

PRIVACY POLICY

Last updated June 16, 2023

This privacy notice for our Service, describes how and why we might collect, store, use, and/or share your information when you use our services ("Services"), such as when you:

- Download and use our mobile application (Brainium), or any other application of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice 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 at

brainium.contact@gmail.com

ACCEPTANCE OF THIS POLICY

By accessing, visiting or using our Services (Brainium), you warrant and represent that you have read, understood and agreed to this Policy and our Terms of Service. If you disagree with anything in this Policy, you must not use or access the Services.

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics below.

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 Brainium, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we receive any information from third parties? We do not receive any information from third parties.

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.

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.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us: brainium.contact@gmail.com

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

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1. 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 register 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.

Personal Information Provided by You. The personal information we collect may include the following:

- email addresses
- usernames

We need to know your username to display your name to your opponents and to the game host during the game.

Our game app uses a third-party library that requires access to the microphone to function properly. Although we personally don't use this functionality, the access request is necessary for the library to work correctly. We would like to assure our users that we don't collect any audio data, and microphone access is only used by the third-party library.

Sensitive Information. We do not process sensitive information.

Payment Data. We may provide paid products and/or services as part of the Service. In this case, we use third-party services to process payments (e.g., payment processors).

We do not store or collect your payment card information. This information is provided directly to our third-party payment processors, whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the PCI-DSS standards set by the PCI Security Standards Council, which is a joint body of brands such as Visa, Mastercard, American Express, and Discover. PCI-DSS requirements help ensure that payment information is processed securely.

We work with the following payment processors:

Apple Store In-App Payments. Their privacy policies are available at: <https://www.apple.com/legal/privacy/en-ww/>

Google Play. Their privacy policy is available at: <https://policies.google.com/privacy>

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's social media accounts, sms messages, and other features. We need access so that you can share the link to the app with your friends and family.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for keeping your own game statistics for yourself.

2. 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:

- To facilitate authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- 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.
- Game statistics. We ask you to authorize so that we can keep your game statistics

3. 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.

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.

4. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly collect data from or market to minors.

5. 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 by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

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 by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

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.

Account Information

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at brainium.contact@gmail.com

6. CHILDREN'S POLICY

We ensure that we comply with the applicable law and regulation regarding children's online privacy protection, and do not knowingly collect personal information about users directed to children under the age of thirteen (13). If you are in the EEA, our Services are not directed to children under 16 and we do not knowingly collect personal information from children under 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly contact us and we take reasonable steps to ensure that such information is deleted from our files.

7. 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.

8. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at brainium.contact@gmail.com

9. 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 email us at brainium.contact@gmail.com