Privacy Policy

This Impact Reality, Inc. d/b/a Flat2VR Studios, Inc. (“Flat2VR Studios,” “we,” “us,” or “our”) Privacy Policy (“Policy”) is designed to help you better understand how we collect, use, secure, and share your personal information. This Policy applies when you visit our websites located at www.flat2vrstudios.com, https://tc.flat2vrstudios.com/, or any other websites, pages, features, or content we own or operate (collectively, the “Site(s)”), when you play our games including Trombone Champ: Unflattened (the “Game(s)”), or otherwise engage our products or services that link to this policy (referred to collectively hereinafter as “Services”).

Please read this entire Policy to make sure you fully understand it. You should also be sure to carefully review other Terms applicable to your use of our Services. By accessing and using our Services, you understand and agree that collection and use of your personal information will be made in accordance with this Privacy Policy and you agree to our Terms of Use at www.flat2vrstudios.com/TOS . If you do not agree with or you are not comfortable with any part of this Policy, please immediately discontinue access or use of our Services.

We may change this Policy from time to time. If we make a change to this Policy that we believe materially affects how we process your personal information or reduce your rights, we will provide you with notice. We may also provide “just-in-time” disclosure or additional information about our data collection, use and sharing practices of specific Services. These notices may supplement or clarify Flat2VR Studios’s privacy practices or may provide you with additional choices about how we process your personal information.

1. Personal Information We Collect
Flat2VR Studios collects certain personal information about you and your use of our Service. Personal information is generally any information that identifies you or makes you identifiable. This information falls into two primary categories: (1) information you voluntarily provide us, and (2) information we collect from you automatically. Information You Voluntarily Provide. We may collect the following types of personal information from you:
(1) Account Information: when you purchase, download and log in our Games from our partner stores, you may share with us your platform account information, such as, your name, email, platform username or account ID, and friends list (where applicable)..
(2) Demographic Information: in your account profile, you may choose to provide your age group, gender and nationality. This information allows us to better match you with other players when entertaining you into tournaments.
(3) Tournament Registration: when you sign up for tournaments in our Games, we may collect your email address, Facebook username (optional), Discord or other tournament management platform username, and player ID.
(4) Customer Service: when you engage with our support team, we will collect records and copies of your correspondence (including email addresses).

(5) Game Data: when you play our Games, we may collect your body motion and your controller position data with your consent to enhance your user experience. We may also collect game replays and voice recordings for limited moderation purposes.
Information We Automatically Collect. To the extent permitted under the applicable law, we may collect certain types of information automatically, such as whenever you interact with the Sites or use the Services. This information helps us address customer support issues, improve the performance of our Sites and Services, provide you with a streamlined and personalized experience, and protect your account from fraud by detecting unauthorized access. We may collect following types of information automatically from you:
(1) Website Log Data: when you browse our Site, we automatically collect information such as your web request, Internet Protocol ("IP") address, browser type, domain names, referring and exit pages and URLs, pages viewed and the order of these page views, the date and time you access our servers, and operating system.
(2) Game Log Data. When you play our Games, we automatically collect log data within the game. If you do not wish for us to collect your log data relating to your game play, you may turn off the data log setting within your device.
(3) Device Information: When you run our Games on your device, we may be able to identify your device's unique device identifier, MAC address, operating system, and connectivity metrics during game sessions.
2. How We Use Your Personal Information
Our primary purpose in collecting personal information is to provide you with a secure, smooth, and customized game experience. In general, we use personal information to create, develop, operate, deliver, and improve our Services. We may use your personal information to:
(1) Provide Flat2VR Studios's Services. We process your personal information to provide the Services to you. For example, when you play our Games, we require body motion and movement information.
(2) Provide Services Communications. We may send administrative and account related communications to you to keep you updated about our Services and inform you of relevant issues.
(3) Enforce Terms in Our Agreements. We may process your personal information to enforce terms you have accepted, such as enforcing our licenses, agreements, and terms of use, which may include reasonable monitoring to detect and prevent misuse or fraud, keep our games fair to all users, and otherwise defend our services.
(4) Detect Fraud and Prevent Security Risks. We may process your personal information to help providing our users a fair, balanced, and competitive experience on our Service via anti-cheat and fraud prevention technologies, enhance security, and combat other security risks.
(5) Response to Requests. We may process your personal information when you contact us, such as with questions, concerns and feedback.
(6) Research and Development of Our Services. We process your personal information to better understand the way you use and interact with our Services to improve our existing Services and to build new Services.
(7) Personalize Your Experience. We may also process your information to personalize your experience See the Cookies and Other Similar Tracking Technologies section for some examples.

(8) Facilitate Corporate Acquisitions, Mergers and Transactions. We may process your personal information as is necessary in the context of corporate acquisitions, mergers, or other corporate transactions.
(9) With Your Consent. We may process your information for any other purpose which is reasonably necessary to provide the Services or other related services requested, with your permission or upon your direction.

3. How We Share Your Personal Information

We share your information as needed to fulfill the purposes described in this Policy and as permitted by applicable law. We may share your information in the following circumstances:
(1) On Public Forum. We may share your information such as match history, scores, username on our leaderboards sites or other similar public forums in order to help you engage with other players.
(2) With Other Players. In order to support the multiplayer activities within our Games, such as adding friends, inviting people to match, or accepting challenge invites, we may share your information with other players including your username (encrypted form unless in the game), match history, and scores.
(3) When We Work with Service Providers. We may share your information with service providers that provide us with support services, such as secure website hosting, cloud storage, information technology maintenance, network infrastructure, anti-cheat and fraud detections, content moderation and analytics.
(4) During Corporate Transactions. We may disclose your personal information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us is among the assets transferred. By engaging with us or using our Services, you understand and agree to our assignment or transfer of rights to your personal information.
(5) As Required by Law. We may disclose your information if we believe that the disclosure is required by law, if we believe that the disclosure is necessary to enforce our agreements or policies, in response to valid requests by public authorities (e.g., a court or a government agency), or if we believe that the disclosure will help us protect the rights, property, or safety of Flat2VR Studios or our customers.
(6) With Your Consent. We may disclose your personal information for any purpose with your consent.

4. Legal Bases for Processing Your Personal Information

For individuals who are located in the European Economic Area, the United Kingdom, and Brazil at the time of data collection, our legal bases for processing your information under the EU General Data Protection Regulation (“GDPR”) and the Brazil General Personal Data Protection Act (“LGPD“) will depend on the personal information at issue, the specific context in the which the personal information is collected and the purposes for which it is used or shared.

Section & Purpose of Processing	Legal Bases for Processing
Section 2(4) Detect and Prevent Fraud and Security Risks. Section 3(5) As required by Law	Based on our legal obligations. Article 6(1) lit.(c) GDPR; Article 7(II) LGPD.
Section 2(1) Provide Flat2VR Studios's Services. Section 2(2) Provide Services Communications Section 2(3) Enforce Terms in Our Agreements Section 3(1) On Public Forum. Section 3(2) With Other Players. Section 3(3) When We Work with Service Providers	Based on our contract with you or to take steps at your request prior to entering a contract. Article 6(1) lit.(b) GDPR; Article 7(V) LGPD.
Section 2(6) Research and Development of Our Services. Section 2(7) Personalize Your Experience Section 2(8) Facilitate Corporate Acquisitions, Mergers, and Transactions. Section 3(4) During Corporate Transaction	Based on our legitimate interest to operate our business and not overridden by your data protection interests or fundamental rights and freedom. Article 6(1) lit.(f) GDPR; Article 7(IX) LGPD.
Section 2(5) Respond to Requests. Section 2(9) With Your Consent Section 3(6) With Your Consent	Based on your consent. Article 6(1) lit.(a) GDPR; Article 7(I) LGPD.

5. Third-party Sites and Services

Our Services may contain links to third-party websites. The third parties you interact with may have their own privacy policies, and Flat2VR Studios is not responsible for their collection and use of data. We encourage you to check the applicable third-party privacy policy and terms of use when visiting or using any third- party services.

6. Cookies and Similar Tracking Technologies

We and third parties on our behalf may employ various tracking technologies, such as cookies and other similar technologies (collectively, "Tracking Technologies") to collect additional personal information automatically as you interact with our Services, that help us to personalize your experience with our Service, and help us better manage content on our Service by informing us what content is effective.

Cookies

Cookies are small text files that a website can use to recognize a repeat visitor to the Sites. We may use cookies and similar technologies for various purposes, including to:

- Analyze our web traffic using an analytics package
- Identify whether you already visited our Sites
- Test content on our Sites
- Store information about your preferences
- To recognize when you return to our Sites

Managing Cookies and Similar Tracking Technologies

You have the right to decide whether to accept cookies. If you do not want Flat2VR Studios to deploy cookies in your browser, you may exercise your preference by modify your web browser setting to either (1) refuse some or all cookies, or (2) notify you and asking for your permission when a website tries to set a cookie. If you want to learn the correct way to modify your browser settings, please use the “Help,” “Tools” or “Edit” menu in your browser or review the instructions provided by the following browsers: Internet Explorer, Google Chrome, Mozilla Firefox, Safari Desktop, Safari Mobile; and Android browser. If you choose to disable cookies in your browser, you can still use our Sites, although your ability to use some of the features may be affected.
If you want to exercise your rights regarding personal information collected via cookies and similar tracking technologies, please see the Your Rights and Choices section below.

Interest-Based Advertising
Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain websites where people can opt out of interest-based advertising from their members. To opt-out of website interest-based advertising provided by each organization’s respective participating companies, visit the DAA’s opt-out portal available at http://optout.aboutads.info/, or visit the NAI’s opt-out portal available at http://optout.networkadvertising.org/?c=1. If you reside in European Economic Area, Switzerland, or the United Kingdom, you may opt-out of online behavioral advertising served by the European Interactive Digital Advertising Alliance’s participating member organizations by visiting youronlinechoices.eu/.

7. Your Rights and Choices
You have the right to access, correct, update, or delete personal information that has been previously provided to us through our Services. In order to do so, you may contact us by logging into your account and making the appropriate changes or by emailing us at business@flat2vrstudios.com.
In your request, please make clear what personal information you would like to have changed or removed from our database. For your protection, we may need to verify your identity before implementing your request.

Additional Rights for European Economic Area, Switzerland, the United Kingdom, and Brazil
If you reside in European Economic Area, Switzerland, the United Kingdom, or Brazil, you may have the rights to exercise following privacy rights available to you under applicable law. However, we may limit these privacy rights requests under the applicable law: (1) when denial of access is required or authorized by law; (2) when granting access would have a negative impact on another's privacy; (3) to protect our rights and properties; (4) where the request is frivolous or burdensome. To assert your privacy rights, please contact us at business@flat2vrstudios.com. We may seek to verify your identity when we receive your privacy rights request to ensure the security of your personal information.

(1) Right to access. You may have the right to obtain a copy of your personal information that we hold about you, as well as other supplementary information, such as the purposes of

processing, the categories of personal information that we process, the entities to whom we disclose your personal information, etc..
(2) Right to rectification. You may have the right to request us correct any of your personal information in our files.
(3) Right to erasure. Under certain circumstances, you may have the right to request erasure of your personal information that we hold about you. To note, this right is not absolute, and we may refuse your right to erasure if there are compelling legitimate grounds for keeping your information.
(4) Right to restriction. You have the right to request that we restrict our processing of your personal information in certain circumstances. For instance, this right is available if you contest the accuracy of the personal information or you objected to our processing.
(5) Right to object to processing. You have the right to object to our processing of your personal information at any time and as permitted by applicable law if we process your personal information on the legal bases of: consent, or legitimate interests (see Section 4 above). However, we may continue to process your personal information if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law.
(6) Right to portability. Under circumstances, you may have the right to receive personal information we hold about you in a structured, commonly used, and machine-readable format so that you can provide that personal information to another controller.
(7) Right to lodge a complaint. Without prejudice to any other administrative or judicial remedy, you may have the right to lodge a complaint with a supervisory authority in a specific region according to applicable law.

Additional Rights for California Residents
You may have additional privacy rights if you are a California Residents, see Section 11 “Notice to California Residents” below for more information.

8. International Transfer of Personal Information
We operate in and store your personal information in the United States. We will always protect your information in accordance with this Privacy Policy wherever it is processed. We will take appropriate contractual or other steps to protect the relevant personal information in accordance with applicable laws.

9. Retention of Your Personal Information
We will retain your personal information for as long as needed to provide the applicable Service you use, unless a longer retention period is required or permitted by law. We will retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our rights. We will cease to retain your personal information, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal information was collected, and is no longer necessary for legal or business purposes.

10. How We Protect Your Personal Information
We maintain our Services and all associated data with technical, administrative and physical safeguards to protect against loss, unauthorized access, destruction, misuse, modification and

improper disclosure. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail (and please do not send us sensitive information, such as payment card information or government issued IDs). If you have any questions about the security of your interaction with us (if, for example, you feel that the security of any account you might have with us has been compromised), you can contact us at business@flat2vrstudios.com.

11. Notice to California Residents

This section only applies to California residents. The purpose of this section is to inform California residents ("consumers" or "you"), at or before the time of collection of personal information, about our data collection practices and your privacy-related rights under California law, including the California Consumer Privacy Act of 2018, as amended ("CCPA"). Your "right to know" about personal information collected, used, and disclosed by Flat2VR Studios includes what categories of personal information we collect from you and the purpose for its collection; how we use those categories of personal information; and how we share the personal information you entrust to us. For purpose of this section, the term "personal information", as defined under the CCPA, is used.

Categories of Personal Information Collected

The chart below described the categories of personal information we have collected in the preceding 12 months, the sources and purpose of such collection, and the parties to whom the information was shared for business purpose.

Personal Information Category (corresponds to categories in CCPA §1798.140(o)(1))	Sources of Personal Information (see Section 1 above for more information)	Purpose of Information Collection	Disclosure of Personal Information (see Section 3 above for more information)
Identifiers	Information You Voluntarily Provide; Information We Collect Automatically, as outlined in Section 1 above.	See Section 2, subsection (1), (2), (3), (4), (5), (6), (7), (8) and (9).	To our service providers, on public forum, with other players, as outlined in Section 3 above.
Personal Information under California Civil Code section 1798.80	Information You Voluntarily Provide, as outlined in Section 1 above.	See Section 2, subsection (1), (2), (3), (4), (5), (6), and (7).	To our service providers, as outlined in Section 3 above.

Protected Classifications, including gender and age.	Information You Voluntarily Provide, as outlined in Section 1 above.	See Section 3, subsection 2.	To our services providers, as outlined in Section 3 above.
Internet activity information, such as browsing history.	Information We Collect Automatically, as outlined in Section 1 above.	See Section 2, subsection (1), (2), (3), (4), (5), (6), (7), (8) and (9).	To our service providers, as outlined in Section 3 above.
Inferences about preferences, characteristics, etc.	Information You Voluntarily Provide; Information We Collect Automatically, as outlined in Section 1 above.	See Section 2, subsection (6), (7), and (9).	To our service providers, on public forum, with other players, as outlined in Section 3 above.

Rights Under the CCPA

If you are a California resident, you may be entitled to the following rights subject to certain exceptions.

Access to Specific Information and Data Portability Rights – You have the right to request a copy of the personal information that we collected about you during the 12 months before your request. Once we receive your request and verify your identity, we will disclose to you:

- The categories of personal information we have collected about you;
- The categories of sources for the personal information we have collected about you;
- Our business or commercial purpose for the information collection;
- The categories of third parties with whom we share that personal information; and
- The specific pieces of personal information we collected about you.

Sale of Personal Information – To the extent we sell your personal information to third parties, you have the right to request that we disclose to you:

- The categories of your personal information that we sold,
- The categories of third parties to whom your personal information was sold.

You have the right to direct us not to sell your personal information. Flat2VR Studios does not sell your personal information in its ordinary course of business and will never sell your personal information to third parties without your explicit consent.

Deletion Request Rights – You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.
Non-Discrimination – We will not discriminate against you (e.g., through denying goods or services, or providing a different level or quality of goods or services) for exercising any of the rights afforded to you under the CCPA.

Exercising Access, Data Portability, and Deletion Rights – To exercise the access, data portability, and deletion rights described above as a California resident, please submit a request to us by emailing business@flat2vrstudios.com. Before fulfilling your request, as required by law, we may request additional information verifying your identity to make sure you are the individual from whom we have collected personal information.

Use of an Authorized Agent to Submit a Request – Only you or a person you formally authorize to act on your behalf, may make a request related to your personal information as a California consumer. If you use an authorized agent to submit such a request, we will require written proof that the authorized agent has been authorized to act on your behalf or a copy of the power-of-attorney document granting that right.

12. Children's Personal information

Our Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children. If you are a parent or guardian and wish to review information collected from your child, or have that information modified or deleted, you may contact us business@flat2vrstudios.com. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account and/or revert them to the underage experience, as applicable.

13. Contact Us

If you have any questions regarding this Privacy Policy you can contact us via email at business@flat2vrstudios.com, or by writing to us at Impact Reality d/b/a Flat2VR Studios, 27251 Wesley Chapel Blvd, Wesley Chapel, Florida 33544.