

PEOPLE | PLANET | PLAY
CAESARS ENTERTAINMENT
**POSITION ON
DATA PRIVACY & SECURITY**



CAESARS
ENTERTAINMENT®

OUR POSITION ON DATA PRIVACY & SECURITY



Definition

Data privacy & security refers to safeguarding the data protection and privacy rights of Team Members, guests, suppliers and others, while maintaining strict information security protocols and systems to mitigate cyber risks.

Importance of Data Privacy & Security

During the course of our daily operations, we collect a large amount of personal information from our guests and Team Members. This information is necessary for Caesars Entertainment to be able to conduct its business through our multiple interactions with guests, users of our online gaming sites and Team Members. Everyone who shares personal information with Caesars Entertainment has a right to know that we will use their information responsibly and comply with the highest standards of privacy. Similarly, maintenance of robust information security controls gives guests and Team Members the confidence that our systems can withstand cyber-attacks that could threaten the protection of their information. Ensuring data privacy and security is a fundamental element of good corporate governance and helps maintain Caesars Entertainment's positive reputation as a trustworthy business.

Values and Principles

In 2000, we published our first Code of Commitment as a pledge to our guests, Team Members, communities, business partners and those we reach through our business. Our PEOPLE PLANET PLAY Corporate Social Responsibility (CSR) approach was created from our Code of Commitment, and today, the Code aligns with our CSR and Environmental, Social and Governance (ESG) priorities.

Data privacy & security falls within the PLAY pillar of our CSR framework, as it is fundamental to both our commitment to Team Members and to ensuring the positive experience of our guests at Caesars Entertainment.

Our Code of Commitment

PEOPLE	PLANET	PLAY
We commit to supporting the wellbeing of all our Team Members, guests and local communities.	We commit to taking care of the world we all call home.	We commit to creating memorable experiences for our guests and leading the industry as a responsible business, including Responsible Gaming practices.

OUR APPROACH

Information security and data privacy are fundamental to our success and to retain the trust of our Team Members, guests and all we serve. We support the continuity of our business and the protection of personal information of Team Members and guests through robust standards and controls. We aim to responsibly manage the personal information of our Team Members and guests in line with legal requirements, as well as our own proprietary standards, to ensure there can be no unauthorized use of or access to personal information.

Compliance

We aim to be fully compliant with all applicable information security and data privacy laws and regulations in all jurisdictions in which we operate. We maintain the necessary policies, standards, structures, processes and reporting mechanisms to protect our business and individuals from data breaches or disruption. We monitor regulatory changes and requirements and aim to ensure compliance throughout our business as needs arise.

Information Security Policies and Standards

We maintain a comprehensive information security program that contains administrative, technical and physical controls and safeguards using the National Institute of Standards and Technology (NIST) as our compliance framework. Our framework and program include:

- Corporate technology and security policy
- Incident response plan
- Acceptable use guidelines
- Software development guidelines
- Authentication and authorization standards
- Physical and environmental security standards
- Encryption requirements
- Monitoring and reporting and data governance
- Vulnerability management
- Multi-factor authentication, hard drive encryption and VPN check across all remote access channels including laptops

Specifically, the data management systems governing the gaming floors at our properties are fully isolated from the rest of our corporate network, preventing any unauthorized access to gaming floor data from an office workstation.

Protection of Personal Information

We aim to protect all the data that is entrusted to us by our Team Members and guests by maintaining comprehensive systems and controls throughout our operations to ensure compliance with privacy regulations in the different jurisdictions in which we operate. Where possible from a regulatory standpoint, we leverage technology to automate data processes to minimize human intervention and possibilities for error or privacy breaches.

We collect only personal information that is necessary and relevant for the conduct of our business and we use such data only for the purpose for which it was collected. Our information security systems protect personal information retained in our systems, usually in encrypted formats. We dispose of data responsibly when it is no longer needed. Personal information that we retain can be accessed by the individuals who submitted their information to us if requested.

Data Privacy & Security Training

All Team Members attend Security Awareness Training upon hire and, at a minimum, annually. Annual training includes cybersecurity policy and standards awareness. Additional training, as required, includes specific topics in greater detail such as monthly phishing email testing, payment card training, third-party contract training requirements, weekly security tips and cybersecurity alerts. Along with this training, Team Members and contractors provide a written acknowledgement that they:

- Read, understand and will abide by the Company's cybersecurity policy;
- Have and maintain the appropriate skills and qualifications to perform the duties of their job, including security-related functions;
- Have acquired a level of awareness on security relevant to their roles and responsibilities within the organization;
- Agree to protect all Caesars Entertainment's sensitive data that they encounter, and not disclose it to unauthorized internal or external parties; and
- Have a duty to report all suspected violations and security breaches as quickly as possible.

Additionally, contractors working at our facilities are provided Security Awareness Training in line with guidelines from Caesars Entertainment.

Reporting of Concerns

All suspected breaches of data privacy & security should be reported to our cybersecurity team or service desk. The relevant teams conduct an immediate investigation and take appropriate action. Data security & privacy performance is reported quarterly to our Senior Leadership Team. Significant breaches are reported immediately to the Senior Leadership Team and to the Board of Directors.

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS



Our investment in information security and data privacy and our adherence to strict standards and controls in our business and in all interactions with third parties serve to promote the rule of law and contribute to reducing bribery and corruption in our business and in our industry. This specifically aligns with the objectives of SDG #16.

GOVERNANCE OF DATA PRIVACY & SECURITY

Overall accountability for data security rests with Caesars Entertainment's Senior Vice President of Information Technology (IT), supported by a team of information security professionals. Data Privacy is overseen by our legal department, under our Chief Legal Officer. Data privacy and information security are closely connected, so de facto leadership of both areas is based on close collaboration between IT and legal teams.

VALIDITY

This Position on Data Privacy & Security:

- Includes all Caesars Entertainment's owned and operated hospitality facilities. We aim to achieve the same standards at managed and joint venture (tribal) destinations.
- Has been approved by Caesars Entertainment's Senior Leadership Team and the CSR Committee of the Board of Directors.

RELATED DOCUMENTS

For annual updates on our data privacy & security activities, please see our [CSR Report](#). See also our published privacy policies: our privacy policies: [U.S. Privacy Policy](#) and [Canada Privacy Policy](#).

Last Updated

September 2022



See our annual CSR Report:

<https://www.caesars.com/corporate-social-responsibility/csr-reports>