

# Privacy Policy

## Introduction

This privacy policy (the "Privacy Policy") is designed to help you understand how Lokie Labs, S.L. ("Lokie Labs", "we", "us", "our", the "Company" or the "Controller") collects, uses, processes and shares the personal information and data you provide when you access and/or use our websites (the "Sites", the "Websites" or the "Webs", indistinctly), games we operate, and any other services or interfaces owned or controlled by Lokie Labs that link to this Privacy Policy (each a "Service" and collectively, the "Services").

## Laws incorporated in this Privacy Policy

This Privacy Policy is adapted to the Spanish and European regulations in force regarding the protection of personal data on the Internet. Specifically, it respects the following rules:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR").
- The Organic Law 3/2018, of December 5, 2018, on the Protection of Personal Data and guarantee of digital rights ("LOPD-GDD").
- Royal Decree 1720/2007, of December 21, 2007, approving the Regulations for the development of Organic Law 15/1999, of December 13, 1999, on Personal Data Protection ("RDLOPD").
- Law 34/2002, of July 11, 2002, on Information Society Services and Electronic Commerce ("LSSI-CE").

## Data Controller

The person responsible for the processing of personal data (the "Data Controller") is Lokie Labs, S.L., a business entity incorporated under the laws of Spain, with registered office at Alcobendas (Madrid), and provided with tax identification number (N.I.F.) B13930714.

## Data Protection Officer

The data protection officer (the "Data Protection Officer", "DPO" or "DPD", indistinctly) is responsible for ensuring compliance with data protection regulations, and in connection with this, that the rights and freedoms of data subjects are not adversely affected by the data processing operations. You can contact the DPO of Lokie Labs at the following e-mail address: [contact@lokielabs.com](mailto:contact@lokielabs.com).

## Incorporation to files

In compliance with the provisions of the GDPR and the LOPD-GDD, we inform you that the personal data collected by Lokie Labs through the forms provided on our Sites will be incorporated and processed in our files for the purposes referred to in this Privacy Policy.

## Principles applicable to the processing of personal data

The processing of the user's personal data shall be subject to the following principles set out in Article 5 of the GDPR:

- **Principle of lawfulness, fairness and transparency:** the consent of the user will be required at all times after fully transparent information of the purposes for which the personal data are collected.
- **Purpose limitation principle:** personal data will be collected for specified, explicit and legitimate purposes.
- **Principle of data minimization:** personal data collected will be only those strictly necessary in relation to the purposes for which they are processed.
- **Accuracy principle:** personal data must be accurate and always up to date.
- **Principle of limitation of the storage period:** personal data shall only be kept in such a way as to allow the identification of the user for the time necessary for the purposes for which they are processed.
- **Principle of integrity and confidentiality:** personal data will be processed in a way that ensures their security and confidentiality.
- **Principle of proactive responsibility:** the Data Controller shall be responsible for ensuring that the above principles are complied with.

## Categories of personal data

The categories of personal information we collect will depend on your interaction with us, your use of our Services, and the requirements of applicable laws. We collect personal information that you provide to us, personal information that we obtain automatically when you use our Services, and personal information from other sources, such as third-party services and organizations, as described below.

### A) Information you provide directly to us

We may collect the following personal information that you provide to us:

- **Contact:** We may collect personal information, such as name, email address or phone number, when you contact us via the contact form or otherwise, request information about our Services, sign up for our newsletter or apply for a job.
- **Account Creation:** We may collect personal information when you create an account with us, such as name, phone number, time zone and email address.
- **Purchase, wallet and transaction information:** To make certain transactions or purchases on the Services, you may need to provide us or our third-party payment processors with your payment information and allow us to connect to your digital wallet by providing us with your public wallet address. We will never ask for or collect your

private keys. We do not directly collect or store any payment card information entered through our Services or access your digital wallet, but we may receive from our third-party payment processing providers information associated with your payment card information (e.g., your billing information). We may also collect your name, recipient name, email address, currency and date as part of transactions that take place on the Services.

- **Interactive features:** We and other users of our Services may collect personal information that you submit or make available through our interactive features (for example, through Lokie Labs communities on Discord, messaging and chat features and social networking pages). Such personal information may include photos, avatars or other images you upload and usernames that include personal or biographical information. Any personal information you provide in the public sections of these features will be considered "public" (the "User Content"), unless otherwise required by applicable law, and will not be subject to the privacy protections referenced herein. Use caution before disclosing to other users any information that could identify you in the real world.
- **Surveys:** We may contact you to participate in surveys. If you choose to participate, you may be asked to provide certain information, which may include personal information.
- **Sweepstakes, giveaways or contests:** We may collect the personal information you provide to us for any sweepstakes, giveaways or contests we offer. We may publicly share sweepstakes and contest winners' information.
- **Conferences, fairs and other events:** We may collect personal information from individuals when we attend or host conferences, fairs and other events.
- **Business development and strategic partnerships:** We may collect personal information from individuals and third parties to evaluate and take advantage of potential business opportunities.

## **B) Information collected automatically**

We may collect personal information automatically when you use our Services, such as:

- **Automatic data collection:** We may collect certain information automatically when you use our Services, such as information about your browser or device, information about your location (including approximate location derived from IP address), and metadata about the content you provide. We may also automatically collect information about your use of our Services, such as the pages you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- **Game usage information:** If you play any of the games offered by us or our development partners (the "Developer Partners"), we and our Developer Partners may collect information about your in-game data and actions (e.g., your public wallet address, the number of games you play and your in-game spending). If you play any of these games, you may also be subject to the privacy policies of our Developer Partners, so please read and understand their privacy policies.

- **Cookies and other technologies:** We, as well as third parties that provide content or other functionality on our Services, may use cookies, local storage and other technologies ("Technologies") to automatically collect information through your use of our Services. Cookies are small text files placed on device browsers that store preferences and facilitate and enhance your experience. Analytics: We may use tools to process analytical information on our Services. These technologies allow us to process usage data to better understand how our Services are used and to continually improve them. Social Media Platforms: Our Services may contain social media buttons, such as Discord, Instagram and Twitter, which may include widgets such as a "share this" button or other interactive mini-programs). These features may collect your IP address and the page you are visiting on our Services and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing them.

You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as allowed by your browser or device. However, if you adjust your preferences, our Services may not function properly. Please note that cookie-based opt-outs may not be effective on mobile applications.

### **C) Information gathered from other sources**

- **Third Party Sources:** We may obtain information about you from other sources, including through third party services and organizations. For example, if you access our Services through a third party application, such as an app store, third party login service or social networking site, we may collect information about you from that third party application that you have made available through your privacy settings. Your access through a third-party application may also be subject to the privacy policies of those third parties, so we encourage you to read and understand their privacy policies.
- **Sharing Features:** Our Services may offer various tools and functionalities that allow you to provide information about your friends; third parties may also use these services to upload information about you. Our Services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share contact information about individuals with us if you have their express consent.

### **Purposes of the processing for which the personal data is used**

Personal data are collected and managed by Lokie Labs in order to provide the Services and to facilitate, expedite and fulfill the commitments established between the Site and the user or the maintenance of the relationship established in the forms that the latter fills out or to respond to a request or inquiry.

Likewise, the data may be used for commercial purposes of personalization, operational and statistical purposes, and activities related to the corporate purpose of Lokie Labs, as well as for the extraction, storage of data and marketing studies to adapt the Content offered to the user, as well as to improve the quality, operation and navigation of the website.

At the time the personal data is obtained, the user will be informed about the specific purpose or purposes of the processing for which the personal data will be used; that is, the use or uses that will be given to the information collected.

## **Recipients of personal data**

Lokie Labs does not share users' personal data with third parties. However, Lokie Labs allows access to its users' personal data to third parties with whom Lokie Labs has previously established professional relationships. These third parties, known as "Processors", access the User's personal data in order to fulfill the specific purposes for which Lokie Labs processes personal data, set out in the previous section. These relationships between Lokie Labs and its Data Processors are regulated and delimited in their corresponding contracts, and comply with all the requirements of the current Spanish and European legislation on Personal Data Protection.

Likewise, Lokie Labs ensures that its Data Processors comply with all the security requirements required by the Spanish and European legislation in force regarding the protection of personal data.

In the event that the Data Controller intends to transfer personal data to a third country or international organization, at the time the personal data is obtained, the user will be informed about the third country or international organization to which it intends to transfer the data, as well as the existence or absence of an adequacy decision of the European Commission.

The provisions of this paragraph are without prejudice to the communication of personal data to third parties in cases of legal obligation.

## **Personal data of minors**

Respecting the provisions of articles 8 of the GDPR and 7 of the LOPD-GDD, only those over 14 years of age may give their consent to the processing of their personal data in a lawful manner by Lokie Labs. In the case of a minor under 14 years of age, the consent of the parents or guardians will be required for the processing, and this will only be considered lawful to the extent that they have authorized it.

## **Secrecy and security of personal data**

Lokie Labs undertakes to adopt the necessary technical and organizational measures, according to the level of security appropriate to the risk of the data collected, so as to ensure the security of personal data and to prevent the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or the unauthorized communication of or access to such data.

However, because Lokie Labs cannot guarantee the impregnability of the Internet or the total absence of hackers or others who fraudulently access personal data, the Data Controller undertakes to notify the user without undue delay when a breach of security of

personal data occurs that is likely to involve a high risk to the rights and freedoms of natural persons.

Following the provisions of Article 4 of the GDPR, a breach of security of personal data means any breach of security resulting in the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or the unauthorized communication of or access to such data.

Personal data will be treated as confidential by the Data Controller, who undertakes to inform and to ensure by means of a legal or contractual obligation that such confidentiality is respected by its employees, associates, and any person to whom it makes the information accessible.

### **Time of conservation of personal data**

The personal data provided will be kept for the time necessary to fulfill the purpose for which they are collected, in addition to the periods established in the regulations on archives and documentation. However, you may request deletion at any time.

### **Accuracy and veracity of personal data**

You undertake to ensure that the data you provide us with is correct, complete, accurate and current, as well as to keep it duly updated. As a user of our Services you are solely responsible for the veracity and accuracy of the data you submit, exonerating Lokie Labs from any liability in this regard.

### **Acceptance and consent**

As a user of the Services, you declare that you have been informed of the conditions on personal data protection, you accept and consent to the processing of such data by Lokie Labs in the manner and for the purposes indicated in this Privacy Policy.

### **Acceptance and changes to this Privacy Policy**

It is necessary that you have read and agree with the conditions on the protection of personal data contained in this Privacy Policy, as well as that you accept the processing of your personal data so that the Data Controller can proceed in the manner, during the periods and for the purposes indicated. The use of the Site will imply the acceptance of its Privacy Policy.

Lokie Labs reserves the right to modify its Privacy Policy, according to its own criteria, or motivated by a legislative, jurisprudential or doctrinal change of the Spanish Data Protection Agency (Agencia Española de Protección de Datos). In the event of any material change, we will notify you in accordance with applicable law. We encourage you to periodically review this privacy statement to be informed of how Lokie Labs is protecting your information. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy becomes effective.

## **User rights**

In accordance with the rights recognized in the GDPR and the LOPD-GDD, you may exercise your rights of access, rectification, limitation of processing, deletion, portability and opposition to the processing of your personal data, as well as the consent given for the processing of the same, by sending your request to the e-mail [contact@lokielabs.com](mailto:contact@lokielabs.com).

## **Links to third parties**

The user may find links on our Sites or Services to other websites controlled by third parties. Lokie Labs does not have the power to control the content provided by these other websites and is not responsible for the processing of users' personal data by those responsible for these websites. We remind you that this Privacy Policy only applies to personal data collected and processed by Lokie Labs through its Sites. Therefore, Lokie Labs is not responsible for any aspect related to the processing of your data that may be carried out by those responsible for these third party websites, who will be responsible for their own files and their own privacy practices.

## **Contact**

If you have any questions about this Privacy Policy or the use of your personal data, or if you wish to correct or delete data, please send an email to [contact@lokielabs.com](mailto:contact@lokielabs.com).