

PRIVACY POLICY

This Privacy Policy is intended to provide you with information on how information and data concerning you (including personal data) is collected and used in connection with you using mobile application application (the “APP”).

1. GENERAL INFORMATION

Within the App you may:

- play the game;

Accessing the App requires accepting this Privacy Policy. Subsequently, whenever you access the App we may be collecting certain information about you, some of which (independently or in connection with other information) may constitute **personal data** under the Regulation 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“GDPR”) or under Assembly Bill 375 of the California House of Representatives, an act to add Title 1.81.5 (commencing with Section 1798.100) to Part 4 of Division 3 of the Civil Code, relating to privacy and approved by the California Governor on June 28, 2018 (California Consumer Privacy Act, “CCPA”);.

The developer of the App and the entity which determines the purposes and means of the processing of your personal data collected when using the App (the GDPR – the controller; the CCPA – the business) is RTB Marketing & Tech Services Ltd. with its registered seat in Nicosia, Cyprus at Kyriakou Matsi 18, 2nd Floor, Egkomi, Nicosia 2408 (“we”).

2. WHAT DATA WE COLLECT

Most of data we collect comes directly from your device when you use the App. This includes:

- IP address,
- technical and statistical information (such as device type, session data, interactions with interface elements, game progress data),
- unique device identification numbers,
- unique advertising ID numbers (Apple Identifier for Advertisers “IDFA” on Apple, and Google Advertising Identity “GAID” on Android).

3. HOW YOUR DATA IS USED

- We will use your data for the following purposes:
 1. assuring proper functionality of the App, in particular properly running the game, including detecting illegal activities and;
 2. remembering your preferences with regards to the App;
 3. conducting analytical operations for technology and product development (e.g. analyzing how you engage in with the App);
- Some of the above information will be collected through software development kits (“SDKs”) provided by our partners, namely:

1. Unity Analytics – which allows for conducting analyses of your behavior when using the App. For more information click [here](#).

- We may also process your personal data to defend our rights and, if required, pursue claims.

4. LEGAL BASIS FOR PROCESSING OF YOUR PERSONAL DATA

- Your data collected for the purposes of assuring proper functionality of the App on the basis of the **necessity for entering or performance of a contract** to which you are subject, when using the App.
- Your data collected for the purposes of remembering your preferences with regards to the App and conducting analytical operations for technology and product development is processed pursuant to our **legitimate interest** consisting in (1) providing you services tailored to your preferences and (2) constant improvement of our services.
- Your data collected for the purposes of marketing is processed pursuant to **the consent you give** when accepting this Privacy Policy.
- Should you need further information concerning the legal basis for collection and use your personal information, please contact us at: contact@bestgames.ai

5. SHARING YOUR DATA

We may share your data with the following categories of third parties.

- in order to assure the ongoing operation of the App and its security – with **our subcontractors** such as providers of data centers or IT services;
- for the purposes indicated in Section 3 above – with **our trusted partners** i.e.: Unity Technologies ApS, Google LLC, Inc. and Apple Inc.

In any case we follow security procedures in particular we make sure they grant an appropriate level of privacy security to your data and process your data only for the purposes referred to above as well as in compliance with this Policy and the applicable laws. To learn more about how our partners use your data please consult their Privacy Policies.

Your personal data may also be disclosed to entities which are authorized by the applicable laws to receive such data, including to the competent law enforcement authorities. We will not transfer or permit any of your personal data to be transferred to a territory outside of the European Economic Area unless we have taken measures necessary to ensure the transfer is in compliance with applicable laws. Such measures may include (without limitation) transferring the personal data to a recipient in a country that the European Commission has decided provides adequate protection for Personal Data as referred to in Article 45 GDPR or to a recipient in the United States that has entered into EU Standard contractual Clauses. Nonetheless, some of your data may be transferred to such countries as part of our partners' activities. For more information, please consult their Privacy Policies.

Please be informed that over the preceding 12 months, we have not sold any categories of California residents' personal information to third parties. We do not, and will not, sell your personal information.

6. DATA SECURITY MEASURES

We implement technical and organizational measures to ensure a level of security appropriate to address the identified risks, taking into account in particular the scope, context and purposes of

processing your personal data. Confidentiality, integrity and availability principles are strictly adhered to.

We store your data in top-tier multi-tenant data centers operated by market leading companies with appropriate data security certifications. The data is replicated over multiple systems to help to protect against accidental destruction or loss and backups of data are performed in regular intervals.

Access to our data processing systems is granted only to members of the staff authorized by the management of the company. We use security mechanisms, file system permissions, application permissions and passwords as well as various two-factor authentication methods to prevent unauthorized access and encrypt data transmission channels.

We have deployed procedures regarding every aspect of processing, carefully select technologies used for processing as well as data recipients and constantly develop the awareness and knowledge about privacy and personal data protection.

7. DATA RETENTION

We will process personal information concerning you for as long as we have a valid legal basis for processing.

In case of data processing based on our legitimate interest your data will be processed until you object to such processing. Where the data processing is related to responding to your query, we will keep such data for a period needed to deal with a specific query and a reasonable term thereafter, in order to evidence compliance with applicable laws.

In any case we do not store your data after you uninstall the App from your device.

Please be advised that our Partners may have different data retention rules. For more information, please consult their privacy policies (linked in section 3).

8. EXERCISING YOUR PRIVACY RIGHTS

You may opt-out from using advertising IDs in privacy settings on your device.

To the extent provided by the applicable data protection laws, in particular the GDPR, you have the right to:

- access your personal data,
- rectify your personal data,
- request erasure of your personal data,
- object to data processing,
- restrict processing of your personal data,
- receive a copy of your data in a structured, commonly used and machine-readable format or to request transmission of the data to another controller,
- lodge a complaint with a competent supervisory authority,
- withdraw consent for data processing you gave at any time (without affecting the lawfulness of processing based on consent before its withdrawal).

If you are a resident of California you have the right to request that we disclose what personal information we collect, use and disclose about you specifically ("**right to know**"). To submit a request to

exercise the right to know, please submit an email request to contact@bestgames.ai and include “California Request to Know” in the subject line. You have a **right to request the deletion** of personal information that we collect or maintain about you. To submit a request to delete personal information, please submit an email request to contact@bestgames.ai and include “California Request to Delete” in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA. We will ask that you provide certain information to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why. You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to contact@bestgames.ai and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

For more detailed information related to your data subject rights please do not hesitate to contact us at: contact@bestgames.ai

9. CHILDREN’S PRIVACY

We do not knowingly collect or solicit any information from anyone under the age of 16. This App is not directed at children under the age of 16. In the event that we learn that we have collected personal information from a child under age 16 without verification of parental consent, we will delete that information as quickly as possible.

10. AMENDMENTS

We keep this privacy policy under regular review to make sure it is up to date and accurate. We will notify about its changes in advance.

11. CONTACT US

If you wish register a complaint regarding the operation of the App, you may do so by writing to us at RTB Marketing & Tech Services Ltd., Kyriakou Matsi 18, 2nd Floor, Egkomi, Nicosia 2408, Cyprus or contact us at: contact@bestgames.ai We shall provide you with our response within **30 days** at the latest in the same form in which a complaint was made.

Last Updated: January 11, 2021