



July 17, 2007

Address

Dear Lottery Retailer:

Re: Lottery Retailer Directives from British Columbia Lottery Corporation ("BCLC")

BCLC has introduced the **Player First** program which is made up of both the B.C. Ombudsman's 23 recommendations and other leading edge solutions developed by BCLC. As such, BCLC has instituted a number of new policies and procedures that we expect Lottery Retailers to comply with immediately as required by the current Lottery Operations Agreement and its predecessor agreements (the "LOA").

Attached are the Directives from BCLC regarding these changes entitled Lottery Procedures, Conduct and Validations by Lottery Retailers in the Province of British Columbia; these changes were announced to you through the "**Player First**" Lottery Retailer newsletter distributed on May 30, 2007.

These Directives outline the critical requirements for Lottery Retailers who sell, validate, purchase or play BCLC lottery games. Lottery Retailers play an integral role instilling player and public confidence and therefore, must safeguard BCLC's commitment to integrity and respect in the lottery system. We appreciate that these Directives impact your business and employees, and we thank you for your understanding as we make these important changes to the lottery system.

These Directives include:

1.0 - Retailer Code of Conduct;

The Retailer Code of Conduct will assist Lottery Retailers to understand key contractual responsibilities and establishes a consistent standard of customer service across the lottery network. Two copies of the Retailer Code of Conduct are enclosed.

2.0 - Restricted Lottery Retailer Play Policy – "No Play at Work";

This change is to protect players so that they can play with confidence. As well it protects Lottery Retailers from being accused of any wrongdoing by clearly keeping the role of "Lottery Retailer" and "Player" separate and distinct.

3.0 - Lottery Retailers to Ask the Player to Sign the Back of Their Ticket;

Asking players to sign the back of their ticket is an effective way to ensure the ticket is identified as the player's and helps ensure the rightful holder claims any prize.

4.0 - New Validation Procedure Requirements;

Lottery Retailers must stamp "PAID" on the back of a winning ticket and return the winning ticket to the customer along with the validation slip. This will provide players with confidence that they have received the correct prize amount for their ticket as they will be able to check the ticket against the validation slip. Non-winning tickets will also be returned to the player together with the validation slip.

*Marketing Office: 10760 Shellbridge Way, Richmond, British Columbia V6X 3H1
Phone: 604 270 0649 Fax: 604 276 6424 www.bclc.com*

5.0 - Database of Lottery Retailers;

BCLC is creating a database of all Lottery Retailers who sell and/or handle our lottery products or operate lottery terminals. This database will be used to track who is selling our products, operating our equipment as well as to identify Lottery Retailers when they claim a prize at our Prize Payout Centres.

6.0 - Gaming Policy Enforcement Branch (GPEB) Lottery Retailer Registration.

GPEB requires registration of two (2) persons, one of which would be the signatory of the Lottery Retailer Agreement (LOA) and the other, the on-site location manager of the lottery retail location. These forms must be completed in a timely manner and returned to GPEB directly.

BCLC respectfully reminds all Lottery Retailers that failure to adhere to these requirements may result in disciplinary action including termination of the LOA thereby ceasing our business relationship. BCLC is taking these actions to help ensure the public's trust in our products and services and we appreciate your compliance and cooperation.

In closing, we would like to recognize the difficult and stressful situations some of you have had to endure over the past few months. It is our intention to support our Lottery Retailers with clear and current communication. If you have questions or concerns, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lightbody". The signature is fluid and cursive, with a large initial "J" and "L".

Jim Lightbody
Vice President, Lottery Gaming

Enclosure

Vice President, Lottery Gaming
British Columbia Lottery Corporation

Directive # 1.0
To Lottery Retailers
Effective July 17, 2007

Lottery Procedures, Conduct and Validation
By Lottery Retailers in the Province of British Columbia

In this Directive:

“Lottery Retailer” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

This directive is issued pursuant to the Lottery Operations Agreement and its predecessor agreements and directs Lottery Retailers to comply, effective this date, to adhere with the following:

Retailer Code of Conduct

The Retailer Code of Conduct and any amendments thereto, clarify key responsibilities of Lottery Retailers and establish a consistent standard of customer service across the lottery network. The Lottery Retailer who operates a retail location shall ensure that all employees of that location understand and follow the Retailer Code of Conduct. The Lottery Retailer who operates a retail location shall display a copy of the Retailer Code of Conduct at all times in a location visible to all employees.

Vice President, Lottery Gaming
British Columbia Lottery Corporation

Directive # 2.0
To Lottery Retailers
Effective July 17, 2007

Lottery Procedures, Conduct and Validation
By Lottery Retailers in the Province of British Columbia

In this Directive:

“Lottery Retailer” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

“Family Member” means a person who is:

- 1) a grandparent, grandchild, aunt, uncle, nephew, niece, cousin, parent, child, or sibling of a Lottery Retailer (whether related biologically or through remarriage); or,
- 2) a spouse (including common law) of a Lottery Retailer; or
- 3) anyone living at the same residence of a Lottery Retailer.

This directive is issued pursuant to the Lottery Operations Agreement and its predecessor agreements and directs Lottery Retailers to comply, effective this date, to adhere with the following:

Restricted Lottery Retailer Play Policy – “No Play at Work”

The previous policy of “No Play While on Active Duty” is hereby modified. Lottery Retailers shall not, at any time, purchase, play or validate their personal lottery tickets at their location of employment. Lottery Retailers may play BCLC lottery games at other lottery retail locations where they are not employed. All Lottery Retailers must declare themselves to be a Lottery Retailer when claiming a prize at any BCLC Prize Payout office or BCLC Regional Prize Payout Centre.

NOTE: During the prize claim process at a BCLC Prize Payout office or BCLC Regional Prize Payout Centre, all players must identify whether they are a Lottery Retailer or a Family Member. Lottery Retailers and Family Members will undergo an in-depth investigation by BCLC Corporate Security.

BCLC recommends that Family Members purchase, play or validate their personal lottery tickets at a lottery retail location where their relative or person living at the same residence is not employed. This will assist Family Members during the prize claim investigation process.

Vice President, Lottery Gaming
British Columbia Lottery Corporation

Directive # 3.0
To Lottery Retailers
Effective July 17, 2007

Lottery Procedures, Conduct and Validation
By Lottery Retailers in the Province of British Columbia

In this Directive:

“Lottery Retailer” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

This directive is issued pursuant to the Lottery Operations Agreement and its predecessor agreements and directs Lottery Retailers to comply, effective this date, to adhere with the following:

Lottery Retailers to Ask the Player to Sign the Back of Their Ticket

Lottery Retailers are required to comply with BCLC policy by asking players to sign the back of their lottery tickets at the time of sale to help ensure the rightful holder claims any prizes.

Vice President, Lottery Gaming
British Columbia Lottery Corporation

Directive # 4.0
To Lottery Retailers
Effective July 17, 2007

Lottery Procedures, Conduct and Validation
By Lottery Retailers in the Province of British Columbia

In this Directive:

“Lottery Retailer” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

This directive is issued pursuant to the Lottery Operations Agreement and its predecessor agreements and directs Lottery Retailers to comply, effective this date, to adhere with the following:

New Validation Procedure Requirements

Lottery Retailers must comply with all BCLC rules, regulations, instructions, directives and operating manuals and, in particular, follow the proper validation procedures. The previous validation procedure, commonly known as “Cash and Trash” is hereby replaced.

When validating lottery tickets, Lottery Retailers must:

- i) Mark the back of all winning tickets that are paid at their location with the official BCLC “PAID by lottery retailer” stamp (supplied by BCLC) before returning the winning ticket and paying the prize(s) to the player;
- ii) Return non-winning tickets to the player;
- iii) Provide the player with the corresponding validation slip or receipt for each ticket validated;
- iv) Contact BCLC immediately if the official BCLC “PAID” stamp is stolen, lost or damaged to obtain a replacement. In the interim, write your Lottery Retailer Number and “PAID” on the back of the winning ticket before returning the ticket to the player;
- v) Pay all prize claims within the prize payout limit at that lottery retail location;
- vi) Return the ticket to the player if the Lottery Retailer cannot pay out a prize claim. Do NOT stamp this ticket.

Vice President, Lottery Gaming
British Columbia Lottery Corporation

Directive # 5.0
To Lottery Retailers
Effective July 17, 2007

Lottery Procedures, Conduct and Validation
By Lottery Retailers in the Province of British Columbia

In this Directive:

“Lottery Retailer” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

This directive is issued pursuant to the Lottery Operations Agreement and its predecessor agreements and directs Lottery Retailers to comply, effective this date, to adhere with the following:

Database of Lottery Retailers

Lottery Retailers are required to comply with all requests for information by BCLC on an ongoing, as needed, basis. BCLC requires a Lottery Retailer database in order to track who is selling our products and/or operating our equipment, to effectively identify Lottery Retailers when claiming prizes at BCLC Prize Payout Centres and for other purposes to help ensure the integrity of the lottery system. This database will be created, stored and accessed in accordance with applicable privacy laws.

Vice President, Lottery Gaming
British Columbia Lottery Corporation

Directive # 6.0
To Lottery Retailers
Effective July 17, 2007

Lottery Procedures, Conduct and Validation
By Lottery Retailers in the Province of British Columbia

In this Directive:

“Lottery Retailer” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

This directive is issued pursuant to the Lottery Operations Agreement and its predecessor agreements and directs Lottery Retailers to comply, effective this date, to adhere with the following:

Gaming Policy Enforcement Branch (GPEB) Lottery Retailer Registration

Lottery Retailers shall comply with any applicable GPEB registration requirements and provide BCLC with proof of registration upon request. As the regulator of gaming in British Columbia, GPEB establishes and administers registration requirements.

Questions and Answers

DIRECTIVE # 1.0

Retailer Code of Conduct

Q: What is the Retailer Code of Conduct?

A: The Retailer Code of Conduct is a one-page document that will assist Lottery Retailers to understand the contractual expectations BCLC has of Lottery Retailers as previously outlined in the Lottery Operation Agreement (LOA) and/or subsequent Directives.

Q: How is this document different from the Lottery Operation Agreement (LOA)?

A: The Retailer Code of Conduct is an accompaniment to the LOA. All of the points outlined in the Retailer Code of Conduct do not replace the terms and conditions of the LOA but rather elaborate on terms already outlined in the LOA and/or subsequent Directives.

Q: Who does the Retailer Code of Conduct Directive apply to?

A: The Retailer Code of Conduct Directive applies to all Lottery Retailers. “**Lottery Retailer**” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

Q: Why is BCLC making Lottery Retailers follow a Retailer Code of Conduct?

A: It is important for all Lottery Retailers to understand the contract obligations of their Lottery Operation Agreement (LOA) to make certain they understand the expectations BCLC has of Lottery Retailers. Lottery Retailers play an integral role in establishing player trust and confidence. By following the Retailer Code of Conduct, Lottery Retailers will operate their lottery business with a high level of integrity.

Q: Can I post the Retailer Code of Conduct in my staff room?

A: Yes. We require that you post a copy of the Retailer Code of Conduct in the staff room or in a location that will be visible to all employees to ensure that all employees involved in any aspect of the lottery transaction understand the rules.

DIRECTIVE # 2.0

Restricted Lottery Retailer Play Policy – “No Play at Work”

Q: Who does this “No Play at Work” Directive apply to?

A: The restricted Lottery Retailer play Directive/rule applies to all Lottery Retailers. “**Lottery Retailer**” means a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or is involved in the handling, selling and/or validation of lottery products.

The above change is to protect players so that they can play with confidence. We hope you agree that this rule also helps protect Lottery Retailers from being accused of any wrongdoing.

Q: What if I’m not on active duty, can I still play at my place of work?

A: No. If you are a person who operates a retail location contracted by BCLC to sell lottery tickets and provide lottery services or, a person who is an employee or volunteer of a retail location contracted by BCLC and is authorized to operate a lottery terminal or, is involved in the handling, selling and/or validation of lottery products then you cannot purchase, play or validate at your place of employment at any time.

In addition, you should recommend to your family, and anyone else who lives at the same residence as you, not to purchase any lottery products from your place of work; this will simplify the prize claim investigation process if they win a prize.

Q: Why is BCLC introducing this new rule?

A: BCLC has always had restrictions on Lottery Retailer play. In the past, Lottery Retailers were not permitted to purchase, play or validate personal lottery tickets at their place of employment while they were on “active duty” (LOA Section 6 (j)). BCLC is enhancing this play restriction. This new rule allows BCLC better controls during the prize claim process because the role of “retailer” and “player” is more clearly defined. By following the Restricted Retailer Play policy, Lottery Retailers will also help build player confidence and protect you from any negative perception by the playing public.

Q: My place of employment offers lottery products but my job duties don’t have anything to do with lottery (i.e. dishwasher, baker, butcher) can I still purchase, play and validate my personal lottery tickets at my place of work?

A: If your job duties do not involve that of a Lottery Retailer i.e. operating the terminal or selling and/or validating lottery products, then yes, you can still purchase lottery tickets from the lottery terminal at your work place. You are not considered a Lottery Retailer.

Q: I work in a pub and we have a lottery terminal, a Pull Tab machine and a Self Serve Terminal (SST) located there. The Licensed Retail Store (LRS/Cold Beer and Wine Store) located right next to the pub also has a lottery terminal there. If I work at the pub, can I purchase, play or validate my own personal lottery tickets at the LRS?

A: If you work at the pub with an LRS attached and you are not responsible for operating the lottery terminal or involved in the selling/or validating of lottery products within the LRS, then yes, you (pub staff) can purchase lottery tickets from the LRS’s terminal.

Conversely, if you work at the LRS with a pub attached and you are not responsible for operating the lottery terminal or involved in the selling/or validating of lottery products within the pub, then yes, you (LRS staff) can purchase lottery tickets from the pub's terminal.

If you operate the lottery terminal or are involved in the selling/and validating of lottery products at either location (pub or LRS) then you are considered a Lottery Retailer at both locations and therefore you are not permitted to purchase, play or validate your personal tickets at either location.

Q: Can I use the Self Serve Terminal (SST) located at my place of work (bars & pubs) to purchase or validate my personal tickets?

A: No.

Q: Can I use the Check-A-Ticket Terminal (CAT) located at my place of work to check my personal tickets?

A: No.

Q: Does this new rule apply to all BCLC products?

A: Yes. This restriction applies to all lottery tickets produced by the lottery terminal and/or the Self Serve Terminal (SST) or any other lottery devices; Lottery Subscriptions, all Scratch & Win tickets and Pull Tab tickets.

Q: Can I still purchase lottery tickets from PlayNow on www.bclc.com?

A: Yes. There are no restrictions on Lottery Retailers playing on PlayNow.

Q: Does this new rule apply to hospital lottery products?

A: No. BCLC does not manage, sell or validate hospital lottery products.

Q: If I am a Lottery Retailer, can I buy a Lotto Subscription?

A: Yes, however you may not purchase it from your place of employment.

Q: I am currently involved in a group play with my co-workers, customers or other people, can I still be part of that?

A: If you are considered a Lottery Retailer, you can still participate in group play agreements with your co-workers or other people however as a Lottery Retailer, you are not permitted to participate in a group play if your group's ticket is purchased from your place of work.

Q: So where can Lottery Retailers play lottery games?

A: Lottery Retailers can purchase, play, and potentially win lottery games anywhere except where they work. If there isn't another Lottery Retailer nearby, you're welcome to purchase lottery products on PlayNow at bclc.com. You can also be part of group play as long as the group play ticket is not purchased or validated at your place of employment. Remember, any person involved in group play agreements should always complete the "Group Release" form available on www.bclc.com.

Q: If I am a Lottery Retailer, can I accept lottery tickets from my customers as a gift or tip?

A: No. Lottery Retailers cannot accept lottery tickets from customers as a gift or tip if the lottery ticket was purchased at their place of work.

Q: Can my spouse purchase, play or validate their personal lottery tickets at my place of work if I am identified as a “Lottery Retailer?”

A: BCLC does not have any authority over the actions of spouses and/or family members of Lottery Retailers because we do not have a contract with those individuals. However, during the prize claim process, all winners will be asked if they are a Family Member of a Lottery Retailer and if they answer yes, or if it is determined by other means that they are a Family Member or relation, their prize claim will be under more scrutiny. Therefore, if you are a Lottery Retailer, BCLC recommends that your spouse and/or Family Members or people living in the same residence do not purchase, play or validate their personal lottery tickets at your place of work to reduce investigation time and possible delays during the prize claim process.

Q: How will BCLC know if I do not follow this rule?

A: BCLC will conduct regular audits to help ensure all rules and regulations are being followed. Furthermore, new prize claim procedures are in place requiring Lottery Retailers to identify themselves when claiming a prize.

Q: What happens if I do not follow this rule?

A: Lottery Retailers that do not follow the Restricted Retailer Play policy will be subjected to an investigation by BCLC Corporate Security, which could result in progressive discipline action up to and including termination of the Lottery Operation Agreement (LOA). BCLC will retain prize winnings during course of investigation. Lottery Retailers are responsible for the actions of their lottery employees.

Q: I have already purchased a subscription for one year (or an advanced buy with remaining draws), what do I do?

A: You can safely play out any the remaining draws on any purchases made before this new rule was effective. For advance draws, you must refrain from checking or validating any of those tickets purchased prior to the new rule being effective, at your place of work. When the time comes to renew your subscription, you will have to purchase it from an alternative Lottery Retailer.

Q: What should I do if I accidentally print a ticket that can't be cancelled (i.e. Pacific Hold'em Poker) and I can't sell it to another customer?

A: Call BCLC Lottery Support Hotline.

Q: How do I know if this rule applies to me specifically?

A: If you answer “yes” to any one of the following questions, you are considered a Lottery Retailer and therefore not allowed to purchase, play or validate your personal lottery tickets at your place of work, at any time.

1. Is your name/signature on the Lottery Operation Agreement (LOA)?
2. Do you touch, sell, validate or payout any BCLC lottery tickets as part of your job responsibilities?
3. Do you ever operate the lottery terminal or any other piece of BCLC equipment?

If you have questions, please contact BCLC Lottery Support Hotline at 1-800-667-1649 or speak with your BCLC Sales Representative.

DIRECTIVE # 3.0

Lottery Retailers to Ask the Player to Sign the Back of Their Ticket

Q: What if I forget to ask the Player to sign the back of the ticket?

A: Reinforcing public trust in lottery games is BCLC's number one priority and your cooperation is critical. As such, Lottery Retailers must ask players to sign the back of their lottery tickets at the time of sale. This is an effective way to ensure that the ticket is identified as the player's and helps ensure the rightful holder claims any prizes.

Q: What if the player refuses to sign the back of the ticket?

A: BCLC requires that Lottery Retailers ask the player to sign the back of their lottery ticket. If the player refuses to sign the back of the lottery ticket that is the decision of the player and should be respected.

Q: What if the player is buying a ticket for someone else?

A: If the player is buying a lottery ticket as a gift for another person and refuses to sign the back of the ticket that is again up to the player. BCLC is requiring that all Lottery Retailers must ask the player to sign the back to protect a potentially winning ticket.

DIRECTIVE # 4.0

New Validation Procedure Requirements

Q: Why do we need to stamp the back of winning tickets “PAID”?

A: To provide players with confidence that they have received the correct prize amount for their ticket, Lottery Retailers must return the winning ticket to the customer along with the validation slip. By giving the player these two pieces of paper (original ticket and corresponding validation slip) they can cross-reference the control numbers to help ensure they match.

Applying a “PAID” stamp to the back of a winning ticket that has been paid out, marks the ticket transaction as completed and will prevent players from attempting to check their tickets again at a different location.

REMEMBER: Lottery Retailers are reminded to continue returning non-winning tickets to players along with the corresponding validation slip.

Q: If the retailer loses their stamp what do they do?

A: Contact BCLC Lottery Hotline immediately if the “PAID” stamp is stolen, lost or damaged to obtain a replacement. In the interim, the retailer can write their Lottery Retailer Number and “PAID” on the back of the winning ticket before returning the ticket to the player.

Q: Are more stamps available?

A: Yes. Lottery Retailers can order more stamps through their Customer Sales Assistant on their call day. Lottery Retailers can also call Hotline who will initiate an order through Customer Sales and we will ship the stamp at no charge the next business day. Sales Representatives will also have stamps available.

Q: Were other validation options explored?

A: Yes, we also looked at a number of potential solutions but the stamp solution is the best fit at this point of time.

Q: Is there some type of technology that we could use instead of a stamp?

A: Yes, we are also exploring a new technology that will allow the player to retain their ticket through the entire transaction. This is likely 18 to 24 months away.

DIRECTIVE # 5.0

Database of Lottery Retailers

Q: What information do you require?

A: BCLC requires the number of Lottery Retailers at your location, the first, middle, and last legal name of your lottery employees and their birthdate. BCLC also requests the email address of the on-site location manager.

Q: Why does BCLC need to collect personal information on Lottery Retailers?

A: BCLC is creating a database of all Lottery Retailers who sell and/or handle our lottery products or operate lottery terminals. This database will be used for:

- i) Tracking who is selling our products and/or operating our equipment and referencing this with the list of Lottery Retailers who have received lottery training;
- ii) Effectively identifying Lottery Retailers when claiming prizes at BCLC Prize Payout Centres.

Q: What's the purpose of BCLC having this information?

A: Personal information provided to BCLC is used for the purposes of:

- i) BCLC's operation of its retailer lottery network and any related matters;
- ii) communication between BCLC and its Lottery Retailers on lottery or other gaming matters;
- iii) assisting BCLC and/or the Provincial Government with any aspect or operation of any existing or future responsible play programs, policies, measures or initiatives; and
- iv) helping BCLC plan future lottery operations; and
- v) to complete audits and compliance checks.

Q: What authority does BCLC have to collect this information?

A: The authority for obtaining this information is found in Section 26 (c) of the *Freedom of Information and Protection of Privacy Act* (BC) and the *Gaming Control Act* (BC).

No personal information may be collected by or for a public body unless (a) the collection is authorized by or under an Act or (b) that information is related directly to and is necessary for an operating program or activity of the public body.

In this case, BCLC is collecting the information under point (b) as BCLC is augmenting its information regarding all Lottery Retailers within the lottery network.

If you have any questions regarding the collection of personal information may be directed to BCLC's Freedom of Information Coordinator, at 74 West Seymour Street, Kamloops, B.C., V2C 1E2, Telephone 1-250-828-5500.

Q: What does this statement really mean?

A: When collecting personal information, BCLC must advise the individual at the time of collection: the legal authority for the collection of the information, the uses of the personal information and a contact position, telephone number and email address of someone within the Corporation who can answer specific questions regarding any privacy concerns.

Q: How is the personal information protected?

A: At BCLC your privacy matters. Our privacy policies and the procedures that support them help ensure your personal information is maintained in a secure and confidential manner.

BCLC is required under the *Freedom of Information and Protection of Privacy Act* (FOIPP) to protect personal information in its custody or under its control by making reasonable security arrangements against such risks as unauthorized access, collection, use, disclosure or disposal.

Q: Will this information be shared outside of your organization? How can I be sure of that?

A: BCLC is required under the *Freedom of Information and Protection of Privacy Act* (FOIPP) to help ensure that personal information in its custody or under its control is used only for the purpose it was collected or for a use consistent with that purpose.

Sections 33 to 36 of the FOIPP Act does not permit the disclosure of personal information under limited conditions. You may be interested to review the FOIPP Act at www.gov.bc.ca for specific conditions.

Q: Why is BCLC asking for the e-mail address of the on-site location manager?

A: BCLC has a strong desire to communicate quickly and efficiently with Lottery Retailers. We would like the option to communicate with you via this method. The benefit to you is that you will receive any new information in a more timely manner.

Q: Why does BCLC need to know how many of my employees sell and/or handle lottery products or operation lottery terminals?

A: The lottery business is a highly regulated industry and it is important for BCLC to know how many people are selling and/or handling our lottery products or operating lottery terminals.

Q: Why is BCLC asking for birthdates?

A: Because the lottery business is a highly regulated industry, not only is it important for us to know how many people sell and/or handle our lottery products but it is important to know who those individuals are. The birthdate is unique, identifying personal information to distinguish John Smith born Dec.17, 1971 from John Smith born May.12, 1945. Many people have the same name but not often do they have the same name and the same birthdate.

Q: How will this information be used?

A: By maintaining a database of Lottery Retailers, BCLC can not only better determine the scope of training needs, it will eventually help BCLC keep track of who has received training. The retailer database will also be used during the prize claim process to help ensure all retailers are self-identifying as required.

Q: What are my responsibilities for maintaining the database? Do I have to notify BCLC every time I hire/fire someone? How do I provide this information?

A: Retailers are required to advise BCLC Sales Representatives (during regular visits) of any changes to help ensure and verify the accuracy of your employees' personal information on an ongoing basis.

Q: What if my employee refuses to release this information to BCLC?

A: A requirement of the registration and training process is to provide BCLC with the information requested. If an employee refuses to provide accurate personal information the employee cannot be registered and trained and therefore cannot be involved in the handling and selling of BCLC's lottery products.

Q: What if my company policy forbids the release of such employee information?

A: Lottery Retailers are required to comply with BCLC policies and Directives. BCLC will work with you to determine if this information can be provided in another way. However, a Lottery Retailer's failure to adhere to these requirements may result in disciplinary action including termination of the LOA thereby ceasing our business relationship.

DIRECTIVE # 6.0

Gaming Policy Enforcement Branch (GPEB) Lottery Retailer Registration

Q: Who is the Gaming Policy Enforcement Branch (GPEB)?

A: The Gaming Policy and Enforcement Branch regulates all gaming in British Columbia, ensures the integrity of gaming industry companies, people and equipment, and investigates allegations of wrongdoing. This includes regulatory oversight of the British Columbia Lottery Corporation (which conducts and manages lotteries, casinos, community gaming centres and commercial bingo halls), B.C.'s horse racing industry and licensed gaming events. The Branch also manages responsible and problem gambling programs and distributes gaming funds to community organizations.

Q: Why are Lottery Retailers being asked to register with GPEB?

A: Currently, all persons working in the gaming industry in British Columbia (BCLC employees, casino employees, bingo hall employees, etc.) must be registered by GPEB. This requirement is now being extended to the signatory of the LOA and the On-Site Location Manager.

GPEB requires registration of two (2) persons, one of which would be the signatory of the Lottery Operations Agreement (LOA) and the other, the On-Site Location Manager of the lottery retail location. This process is administered by GPEB. GPEB will be contacting each Lottery Retailer with registration material. These forms must be completed in a timely manner and returned to GPEB directly. In order to offer BCLC lottery products and services, all Lottery Retailers must adhere to this policy.

Q: What happens if I am the LOA Signatory and also the On-Site Location Manager? Can one person be registered or do I need to have a second person registered under my agreement? If so, who should also be registered?

A: GPEB requires two (2) registered lottery retailers per agreement. If your name/signature is on the Lottery Operation Agreement and you are also the primary On-Site Location Manager, you will need to have a second person registered by GPEB. The secondary person should be someone capable of overseeing the lottery business in your absence, such as your secondary contact person, supervisor, acting manager, assistant manager, head cashier or managing business partner. This secondary person does not necessarily have to work in the location on a day to day basis, but they must be capable of overseeing the lottery operation within your business, if required.

Q: If I move to a new location do I have to get registered again?

A: You will have to contact GPEB directly to let them know. GPEB will determine if you must get registered again.

Q: Will this cost anything? Will BCLC pay for Lottery Retailers to get registered?

A: The cost to register with GPEB is \$45 per person. BCLC will not pay for this registration.

Q: How long is the GPEB registration valid?

A: GPEB registration remains active for three years. You must be 19 or over to apply and you must be currently employed in the gaming industry.

Q: Are there any privacy issues with giving information to GPEB?

A: GPEB has taken their registration program to both the Ombudsman and Privacy Commissioner and neither organization has identified any privacy issues.

Q: How will GPEB track On-Site Location Managers?

A: The Lottery Retailer is ultimately responsible for keeping GPEB informed of any changes to the signatory on the LOA or the On-Site Location Manager. However, during regularly scheduled calls, BCLC's Customer Sales Department will ask each Lottery Retailer if their On-Site Location Manager has changed. BCLC will then update their master database and transfer that information to GPEB on a monthly basis. GPEB will use this as a database to ensure compliance.

Q: Is there a transition period if an On-Site Location Manager suddenly quits or leaves a retailer?

A: GPEB will allow 30 days for the location to register a new On-Site Location Manager. It is the Lottery Retailer's responsibility to update GPEB.

Q: If a retailer has any questions or concerns about the GPEB registration program what should they do?

A: Lottery Retailers are invited to call GPEB directly at 250-356-0663 or email at: Gaming.Branch@gov.bc.ca

Q: Will GPEB delay a registration of a brand new Lottery Retailer to the network?

A: Yes. GPEB requires that all new Lottery Retailers to the network be registered prior to selling lottery products.

Q: If a person is already registered within a Casino or Bingo Hall with GPEB, do they need also register as a Lottery Retailer within a Casino or Bingo Hall?

A: No, they will be considered already registered.