

PRIVACY POLICY

1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA AND HOW TO CONTACT US

This Privacy Policy applies to all of our games, websites and related services, collectively referred here as our Services. Your continued use of the Services after the effective date will be subject to new Privacy Policy. Your use of our Services, and any dispute over privacy, is subject to this Privacy Policy and our Terms of Use, including its applicable limitations on damages and the resolution of disputes. The Terms of Use are incorporated by reference into this Privacy Policy. If you are a California resident, please see **Additional Information For California Residents** for additional disclosures.

Please read the following to learn more about how we use your personal data.

For the purpose of the General Data Protection Regulation 2016/679 and any implementing legislation (the "GDPR"), Legacy Interactive (referred to as "Legacy Games", "we", "us", or "our") will be the data controller responsible for any personal data we process.

If you have any questions or concerns about this Privacy Policy, including those related to exercise any of your rights, please contact us through the game's Help & Support so we can reply to you more quickly.

The data controller: Legacy Interactive

Email: info@legacygames.com

Address: 4470 Sunset Blvd., Suite 271, Los Angeles, CA 90027, USA

2. WHAT PERSONAL DATA WE COLLECT AND WHY?

We may source, use and otherwise process your personal data in different ways. In all cases we are committed to protecting your personal data.

In each of the sections listed below, we describe how we obtain your personal data and how we treat it.

2.1 INDIVIDUAL CUSTOMERS

We collect personal data related to current, prospective, and former customers (“users”) of our Services.

A - SOURCES OF PERSONAL DATA

We may obtain your personal data from the following sources:

- a) from you directly (through the game, website or online forms); and/or
- b) from other entities, service providers that are assisting us in providing you with a service (including data analytics providers, operating systems, and internet services providers), or from your social networks accounts you used to sign in to our online services (for example, Facebook, Google, Game Circle, Weibo).

B - PERSONAL DATA THAT WE COLLECT AND PROCESS

We may collect the following categories of personal data relating to our users:

- a) Contact information (such as name or nickname or email you submit as part of your register for our Services or log-in or via social networks);
- b) Data about your account and game progress, we create a Legacy-specific ID for you when you use the Services;
- c) Your IP address and unique mobile device identification numbers (such as your device ID, advertising ID, MAC address);
- d) Data about your device, such as manufacturer, operating system, CPU, RAM, browser type and language;
- e) Broad location data (e.g. country or city-level location);
- f) Precise geolocation data (GPS, with your consent);
- g) Usage data, such as data we collect with cookies and similar technologies Cookies Notice;
- h) Data (such as your nickname, profile picture) we receive if you link another provider’s tool with the Service (such as Facebook, Google or Weibo);
- i) purchase history, including details of orders (amount spent, date, time, vouchers or offers used);
- j) Data to fight fraud (such as refund abuse in games or click fraud in advertising);
- k) Data from platforms that the games run on (such as to verify payment);
- l) Data for advertising and analytics purposes, so we can provide you a better Service;

- m) Your email address and your messages to the Services (such as chat logs and player support tickets sent by email or through another service we can use in the future) any feedback you submitted about your experience with us; and/or
- n) Other data you choose to give us.

C - WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?

Individual Customers

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
<p>Provide you with our products or services (for example, play one of our online games and make online purchases)</p>	<p>Legitimate Interest</p>	<p>Contract</p>
<p>Establish and manage our relationship (including maintaining or servicing accounts, providing customer service, and making your experience with us personalised,)</p>		<ul style="list-style-type: none"> - Account Management - Management Reporting (including at an intra-group level) - Exercise or defend legal claims
<p>Learn about how our products and services are or may be used to verify or maintain the quality of, and improve, our products and services (for example, when we ask you to fill out surveys about the experience you had with us)</p>		<ul style="list-style-type: none"> - Understand the market in which we operate - Management Reporting (including at an intra-group level)
<p>Security (ensuring confidentiality of personal data, preventing unauthorised access and modifications to our systems and otherwise maintaining the security of personal data)</p>		<ul style="list-style-type: none"> - Managing security, risk and fraud prevention - Management Reporting (including at an intra-group level)
<p>Perform advertising or marketing services, including letting you know about our products, services and events that may be of interest to you by</p>		<ul style="list-style-type: none"> - Promote our goods and services - Management Reporting (including at an intra-group level)

email or other forms of electronic communication		
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If you object to us using your personal data for the above purposes, including direct marketing, please let us know using the email address provided in section 1.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

We do not knowingly collect or solicit personal data about or direct or target interest-based advertising to anyone under the age of 16 or knowingly allow such persons to use our Services. If you are under 16, please do not send any data about yourself to us, including your name, address, telephone number, or email address. No one under the age of 16 may provide any personal data. If we learn that we have collected personal data about a child under age 16, we will delete that data as quickly as possible. If you believe that we might have any data from or about a child under the age of 16, please contact us.

D – HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will process your personal data only for as long as is necessary for the purposes for which it was collected in connection with the provision of service to you, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims.

2.2 REPRESENTATIVES OF OUR EXISTING OR PROSPECTIVE CORPORATE CUSTOMERS, BUSINESS PARTNERS, AND VENDORS

We may collect personal data related to employees, directors, authorized signatories, or other individuals associated with Legacy Games' existing or prospective corporate customers, business partners, and vendors.

A - SOURCES OF PERSONAL DATA

We may obtain your personal data from the following sources:

- a) from you directly,
- b) from a company that employs you, if you are an employee of our existing or prospective customer, business partner, or vendor,
- c) during networking events that we have either hosted, or sponsored, or attended, including from entities conducting network events; and/or
- d) from publicly available sources and social media networks (for example, your company website or social media sites, such as LinkedIn).

B - PERSONAL DATA THAT WE COLLECT AND PROCESS

We may collect the following categories of personal data relating to our existing or prospective customers', business partners', and vendors' employees, officers, authorized signatories, and other associated individuals:

- a) name;
- b) business address;
- c) business email address;
- d) business telephone number; and/or
- e) job title.

C - WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide you with our products or services or receive products or services from you	Legitimate Interest	- Efficiently fulfil our contractual and legal obligations - Management Reporting (including at an intra-group level)
Establish and manage our relationship		- Efficiently fulfil our contractual and legal obligations - Account Management

<p>Learn about how our products and services are or may be used</p>		<ul style="list-style-type: none"> - Understand the market in which we operate - Management Reporting (including at an intra-group level) - Exercise or defend legal claims
<p>Security</p>		<ul style="list-style-type: none"> - Understand the market in which we operate - Management Reporting (including at an intra-group level) - Managing security, risk and fraud prevention - Management Reporting (including at an intra-group level)
<p>Let you know about our products, services and events that may be of interest to you by email or other forms of electronic communication</p>		<ul style="list-style-type: none"> - Promote our goods and services - Management Reporting (including at an intra-group level)

If you object to us using your personal data for these purposes, including direct marketing, please let us know using game's Help & Support tool or via the email provided in section 1 above.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

D – HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will process your personal data only for as long as is necessary for the purposes for which it was

collected in connection with your business relationship with us, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims.

2.3 WEBSITE VISITORS

We may obtain your personal data from the following sources:

- a) from you directly (for example, at the time of subscribing to any services offered on our website, including but not limited to email mailing lists, interactive services, posting material); and/or
- b) from your device or browser through internet service providers, operating systems and platforms, and data analytics providers.

If you contact us, we may keep a record of that correspondence.

B – PERSONAL DATA THAT WE COLLECT AND PROCESS

- a) browser type;
- b) information on the use of our website (for example, pages visited, geographical location, time spent on the website, online transactions);
- c) cookie data (for more information please see our Cookie Notice);
- d) preferences regarding online marketing; and/or
- e) IP address.

C – WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?

Website Visitors		
We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Provide our website services to you	Legitimate Interest	<ul style="list-style-type: none"> - Website Management - Promote our goods and services - Account Management
Establish and manage our relationship		<ul style="list-style-type: none"> - Understand the market in which we operate - Management Reporting (including at an intra-group level)
Learn about our website(s) visitors' browsing patterns and the performance of our website(s), including to verify or maintain the quality of, and improve, our website, products and services		<ul style="list-style-type: none"> - Account Management Learn about our website(s) visitors' browsing patterns and the performance of our website(s), including to verify or maintain the quality of, and improve, our website, products and services Website Management

<p>Security (including ensuring confidentiality of personal data, preventing unauthorised access and modifications to our systems and otherwise maintaining the security of personal data)</p>		<ul style="list-style-type: none"> - Managing security, risk and crime prevention - Management Reporting (including at an intra-group level)
<p>Perform advertising or marketing services, including letting you know about our products, services and events that may be of interest to you by email or other forms of electronic communication</p>		<ul style="list-style-type: none"> - Promote our goods and services - Management Reporting (including at an intra-group level)
<p>Learn about how our products or services may be used, including to verify or maintain the quality of, and improve, our products and services</p>		<ul style="list-style-type: none"> - Understand the market in which we operate - Management Reporting (including at an intra-group level)

If you object to us using your personal data for the above purposes, including direct marketing, please contact with us using the email address in section 1.

Where we use cookies or similar technologies we will seek your prior consent where required to do so by law.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law.

D – HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will keep your personal data only for as long as is necessary for the purposes for which it was collected in connection with your requests via our website or your use of our website.

2.4 VISITORS TO OUR PREMISES

A - SOURCES OF PERSONAL DATA

We may obtain your personal data from you directly and from our records in our operating systems and platforms.

B - PERSONAL DATA THAT WE COLLECT AND PROCESS

- a) name;
- b) business contact details;
- c) organisation;
- d) role;
- e) time and date of your visit; and/or
- f) image (for example, from CCTV cameras at our premises).

C - WHY DO WE COLLECT YOUR PERSONAL DATA AND WHAT ARE OUR LAWFUL BASES FOR IT?

Visitors to our Premises

We may use your personal data to:	Our lawful basis for doing so is:	Our legitimate interests in doing so are:
Security	Legitimate Interest	Managing security, risk and crime prevention
Maintain records of visitors to our premises		Management Reporting

If you object to us using your personal data for the above purposes, please let us know using the email address provided in section 1.

3. WHO DO WE SHARE YOUR PERSONAL DATA WITH

Our Partner Organisations and Service Providers

We may disclose information about you to organisations that provide a service to us, ensuring that they are contractually obligated to keep your personal data confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of service providers:

- a) technical support providers who assist with our website and IT infrastructure,
- b) software providers, including 'software as a service' solution providers, where the provider hosts the relevant personal data on our behalf;
- c) professional advisers such as solicitors, accountants, tax advisors, auditors and insurance brokers;
- d) providers that help us generate and collate reviews in relation to our goods and services;
- e) our advertising and promotional agencies and consultants and those organisations or online platforms selected by us to carry out marketing campaigns on our behalf and to advertise their own products or services that may be of interest to you; and/or
- f) service providers that assist us in providing our services.

Law enforcement or government bodies

We may disclose your personal data as permitted by law in order to investigate, prevent or take action regarding illegal activities, suspected fraud, violation of our intellectual property rights, situations involving potential threats to the physical safety of any person, violation of our Terms and Conditions or other agreements, or as required by law.

4. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EUROPEAN ECONOMIC AREA

We share your personal data with our affiliates and partners in the EU/EEA and outside the EU/EEA. Where a data transfer outside the EU/EEA is not covered by an EU Commission adequacy decision, we rely on lawful safeguards referred to in Art 46 et. seqq. GDPR. This mainly includes EU Commission-approved Standard Contractual Clauses which we enhanced by supplementary security measures such as ancillary individual risk-assessments, additional contractual safeguards and technical safeguards including additional encryption or pseudonymisation, to enable International transfers with Legacy Interactive affiliates and partners outside the EU/EEA. You will find the full text of the EU Commission-approved Standard Contractual Clauses through [this link](#). Please feel free to [contact us](#) for additional information on third country data transfers as well as our safeguards and supplementary security measures.

We share personal data with external vendors or service providers or suppliers that we engage to perform services or functions on our behalf and under our instructions. Where these vendors are located within the EU, we ensure that they are contractually obligated to comply with the EU data protection rules. We also ensure in our contracts with these organisations that they only Process Personal Data in accordance with our instructions and in order to provide the agreed services and protect the integrity and confidentiality of your personal data entrusted to them.

We may also disclose personal data to our advisers, consultants, law enforcement and other public authorities (such as tax and social security bodies), the police, prosecutors, courts and tribunals. All these recipients are themselves responsible to comply with the EU data protection rules.

Some of the vendors that we engage to are located outside the European Economic Area. Where the EU Commission did not recognise them as locations providing adequate protection for personal data, we rely on lawful safeguards as described above.

You may request a copy of these agreements by contacting us via [Contact Us](#) section.

5. YOUR RIGHTS UNDER THE GDPR

You are entitled to obtain information from us on how we handle your personal data, to see copies of all personal data held by us and to request that your personal data is amended, corrected or deleted from our systems. You can also limit, restrict or object to the processing of your data.

We do not carry out any decision-making based solely on automated processing, including profiling. If you gave us your consent to use your data, e.g. so that we can send you marketing emails or display personalised ads, you can withdraw your consent at any time. Please note that even if you withdraw your consent, we can still rely on the consent you gave as the lawful basis for processing your personal data before you withdrew your consent.

You can object to our use of your personal data where we stated we rely on our legitimate business interests to do so. We explained the legitimate interests we rely on in sections 'Why do we collect your personal data and what are our lawful bases for it?' above.

If you would like to exercise any of your above rights, you may contact us via [Contact Us](#) section.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

PRIVACY POLICY

In this section, we provide additional information about how we handle personal data about California residents as required under California privacy laws including the California Consumer Privacy Act (“CCPA”). This section does not address or apply to our handling of publicly available information lawfully made available by state or federal government records or other personal that is exempt under the CCPA.

CATEGORIES OF PERSONAL DATA UNDER THE CCPA

(Last Updated: 1 July 2021)

In this section we describe, generally, how we have collected and disclosed personal data about you in the prior 12 months (from the Last Updated date above). As noted above the data that we collect about you varies on your relationship with us. As described in sections “2.1 Individual Customers – A. Sources of Personal Data”, “ 2.2. Representatives of Our Existing Or Prospective Corporate Customers, Business Partners and Vendors -- A. Sources of Personal Data”, “ 2.3 Website Visitors”, and “2.4 Visitors to Our Premises -- A. Sources of Personal Data” above, we may collect personal data from the following sources:

- directly from you
- social networks
- operating systems and platforms
- entities conducting networking events
- publicly available sources
- advertising networks
- data analytics providers

The table below identifies the categories of personal data (as defined by the CCPA) we have collected about you, as well as how we have sold or disclosed for a business purpose such information. For more information about the business and commercial purposes for which we collect, and sell personal data, please see sections “2.1 Individual Customers – C. Why Do We Collect Your Personal Data and What Are Our Lawful Bases For It”, “ 2.2. Representatives of Our Existing Or Prospective Corporate Customers, Business Partners and Vendors -- C. Why Do We Collect Your Personal Data and What Are Our Lawful Bases For It”, “2.3 Website Visitors -- C. Why Do We Collect Your Personal Data and What Are Our Lawful Bases For It”, “2.4 Visitors to Our Premises -- C. Why Do We Collect Your Personal Data and What Are Our Lawful Bases For It” and “3. Who Do We Share Your Personal Data With” above.

Under the CCPA, a “sale” includes disclosing or making available to a third party personal data, in exchange for monetary compensation or some other value or benefit. While we do not disclose personal data in exchange for monetary compensation, we may make certain categories of personal data available in order to receive certain benefits or services, such as when we make browsing information available to third party ad companies (through third party tags on our Sites)

in order to improve and measure our ad campaigns and reach users with more relevant ads and content.

We may share your information with other players (your in-game nickname and avatar only), our business partners, service providers, affiliates and subsidiaries, advertising and promotional agencies and networks, consultants and those organisations or online platforms selected by us to carry out marketing campaigns on our behalf and to advertise their own products or services that may be of interest to you.

PERSONAL DATA COLLECTED

Categories	Description	Categories of Entities to Whom We May Disclose or Sell this Information
Identifiers	Includes direct identifiers, such as email address; IP address, device ID and other online identifiers.	<ul style="list-style-type: none"> - Affiliates and Subsidiaries - Other Players (username and profile only) - Service Providers - Business Partners - Advertising Agencies (Advertising identifier and IP address only)
Customer Records	Includes personal information, such as advertising ID in order to understand which others of our products and services individuals have purchased and/or played.	Affiliates and Subsidiaries
Commercial Information	Includes records of products or services purchased.	Affiliates and Subsidiaries
Usage Data	Includes ad views, browsing history, clickstream data, search history, access logs and other usage data and information regarding an individual's interaction with our websites, mobile apps [and other Services], and our marketing emails and online ads.	<ul style="list-style-type: none"> - Affiliates and Subsidiaries - Service Providers - Business Partners - Advertising Networks

Geolocation Data	Includes location information about a particular individual or device.	<ul style="list-style-type: none"> - Affiliates and Subsidiaries - Service Providers - Business Partners - Advertising Agencies - Advisors and Agents - Government Entities and Law Enforcement
Tech device data	Includes device language setting, OS version, device model, user agent (browser version), connection type, carrier etc.	Affiliates and Subsidiaries
Player activity data	Date and time when the user has opened the app, finished the tutorial, in-game progress, etc.	<ul style="list-style-type: none"> - Affiliates and Subsidiaries - Service Providers

CALIFORNIA RESIDENTS' RIGHTS

CCPA Rights. In general, California residents have the following rights with respect to your personal data:

Do-not-sell (opt-out): to opt-out of our sale of your personal data. While we may “sell” personal data as defined by the CCPA, we do not sell personal data about California consumers who we know are younger than 16 years old.

Right of deletion: to request deletion of their personal data that we have collected about you and to have such personal data deleted (without charge), subject to certain exceptions.

Right to know: with respect to the personal data we have collected about you in the prior 12 months, to require that we disclose the following to you (up to twice per year and subject to certain exemptions):

- categories of personal data collected;
- categories of sources of personal data;
- categories of personal data about you we have disclosed for a business purpose [or sold];
- categories of third parties to whom we have sold or disclosed for a business purpose your personal data;
- the business or commercial purposes for collecting or selling personal data; and
- a copy of the specific pieces of personal data we have collected about you.

Right to non-discrimination: the right not to be subject to discriminatory treatment for exercising your rights under the CCPA.

Submitting CCPA Requests. California residents may submit CCPA requests through one of the following methods:

- Through the game; or
- By contacting us via email: info@legacygames.com

For more information about our privacy practices, you may contact us via Contact Us section: <https://legacygames.com/contact/>

Effective Date: 1 July 2021