

NYRA GROUP PRIVACY POLICY

Effective Date: August 25, 2026

The New York Racing Association, Inc. (“**NYRA**”), NYRA Bets, LLC (“**NYRA Bets**”), and their respective subsidiaries and affiliates (collectively, the “**NYRA Group**,” “**we**,” “**us**,” or “**our**”) respect your privacy. This Privacy Policy describes how we collect, use, disclose, retain, and protect Personal Information when you use NYRA Group websites, mobile applications, digital platforms, products, services, and other online or mobile offerings that link to this Privacy Policy (collectively, the “**Services**”).

The Services include, among other things, NYRA.com, NYRA-operated mobile applications, NYRA’s venue mobile application, including, without limitation, those used at Belmont Park, Saratoga Race Course and other NYRA locations (the “**Venue App**”), NYRA promotional and communications programs, and the NYRA Bets advance deposit wagering platform and related wagering products found therein.

This Privacy Policy applies across the NYRA Group. The particular NYRA Group entity responsible for providing a Service or processing particular information may vary depending on the Service, the location of the user, applicable licensing requirements, and applicable law.

1. NYRA AND NYRA BETS WAGERING SERVICES

The NYRA Bets brand and platform are used to provide online account wagering services. The licensed entity responsible for accepting or processing a particular pari-mutuel wager depends upon the physical location of the person placing the wager and applicable racing and wagering laws.

The NYRA Bets brand and platform are used to provide online account wagering services. The licensed entity responsible for accepting or processing a particular pari-mutuel wager depends upon the jurisdiction applicable to the wager and applicable racing and wagering laws.

For New York customers, wagering services are provided by NYRA pursuant to its applicable New York license. For customers in other jurisdictions, wagering services generally are provided by NYRA Bets or through other applicable licensed arrangements, as required by the laws of the applicable jurisdiction.

Accordingly, Personal Information associated with a NYRA Bets account may be collected, accessed, used, processed, or maintained by NYRA, NYRA Bets, their service providers, or applicable licensed partners depending upon the user’s location, the transaction involved, and applicable regulatory requirements.

Additional terms governing account wagering are contained in the NYRA Bets Terms and Conditions.

2. PERSONAL INFORMATION WE COLLECT

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with an individual or device.

The Personal Information we collect depends upon the Services you use and how you interact with us.

A. Information You Provide to Us

We may collect information you provide directly to us, including:

- Name;
- Mailing or residential address;
- Email address;
- Telephone or mobile phone number;
- Date of birth and age;
- Account username, password, PIN, or other account credentials;
- Marketing, communication, and notification preferences;
- Information submitted in surveys, contests, sweepstakes, promotions, or other registrations;
- Customer service inquiries and other communications with us;
- Information relating to purchases, tickets, hospitality, merchandise, food and beverage, parking, and other transactions or services;
- Information you provide when interacting with NYRA facilities, events, websites, applications, or digital services; and
- Other information you choose to provide.

B. Wagering and Financial Information

If you establish or use a wagering account or another Service involving financial transactions, we may collect additional information, including:

- Social Security number or other government-issued identification information;
- Bank account information;
- Credit or debit card information;
- Funding and withdrawal information;
- Wagering activity and wagering history;
- Account balances and transaction history;
- Tax reporting and withholding information;
- Identity verification information;
- Information used to confirm eligibility to establish or use an account;
- Information used to determine the jurisdiction from which wagering activity occurs; and
- Information required to comply with racing, gaming, financial, anti-money laundering, fraud prevention, tax, and other legal or regulatory requirements.

Certain financial information may be collected or processed directly by banks, payment processors, or other financial service providers on our behalf.

C. Device, Usage, and Technical Information

When you use our websites, applications, or other digital Services, we and our service providers may automatically collect information such as:

- Internet Protocol (“IP”) address;
- Device identifiers and advertising identifiers;
- Device type, operating system, and browser information;
- Application version and settings;
- Pages, screens, features, or content viewed;
- Dates, times, duration, and frequency of interactions with the Services;
- Links or features selected;
- Referring and exit pages;
- Application performance information;
- Diagnostic information;
- Crash data;
- Interaction and engagement information;
- Push notification interactions;
- Cookie, pixel, SDK, and similar technology identifiers; and
- Approximate or precise location information, as described below.

3. LOCATION INFORMATION

Certain NYRA Group Services, including the Venue App and wagering services, may collect or process information concerning the location of your device for the reasons set forth below, including, *inter alia*, correctly process your wagers, comply with regulatory requirements, and provide the Services.

A. Types of Location Information

Depending upon the Service, feature, device settings, and permissions you provide, location information may include:

- **Approximate location**, such as the city or general geographic area in which a device is located; or
- **Precise location**, which may identify the physical location of a device with greater specificity.

Location may be determined through device location services, GPS, Wi-Fi information, Bluetooth or beacon technologies, IP address, mobile network information, or similar technologies.

B. When the Venue App Uses Location

Most location information used by the Venue App is collected or processed while you are actively using the App.

If you affirmatively enable the applicable device permission, the Venue App also may process location information while the App is not actively displayed or is operating in the background. Background location is optional and will be used only where enabled through your device or application permissions.

Depending upon the features you use and permissions you select, the Venue App may use approximate or precise location information.

C. How Venue App Location Information Is Used

Location information may be used to:

- Provide location-aware and localized experiences within NYRA venues;
- Provide information or functionality relevant to your location;
- Personalize content and the Venue App experience;
- Deliver relevant or location-based push notifications, promotions, venue information, or other communications;
- Develop audience information and understand how visitors interact with NYRA venues and Services;
- Analyze use of the Venue App and its features;
- Support application performance, diagnostics, and crash reporting;
- Support venue, event, customer service, security, and operational functions;
- Enable or facilitate location-dependent features requested by you; and
- Support other purposes disclosed to you at the time location information is requested.

D. Service Providers Processing Location Information

NYRA uses service providers and software development kits (“**SDKs**”) to operate and support the Venue App. Location information may be transmitted to or processed on NYRA’s behalf by service providers including:

- **Airship**, for functionality including targeted push notifications and related engagement services;
- **mParticle**, for data management, audience information, analytics, and related application services; and
- **Radar**, for location-related functionality and localized experiences.

These providers may process approximate or precise location information, depending upon the feature being used and the permissions enabled by the user.

Everi, which provides technology and services supporting the Venue App, does not store Venue App location data.

We may change the service providers used to support the Venue App from time to time. Any such providers will be required to process Personal Information in accordance with their contractual obligations to NYRA and applicable law.

E. Rideshare Functionality

Location information also may be used when you choose to access rideshare functionality through the Venue App.

Everi does not directly provide your location information to the rideshare provider. If the Venue App links or redirects you to a third-party rideshare service, information collected directly by that service, including any location information you provide to or authorize that service to access, is governed by the rideshare provider's own terms and privacy policy.

F. Location Used for Wagering

Location information also may be collected, used, or verified in connection with NYRA Bets and other wagering services to determine whether you are physically located in a jurisdiction in which the applicable wagering service may lawfully accept your wager and to comply with racing and gaming laws, licensing requirements, fraud prevention requirements, and other legal obligations.

The location information and technology used for wagering compliance may differ from the location information and technology used by the Venue App.

G. Your Location Choices

You may control whether the Venue App has access to your device location through your device settings and, where available, through settings within the App.

Depending upon your device, you may be able to:

- Deny location access;
- Permit location only while using the App;
- Permit approximate rather than precise location;
- Permit precise location;
- Permit or decline background location access; or
- Revoke a previously granted location permission.

If you disable or limit location access, certain location-dependent Services or features may be unavailable, less accurate, or less personalized.

Your decision regarding location permissions is separate from your ability to enable or disable push notifications through your device settings.

4. INFORMATION WE RECEIVE FROM OTHER SOURCES

We may receive Personal Information from third parties, including:

- Service providers;
- Payment processors and financial institutions;

- Identity verification providers;
- Fraud prevention and security providers;
- Racing, gaming, and regulatory organizations;
- Ticketing providers;
- Parking providers;
- Food and beverage providers;
- Hospitality and merchandise providers;
- Marketing and communications providers;
- Analytics providers;
- Advertising and promotional partners;
- Social media platforms, if you choose to connect or interact with our Services through those platforms; and
- Other business partners with which you choose to interact.

We may combine information received from these sources with information we collect through other NYRA Group Services.

5. HOW WE USE PERSONAL INFORMATION

We may use Personal Information to:

Provide and Operate Services

- Create and administer user and wagering accounts;
- Process wagers, deposits, withdrawals, purchases, and other transactions;
- Provide racing, venue, ticketing, parking, hospitality, food and beverage, merchandise, and other services;
- Provide the Venue App and its features;
- Authenticate users and maintain account security;
- Respond to questions and provide customer service;
- Fulfill requests and transactions; and
- Maintain and improve our websites, applications, platforms, facilities, products, and Services.

Personalize and Improve Services

We may use information to understand how people use our Services, develop audience information, personalize content and communications, evaluate performance, conduct analytics, troubleshoot problems, perform crash reporting, and develop or improve products, Services, events, and customer experiences.

Marketing, Promotions, and Communications

Subject to applicable law and your communication preferences, we may use Personal Information to:

- Send racing and event information;
- Provide venue updates;
- Send offers and promotions;
- Provide information regarding merchandise, hospitality, tickets, experiences, and other NYRA products and Services;
- Administer contests, sweepstakes, and promotions;
- Send marketing or informational email, SMS/text messages, or push notifications;
- Personalize or target communications based on interests, activity, engagement, or location where permitted; and
- Measure the effectiveness of communications and promotional activities.

Wagering, Regulatory, and Compliance Purposes

We may use information relating to wagering accounts and activity to:

- Verify identity, age, and eligibility;
- Determine whether wagers may lawfully be accepted from a user's location;
- Process and administer wagering activity;
- Perform financial, tax, and regulatory reporting;
- Detect and prevent fraud, money laundering, unauthorized wagering, and other unlawful activity;
- Promote responsible wagering;
- Investigate account activity;
- Respond to racing, gaming, financial, or other regulatory authorities; and
- Comply with applicable federal, state, and local laws and regulations.

Security and Protection

We may use Personal Information to maintain network and information security, detect unauthorized access, investigate suspected violations, prevent fraud or misuse of the Services, protect the safety and security of users and NYRA facilities, and protect the rights and property of the NYRA Group and others.

Legal Purposes

We may use Personal Information where necessary to comply with laws, regulations, subpoenas, court orders, regulatory directives, legal proceedings, governmental requests, contractual obligations, or to establish, exercise, or defend legal claims.

6. HOW WE DISCLOSE PERSONAL INFORMATION

We may disclose Personal Information as follows.

Within the NYRA Group

Information may be disclosed among NYRA, NYRA Bets, and other NYRA Group entities when reasonably necessary to provide Services, operate our businesses, administer wagering, maintain security, conduct marketing and analytics, or otherwise carry out the purposes described in this Privacy Policy.

Service Providers

We may provide Personal Information to vendors and service providers that perform services for us, including providers of:

- Application and website technology;
- Cloud hosting and data storage;
- Location technology;
- Data management;
- Analytics and crash reporting;
- Push notifications, email, and text messaging;
- Payment processing;
- Identity and age verification;
- Wagering technology and totalizator services;
- Fraud detection and cybersecurity;
- Customer support;
- Marketing and promotions; and
- Other operational services.

These providers are authorized to use Personal Information as necessary to provide services to us and as otherwise permitted by their agreements with us and applicable law.

Transaction and Venue Partners

When you request or use a service offered through or in connection with a third party, information may be provided to the applicable ticketing, parking, food and beverage, hospitality, merchandise, transportation, payment, or other provider as necessary to complete your request or provide the applicable service.

Where we merely provide a link to a third-party service and do not transmit information to that provider, information subsequently collected by that third party is governed by the third party's privacy policy.

Racing, Gaming, Governmental, and Law Enforcement Authorities

We may disclose Personal Information when required or permitted by law, including to racing and gaming regulators, law enforcement agencies, courts, taxing authorities, financial regulators, governmental agencies, or other authorized entities.

Corporate Transactions

Personal Information may be transferred or disclosed in connection with an actual or proposed merger, acquisition, financing, restructuring, sale of assets, transfer of operations, or similar corporate transaction, subject to applicable law.

With Your Direction or Consent

We may disclose information when you direct us to do so or otherwise consent to the disclosure.

Aggregated or De-Identified Information

We may use and disclose information that has been aggregated or de-identified so that it cannot reasonably be used to identify you, subject to applicable law.

7. THIRD-PARTY WEBSITES, APPLICATIONS, AND SERVICES

Our Services may contain links to, integrate with, or provide access to websites, mobile applications, and services operated by third parties, including ticketing, parking, food and beverage, rideshare, hospitality, merchandise, payment, and other service providers.

A link or integration does not mean that NYRA controls the third party's privacy practices.

When you leave an NYRA Group Service or interact directly with a third party, Personal Information collected by that third party is governed by the third party's privacy policy and terms. We encourage you to review those policies before providing Personal Information.

8. COOKIES, SDKS, AND SIMILAR TECHNOLOGIES

We and our service providers may use cookies, web beacons, pixels, SDKs, mobile identifiers, local storage, and similar technologies to operate and secure the Services, remember preferences, understand how the Services are used, conduct analytics, personalize experiences and content, deliver communications, and measure engagement.

Mobile applications may use SDKs supplied by third parties to provide functionality such as analytics, location services, messaging, push notifications, application performance monitoring, and crash reporting.

Your browser, device, or operating system may provide settings that allow you to limit certain technologies or reset device identifiers. Limiting these technologies may affect the operation or availability of certain features.

9. EMAIL, SMS/TEXT, AND PUSH NOTIFICATIONS

If you affirmatively enroll in or otherwise consent to receive marketing communications, NYRA may communicate with you through email, SMS/text message, push notification, or other permitted channels.

You may opt out of promotional email by using the unsubscribe link included in the communication.

You may opt out of promotional SMS/text messages by following the opt-out instructions in the applicable message, including by replying STOP where applicable.

You may control push notifications through the notification settings on your mobile device.

Even after opting out of promotional communications, we may continue to send transactional, account, security, wagering, customer-service, or other non-promotional communications where permitted by law.

10. DATA RETENTION

We retain Personal Information for as long as reasonably necessary to fulfill the purposes for which it was collected, provide the Services, maintain accounts, complete transactions, resolve disputes, enforce agreements, protect against fraud or misuse, and satisfy legal, regulatory, tax, accounting, recordkeeping, and compliance obligations.

Retention periods vary depending upon the nature of the information and the Service involved.

Wagering and financial information may be subject to specific retention requirements imposed by racing, gaming, financial, tax, anti-money laundering, responsible gaming, or other laws and regulations.

Location information associated with the Venue App is retained only as necessary for the applicable business purpose or as required by law. Everi does not store Venue App location data. Other service providers processing location information on NYRA's behalf may retain information in accordance with their contractual obligations to NYRA and applicable retention requirements.

When Personal Information is no longer reasonably necessary and retention is not required or permitted by law, we may delete, de-identify, or otherwise dispose of it in accordance with our data retention practices.

11. ACCOUNT DELETION AND PRIVACY REQUESTS

Where an NYRA Group application permits users to create an account, users may request deletion of the account and associated Personal Information through the account deletion mechanism made available for the applicable Service or by contacting NYRA using the information below.

Following a valid deletion request, we will delete or de-identify Personal Information associated with the account except to the extent retention is reasonably necessary or permitted for purposes including:

- Compliance with racing, gaming, financial, tax, anti-money laundering, responsible gaming, or other legal or regulatory obligations;

- Fraud prevention, security, and abuse prevention;
- Completion of pending transactions;
- Maintaining records required by law;
- Establishing, exercising, or defending legal claims; or
- Other purposes permitted by applicable law.

Deletion of a general NYRA or Venue App account does not necessarily result in deletion of information that NYRA or NYRA Bets is independently required to maintain in connection with a wagering account or regulated wagering activity.

Depending upon where you reside and applicable law, you may have rights relating to your Personal Information, which may include rights to request access to, correction of, or deletion of Personal Information or to obtain information about our processing of Personal Information.

We may need to verify your identity before acting on certain requests.

12. SECURITY

NYRA uses reasonable administrative, technical, organizational, and physical safeguards designed to protect Personal Information against unauthorized access, acquisition, loss, misuse, alteration, or disclosure.

Access to Personal Information is limited to employees, contractors, and service providers with a legitimate business need for access, subject to appropriate confidentiality and security requirements.

When appropriate, we use encryption and other technical safeguards to protect information transmitted to or maintained by our systems.

No internet transmission, wireless network, mobile application, electronic storage system, or security measure is completely secure. Accordingly, we cannot guarantee the absolute security of Personal Information.

13. CHILDREN

NYRA Group Services are not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under 13 through the Services.

Certain Services, including wagering services and particular promotions or programs, are subject to higher minimum-age requirements. Users of those Services must satisfy the applicable age requirements.

If we learn that we have collected Personal Information from a child in violation of applicable law, we will take appropriate steps to delete the information.

14. YOUR DEVICE AND PRIVACY CHOICES

You may have choices regarding the collection and use of information through your browser, mobile device, application settings, and communications preferences.

These controls may include:

- Location permissions;
- Precise versus approximate location;
- Foreground or background location permissions;
- Push notification permissions;
- Cookie controls;
- Advertising identifier controls;
- Email preferences; and
- SMS/text preferences.

Changing a permission or preference does not affect processing that occurred before the change and may not affect information we are required by law to retain.

15. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our Services, technologies, business practices, legal requirements, or other circumstances.

When we make changes, we will update the Effective Date shown at the beginning of the Privacy Policy. Where required by law, we will provide additional notice or obtain consent to material changes.

Your use of the Services after an updated Privacy Policy becomes effective will be subject to the updated Privacy Policy, except where applicable law requires otherwise.

16. CONTACT US

If you have questions about this Privacy Policy, our privacy practices, or wish to exercise an applicable privacy right or request deletion of Personal Information, please contact:

The New York Racing Association, Inc.

PO Box 7337

Garden City, NY 11530

Email: compliance@NYRAinc.com

For questions specifically concerning a NYRA Bets wagering account, you may also contact NYRA Bets customer service using the contact information provided on the NYRA Bets website.