

# Polygame Limited PRIVACY POLICY

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## INTRODUCTION

POLYGAME LIMITED (hereinafter “we”, “us” or “our”) operates the website and mobile app <https://www.Polygame.io> (hereinafter “Polygame” or the “website and mobile app”) and is the controller of the information collected or provided via this Website.

We collect, process and retain personal data to the extent it is necessary to provide users with our service. This privacy policy applies to information we collect:

- on this website and mobile app,
- in email, text and other communications between you and this website and mobile app, or
- through mobile applications you download from this Website, Google Play Store, or App Store, which provide dedicated non-browser-based interaction between you and this Website.

It does not apply to information collected by through any other means offline, including on any other website operated by us or any third party and including through any application or content (including advertising) that may link to or be accessible from or on the website and mobile app. We do not control these third-party websites and are not responsible for their privacy statements.

## THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified (“Personal Information”).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

### Persons who visit the Website without logging in or registering “unregistered users”

- Activity data includes aggregated information about your activity and how and what time of the day you use our website and mobile app, products and services.
- Technical data includes internet protocol (IP) address, browser type and version, time zone setting and location, language, device type, device id and operating system on the devices you use to access this website and mobile app.

### Persons who choose to create an account as “registered users”

- Identity data includes, username or similar identifier, date of birth, gender.
- Contact data includes mobile number.

- Transaction data in case of purchases, it may include details about payments to and from you and other details of products and services you have purchased or received from us and what time of the day, year you purchased.
- Technical data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, language, device type, device id and operating system on the devices you use to access this website, mobile app, products and services.
- User submitted data includes data collected at your direction for a specific function, for example your username and password, purchases or orders made by you, your interests, preferences, feedback responses, comments and bullet messages.
- Activity data includes information about your activity and how you use our website, mobile app, products and services.
- Biometric information (only for those who stream via Polygame) includes information regarding your facial features. Before collecting your biometric information, we will inform you separately and ask for your consent.

We may also collect, use and share your data to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website and mobile app feature, to generate statistics about our users, to calculate the percentage of users accessing a specific website and mobile app feature, or to calculate ad impressions served or clicked on.

We do not collect special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We use different methods to collect data from and about you including through:

Direct interactions. Information that you provide when carrying out search queries on our website and mobile app or by filling in forms on our App/ Website, in particular at the time of registering to use our website and mobile app, subscribing to the streaming channels, posting material, taking part in activities, entering a promotion sponsored by us, when reporting a problem with our website and mobile app, or requesting further services on our website and mobile app.

Automated technologies or interactions. See “Cookie Policy” for details of how we may automatically collect your personal data.

## **USER CONTRIBUTIONS**

We may provide areas on our website and mobile app where you can upload content (e.g., pictures, videos, audio files, etc.; collectively as “User Generated Content/UGC”), and post comments or reviews of content found on the website and mobile app. Such postings are governed by our terms of use. You should be aware that any Personal Information you submit, display, or publish in public areas of our website and mobile app is considered publicly available

and can be read, collected, used, and disclosed by others. We cannot control who reads your posting or what other users may do with the information you voluntarily post, so we encourage you to exercise discretion and caution with respect to your Personal Information.

## **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the applicable local law allows us to. Usage of your personal data is including but not limited to the following circumstances:

- For purposes of providing the services, customer management and functionality and security as is necessary to perform the services provided to you under our terms of use and any other contract that you have with us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you declare your valid consent to use it.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

## **PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION**

In general, we use information that we collect about you or that you provide to us for following purposes (the below list is an not an exhaustive list but an indicative list to provide you a sense of the areas where your information can be used):

- Provision of services: to present our website and mobile app and its contents to you, including any interactive features on our website and mobile app, and to provide you with information, products or services that you request from us; we also collect and use Personal Information to verify your eligibility and deliver prizes in connection with promotion activities and sweepstakes;
- Customer management: to manage a registered users' account, to provide customer support and notices to the registered user about his account or subscription, and notices about changes to our website and mobile app or any products or services we offer or provide through it;
- Communication: to communicate and interact with you directly, such as that we may send notifications to you, notify you about upcoming changes, promotion activities or improvements on the website and mobile app , or contact you regarding any content that you have posted to or downloaded from the website and mobile app;
- Customization of content: to perform research and analysis about your use of, or interest in, our website and mobile app content, products, or services, in order to develop and display content tailored to your interests on our website and mobile app ;

- Performance Analysis: to determine whether users of the website and mobile app are unique, or whether the same user is using the website and mobile app on multiple occasions, and to monitor aggregate metrics such as total number of visitors, streaming channels viewed, demographic patterns;
- Functionality and security: to diagnose or fix technology problems, and to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement;
- Compliance: to enforce our terms of use and to comply with our legal obligations;
- Others: to provide you information which we may describe when your consent is provided separately from this privacy policy.
- To acquire more users who are matching your profile on different platforms which allow us to share your information in a controlled manner.

For biometric information (with your separate consent), we use it to provide and improve beauty and similar effects for your streaming.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We do not disclose your Personal Information except in the limited circumstances described here.

- We may share your Personal Information outside of Polygame when we have your consent.
- We may disclose your Personal Information to members of our corporate group (that is, entities that control, are controlled by, or are under common control with us) to the extent this is necessary for the purposes of provision of services, customer management, customization of content, advertising, analytics, verifications, functionality and security, and compliance.
- Service providers. To our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, processing credit card payments, customization of content, analytics, security, supporting our Website functionality, and other features offered through our Website. These service providers may have access to Personal Information needed to perform their functions but are not permitted to share or use such information for any other purposes. However, if you connect to a third-party service through our Website or otherwise link your Polygame account with a third-party service, you are requesting and authorizing Polygame to share or grant access to information on your behalf with such third party. We may also send information about the content that you watch or your activities on the Website to such third parties in order to upgrade your experience of using the Website.
- Legal successors. To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other 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 about our Website users is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy policy.

- Share of UGC. You may share your UGC to other social media, including Facebook, Twitter and YouTube (a “Connected Social Media” respectively) via the function provided by us. However, once your UGC is shared to any Connected Social Media, we cannot control the shared UGC and you will be subject to the policies of the Connected Social Media (for example, [Google Privacy Policy](#) and [Google security settings](#)). Therefore, by using the function of share UGC (or similar function), you expressly relieve us from any liability arising from your share UGC or the Connected Social Media. We encourage you to review the Connected Social Media’s privacy policy and other legal documents before you share your UGC.

We access, preserve and share your Personal Information with regulators, law enforcement or others where we reasonably believe such disclosure is needed to (a) satisfy any applicable law, regulation, legal process, or governmental request, (b) enforce applicable terms of use, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address illegal or suspected illegal activities, security or technical issues, (d) protect against harm to the rights, property or safety of our company, our users, our employees, or others; or (e) to maintain and protect the security and integrity of our Website or infrastructure. In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. We also may share aggregated information with third parties for conducting general business analysis. This information does not contain any Personal Information and may be used to develop content and services that we hope you and other users will find of interest.

## **ANALYTICS PROVIDERS**

We use third-party analytics services, such as Google Analytics, on our website and mobile app and mobile applications. These service providers may utilize several tracking technologies, including cookies, to analyze how you use our services. To evaluate your use of our service, your Personal Information collected by us may be disclosed to or directly collected by these services provided.

## **FINANCIAL INFORMATION**

Financial information (including Personal Information) that you have provided to us will only be shared with our third-party processors in order to initiate and complete any orders placed on your account. All financial data and related Personal Information will not be shared by us with third parties except with your authorization or when necessary to carry out all and any transactions requested by you with the understanding that such transactions may be subject to rules, terms, conditions and policies of a third party. All such information provided to a third party is subject to their terms of use.

## **TRANSFERS OF YOUR PERSONAL INFORMATION TO OTHER COUNTRIES**

With your consent, we may transfer the information that we collect about you, including personal information, to any country in which we, members of our corporate group (that is, entities that control, are controlled by, or are under common control with us) or our service providers are located.

## **HOW WE PROTECT THE SECURITY OF YOUR PERSONAL INFORMATION**

We take appropriate security measures to safeguard your Personal Information from unauthorized access and disclosure. For example, only authorized employees are permitted to access Personal Information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of certain your Personal Information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your Personal Information. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of Personal Data.

You are responsible for maintaining the secrecy of your unique password and account information at all times. We are not responsible for circumventions of any privacy settings or security measures contained on the Website.

## **YOUR RIGHTS AND CHOICES (ACCOUNT CLOSURE & DELETION)**

We strive to provide you with rights and choices regarding your personal information, including the right to close your account and delete your personal information. Please check Polygame's privacy choices pages so you may find your rights, choices, and how to review, update, or delete such Personal Information.

You can choose not to provide us with certain Personal Information, but that may result in you being unable to use certain features of our Website because such information may be required in order for you to register as a member; purchase products or services; participate in a contest, promotion, survey, or sweepstakes; ask a question; or initiate other transactions on our Website.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Website may then be inaccessible or not function properly.

## **RETENTION OF YOUR PERSONAL INFORMATION**

We maintain your personal information in order to fulfill the relevant purposes described in this Privacy Policy, or as required or permitted by law, or as otherwise communicated to you. Once you request us to close your account and delete your personal data, we will delete or all of your personal information that we are not required or permitted to retain by law.

## **CHANGES TO OUR PRIVACY POLICY**

We may modify or revise our privacy policy from time to time. Although we may attempt to notify you when major changes are made to this privacy policy, you are expected to periodically review the most up-to-date version found at our Website so you are aware of any changes, as they are binding on you.

If we change anything in our privacy policy, the date of change will be reflected in the “last modified date”. You agree that you will periodically review this privacy policy and refresh the page when doing so. You agree to note the date of the last revision to our privacy policy. If the “last modified” date is unchanged from the last time you reviewed our privacy policy, then it is unchanged. On the other hand, if the date has changed, then there have been changes, and you agree to re-review our privacy policy, and you agree to the new ones. By continuing to use the Website subsequent to us making available an amended version of our privacy policy in a way that you can easily take notice of it, you thereby consent to such amendment.

## **ENFORCEMENT; COOPERATION**

We regularly review our compliance with this privacy policy. Please feel free to direct any questions or concerns regarding this privacy policy or our treatment of Personal Information by contacting us through this Website at [Sushil@Polygame.com](mailto:Sushil@Polygame.com) When we receive a formal written complaint, it is our policy to contact the complaining party regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the collection, use and disclosure of Personal Information that cannot be resolved by an individual and us.

## **NO RIGHTS OF THIRD PARTIES**

This privacy policy does not create rights enforceable by third parties or require disclosure of any Personal Information relating to users of the Website.

## **OUR POLICY TOWARDS MINORS**

Our Website is not directed to persons under the age of 18 or the applicable age of majority in the jurisdiction from which the Website is accessed and we do not knowingly collect Personal Information from minors. If you become aware that your child has provided us with Personal Information, please contact us at [Sushil@Polygame.com](mailto:Sushil@Polygame.com) If we become aware that a minor has provided us with Personal Information, we take steps to remove such information and terminate that person’s account.

## **NO ERROR FREE PERFORMANCE**

We do not guarantee error-free performance under this privacy policy. We will use reasonable efforts to comply with this privacy policy and will take prompt corrective action when we learn of

any failure to comply with our privacy policy. We shall not be liable for any incidental, consequential or punitive damages relating to this privacy policy.

#### **CONTACT INFORMATION**

If you have any questions about this privacy policy or our information-handling practices, please contact us at [Sushil@Polygame.com](mailto:Sushil@Polygame.com)