

## PRIVACY POLICY

*Version as of August 08<sup>th</sup>, 2025*

This Privacy Policy (hereinafter referred to as "**Policy**") describes how the Limited liability Partnership "KowiyGames", BIN 221040032392, address: Kazakhstan, Almaty city, Bostandyk district, Auezova st. 175, n.p. 9a, postal code 050057 (hereinafter referred to as "KowiyGames", "We" and derivatives) processes Personal Data as part of providing access to Its PC and mobile games, as well as to the website and/or other services (hereinafter referred to as "Games", "Services"). By using Our Games and/or Services and/or checking the appropriate box when launching Games/accessing Services, You or Your holder of parental responsibility (hereinafter referred to as "User", "You", "Data Subject" and derivatives) accept the Policy.

We do not collect or process special categories of personal data ("sensitive data"), i.e. data related to race/nationality, political views, religious or philosophical beliefs, health status, intimate life and/or sexual orientation.

Given that in-game chat is available to You in Our multiplayer Games, **please, do not share Your Personal Data and other personal or confidential information with other Users.** We also inform You that if a message is sent to the "global" channel of the in-game chat, such a message will be available to all players of the corresponding server. If You leave information in comments and discussions in Our other publicly available resources, such information will be stored in such sources and remain accessible to an indefinite circle of people for the period of existence of such resources and/or discussions. If You close Your account linked to the corresponding resource, Your public ID will be deleted, but the content of the comment will remain and remain accessible to an indefinite circle of people. By accepting the Policy, You confirm that You have read this provision and agree with the functioning of the in-game chat and Our publicly available resources.

INFORMATION ON HOW TO EXERCISE YOUR RIGHT TO RESTRICT DISCLOSURE/SALE OF YOUR PERSONAL DATA TO THIRD PARTIES CAN BE FOUND IN SECTION 3 OF THE POLICY.

IF YOU ARE UNDER THE AGE OF 18 OR ANY OTHER AGE OF MAJORITY ESTABLISHED BY LEGISLATION OF YOUR COUNTRY OF RESIDENCE, ASK YOUR PARENTS OR OTHER HOLDER OF PARENTAL RESPONSIBILITY TO READ AND ACCEPT THE POLICY. If You are a minor and You are not able to present the Policy to Your holder of parental responsibility, and if You or Your holder of parental responsibility does not agree to the Policy, please, **refrain from using the Games and Services.**

If You, being a holder of parental responsibility, allow a minor to Use the Games, We assume that the holder of parental responsibility has read the Policy and accepted it on behalf of the minor.

At the same time We do not purposefully collect Personal Data of Users under the age of 13 and other minors/persons lacking legal capacity. If We receive information that a User is a minor or a person who is unable to consent to Processing of Personal Data, and the parent or other holder of parental responsibility of such a person does not agree or did not consent to Processing of Personal Data in accordance with the Policy, We will Process Personal Data only for purposes that do not require direct consent, in particular:

- for the purposes of supporting and analyzing functioning of Games;
- implementation of network communications;
- User authentication or personalization of content in Games;
- to display advertisements/contextual advertising or to cap frequency of its display to Users;
- to ensure security and integrity of Personal Data, User, his devices and Use of Games;
- to comply with the requirements of applicable law; and/or
- to fulfill the request of a minor or a person lacking legal capacity in accordance with applicable legislation governing Processing of Personal Data.

The Policy provided to the User when launching Games or publicly posted on Our pages and websites is up to date. We may introduce amendments to the Policy over time. All changes take effect from the date they are published and/or communicated to the User. Taking into account means and information available to Us, We will make every reasonable effort to organize additional ways to notify Users about publication of new versions of the Policy, however, We also recommend that You visit Our resources and check for new versions of the Policy.

If you reside in the United States, in particular, you are a resident of the states of California, Colorado, Connecticut, Nevada, Utah, Montana, Oregon, Texas or Virginia, please, also read Sections 11 and 12 of the Policy.

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## 1. DEFINITIONS

- **“Automated decision-making in relation to Data Subjects”** — adoption of legally or otherwise significant decisions for the Data Subject, based solely or to a greater extent on automated Processing of Personal Data without significant human involvement;
- **“Anonymization”** — Processing of Personal Data in such a way that it could no longer be attributed to a specific Data Subject;
- **“Credit/debit card data”** — the data indicated on a payment instrument issued by the bank, which is usually referred to as a "bank card";
- **“Identifiers”** — identifiers assigned to the User and his device, namely, User ID, Device ID and Privacy ID, which is assigned to User to allow her to manage her Personal data. Identifiers are assigned to Users automatically when they first Use Our Games and other KowiyGames services. This also includes username, password, and Google ID used to authorize the User;
- **“In-game chat data”** — information created by Users as part of gameplay and used by them to interact with each other, represented as text;
- **“Advertising Campaign information”** — information about the fact of viewing, clicking on an ad or installation of an advertised application;
- **“Information on the Use of Games”** — data created by the User during the Use of Games, such as (1) the time of logging into the Game, (2) duration of game sessions, (3) depersonalized information about User's actions in a Game, necessary to support and analyze the functioning of Games (for example, to fix bugs, balance game-mechanics, and/or adjust in-game economy), (4) in-game progress, (5) performance during gameplay, participation in events and promotions, as well as information related to participation in clans/communities;
- **“Use”** — access to, operation and other lawful actions that the User performs in relation to Games and other services of KowiyGames;
- **“Contact Details”** — data that the User can share with KowiyGames so that they can be assisted as part of User support and User feedback. Such data includes e-mail and contact phone number;
- **“General Technical information”** — information related to User's device, namely: (1) time zone information, (2) free memory on the device, (3) device IP, (4) country of connection, (5) screen resolution, (6) system language, (7) name and version of the operating system, (8) name of the mobile device (make, model), (9) CPU and GPU information;
- **“Processing of Personal Data”** — any action (operation) or a set of actions (operations) performed with Personal Data using automation tools or without use of such tools, including collection, recording, organization, structuring, accumulation, storage, adaptation or modification, downloading, viewing, use,

disclosure through transmission, distribution or other type of provision of access, comparison or combination, reduction, deletion or destruction;

- **“Personal Data”** — any information related to the User, including cookies;
- **“Profiling”** — any form of automated Processing of Personal Data which constitutes use of Personal Data to evaluate certain personal aspects of an individual, in particular, to analyze or predict aspects of his performance at work, his/her economic situation, health, personal preferences, interests, reliability, behavior and movement;
- **“Terms of Service”** — an agreement concluded between the User and KowiyGames, which establishes conditions for access to Games and other services available at [https://kowiyygames.com/ToS\\_EN.pdf](https://kowiyygames.com/ToS_EN.pdf);
- **“Pseudonymization”** — Processing of Personal Data in such a way that it can no longer be attributed to a specific Data Subject without use of additional information, provided that such additional information is stored separately, and technical and organizational measures have been taken with respect to it to prevent its attribution to an identified or identifiable individual;
- **“Ad Identifiers”** — identifiers assigned to the User's device that are necessary for displaying ads in Games and/or other KowiyGames services, namely (1) Main Advertising Identifier ("Advertising ID"), which is divided into Google Advertising ID and IDFA, depending on the type of the User's operating system, and (2) IP address;
- **“Special Categories of Personal Data”** — data relating to racial or ethnic origin, political views, religious or philosophical beliefs, trade union membership, as well as Processing of genetic data, biometric data for the purpose of precise identification of an individual, data concerning health, sexual life or sexual orientation of an individual;
- **“Cross-border transfer of Personal Data”** — transfer of Personal Data to the territory of a foreign state;
- **“Financial information”** — information about transactions made by the User in Games, including data on purchases and refunds, date and time of transactions, basic bank details, electronic receipt data, number of transactions, confirmation of receipt of funds, etc.

## 2. HOW CAN YOU REACH US?

If You have any questions or wish to send a request to KowiyGames in accordance with the Policy, You can always contact Us using the following contact details:

- Data Protection Officer (“DPO”): [lawyer@kowiyygames.com](mailto:lawyer@kowiyygames.com)
- European Economic Area (“EEA”) Representative: [lawyer@kowiyygames.com](mailto:lawyer@kowiyygames.com)

## 3. WHAT DATA AND FOR WHAT PURPOSES DO WE PROCESS?

We Process Personal Data only if the appropriate legal basis for such Processing is applicable for specific purposes. We are striving to minimize Processing of Personal Data and limit it to ensure normal Use of Our Games and other services, as well as to maintain basic forms of monetization.

You can get acquainted with categories of Personal Data, legal grounds and purposes of Processing in the following table:

Data category	Legal basis	Purposes of Processing
<i>Your age</i>	(1) Compliance with requirements of legislation regulating Processing of Personal Data, (2) compliance with the requirements of legislation regulating content of ads shown.	Compliance with applicable legislation governing Processing of Personal Data establishing age required to consent to such Processing. Depending on the information received, We will apply the appropriate Processing regime. Age information is also required to set up ads shown to the User.
<i>Identifiers</i>	(1) Execution of Terms of Service to which User is a party, (2) compliance with requirements of legislation establishing requirements for security of Personal Data Processing, (3) Our legitimate interest in supporting and analyzing functionality of Games and other services.	Ensure normal Use of Games and other KowiyGames services by the User, authentication in Games and other services, improvement of Games and other services. Necessary for User authorization.  Privacy ID is used, in particular, to provide the User with the ability to (1) revoke consent to the Processing of Personal Data, (2) request account deletion, and (3) confirm account ownership when the User applies without a login.
<i>Financial information, Identifiers</i>	(1) Execution of Terms of Service to which User is a party, (2) compliance with requirements of legislation on reporting and accounting, and ensuring security of operations, as well as AML requirements and countering financing of terrorism, (3) Our legitimate interest in defense against legal claims and actions.	Transaction accounting, reporting, sending electronic checks, checking payments, provision of support, compliance with legal requirements, defense against legal claims and actions. Data indicated may also be required to provide a User with a refund.  We do not Process credit/debit card information.

		Such data may be Processed by Our payment agents, You can find more information about them in Section 4 of the Policy.
<i>In-game chat data</i>	(1) Execution of Terms of Service to which User is a party, (2) compliance with legal requirements on detection and blocking of messages found in violation of legislation or rights of third parties, (3) Your consent to such Processing.	The Games have built-in electronic text messaging capability so that Users can have a full-fledged multiplayer experience. You can complain about other Users if they use text chat in violation of the Terms of Service, and We will review the in-game chat Data to make a decision regarding Your complaint.
<i>Information on the Use of Games, General Technical information</i>	Our legitimate interest in improving the quality of the Games and ensuring their normal functioning.	<p>We use depersonalized data that demonstrates different aspects of the Use of Games, i.e. we separate Identifiers from Information about the Use of Games. In other words, We collect “statistical information”. The processing of this data is necessary to support and analyze the functioning of the Games.</p> <p>We may not separate some of this information from Your in-game ID if it is necessary to maintain the proper functioning of the Games, record in-game transactions and other similar operations.</p>
<i>Contact Details, Identifiers</i>	(1) Execution of Terms of Service to which User is a party, (2) compliance with requirements of law regulating interaction with Users, in particular to comply with requirements of	Provision of support to Users upon request, as well as communication with the User regarding Processing of Personal Data.

	legislation regulating Processing of Personal Data.	
<i>Ad Identifiers, Advertising Campaign information, General Technical information</i>	(1) Our legitimate interest in monetization of Games and services, (2) Your consent to such Processing.	Displaying ads in Our Games and services.
<i>Ad Identifiers, General Technical information</i>	(1) Our legitimate interest in monetization of Games and services, (2) Your consent to such Processing.	Communication with advertisers to display ads in Our Games and Services.
<i>General Technical information, Advertising Campaign information</i>	(1) Our legitimate interest in monetization of Games and services, (2) Your consent to such Processing.	Receipt of general information about the viewed ad and the facts of interaction therewith.
<i>Information on the Use of Games, Identifiers</i>	Your consent to receive targeted advertising, newsletters, special offers, and notifications about promotions and events.	Based on this data, We can send You personalized offers (i.e., We send an offer to You or a specific small number of players) or non-personalized offers (i.e., We send an offer to a wide range of players based on certain criteria). We do not discriminate against prices based on Your preferences. We will not send You targeted advertising, non-critical newsletters, personalized offers and notifications about promotions and events in the absence of Your express consent.

We do not sell Your Personal Data and/or use it for the purposes of displaying targeted advertising and/or Profiling. Targeted advertising can only be provided to You if We receive Your express consent during registration or at another time.

KowiyGames conducted the legitimate interest assessment necessary for application of “legitimate interest” as a legal basis for Processing of Personal Data. You can get information about the results of this analysis by requesting it via the DPO’s email address.

We also hereby notify You that if You are a person who is subject to the relevant provisions of the sanctions of the European Union and/or the United States of America, on the basis of which We are obliged, upon request, to disclose Personal Data and/or other information that You provide to Us, KowiyGames will be forced to do so. By accepting the Policy and/or the Terms of Service, You express Your awareness with and consent to this provision.

**If You are a resident of the States of California or Virginia of the United States of America, or a resident of another State legislation of which requires you to provide additional information to the User, please, also acquaint Yourself with the following information:**

- WE DO NOT SELL YOUR PERSONAL DATA TO THIRD PARTIES;
- Over the past 12 months We have not disclosed Your Personal data to third parties.

YOU HAVE THE RIGHT TO SEND US A REQUEST TO TERMINATE THE TRANSFER/SALE OF YOUR PERSONAL DATA ("Do not sell my personal data") TO THE DPO VIA EMAIL AT ANY TIME, and We will restrict Processing of Personal Data in accordance with the requirements of the laws of these States. In particular, Your Advertising ID will not be transferred to third parties and used cross-platform, the corresponding ad provider will restrict the use of Personal Data to the permitted purposes, such as, for example, countering fraud and capping frequency of contextual advertising. THE ABOVE PROCESSING PROCEDURE IS CURRENTLY APPLIED TO ALL USERS WITHOUT THE NEED TO SEND US A NOTIFICATION.

**If You are a resident of the United States of America, please, also read the following information:**

If the User indicates that he/she is below the age of 13, or We otherwise learn that the User has not reached the age of 13, We will transfer this information to the corresponding ad provider, which in turn will apply the following restrictions to the Processing of Personal Data:

- The Personal Data received will be used exclusively for displaying contextual advertising, capping frequency of displaying, for countering fraud and as part of other measures necessary to maintain internal operations of the company;
- Persistent identifiers will not be transmitted to external advertisers ("DSPs" – platforms with a priority of demand, and "SSPs" – platforms with a priority of supply), advertising exchanges, marketplaces, unless such Processing is carried out for the purposes of supporting internal operations of the company; and
- Questionnaire advertisements will not be displayed, as well as other such advertisements that request, promote, facilitate or provide the User with the opportunity to disclose their Personal Data.

At the same time, We currently do not use the services of advertising providers.

**If you are a resident of the States of Virginia, Colorado, or Connecticut, if We reject Your request regarding Processing of Personal Data, You have the right to send Us Your disagreement with such a decision by sending an appeal by e-mail to the DPO titled "Appeal against the decision". If You do not agree with the results of the appeal, You have the right to contact the Attorney General of Your State. We also inform You that**

We do not sell Your Personal Data and/or use it for the purpose of displaying targeted advertising or Profiling, and therefore You do not need to object to such Processing.

#### 4. WHO IS MY PERSONAL DATA TRANSFERRED TO?

By agreeing to the Policy, You confirm that You agree to the transfer of Your data to third parties and partners designated in the Policy who are not Our affiliates.

We guarantee that agreements concluded with third parties provide a level of protection not lower than that provided for in the Policy, including [standard contractual clauses](#), which comply with the requirements of applicable legislation on Personal Data.

In order to provide You with the best user experience and comply with the provisions of the Terms of Service concluded between You and Us, in order to comply with the requirements of applicable law, as well as for the purposes of monetization of Our Games, We may transfer Your Personal Data to third parties, namely:

Third party	Third party's privacy policy	Personal Data transferred	Purpose of transfer
Limited Liability Company "Selectel"	<a href="https://selectel.ru/about/documents/">https://selectel.ru/about/documents/</a>	<i>All Personal Data of Users indicated in Section 3.</i>	(1) Compliance with the requirements of the legislation of the Russian Federation on data localization, (2) storage of Personal data for the purposes of maintenance of accessibility and correct functioning of the Games.

The Limited Liability Company "Selectel" does not have access to Your Personal Data and only performs the function of data storage under the obligation of confidentiality.

We may transfer Personal Data as part of or during preparations for a sale of Our company, merger, change of control, or any other type of acquisition or business combination that may affect all or any part of Our assets, or result in the transfer of all or part of Our business to another legal entity. In addition, if We transfer the right to publish any Games or other related products to another legal entity, the new publisher may receive the right to continue using Personal Data in almost the same way as indicated in the Policy, unless you are informed otherwise.

In some cases, We collect Personal Information (such as relevant IDs, email addresses, and nicknames) for Our partners who provide access to Our Games on their platforms, such as Google (Android) and Apple (iOS). Our partners, not Us, are responsible for Your accounts on their platforms, so we recommend that You review their privacy policies as well.

## 5. CAN WE RECEIVE PERSONAL DATA FROM THIRD PARTIES?

We may receive limited Information about our partners' advertising campaigns in order to determine the effectiveness of the said advertising campaigns.

If You believe that third parties transfer Personal Data to Us without Your consent, please, let Us know by sending a letter to the DPO's email address.

## 6. FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will process Your Personal Data as long as You continue to use KowiyGames Games and other services. If You stop Using Our Games and/or other services, as a general rule, We will continue to Process Your Personal Data for the subsequent 2 years so that You can resume Using the Games and/or other services, and We will comply with the requirements of applicable data storage legislation and/or, if necessary, protect ourselves from legal claims and/or lawsuits, or to submit relevant legal claims and/or lawsuits.

In addition to the abovementioned period, Personal Data is also withheld for the purpose of ensuring safety of Games and conducting internal investigations:

- 1) for 3 months after the account is closed under the general procedure; or
- 2) within 1 year after the forced closure of the User's account at Our initiative (ban).

After all the above periods have expired, We will erase Your Personal Data, except for the following cases:

- Financial information (transaction data) is stored for 5 years from the date of receipt for the purposes of compliance with the requirements of applicable legislation;
- Data on the fact and time of receipt of consent from the User to the Privacy Policy and Terms of Service – within 5 years from the date of the decision to close the account;
- Records related to provision of support to the User, as well as approximate (anonymous) geolocation of downloads/purchases are stored for 5 years from the date of receipt based on Our legitimate interest. If KowiyGames becomes a participant in any dispute, investigation or request by a state, judicial authority or other authorized body or organization, the period of storage of Personal Data may be proportionally extended, and the purpose of protecting the legitimate interests of KowiyGames becomes the legal basis for Processing these data;
- Metadata and content of User communication in the In-game chat are stored for 3 months from the date of receipt. The same data is stored for 3 years from the date of receipt if a decision was made to ban and/or close the account of the corresponding User which is done on the basis of Our legitimate interest in defense against complaints and claims, and/or for the purposes of notification of the corresponding governmental bodies of unlawful acts;
- **If you live in the Russian Federation**, the following storage regime applies to metadata and content of communications in the In-game Chat:

- metadata of communications (information about the fact of transfer) is stored for 1 year from the date of transfer for the purpose of compliance with a legal obligation;
- the content of communications is stored for 6 months from the date of transfer for the purpose of compliance with a legal obligation; and
- if a decision has been made regarding the relevant user to ban and/or close the account, then such data is stored for 3 years from the date of transfer which is done on the basis of Our legitimate interest in defense against complaints and claims, and/or for the purposes of notification of the corresponding governmental bodies of unlawful acts.

## 7. HOW DO WE MAINTAIN SECURITY OF PERSONAL DATA PROCESSING AND FUNCTIONING OF THE IN-GAME CHAT?

Security of Your data is important to Us, and therefore We apply appropriate technical and organizational measures to protect Personal Data. For KowiyGames this includes among other things:

- prevention of disclosure of Your data in absence of a proper legal basis;
- ensuring transmission of all information collected by KowiyGames through secure channels;
- protection and, where applicable, encryption by software of the appropriate level to protect against unauthorized access;
- employees and third parties who gain access to Your data are obliged to observe confidentiality;
- the privacy regime in KowiyGames and the rules for working with Personal Data are governed by the company's internal regulations;
- compliance with the general principles of Personal Data Processing, in particular, the principle of data minimization;
- where possible, We strive to anonymize and/or depersonalize/pseudonymize Your Personal Data, within the framework of the relevant Processing purposes.

We follow generally accepted standards for security of Personal Data both during transmission and after its receipt. However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, We cannot guarantee absolute security.

As a general rule, We respect the confidentiality of User communications in the In-game chat, taking into account specifics of its functionality, however in some cases We may gain access to In-game chat data, and sometimes We are obliged to transfer this information to third parties. These cases are listed below:

- in compliance with the requirements of the corresponding legislation, including at the request of state and other authorized bodies. For example, if We find that a User violates the requirements of applicable law (distributes prohibited materials, etc.) using In-game chat, We will transmit information about such violation to the authorized authorities;
- based on a report from a system that monitors behavior that is contrary to the Terms of Service and/or legislation. If such a system is active in Our Games and/or

- other services, illegal behavior will be "highlighted", which will allow Us to check the data and take appropriate measures; and/or
- based on a report from another User who wants to complain about undesirable or illegal behavior.

## 8. WHAT RIGHTS DOES A USER HAVE IN RELATION TO PERSONAL DATA?

As a general rule, We respond to User requests within 30 calendar days, but in some cases a shorter response time is set.

To exercise Your rights in accordance with the Policy, please, send Us a request to the DPO's email address with the obligatory indication of your Privacy ID, which You can find in the main menu of the Game by clicking on the block with Your nickname.

Please, note that if, after receiving Your request, We are unable to identify You in one way or another, We will be forced to refuse to fulfill Your request sent in accordance with the Policy. In this case, You can send Us additional information so that We can make sure that You are indeed authorized to exercise Your rights in accordance with the Policy.

You can learn about Your rights related to Our Processing of Your Personal Data, as well as special response periods, below:

**8.1. Right of access.** Users have the right to request from KowiyGames confirmation of Processing of Personal Data related to them and, if confirmed, have the right to access such Personal Data.

Among other things, KowiyGames is obliged to provide a copy of Personal Data Processed upon the User's request.

In particular, Users are provided with access to the following information:

- Purposes of Processing;
- categories of relevant Personal Data;
- on recipients or categories of recipients to whom Personal Data has been or will be disclosed, in particular recipients in third countries or international organizations;
- to the extent possible, the stipulated period of storage of Personal Data, or, in the absence of precise period, criteria used to determine the specified period;
- existence of the right to demand from KowiyGames correction or erasure of the relevant Personal Data, or restriction of Processing, or to object to the said Processing;
- the right to file a complaint with the relevant supervisory authority;
- if Personal Data is not received from the User, any available information about the source;
- presence of Automated decision-making in relation to the User, including profiling, and reliable information about the logic, as well as about the significance and expected consequences of this Processing for the User;

- information about means of providing security of Processing of Personal Data when it is transferred to countries that do not provide an adequate level of Personal Data protection or to international organizations; etc.

**8.2. Right to rectification of Personal Data.** Users have the right to demand that We correct or supplement inaccurate, outdated and/or incomplete Personal Data. We will respond to Your request and take appropriate measures within 1 business day from the date of receipt of the request. To exercise this right, please, send Us up-to-date data indicating the need for corrections/additions/clarifications.

**8.3. Right to revoke consent to Processing.** Upon Your request We will delete Your Personal Data from Our systems and databases within 1 business day if Your consent is required for its Processing and if there is no other legal basis for Processing.

**8.4. Right to erasure (“right to be forgotten”).** Upon Your request We will delete Your Personal Data from Our systems and databases within 1 business day if:

- Personal Data is no longer required for the purposes for which it was collected and Processed;
- the User withdraws consent to Processing and provided that there are no other legal grounds for Processing (for Personal Data, which requires the User's consent);
- the User objects to Processing in accordance with art. 8.7 of the Policy;
- Personal Data is processed illegally;
- Personal Data must be destroyed under the law; and/or
- the request is submitted by the User or his/her holder of parental responsibility in relation to Personal Data related to a child who has not yet reached the age to give independent consent to Processing.

Please, note that when exercising the rights from art. 8.3 and 8.4 of the Policy, circumstances may arise under which it will be impossible to provide access to Games and/or other KowiyGames services. In this case, We will warn You about this in response to the request so that You will be able to withdraw or amend Your decision.

**You can also request erasure of all Personal Data related to You that We have,** but in this case, We will be forced to restrict Your access to Our Games and/or other services, as such will become impossible from a technical standpoint. We will stop Processing and erase all the relevant Personal Data, except for data necessary to comply with the requirements of law and/or to initiate or defend against legal claims and/or actions.

**8.5. Right to restriction of Processing.** Upon Your request We will restrict (block) within 1 business day Processing of relevant Personal Data in any of the following cases:

- The User contests accuracy of Personal Data;
- Processing is illegal, but the User requires restriction of Processing instead of erasure of Personal Data;
- Personal Data is necessary for the User to initiate or defend against legal claims and/or actions; and/or
- The User objects to Processing in accordance with art. 8.7 of the Policy.

In case of non-confirmation of the fact of violation of requirements for collection, Processing of Personal Data, KowiyGames will lift the restriction (blocking) within 1 business day, of which the User will be informed.

**8.6. Right to data portability.** The User has the right to request his Personal Data presented in a structured, commonly used, machine-readable form, and also has the right to request transfer of this data to another controller at his discretion, if this data:

- is processed on the basis of the User's consent or for the purpose of conclusion and/or execution of a contract with the User (i.e. one of these legal grounds for Processing Personal Data applies); and
- We process this data using automated means.

**8.7. Right to object to Processing.** The User has the right both before and after the start of Processing to object to Processing in the following cases:

- when Our Processing is based on legitimate interest, and such an interest does not prevail over Your rights and freedoms (for example, such Processing is necessary to improve Games and/or Services, to exercise or protect Our rights, etc.). To clarify this, please, contact our DPO via email; and/or
- Processing is carried out for direct marketing purposes (for example, when sending emails, SMS messages, etc.). We will not carry out direct marketing unless you explicitly give your consent to receive such a newsletter during registration.

If You receive newsletters or special offers by e-mail, in the letter You will find instructions for unsubscribing from such a newsletter. We also inform You that the functionality of Your e-mail may provide for the possibility of unsubscribing from any such letters received without the need to send Us a direct request about it.

Please, note that even if You opt out or unsubscribe from receiving personalized messages and offers, We will continue to send You so-called "transactional" notifications, i.e. confirmations of purchases or changes to Your account, notifications related to password recovery or change, information about changes to the Terms of Service and Policy. These notifications will only cease after You delete Your account. We will also continue to show You non-personalized ads and offers in Games and other Services, however, such ads and offers are shown to a wide audience and are not personalized to Your preferences.

You may also restrict the display of personalized ads when using apps on Your Android or iOS device in the privacy settings by selecting "Limit ad tracking" (Apple iOS) or "disable interest-based advertising"/"opt-out of interest-based ads" (Android). You can set up push notifications in the settings of Your iOS or Android device.

**8.8. Right not to be subject to a decision based solely on automated Processing, including Profiling.** This right applies to Users if such decisions may cause legal consequences against the User or otherwise significantly affect him/her. If You believe that We carry out such Processing of Your Personal Data, please, contact Our DPO via the email address and We will check such a decision with the involvement of the DPO within 5 business days.

If You believe that an unfair decision has been made in relation to You based solely on automated Processing but DOES NOT entail legal or other significant consequences for You, please, contact Our DPO via the email address and We will check this decision within 5 business days.

The result of the audit may be either (a) cancellation of such a decision, or (b) sustaining of the decision in force with explanation to the User of the reasons for refusing reverse such a decision.

**8.9. The right to file a complaint with the relevant supervisory authority or court.** If You do not agree with Our decision based on the results of review of Your request, You have the right to file a complaint with the appropriate supervisory authority of Your country of residence.

If You live in the European Union, You may find contact information of the relevant supervisory authority of Your country of residence [here](#).

If You live in the United States of America, You may file a complaint with the supervisory authority of Your State. You may find information about filing a complaint on federal level [here](#).

If You live in the United Kingdom, You may file a complaint with ICO [here](#).

If You live in the Russian Federation, You may file a complaint with Roskomnadzor [here](#).

Please, note that in order to fulfill the request, We may require additional information necessary to identify an applicant. If provision of information (fulfillment of Your request) may violate rights and legitimate interests of third parties, We may refuse to provide You with information (fulfill Your request).

## 9. HOW CAN I CONTROL PROCESSING OF PERSONAL DATA ON MY DEVICE?

If You are using updated versions of iOS and Android, You may restrict collection of the Advertising ID in Your device settings:

- You can read instructions for setting up tracking for iOS devices [here](#);
- You can read instructions for setting up tracking for Android devices [here](#).

Remember that these restrictions will only apply to the specific device You have selected the appropriate settings on, so if You want to restrict collection of the Advertising ID on all Your devices, You will need to do this on each device separately.

## 10. WHERE IS MY PERSONAL DATA STORED?

We store a database with Your Personal Data on a server located in the Russian Federation as part of a hosting service provided by Selectel LLC. After launching Our Games and/or other services the relevant Personal Data is automatically stored on the mentioned server.

Please, note that the Russian Federation is a party to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data of 1981 No. 108. At

the same time, the European Commission [does not consider the Russian Federation to be a jurisdiction that provides a sufficient level of Personal Data protection](#). In this regard, We have concluded a contract for the Processing of Personal Data which contains [Standard Contractual Clauses](#), as well as apply the Personal Data Processing regime that meets the requirements of the [EU General Data Protection Regulation \(EU GDPR\)](#). All agreements concluded by KowiyGames with third parties concerning Personal Data contain provisions that ensure a level of protection not lower than the level set out in the Policy.

By using Our Games and/or other services and agreeing to the Policy, You consent to such Processing of Personal Data.

## **11. ADDITIONAL PROVISIONS FOR RESIDENTS OF THE UNITED STATES OF AMERICA GRANTING ADDITIONAL RIGHTS** (hereinafter referred to as the "Provisions").

These Provisions, which apply to residents of the United States, complement our basic Policy. This applies to residents of those US states that grant additional rights in accordance with applicable law. The terms used in this Privacy Notice in the United States have the meaning assigned to them in accordance with applicable law.

**11.1. Сбop.** During or before the collection of Your Personal Data, you have the right to be notified about our Processing practices. Our Processing practices are described in this Policy and Provisions.

**11.2. Categories of Personal Data** that We have collected over the past 12 months:

- Information about Your age;
- Identifiers;
- Financial information;
- Information on the Use of Games;
- Contact Details;
- Ad Identifiers;
- Advertising Campaign information; and
- General Technical information.

You can learn more about the categories of Personal Data We collect by reading Sections 1 and 3 of Our Policy.

**11.3. Sources of information.** Please, refer to Section 3 of the Policy for this information. We may receive Personal Data from You, the app store where Our Games are hosted (for example, from Google), as well as from advertisers in the case of interaction with advertising materials.

**11.4. Disclosure of Personal Data to third parties.** For information about who We share and/or disclose Your Personal Data to, please, refer to Sections 4 and 5 of the Policy.

**11.5. Personal Data retention.** For information about our rules for storing and scheduling the deletion of Personal Data, please refer to Section 6 of the Policy.

**11.6. Sensitive Personal Data / Special Categories of Personal Data.** We do not Process sensitive Personal Data/Special categories of Personal Data. If We find out that

such Personal Data may have got in Our system (for example, you provided it in an in-game chat), we will immediately delete it from Our databases.

- 11.7. Sale of Personal Data.** We do not sell or transfer Your Personal Data to third parties for any consideration. For example, We do not participate in the display of cross-platform behavioral advertising. However, if You believe that We sell Your Personal Data to third parties, You can always send Us a request to stop such Processing with the wording "Do not sell my Personal Data" to [lawyer@kowiigames.com](mailto:lawyer@kowiigames.com).
- 11.8. Profiling.** We do not Process Personal Data for the purposes of Profiling.
- 11.9. Special offers.** We may offer discounts or special offers to consumers if they subscribe to Our rewards programs. In some States sharing Personal Data as part of a reward program is considered a financial incentive. When We offer these programs, Your participation in them is optional. If You decide to participate in them, Your participation will be subject to the relevant applicable terms and conditions, which We will provide at the time of receiving Your consent to participation.

## 12. CONSUMER RIGHTS.

Subject to the Provisions, as well as the relevant exclusions, You may have some or all of the following rights under applicable law:

- the right to receive confirmation of the Processing of your Personal Data, and in some states, confirmation of the categories of Personal Data being Processed;
- the right to know what Personal Data We collect about You, including categories of data, categories of sources, business or commercial purposes for collecting, selling or transferring, categories of Personal Data that We have sold, transferred or disclosed for business purposes, as well as categories of third parties to whom We have disclosed Personal Data;
- the right to correct inaccuracies in Personal Data;
- If You reside in Oregon, You also have the right to receive a list of specific third parties to whom We have disclosed Personal Data.

If You wish to exercise any of these rights, please, send Us a notification at [lawyer@kowiigames.com](mailto:lawyer@kowiigames.com). We will confirm receipt and respond to Your request within 30 days, or within another time limit under applicable law.

To verify Your identity, We will compare the email addresses that You provided Us with and the ones you've used to contact Us. In some cases, We may need to obtain additional information from You to verify Your identity. If We are unable to verify Your identity, We may refuse Your request.

- 12.1. Cookies and other tracking technologies.** When visiting Our websites, You can configure cookies used in a special window. You can also set up preferences for tracking technologies in Your browser settings (for example, in relation to Chrome, read [this information](#)). You can also customize your preferences using the following services: <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu>).

- 12.2. Authorized representative.** You have the right to appoint a representative to send requests and demands on Your behalf. However, in this case, We will require a written confirmation of the appointment of a representative, as well as to confirm Your identity directly.
- 12.3. Right to non-discrimination.** If You decide to exercise any of Your rights, We will not discriminate against You, i.e. offer You different prices or products, or products of a different level and/or quality, based solely on the fact of receiving Your request or demand.
- 12.4. “Shine The Light”.** Under the California's “Shine the Light” law once a year customers who are residents of California may request (1) a list of categories of Personal Data that We shared with third parties during the immediately preceding calendar year for their own direct marketing purposes; and (2) a list of categories of third parties to whom such Personal Data was disclosed. To send a request, please, contact Us and specify the subject “California Shine the Light”.
- 12.5. California Eraser Requests.** If You are a resident of California and You are under the age of 18, You can ask Us to remove publicly posted content on Our Services and Games by specifying the “California Eraser Request” in the request.
- 12.6. Revocation of consent.** You have the right to revoke Your previously given consent to the Processing of Your Personal Data. To revoke Your consent, write to Us by e-mail (specifying the consent You wish to revoke). If You withdraw Your consent, some or all of Our Games and/or Services may become unavailable to You.
- 12.7. Contesting of a decision.** If We refuse to satisfy Your request or demand within the time limits set by the Policy, Regulations and applicable law, You may send Us a written objection by e-mail. We will consider Your objection within 60 calendar days and inform You about the decision in a reasoned manner. If You do not agree with the outcome of the consideration of Your objection, You have the right to file a complaint with the following institutions:
- For California residents at [California AG](#);
  - For Colorado residents at [Colorado AG](#);
  - For Connecticut residents at [Connecticut AG](#);
  - For Nevada residents at [Nevada AG](#);
  - For Utah residents at [Utah AG](#);
  - For residents of Montana at [Montana AG](#);
  - For residents of Oregon at [Oregon AG](#);
  - For Texas residents at [Texas AG](#);
  - For residents of Virginia at [Virginia AG](#).

Thank You for playing Our Games!

Respectfully,

KowiyGames team