PRIVACY AND DATA PROTECTION POLICY

Updated: July 1, 2023

INTRODUCTION AND PURPOSE:

Caesars Entertainment, Inc. and its affiliates (collectively, "Caesars", "we" or "us") must collect and use the personal information of customers and team members to run its various businesses. This Privacy and Data Protection Policy ("Policy") is designed to allow Caesars to derive benefits from the personal information it collects while simultaneously managing risks to individuals' privacy and the consequential legal and reputational risk to Caesars for any privacy violations. This Policy is an important component of Caesars' overall risk management framework.

IMPORTANT DEFINITIONS:

"Personal information" or "PI" is ***any*** information about an identifiable person or household. Personal information includes both unique identifiers for a person as well as non-identifying information that can be associated with a person. Examples of unique identifiers include Caesars Rewards® account numbers, Social Security numbers, driver's license numbers, and biometric data like fingerprints or faceprints (for facial recognition). Examples of non-identifying information that can be associated with a person include hotel folio details, room type preferences, Caesars Rewards credit earning details, precise geolocation information, and gaming win/loss records.

"Process" or "processing" is used very broadly to indicate performing ***any*** action on PI, including collecting, recording, organizing, analyzing, storing, transferring, modifying, using, retaining, or deleting.

SCOPE:

The Policy applies to all Caesars team members (including employees, independent contractors, and temporary workers) and all vendors who process any PI on behalf of Caesars. This Policy applies to the processing of all PI of our customers, team members, or any other individual who is a business contact of Caesars.

POLICY:

Caesars is committed to respecting the privacy rights of our customers, team members, and business contacts, including their rights to exercise some control over the processing of their PI. Accordingly, all PI processing by Caesars team members and vendors must be consistent with the Privacy Principles identified in this Policy, and Caesars must establish and maintain an effective privacy governance structure with clear accountability, procedures, and standards to enforce these Privacy Principles and other internal privacy requirements.

OUR PRIVACY PRINCIPLES:

Notice
Whenever practicable or whenever required by law, Caesars provides clear, conspicuous privacy notices to all individuals at or before the time their PI is collected via appropriate notices published on our websites, mobile apps, and as needed at our properties or other locations where PI is collected.

Choice and Consent
Caesars provides individuals with certain choices about whether and, if applicable, what PI is collected. Caesars also allows individuals to opt out of the collection and use of PI when required by law. When we collect certain types of sensitive personal information (precise location, biometric data, etc.), Caesars asks for explicit consent to collect and use whenever practicable or required by applicable law.

Limited Collection and Use
Caesars only collects PI as disclosed in our privacy notices and limits collection of PI to what is adequate, relevant, and reasonably necessary for our business purposes. Caesars only uses PI for lawful purposes and only as disclosed in our privacy notices.

Retention and Disposal
Caesars retains PI only for as long as it is needed for our business purposes or as required by law.

Access Control
Caesars only allows those team members or vendors who have a "need to know" to access any PI within our control. Caesars otherwise restricts access to PI using reasonable access controls.

Data Security
All PI collected or processed by Caesars is protected in accordance with our Corporate Technology and Security Policy and the standards issued thereunder. Caesars also maintains an Incident Response Plan to allow Caesars to efficiently investigate and remediate privacy and security events.

Limited Disclosure to Third Parties
Caesars shares PI with third parties only for legitimate business purposes and only as disclosed in our privacy notices. Except for disclosures of PI to our gaming regulators and other PI disclosures that are required by law, Caesars only discloses PI to third parties pursuant to a written contract that appropriately limits the third parties' use and processing of that PI.

Privacy Requests
When an individual submits a privacy request under applicable privacy law (for example, if they want us to provide a copy of their PI, to delete their PI, or to correct their PI), Caesars responds to those requests as required by law. The latest information on available privacy options can be found at www.caesars.com/privacyrequests.

PRIVACY GOVERNANCE AT CAESARS:

Management and Accountability
Caesars manages privacy throughout the Caesars enterprise by assigning responsibility for monitoring compliance with this Policy and other privacy legal requirements to the Legal Department. Team members are also responsible for understanding this Policy and the privacy requirements that relate to their duties. A team member's failure to comply with this Policy or any related internal privacy requirements may result in discipline, up to and including termination of employment.

Privacy Team

The Legal Department is responsible for establishing and supporting a Privacy Team consisting of privacy attorneys and other privacy professionals who can effectively engage on privacy-related matters, advise team members on privacy requirements, and manage privacy rights requests. Team members can request privacy-related advice or ask privacy-related questions by emailing the Privacy Questions Outlook mailbox (privacyquestions@caesars.com), which is monitored by the Privacy Team during business hours.

Privacy Policies, Procedures and Standards

The Privacy Team and the Information Technology Controls and Compliance Department are responsible for publishing and updating policies, procedures and standards that govern the collection and use of PI, which will be reviewed and updated on an annual basis (or earlier if necessary to address new privacy legal obligations and/or PI collection practices).

Cybersecurity and Privacy Executive Steering Committee

A Cybersecurity and Privacy Executive Steering Committee (CPESC) consisting of Senior Management and representatives from Cybersecurity, Internal Audit, Compliance, the Privacy Team, and other departments provides oversight and guidance on enterprise cybersecurity and privacy policies, processes, and issues.

Privacy Council

The Privacy Team oversees an internal Privacy Council, which includes members of the Privacy Team and representatives from the different business units at Caesars. The Privacy Council meets at least quarterly to encourage regular information sharing regarding new business initiatives involving PI processing and new privacy-related legal or procedural requirements.

Privacy Training

Caesars requires annual privacy training for all team members with a network account. This training is part of the company's annual cybersecurity training. Caesars may also require specialized privacy training for a subset of team members who process PI when required by law or as recommended by the Privacy Team.

Privacy Impact Assessments

Caesars has developed and will maintain an internal Privacy Impact Assessment (PIA) review process to identify and manage privacy risks arising from higher-risk processing activities. The Privacy Team completes a PIA before any project that may involve (1) processing of sensitive personal information or profiling (as these terms are defined in applicable privacy laws), (2) collecting a new category of PI, (3) using PI for a new purpose, (4) sharing PI with a new category of third party, or (5) any other processing that requires a PIA under applicable law.

Audits

The Caesars Internal Audit team (or another department as appropriate) will periodically audit the company's privacy practices, including the obligations included in this Policy, when requested by management, Compliance, or the Legal Department and/or when required by legal/regulatory, financial, or compliance obligations. Caesars will conduct audits using an in-house team with privacy auditing experience or engage third party auditors as necessary.