

# Offline Player Privacy Policy

This privacy policy for Victor Buianivskyi ("**Company**," "**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share ("**process**") your information when you use our services ("**Services**"), such as when you:

- a. Visit our website, or any website of ours (*if applicable*).
- b. Download and use our application(s), such as our mobile application — **Offline Player** ("**App**"), or any other application of ours that links to this privacy policy.
- c. Engage with us in other related ways — including any sales, marketing, or events.

**Questions or concerns?** Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us as prescribed in chapter "HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?".

## 1. SUMMARY OF KEY POINTS

1. **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Company and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us below.
2. **Do we process any sensitive personal information?** We do not process sensitive personal information.
3. **Do we receive any information from third parties?** We may receive information from public databases, marketing partners, social media platforms, and other outside sources. Learn more about information collected from other sources below.
4. **How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information below.
5. **In what situations and with which types of parties do we share personal information?** We may share information in specific situations and with specific categories of third parties. Learn more about when and with whom we share your personal information below.
6. **How do we keep your information safe?** We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe below.
7. **What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights below.
8. **How do I exercise my rights?** The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what information we collect? Review the privacy notice in full.

## 2. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us.

***In Short:*** We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you use on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

We may collect two types of data and information from you, depending on your interaction with us. The first type of information is non-identifiable and anonymous information ("**Non-Personal Information**"). We are not aware of the identity of the individual from who we have collected the Non-Personal Data. Non-Personal Information, which is being gathered consists of technical information, and may contain, among other things, the type of operating system and type of browser, type of device, session duration and page impressions, etc.

The second type of information is identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“**Personal Information**”). All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

For the avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

TYPE OF DATA	PURPOSES OF PROCESSING	FOR EU PERSONS - LEGAL BASIS UNDER THE GDPR
<p><b>Contact Information:</b> In the event you contact us for support or any other inquiries, by sending us an email or by any other means of communications we may make available to you, you will be requested to provide us with your full name and email address. In addition, you can choose to provide us with additional information as part of your correspondence with us.</p>	<p>We will use this information solely for the purpose of responding to your inquiries and provide you with the support or information you have requested.</p> <p>The correspondence may be used in order to improve our customer service, and in the event we believe it is required in order to provide you with any further assistance (if applicable).</p>	<p>Our legitimate interest.</p>
<p><b>Registration Information:</b> If you are required to register and create an account through our App, we will collect the Personal Data that you are required to provide us during the registry process, such as your full name and email address. Further, during the registration process you will be supplied with username and password for your account, at which time you thereby represent and warrant that you are responsible for maintaining the confidentiality of your details and password. You represent and warrant that you will not provide us with inaccurate, misleading or false information.</p>	<p>This information will be processed for the purpose of performing our contract with you, to set up your account with us and enable you to use our Services.</p> <p>In addition, we may process your Personal Data for our legitimate interests, for example, to send you marketing and promotional messages and offers related to our Services. You are able to unsubscribe from receiving such correspondence from us by contacting us as prescribed in chapter “HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?”.</p> <p>Please note that if you choose to unsubscribe from direct marketing, we may still retain your contact details and send you relevant service-related information such as invoices and subscription rates.</p>	<p>The registration information is processed to perform our contract with you and the direct marketing is subject to our legitimate interest.</p>

<p><b>Log Data and Unique Identifiers:</b></p> <p>Data we collect may include information such as your device Internet Protocol (“IP”) address, device name, operating system version, the configuration of the App when utilizing our Service, the time and date of your use of the Service, and other statistics. We also may collect information about randomly generated ID of the device identification, information on transitions between pages, App-using time, information about user’s actions in the App, from which page the purchase was made and the purchase ID, and other actions performed by the user (for example, clicking on specific buttons and similar actions).</p> <p>In case of an error in the App we also collect data and information (through third-party service providers) such as “Log Data” or “Crash Data”.</p>	<p>In most cases, this data will not include Personal Data, however we treat this information as Personal Data as we may be able to reasonably identify you.</p>	<p>We process this data set for our legitimate interest of protecting our App and Services and optimizing the App and Services.</p>
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<p><b>Profiling Data:</b> When you using our App we may display advertisement, our partners, the advertisers may place an SDK (as detailed below) and collect certain data on you for the purpose of displaying advertisement. If you wish to prevent the display of advertisements or other identifiers for interest-based advertising, you may change your device settings to reset such advertisement or opt-out of such advertising (typically, this is available under the “Privacy” or “Ads” section in your device settings). Please note that if you reset your advertising settings or opt-out of interest based advertising, you may still see advertisements in our App, but those ads will not be targeted for you. Please note that such actions may result in a less enjoyable user experience.</p>	<p>Our partners will process this data to manage and deliver advertisements more effectively and personally, including contextual, behavioral and interests-based advertising based on your activity, preferences or other data available to us or to our business partners and advertisers, including for re-targeting purposes.</p>	<p>We process this information based on your consent as required under your jurisdiction provided through our cookie manager or similar technology</p>
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**Non-Personal Information Provided by You.** This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

TYPE OF DATA	PURPOSES OF PROCESSING	FOR EU PERSONS - LEGAL BASIS UNDER THE GDPR
<p><b>Technical Data:</b> We also collect certain technical Non-Personal Data which relates to your use of our App such as: the type and version of device, operating system, firmware, App (version, language), time zone setting, country, occurrences of technical errors, diagnostic reports, settings preferences.</p>	<p>We use this data in order to maintain, support, improve, protect and manage our App and Services. This information does not include Personal Data.</p>	<p>As the technical data is Non-Personal Data it does not require a lawful basis.</p>

**Sensitive Information.** We do not process sensitive information.

**Information collected from other sources.**

*In Short: We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, social media platforms, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and

event promotion. If you interact with us on a social media platform using your social media account, we receive personal information about you such as your name, email address, and gender. Any personal information that we collect from your social media account depends on your social media account's privacy settings.

### 3. HOW DO WE COLLECT INFORMATION?

Depending on the nature of your interaction with the App and Services, we may collect information as follows:

**Automatically** – we may use SDK (as elaborated below) or similar tracking technologies to gather some information automatically when you interact with our App and Services.

**Provided by you voluntarily** – we will collect information if and when you choose to provide us with the information, such as through the Services, contact us communications, etc.

### 4. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- a. **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- b. **To respond to user inquiries/offer support to users.** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- c. **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- d. **To fulfill and manage your orders.** We may process your information to fulfill and manage your orders, payments, returns, and exchanges made through the Services.
- e. **To enable user-to-user communications.** We may process your information if you choose to use any of our offerings that allow for communication with another user.
- f. **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- g. **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see section "WHAT ARE YOUR PRIVACY RIGHTS?" below).
- h. **To deliver targeted advertising to you.** We may process your information to develop and display personalized content and advertising tailored to your interests, location, and more. For more information see chapter "DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?".
- i. **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- j. **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- k. **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- l. **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

### 5. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

***In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.*

**If you are located in the EU or UK, this section applies to you.**

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- a. **Consent.** We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.
- b. **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- c. **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
  - i. Send users information about special offers and discounts on our products and services.
  - ii. Develop and display personalized and relevant advertising content for our users.
  - iii. Analyze how our Services are used so we can improve them to engage and retain users.
  - iv. Support our marketing activities.
  - v. Diagnose problems and/or prevent fraudulent activities.
  - vi. Understand how our users use our products and services so we can improve user experience.
- a. **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- b. **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

**If you are located in Canada, this section applies to you.**

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- a. If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way.
- b. For investigations and fraud detection and prevention.
- c. For business transactions provided certain conditions are met.
- d. If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim.
- e. For identifying injured, ill, or deceased persons and communicating with next of kin.
- f. If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse.
- g. If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province.
- h. If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records.
- i. If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced.
- j. If the collection is solely for journalistic, artistic, or literary purposes.
- k. If the information is publicly available and is specified by the regulations.

## **6. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

***In Short:*** We may share information in specific situations described in this section and/or with the following categories of third parties.

We will **not** share your Personal Data with third parties, other than as specifically mentioned herein:

- **Subject to your consent** - we may share your Personal Data upon your explicit consent. Once we share your Personal Data under these circumstances, that data becomes subject to the other third party's privacy practices.
- **Policy enforcement and third party rights** - we may share your Personal Data in the event required to enforce our policies and agreements or to establish and exercise our rights to defend against legal claims, including investigations of potential violations and in order to detect or prevent illegal activities or other wrongdoing, security or technical issues. In addition, we may share your Personal Data to prevent harm to the rights or safety of our users or any applicable third party.

- **Law enforcement** - we may share your Personal Data, solely to the extent needed to comply with any applicable law, regulation, legal process or governmental request.
- **Affiliate company and corporate transaction** – in the event required, we may share your Personal Data with our parent company, any subsidiaries, joint ventures, or other companies under common control (“**Affiliated Companies**”) or in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale). Our Affiliated Companies or acquiring company will assume the rights and obligations as described in this Policy.
- **Service Providers** - we may disclose Personal Data to our service providers to perform requested services on our behalf. Certain of our service providers shall include servers, payment processors, advertisement services, governmental agencies and representatives. These entities are prohibited from using your Personal Data for any purposes other than providing us with requested services and are all signed on applicable data protection agreements limiting their use of the Personal Data.

**7. SDK & TRACKING TECHNOLOGIES**

*In Short: The specific SDK we currently use, the purpose of the SDK, their privacy policy and opt-out controls are set forth below.*

Our Services and some of our Service Providers utilize “cookies” or “software development kits (“SDK”)” anonymous identifiers and other tracking technologies (collectively, “Tracking Technologies”) which help us provide and improve our Services, personalize your experience, and monitor the performance of our activities and campaigns, as well as the usage of our Apps and Services as a whole.

NAME	PURPOSE	PRIVACY AND OPT OUT
Firebase	<ul style="list-style-type: none"> <li>• Remote Config- data</li> <li>• storage and processing location</li> <li>• Crashlytics- data</li> <li>• Cloud Messaging</li> <li>• data encryption</li> <li>• security purpose</li> <li>• a/b testing</li> <li>• in-app mesging</li> <li>• predictions</li> <li>• analytics</li> </ul>	Firebase Privacy Policy: <a href="https://firebase.google.com/support/privacy">https://firebase.google.com/support/privacy</a>

Facebook	<ul style="list-style-type: none"> <li>• Automatically logged events - basic interactions in the Application (e.g. application installs, application launches) and system events (e.g. SDK loading, SDK performance) that are collected automatically</li> <li>• The iOS IDFA or Android Advertising ID</li> <li>• Metadata from the request</li> <li>-the mobile OS type and version, the device opt-out setting, your agent string, and IP address</li> <li>• Your device metrics: time zone, device OS, device model, information about your mobile carrier, screen size, processor cores, total disk space, remaining disk space</li> <li>• Information about your interaction with explicit events configured by us</li> <li>• Information about your interaction with implicit events as offered by Facebook SDK, such as integration with Facebook Login or the "Like" button.</li> </ul>	<p>META Privacy Policy:  <a href="https://www.facebook.com/privacy/policy/">https://www.facebook.com/privacy/policy/</a></p>
<p>Advertisers:  <ul style="list-style-type: none"> <li>• AdMob</li> </ul> <p>And as may be updated from time to time (collectively "Advertisers").</p> </p>	<p>The Advertisers are advertising Service Providers. Their targeted advertising SDKs collect information about your browsing activity across multiple websites and online services in order to provide you with relevant advertisements on the App and Services of third parties. The information collected using these advertising SDK does not disclose your identity, and helps us analyze the effectiveness of our advertising.</p>	<ul style="list-style-type: none"> <li>• AdMob:  <a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a></li> </ul>

## 8. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

**In Short:** We are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Services, but are not affiliated with, our Services.

The Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us, and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a



third-party website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

## **9. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

***In Short:*** *We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. However, we do not use cookies for now. If we start using cookies specific information about how we use such technologies and how you can refuse certain cookies will be set out in our Cookie Policy.

## **10. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

***In Short:*** *We may transfer, store, and process your information in countries other than your own.*

Our servers are located in Europe. Please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?" above), in Germany, and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

### **European Commission's Standard Contractual Clauses:**

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations.

## **11. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:*** *We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us and 6 months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **12. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:*** *We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## **13. DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:*** *We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we

will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us as prescribed in chapter "HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?".

#### 14. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:*** *In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us as prescribed in chapter "HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?".

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your [Member State data protection authority](#) or [UK data protection authority](#).

If you are located in Switzerland, you may contact the [Federal Data Protection and Information Commissioner](#).

**Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us as prescribed in chapter "HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?" or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. For further information, please see chapter "DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?"

If you have questions or comments about your privacy rights, you may email us.

#### 15. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

#### 16. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:*** *Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

##### **CCPA Privacy Notice**

The California Code of Regulations defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and

(2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose.

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

#### **How do we collect, use and share your personal information?**

Information regarding the categories of Personal Information we process, the purposes for the processing of each category, and how we share your Personal Information are described in detail in HMD Global Privacy Policy for products and services.

In the preceding twelve (12) months, we have not sold Personal Information to any third parties, including data aggregators.

#### **What are your California consumer rights?**

If you are a California resident, as defined in the California Code of Regulations, you have the following rights under the CCPA:

##### **Right to know and access**

You have the right to submit a verifiable request for information regarding the:

- a. Categories of Personal Information collected or disclosed by us,
- b. purposes for which categories of Personal Information are collected by us,
- c. categories of sources from which we collect Personal Information, and
- d. specific pieces of Personal Information we have collected about you during the past twelve (12) months.

We will provide you with the information in a portable and, to the greatest extent possible, readily useable format once we have received and validated your request.

You can find more information about the collection, use and sharing of your Personal Information from HMD Global Privacy Policy for products and services.

##### **Right to erasure**

You have the right to request deletion of your Personal Information, subject to certain exceptions. We will delete your Personal Information and direct our service providers to do so once we have received and validated your request, unless an exception applies.

##### **Right to fair treatment**

You have the right not to receive discriminatory treatment for the exercise of your CCPA consumer rights, subject to certain limitations.

##### **Financial Incentives**

"Financial incentive" means a program, benefit, or other offering, including payments to consumers as compensation, for the disclosure, deletion, sharing, or sale of personal information.

The law permits financial incentives or a price or service difference if it is reasonably related to the value of the consumer's data. A business must be able to explain how the financial incentive or price or service difference is reasonably related to the value of the consumer's data. The explanation must include:

- a. a good-faith estimate of the value of the consumer's data that forms the basis for offering the financial incentive or price or service difference; and
- b. a description of the method the business used to calculate the value of the consumer's data.

We may decide to offer a financial incentive (e.g., price or service difference) in exchange for the retention, or sale or sharing of a consumer's personal information.

If we decide to offer a financial incentive, we will notify you of such financial incentive and explain the price difference, as well as material terms of the financial incentive or price of service difference, including the categories of personal information that are implicated by the financial incentive or price or service difference.

If you choose to participate in the financial incentive you can withdraw from the financial incentive at any time by referring to the contact details at the bottom of this document.

## **17. DO VIRGINIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

***In Short:*** Yes, If you are a resident of Virginia, you may be granted specific rights regarding access to and use of your personal information.

#### **Virginia CDPA Privacy Notice**

Under the Virginia Consumer Data Protection Act (CDPA):

"Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

"Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

"Sale of personal data" means the exchange of personal data for monetary consideration.

If this definition of "consumer" applies to you, we must adhere to certain rights and obligations regarding your personal data.

The information we collect, use, and disclose about you will vary depending on how you interact with Company and our Services.

#### Your rights with respect to your personal data

- a. Right to be informed whether or not we are processing your personal data
- b. Right to access your personal data
- c. Right to correct inaccuracies in your personal data
- d. Right to request deletion of your personal data
- e. Right to obtain a copy of the personal data you previously shared with us
- f. Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Company has not sold any personal data to third parties for business or commercial purposes. Company will not sell personal data in the future belonging to website visitors, users, and other consumers.

#### Exercise your rights provided under the Virginia CDPA

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

#### Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

#### Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

### **18. DO WE MAKE UPDATES TO THIS NOTICE?**

*In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

### **19. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please contact us.

## **20. HOW CAN YOU CONTACT US ABOUT THIS PRIVACY POLICY?**

If you have questions or comments about this notice, you may contact us at the mailing address set forth at the start of this Privacy Policy.

**Last updated November 15, 2023**