, use and sharing of your information as described in this Privacy Policy. Please note that if you disagree with anything in this Privacy Policy, you should not visit, access, or use, or provide information to us in connection with our Services.

This Privacy Policy does not create a contractual obligation between you and Wahta Maple Farm and it is subject to our Terms of Use located at [wahtamaple.com/terms-of-use](http://wahtamaple.com/terms-of-use). If you have questions about this Privacy Policy, please contact us at [privacy@wahtamaple.com](mailto:privacy@wahtamaple.com).

### **1. DEFINED TERMS**

As used in this Privacy Policy:

a) “Personal information” refers to any information by which you can be personally identified, such as your first name, last name, address, phone number, email address, credit card number, social security number, driver license number, passport number, license plate number, geolocation information, TS Rewards number, date of birth, purchase information, gaming activity information, biometric information and other similar information.

(b) “Non-personal information” refers to information by which you cannot be personally identified.

### **2. INFORMATION WE MAY COLLECT**

We collect and use information we believe is necessary to administer and promote our business, provide you with the products and services you request, and to provide a safe and healthy environment to our employees and guests and customers. We may collect and maintain both personal information and non-personal information needed for these purposes. Your personal information and/or non-personal information will be referred as your “information” in this Privacy Policy.



### 3. HOW WE COLLECT YOUR INFORMATION

(a) Information You Directly Provide to Us. You may provide information directly to us under a wide range of circumstances, such as when you submit information to us through Wahta Maple Farm website or app, use any services at Wahta Maple Farm, are videotaped or photographed in connection with a security incident or for other purposes, sign up to receive email or text messages from us, sign up to access Wi-Fi, book a reservation, enter an online promotion, request information from us, or provide feedback in a survey.

(b) Information Automatically Collected Through our Website.

(i) Traffic Data. We automatically track and collect general log information when you visit our website, including your: (A) Internet Protocol (IP) address, (B) domain server, (C) operating system, and (D) type of Web browser as well as the pages you visit on our website (collectively "Traffic Data"). Traffic Data does not personally identify you, however, if you choose to provide us with personal information, we may store some items of your personal information and use it with the Traffic Data to better personalize your experience on the website. We use the Traffic Data to report aggregated website activity and to better understand the needs of our users so we can make informed decisions regarding the content and design of the website. It enables us:

- To estimate our audience size and usage pattern;
- To learn what information is of most and least interest;
- To speed up your searches; and
- To learn of any possible website performance problems.
- We may collect Traffic Data through various technologies including, but not limited to, cookies, IP addresses, and transparent GIFs.

(ii) Data Collected Using Cookies and Other Technologies. We also automatically collect information from you using cookies and other technologies on our website. We may use cookies and similar technologies to identify who you are and may use them when you visit our website, click on our ads, or open our emails. Cookies also enable us to remember your user preferences for our website. Cookies and other technologies may also be used for site maintenance and analysis, performing network communications, authenticating users, serving contextual advertisements, and protecting against fraud and theft. You can block or remove cookies using your Internet browser's settings. If you block or remove cookies, your ability to perform certain transactions, use certain functionality, and access certain content on our website may be affected.



(iii) Information Collected by Third Parties through Third Party Links and Content. Our website and apps may include links to other websites and other content from third party businesses. These third party businesses may use cookies, web beacons or other similar technology to collect information about you. We do not have access to or control over these third parties or the cookies, web beacons or other technology that these third parties may use. We are not responsible for the privacy practices of these third parties or the content on any third party website. You are encouraged to review the privacy policies of the different websites you visit and of the advertisers whose ads you may choose to click while on our website.

(iv) Information Collected by Third Party Analytics Services. We may work with third party analytics services to help us understand how our property, offerings or website, or are being used, such as tracking the frequency and duration of use of our website. These analytics services may use cookies and other technologies to collect information about the content you view, what websites you visit immediately prior to and after visiting our website, and your system information and geographic information. The information generated by these technologies about your use of our website will be transmitted to and stored by the applicable analytics services. The information collected by these analytics services allows us to analyze your use of our property, store, and website.

(v) Information You Share on Third Party Websites or through Social Media Services. Our website may include links to third party websites and social media services where you will be able to post comments, stories, reviews or other information. Your use of these third party websites and social media services may result in the collection or sharing of information about you by these third party websites and social media services. We encourage you to review the privacy policies and settings on the third party websites and social media services with which you interact to make sure you understand the information that may be collected, used, and shared by those third party websites and social media services. We may also monitor sentiments regarding Wahta Maple Farm or affiliated properties that you publicly post on social media services or customer review sites. We may reach out to you regarding these postings to address guest service issues and to otherwise help ensure that you have a positive guest experience.

(vi) Information You Post on our Website. If you post information on any public areas of our website, that information may be collected and used by us, other users of affiliated websites and the public generally.



(c) Information Obtained from Other Sources, including from Service Providers, Third Party Services and Joint Marketing Partners. We may obtain information about you from other sources, including service providers, third party services (such as data brokers or analytics firms), publicly available sources, government agencies or Joint Marketing Partners (defined below), and we may combine such information with information we have collected about you as described in this Privacy Policy. To the extent we combine such third party information with other personal information we have collected, we will treat the combined information as personal information under this Privacy Policy. We are not responsible for the accuracy of any information provided by third parties or third party policies or practices.

(d) Information We Automatically Collect When You Use Our Wi-Fi Services. If you use Wi-Fi services that we make available at Wahta Maple Farm, we might collect information about your use of our Wi-Fi services, including your IP address, Wi-Fi information (such as SSID), mobile carrier, the websites you visit, the type of device and browser you are using, your device identification number, bandwidth used and session time.

(d) Information We Automatically Collect from Mobile Devices on our Property. If you have a mobile device, are located on our Property and have your Wi-Fi or Bluetooth functionality enabled, we may collect information concerning your mobile device, including the type of device, device ID, and the precise physical location of your device within and around the property (including geolocation and beacon-based location), for analytics and non-marketing related purposes, such as enabling us to understand our guests' preferences and use of our properties, including general traffic patterns. We might also use your location information for marketing purposes, such as to provide you with real-time offers and personalized promotions. If you do not want information concerning your precise location to be collected, you may adjust your mobile device location sharing settings and disable the Wi-Fi and Bluetooth functionality in your mobile device settings.

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

We will use the information you provide to us for the specific purposes for which you provided the information, as stated at the time of collection, and as otherwise described in the Privacy Policy or permitted by law. The following are some other ways in which we may use your information to administer or promote our business and provide you with the products and services you request or may be of interest to you;

- To participate in the TS Rewards Program and provide information to you about your TS Rewards Program activity;
- To improve the products and services we provide you and develop new products and services;
- To improve our property, services, offerings, and website;



- To track your use of our property, services and website for our internal market research and analytics;
- To create a more accurate and complete customer profile for you to better understand and predict the products and services you want to use and
- To provide a more personalized level of service;
- To notify you about promotions and special offers regarding products and services provided by us or our affiliates or other associated third parties, including our Joint Marketing Partners (defined below);
- To ask for your participation in our internal market research;
- To generate aggregate statistical studies about our guests to better understand how our guests use our services;
- To contact you in response to your inquiries, comments and suggestions;
- To provide a healthy, secure, and safe environment for our guests and employees;
- To protect and defend our rights or property or enforce our agreements with you;
- To perform background checks for any reason (to the extent permitted by applicable laws), which includes but is not limited to any investigation into your identity, any credit checks or any inquiries into your personal history:
- To process credit card, ACH and/or other financial transactions;
- Administer general recordkeeping for financial statements and audits;
- Comply with our internal records management policy and retention rules;
- To contact you otherwise when necessary; and
- Otherwise with your consent or as permitted or required by applicable law.

## **5. HOW WE SHARE YOUR INFORMATION WITH OUR AFFILIATES**

For business purposes, we may share certain information we receive from you, and about your transactions with us, with our affiliates, including Oneida Nation Enterprises' casinos, hotels, convenience stores, marinas, online and web based businesses, and other instrumentalities, corporate entities or affiliates. Doing so allows us to provide the products and services you have requested and quickly respond to applications for credit or other financial services.



## **6. HOW WE SHARE YOUR INFORMATION WITH NON-AFFILIATED THIRD PARTIES**

As permitted by law, we may share the information we collect from and about you with non-affiliated third parties as follows:

(a) Third Party Service Providers. Your information may be shared with or collected by third party service providers who provide us with services, including but not limited to data hosting or processing, credit card processing, credit or background checks, or processing and fulfilling reservations or purchases. We require these providers to exercise reasonable care to protect your personal information and restrict the use of your personal information to the purposes for which it was provided to them.

(b) Third Party Joint Marketing Partners. We may share certain information about you with other companies with whom we have joint marketing or similar agreements, or other businesses with whom we have a contractual relationship ("Joint Marketing Partners"), who may contact you with marketing and promotional offers. If you would like us to stop providing your information to these Joint Marketing Partners, you may opt-out of personal information sharing by following the instructions in Section 8 below.

(c) Response to Lawful Requests for Information or Court Orders or to Protect Rights and to Comply with Our Policies and Applicable Law. To the extent permitted by law, we will disclose your information to government authorities or third parties: (i) if required to do so by applicable law, or in response to a lawful subpoena or court order, search warrant or other valid legal process, (ii) to comply with legal, regulatory or administrative requirements of any governmental authorities having authority or jurisdiction, including but not limited to gaming regulators, (iii) in connection with any legal action, claim or dispute, including but not limited to the collection of debts, (iv) we believe in our sole discretion that disclosure is reasonably necessary to protect against fraud, to protect the property or other rights of us or other users, third parties or the public at large, or (v) we believe that you have abused our website by using it to attack other systems or to gain unauthorized access to any other system, to engage in spamming or otherwise to violate applicable laws. You should be aware that, following disclosure to any third party, your information may be accessible by others to the extent permitted or required by applicable law.

(e) Aggregate Information. We may share your information with affiliated or non-affiliated third parties on an anonymous, aggregate basis. While this information will not identify you personally, in some instances these third parties may be able to combine this aggregate information with other data they have about you, or that they receive from third parties, in a manner that allows them to identify you personally.



## **7. ONLINE ADVERTISING; TRACKING**

(a) Online Advertising. Wahta Maple Farm and third parties may use the information collected through our website using cookies, web beacons, and other similar technologies to help manage online advertising programs. This information may enable advertising services to track the actions of users online over time and across different web sites or platforms to measure statistics relating to marketing efforts, and to deliver electronic advertisements that may be more relevant to individual consumers and that will improve the consumer experience.

(b) Do Not Track. Your browser may allow you to adjust your browser settings so that “do not track” requests are sent to the websites that you visit. However, at the present time we do not disable tracking technology that may be active on our website in response to any “do not track” requests that we receive from your browser.

## **8. “DO NOT SELL MY PERSONAL INFORMATION” REQUESTS**

You may opt-out of having your personal information sold. “Sale” includes a typical sale (i.e., a transfer of data from a seller to a buyer in exchange for money), but it also includes sharing of personal information with a third party in exchange for anything of value (money or otherwise). We may share your personal information with our affiliates or Joint Marketing Partners (defined in Section 6(b) above). You may opt-out out by submitting a request to [privacy@wahtamaple.com](mailto:privacy@wahtamaple.com)

Opting out through this mechanism will not prevent your personal information from being shared with third parties for non-marketing purposes (for example, to process one of your transactions).

## **9. SECURITY**

We maintain physical, electronic and organizational safeguards that reasonably and appropriately protect against the loss, misuse and alteration of the information under our control. With regard to information that you transfer to us through our website, please be aware that no data transmission over the Internet or a wireless network can be guaranteed to be 100% secure. As a result, we cannot guarantee or warrant the security of any information you transmit on or through our website and you do so at your own risk.

## **10. HOW TO ACCESS, UPDATE AND CORRECT PERSONAL INFORMATION**

In order to ensure that all your personal information is correct and up to date, visit Wahta Maple Farm and speak to a guest service representative.



## **11. CHANGES TO OUR PRIVACY POLICY**

Over time, it may be necessary to modify or supplement our Privacy Policy. When we make changes, we will post the changes on our website and change the effective date at the top of the Privacy Policy. We encourage you to visit our website from time to time to review our Privacy Policy in the event it has changed. Your continued provision of information to us or use of our Services following the posting of changes to the Privacy Policy means that you accept the changes and our use of your personal information in accordance with the revised Privacy Policy. If you have provided us with your email address, we will also notify you of material changes to this Privacy Policy by sending an email at least thirty (30) days before the effective date of the changes to the email address you most recently provided to us. We encourage you to keep the email address you provide to us current, and to promptly notify us of any changes to your email address, so that you may receive any notices we send to you regarding material changes to this Privacy Policy. If you do not agree to the changes, you should discontinue your use of our Services prior to the time the modified Privacy Policy takes effect.

## **12. VIDEO SURVEILLANCE AND FACIAL RECOGNITION TECHNOLOGIES**

Video surveillance cameras may be used for security and health purposes and to protect us, our guests, customers and employees against potential violations of criminal or civil laws as well as threats to our guests', customers' and employees' health. Some cameras may also be used at our property to enhance your customer experience and provide services to you. Video camera output is monitored by our employees and may be viewed by law enforcement and regulatory authorities.

## **13. NON-U.S. RESIDENTS**

Unless otherwise specified, our website and material provided on or through our website are solely intended for users located in the United States and for promoting products, programs, and business operations within the United States. If you do not reside in the United States and you choose to access or use our website or visit our property, and provide your personal information to us, it may be transferred to, processed and maintained on servers or databases located outside of the country or jurisdiction where you are located. If you do not want your information transferred to, processed, or maintained outside of the country or jurisdiction where you are located, you should not use our website or visit our property.





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MAPLE FARM

#### **14. CONTACT INFORMATION**

Should you have additional questions, comments or concerns regarding this Privacy Policy or how we collect and use your information, you may send an email or contact us by writing to:

Wahta Maple Farm  
c/o Oneida Nation Enterprises, LLC  
ATTN.: Enterprise Marketing  
Turning Stone Resort Casino  
5218 Patrick Road  
Verona, NY 134785  
[privacy@wahtamaple.com](mailto:privacy@wahtamaple.com)