

1. Introduction

This privacy policy informs you of your choices and our practices regarding any personal information you provide to us. Your use of the product(s), service(s) and related websites ("Service") distributed by XWG Games involves the collection and use of your personal information. It is important for you to understand how this happens and how you may control it.

When you contract to use the Service, you accept our rules and policies regarding your personal information and you expressly consent to us collecting, processing, using and storing your personal information, as described in this policy.

You acknowledge that you have read and understood this privacy policy. If you do not agree with this privacy policy, you must not use the Service. If you change your mind in the future, you may withdraw your consent to use of your personal information in accordance with this policy.

If you have any comments, questions or complaints regarding the processing of your personal information, you can contact us at service@xwg.games.

2. The Types of Personal Information We Use

This section describes the different types of personal information we collect and how we collect it. We will collect and use the following information about you:

- Information you give us. You give us information about you:

2.1. when you register for the Service and link social media or similar accounts (e.g. Facebook, Twitter or Apple) in order to set up your profile (we import from your connected social media your personal information which includes your name as it appears on your social media profile and your profile picture);

2.2. when you set up your profile for the Service (including information you voluntarily elect to provide in order to customize gameplay);

2.3. when you submit your contact details to us (including your name, email address and physical address) as part of promotional activities for the Service;

2.4. when you make purchases in the Service (in which case we will process the information you provide to us to facilitate the payment).

- Information we collect about you. We automatically collect certain data from you when you use the Service, including your IP address and device information (such as device type, network data, operating system) and information regarding your use of the Service, such as date and time stamps of actions. We also collect and store your data each time you interact with us, for example, when you use in-app support to communicate with us.

- Information you generate and display in the course of using the Service. You may provide additional information as part of your profile. You may also provide or generate information when you communicate with other users in the Service (e.g., chat log). You acknowledge

and agree that information generated within our Service should not be considered private and communications within our Services may be viewed/heard by other users. Please avoid revealing any personally identifiable or sensitive information during such communications.

3. How We Use Your Personal Information

We will use the information in the following ways and in accordance with the following legal bases:

- **Registration Information** (such as: ID on third-party accounts, email address, nick name, avatar and other information): We use Registration Information to set-up user accounts, allow users to log-in to the Service by using the Registration Information and provide Services to users. We use this information with your consent to this Privacy Policy.
- **Device Information** (such as: device ID, device type, operating system, CPU, RAM, IP address, MAC address): We use this information to provide and improve the Service such as: to allow users to download and install the software on their devices; to record and keep track of requests from users of the Service; to detect the user network and device status when the user is using the Service; and to correct bugs or errors that occur when the user is using the Service. Use of Device Information is necessary to perform our contract with you to provide the Service.
- **Contact Information** (such as: name, email, address, phone number, instant messaging account): We use this information to send notifications to users to inform them of our promotional activities and any rewards they are entitled to. We use this information with your consent to this Privacy Policy.
- **User Profile** (such as : age, photo and etc.): We use this information to provide customized services to users such as personal information page. We use this information with your consent to this Privacy Policy.
- **Game Data** (such as: level, heroes, scores, chat logs and etc.): We use this information to provide Services to users as it is the basis of our Service. Use of Game Data is necessary to perform our contract with you to provide the Service.

4. How We Store and Share Your Personal Information

In order to perform our contract with you, your personal information will be accessible from and will be processed on our servers. Our servers are hosted on cloud servers such as Amazon Web Services. Your information may be transferred to and processed in countries outside the country you are located. We will take steps necessary to comply with applicable legal requirements, such as using European Commission approved Standard Contractual Clauses to protect your information. In particular, your information will be transferred to and processed in Japan where our central database is based.

We share your personal information with selected third parties in and outside your country, including:

- third-party vendors that provide services in support of the Service, such as Amazon Web Services (“AWS”) for the purpose of hosting the Game, Apple and Google for the purpose of

providing payment services, Helpshift for the purpose of providing customer support, Facebook and Appsflyer for the purpose of the evaluation of our marketing events. Those third party vendors have limited access to your personal information and are contractually bound not use it for other purposes.

- related group companies, with whom we share your information to operate the Services. The transfers contemplated above are made pursuant to our contract with you;

- law enforcement agencies, public authorities or other judicial bodies and organizations. We disclose information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to: (i) comply with a legal obligation, process or request; (ii) enforce our terms of service and other agreements, policies, and standards, including investigation of any potential violation thereof; (iii) detect, prevent or otherwise address security, fraud or technical issues; or (iv) protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organizations for the purposes of fraud protection).

5. The Security of Your Personal Information

We are committed to maintaining the privacy and integrity of your personal information no matter where it is stored. We have information security and access policies that limit access to our systems and technology. We deploy a firewall and other security measures (such as encryption) commensurate to industry standards to prevent unauthorized access to your personal information. Your personal information will remain subject to our technical and organizational controls and our policies and procedures (including this Privacy Policy). Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of the information transmitted to our services; any transmission of your information is at your own risk.

6. Data Retention

We will retain most of your personal information for the lifetime of your use of the Services (i.e. until account deletion in accordance with your request) except that Contact Information obtained from promotional activities will be retained during the lifetime of such activities.

In the event that the processing and retention period have terminated, but personal information is required to be retained continuously for other reasons including for the purposes as prescribed under applicable laws, the relevant personal information will be stored and maintained separately from other types of personal information. If you require us to destroy your personal information before the end of its life cycle, we will destroy your personal information in accordance with local laws.

7. Your Rights

This section ("Your Rights") applies to users that are located in the European Economic Area only. For California Residents. For users located in other territories, please refer to the privacy clauses in our User Agreement.

You have certain rights in relation to the personal information we hold about you. Some of these only apply in certain circumstances (as set out in more detail below). We must respond to a request by you to exercise those rights without undue delay and at least within one month (though this may be extended by a further two months in certain circumstances). To exercise any of your rights, please contact us at service@xwg.games

. Please understand further information may be required to verify your identity when exercising your rights.

8. Access

You have the right to access personal information we hold about you, how we use it, and who we share it with. If you believe we hold any other personal information about you, please contact us and complete the corresponding request form.

9. Portability

You have the right to receive a copy of certain personal information we process about you. This comprises any personal information we process on the basis of your consent or pursuant to our contract with you, as described in the section “How We Use Your Personal Information”. You have the right to receive this information in a structured, commonly used and machine-readable format. You also have the right to request that we transfer that personal information to another party.

If you wish for us to transfer such personal information to a third party, please ensure you detail that party in your request. Note that we can only do so where it is technically feasible. Please note that we may not be able to provide you with personal information if providing it would interfere with another’s rights (e.g., where providing the personal information we hold about you would reveal information about another person or our trade secrets or intellectual property).

10. Correction

You have the right to correct any personal information held about you that is inaccurate. If you believe we hold any other personal information about you and that information is inaccurate, please contact us and complete the request form.

Erasure

You can delete your account, or remove certain personal information. If there is any other personal information you believe we process that you would like us to erase, please contact us and complete the request form.

You may request that we erase the personal information we hold about you in the following circumstances:

- you believe that it is no longer necessary for us to hold such personal information;
- you believe the personal information we hold about you is being unlawfully processed by us.

You can also exercise your right to restrict our processing of your personal information (as described below) whilst we consider your request.

We may need to retain personal information if there are valid grounds under data protection laws for us to do so (e.g., for the defence of legal claims or freedom of expression) but we will let you know if that is the case. Where you have requested that we erase personal information that has been made available publicly on the Service and there are grounds for erasure, we will use reasonable steps to try to tell others that are displaying the personal information or providing links to the personal information to erase it too.

11. Restriction of Processing to Storage Only

You have a right to require us to stop processing the personal information we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection laws for us to do so (e.g., for the defense of legal claims or for another's protection). As above, where we agree to stop processing the personal information, we will try to tell any third party to whom we have disclosed the relevant personal information so that they can stop processing it too.

You may request we stop processing and just store the personal information we hold about you where:

- you believe the personal information is not accurate for the period it takes for us to verify whether it is accurate;
- you wish to erase the personal information as the processing we are doing is unlawful but you want us to retain the personal information but just store it instead; or
- you wish to erase the personal information as it is no longer necessary for our purposes but you require it to be stored for the establishment, exercise or defense of legal claims.

12. Objection

You have the right to object to our processing of personal information about you. We will consider your request in other circumstances as detailed below by contact us and completing the request form.

13. Announcements

We may from time to time send you announcements when we consider it necessary to do so (such as when we temporarily suspend The Service access for maintenance, or security, privacy or administrative-related communications). You may not opt-out of these service-related announcements, which are not promotional in nature.