

PRIVACY POLICY

1. INTRODUCTION

1.1 We commit to protect and respect your privacy. This Privacy Policy ("**Policy**") describes how we treat information that you provide to us or that we collect about you.

1.2 By personal data, we refer to data that relates to you as an identified or identifiable person. Personal data include your name, your address, your telephone number, your e-mail address, your age, your gender and your game preferences, a part of your credit card number. Anonymous information, which we are not in a position to relate to you, does not qualify as personal data.

1.3 We may collect personal data as well as other information when you use the following services:

- Your use of any of our online and mobile games including, but not limited to **Heart of Tribes** (hereinafter referred to as the "**Games**" or individually a "**Game**"). Your use of each Game will be subject to the End User License Agreement (hereinafter referred to as the "**EULA**") and the game rules (hereinafter referred to as the "Game Rules") in respect of that Game. You can find links to the EULA and the Game Rules for our Games in our Terms of Service.
- Your use of any of our other products and services (including support services) which may be accessible via a third-party platform.

2. WHO WE ARE □

We are

StarWell s.r.o.

Smetanova 6

Blansko 678 01,

Czech Republic

(hereinafter referred to as the "**StarWell Games**", "**we**", "**our**" and "**us**").

We respect your right to privacy and will only process personal data and other information you provide to us or we collect about you in accordance with applicable privacy and personal data protection laws.

3. INFORMATION WE MAY COLLECT FROM YOU

When you use the Services, we may collect the following categories of data:

When you create an Account, we collect and process the following "Account Data":

- Your first name and last name, your gender, date of birth, e-mail address, telephone number, social network ID, address, user name, password. You may also choose to provide some other optional information about you.

When you purchase virtual items, or time-limited premium memberships with the credit card, we collect and process the following "Payment Information":

- Your credit card number (or a part of it), and information about your credit card issuer.

When you use the Services, we may collect and process the following "Tracking Data":

- Location information associated with your IP address when you visit our Sites or use a Game.
- Log files and statistics in relation to actions taken on our Sites and in the Games.
- Technical information about any device that you use when you visit the Sites or use a Game, including your Media Access Control (MAC), Unique Device Identifier (UDID) or equivalent device identifier, your IP address and the browser you are using.

When you use the Services, we may collect and process the following "Content Data":

- Information that you post in any of the Games Forums.
- Information sent through the "game-chat" functionality in the Games,
- Information you provide when you request information or support from us or purchase a product or service from us, including information necessary to process your orders with the relevant payment merchant which may include the amount of any transaction, but will not include your financial information which will only be submitted directly to the payment merchant under secure protocols.
- Information other than the Account Data you provide to us when participating in competitions, contests and tournaments and responding to surveys.
- Information relating to your profiles on social networking sites in order to allow integration with such social networking sites.

4. HOW WE USE YOUR INFORMATION

We may use the information that you provide to us or that we collect about you for the following purposes:

4.1 Provision of services. Account Data, Tracking Data and Content Data may be collected and processed by us to provide you with the Services that you request from us and to perform the

respective EULA and Terms of Service accepted by you. Data collected for that purpose will only be kept as long as necessary to provide the requested Services, and to comply with applicable laws.

4.2 Any data collected may be processed by us to detect, investigate and prevent activities that may be illegal, or that may violate the Terms of Service or Forum Rules, or that may violate the respective EULA in respect of any of the Games. Such data will be kept for a maximum duration of six months after the Account closure.

4.4 Creation of additional promotion and advertising and creation of user profiles:

4.4 While accepting the Policy you hereby agree, we may use your personal data for following purposes:

- We may use the e-mail address registered to your Account to provide you with information about products and services related to our Services that you request from us, unless you choose to opt out from this service at the time your Account is created. You may also opt-out from use of your e-mail address for this purpose at any time, by sending an e-mail from the e-mail address registered to **contact@starwellgames.com** your Account to stating that you do not wish to receive such information. Alternatively, you may opt out by following the unsubscribe instructions at the bottom of each e-mail you receive from us.
- We may use Tracking Data to monitor, improve, or modify the Services and our operations.
We may create a "personal user profile" by connecting your Account Data with your Tracking Data for purposes of improving, or modifying the Services and our operations and, for our own promotions, advertising and market research.

5. SHARING YOUR INFORMATION

5.1 We will not share your data with anyone else unless we obtain our consent, or in the following limited circumstances including:

- To the extent that we are required to do so by applicable law, by a governmental body or by a law enforcement agency, or for crime prevention purposes.
- Where necessary to enforce the Terms of Service or Forum Rules, or the EULA or Game Rules in respect of any of the Games, to provide you with Services you request from us, to protect the safety of our users and third parties, to protect our rights and property and the rights and property of other users and third parties, or in other cases if we believe in good faith that disclosure is required by law.
- We may disclose and allow access to information collected through our Services to facilitate the targeting, delivery, and measurement of advertising through and in connection with the Service: to facilitate the targeting, delivery, and measurement of online advertising on third-party services on our behalf, and otherwise to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to our users.

- We may share anonymous information, i.e. information which does not directly or indirectly disclose your identity, and aggregated information (meaning information about groups and categories of users, including game statistics and behavior, but which does not identify and that cannot reasonably be used to identify any individual user).

6. CHILDREN

We recognize that we have a special obligation to protect personal information obtained from children. We will not knowingly collect personal information from any child, or process such information, without parental consent. For the purpose of this Policy, a child means any individual who is under the age of 18 (or the minimum legal age to consent to the collection and processing of personal information where this is different under applicable law).

7. SECURITY

7.1 We take reasonable precautions to prevent the loss, misuse or alteration of your personal information. Our employees, contractors and agents may be given access to your personal information which we collect, but their use shall be limited to the performance of their duties in relation to facilitating your use of the Services. Our employees, contractors and agents who have access to your personal information are required to keep that information confidential and are not permitted to use it for any purposes other than those listed above or to deal with requests which you submit to us.

7.2 We have implemented all reasonable technical, administrative and physical security measures to protect the security of your information.

8. THIRD PARTY SITES

The Services may contain links to other websites operated and services provided by third parties, including those retailers you enter into a transaction with. Please note that this Policy applies only to the personal information that we collect through the Services and we cannot be responsible for personal information that third parties may collect, store and use through their websites or their services. You should always read the privacy policy of each website you visit carefully.

9. YOUR RIGHTS

In addition to your opt-out right under section 4.2, you may exercise the following rights at any time:

- You may ask us to provide you with copies of the personal information that we hold about you, or with information about the processing of such information.
- You may ask us to update and correct any out-of-date or incorrect personal information that we hold about you.

If you wish to exercise any of these rights, then please contact us at contact@starwellgames.com. If you ask us to delete personal information about you then we may retain an archived copy of this information if required to do so by law.

10. CHANGES TO THIS POLICY

We may change this Policy from time to time for various reasons such as changes to reflect in law and regulation, changes in industry practices and technological developments. In case you have a registered Account, you will be notified of any changes of this Policy via e-mail to the e-mail address related to your Account. The latest version of this Policy will always be available on the Sites. Any new version of this Policy shall take effect (i) immediately upon the date of your receipt of the notification e-mail where the changes to this Policy relate to non-material changes which do not reduce your rights; or (ii) no less than thirty (30) days after your receipt of the notification e-mail where the changes to this Policy potentially reduce your rights; or (iii) in case you do not have a registered Account, the moment they are uploaded to our Services.

11. QUESTIONS AND COMMENTS

If you have any questions or comments about this Policy, please contact us at contact@starwellgames.com.