

# PRIVACY POLICY

**Version: 1.0**

**Updated on: January 12, 2022**

The present Privacy Policy (hereafter, the "**Policy**") is applicable to games (hereafter, the "**Game**") developed, published, and/or managed (controlled) by the **Cyber-Rom Limited Liability Company** (hereafter, the "**Company**"), distributed on Internet sites, in the Google Play Market and/or the Apple App Store, as well as on other Company resources directly related to the Games.

## PREAMBLE

The Company, within the parameters of its activities (namely, the distribution and management of Games via the Internet), receives access to information that is confidential, as well as to the data of the individuals who use its Games (hereafter, "**User**" or "**Users**").

The Company may need to gather from the User certain information and data for the purposes of identifying the User within the Game as well as to comply with the End User License Agreement. In such circumstances, the Company affirms that the confidential information and/or data are subject to protection from unsanctioned distribution and/or use in compliance with the requirements of the laws of the Russian Federation and the provisions of the present Policy.

## **INFORMATION AND DATA ACQUIRED BY THE COMPANY**

The User, in using the Game, including undertaking the registration procedure (if applicable), sending messages, letters, and otherwise interacting with the Company, provides the Company with certain information and data that is confidential. By starting to use the Game, the User consents to the Company collecting, storing, and processing such confidential information and data.

The Company does not access the User's payment data, nor does it store the User's credit or debit card information or other User data.

The User undertakes not to collect, distribute, or use within the Game or its services the personal data of any third parties without their consent, including first names, last names, telephone numbers, email addresses, residential addresses, passport data, or any other information.

The User accepts responsibility for the storing of their own authorization data, including login and password for accessing the User's account within the Game or for any of its services. In the instance of a violation of the confidentiality of the User's data, when this data was under the control of the Company, the Company undertakes to notify the User within a reasonable timeframe.

The User is advised, during the registration process or any other actions performed while using the Game, not to disclose to third parties any personal data or personal information, including telephone numbers, addresses, bank account numbers, or any other information or data that the User considers confidential.

The User agrees that, during the process of managing the Game, the Company receives certain information of a technical and in-game nature, including that which displays User activity while in-game.

Nicknames and other User information, depending on the location of its dissemination (chat or forum), may be available to all Users. By publishing personal information, the User clearly makes that information publicly accessible, meaning that it will be available to other Users of the Company's Games and Internet users and can be copied and/or distributed by these users. As soon as the User publishes their data for other users, that data cannot be deleted.

The Company does not request and does not collect or process any information related to special categories of personal data such as that concerning health, race, religion, political views or philosophical beliefs, or intimate life.

## **USAGE OF INFORMATION AND DATA ACQUIRED BY THE COMPANY**

The Company has the right to use information and data acquired from the User for the following purposes:

- (a) To manage the User's account;
- (b) To provide the User access to the Game;
- (c) To provide the User with additional information and materials for the Game;
- (d) To provide the User access to additional services, including those to which the User has subscribed;
- (e) To facilitate communication between Users;
- (f) To ensure operation of customer support services;
- (g) To update, expand, or improve the Game.

The Company, or third-party partners selected by the Company and with its permission, may show the User advertisements using their own ad servers.

## **PRIVACY COMMITMENT AND DISCLOSURE OF INFORMATION** **AND DATA**

The Company commits to storing the information and data gathered from its Users strictly confidentially, undertaking all necessary legal, organizational, and technical measures to ensure the security of such information from unauthorized or accidental access, destruction, modification, blocking, copying, disbursement or dissemination, as well as other unlawful actions in relation to the data. The Company also commits to taking all necessary measures to prevent the exposure or use of the information and data in any way besides that specifically delineated by the present Policy.

Access to the User's information can be obtained solely by Company employees, consultants, and auditors who require access to such information in order to fulfill their duties, subject to the necessary security measures to protect the confidentiality of the information.

The Company has the right to disclose information and data provided by the User to third parties with the User's consent. The User agrees that the Company can disclose information about the User to third parties in the following scenarios:

- (a) To provide the User with additional information and services;
- (b) To facilitate financial transactions undertaken by the User during the course of using the Game;
- (c) In the event that such a disclosure is necessary for the provision of justice, the execution of a judicial act, or the act of another organ or official body subject to enforcement in accordance with the laws of the Russian Federation.

The company undertakes to store the User's information for as long as it is necessary for the purposes of executing the End User License Agreement,

compliance with legal requirements, as well as the enforcement of applicable judicial decisions.

## **ACQUISITION AND USAGE OF CONFIDENTIAL INFORMATION AND DATA FROM MINORS**

The Company, acting in good faith, does not accept or intentionally collect any information or data about any underage persons as determined by the legislation of their country of residence (location) for the use of services, similar to the Game, developed and/or under the management (control) of the Company, including first names, last names, addresses, telephone numbers, and/or email addresses.

## **TECHNICAL INFORMATION (COOKIES)**

The Game website uses cookies (cookies are small files stored on the User's device that contain information about the User's most recent activity) to streamline the authorization process, remembering the User's preferred in-game language.

The Company has the right to place cookies and web beacons on its website and the Game's website in order to collect information about the sections the User has accessed, the services that interested the User, and the User's movements on both the Game and Company websites. If the User is registered, this information is stored in the Company's database. The Company uses this information to improve the functioning of the Game, to provide Users with additional information and services, as well as for other marketing purposes.

The User has the right to independently regulate the use of cookies in their chosen browser. That said, disabling cookies may result in the User not being able to take full advantage of all the different functions of the Game.

## **APPLICABILITY OF THIS POLICY AND THIRD PARTY RESOURCES**

The provision of the present Policy only applies to the Games developed, published, and/or managed (controlled) by the Company. Furthermore, the Company specifically stipulates that in certain Games hyperlinks and banners belonging to third parties, including those leading to third-party websites, may appear.

The Company does not guarantee to the User compliance with the provisions of the present Policy on such sites and is not responsible for the disclosure of the User's confidential information on such sites.

## **USER ACCESS AND MODIFICATION OF INFORMATION AND DATA**

The User has the right to access all of their personal information and data stored in the Company's databases.

The User has the right to prohibit the Company from using the information and data mentioned in the present Policy. In such a case, after receiving such a prohibition from the User, the Company cannot guarantee the User unfettered and complete access to the Game and the Company's other services.

The User has the right to delete their data. The company warns the User that, in the event they decide to delete the data, the Company will be unable to restore it.

Any Users who wish to object to the processing of their data may send this objection to the Company using the contact information provided below. This is also applicable to the exercise of any rights to obtain information, modify or delete data, or to the restriction or transfer of such data.

Information and data can be modified by the User at any time, subject to the restrictions mentioned in the present Policy.

## **CONTACT INFORMATION**

**Contact Information:** Cyber-Rom Limited Liability Company

**Address:** Building 6, Corpus 4, Section 104, Room 1B, Kronshtadtskii Boulevard, Moscow, 125212

**Email Address:** support.gamedev@cyrm.ru

## **CHANGES TO POLICY AND APPLICABLE LAW**

The Company reserves the right to make updates to the present Policy at any time, including to take into account any changes in legislation.

The User undertakes to independently check the text of the Policy for changes. Failure by the User to take action to become familiar with the text of the Policy cannot serve as a basis for challenge by the User of any rights/permissions or procedures for the use of the User's data as carried out by the Company in accordance with the present Policy.

The present Policy, as well as any disputes that may arise between the User and the Company, are regulated by the laws of the Russian Federation without regard to Conflict of Laws rules or the location of the User.