

PLAY TO TRADE

PRIVACY POLICY

Last modified: 9th March 2023

SUMMARY

- We collect information about you as you use the Play to Trade app
- We use this information in order to provide you a more personalized experience
- Information we collect from you may be shared, stored or processed with our service providers. In these cases we ensure your data is treated securely
- You are in control of your data and can modify your preferences at any time
- You must be over 13 years old to use the Play to Trade app

INTRODUCTION

SuperPro Group Ltd. and its affiliates (collectively, “**SuperPro**”, “**we**”, “**our**” or “**us**”) develops, publishes and operates social gaming applications for mobile environments (“**Games**”), including mobile applications (each, an “**App**”) for playing our Games across multiple devices and platforms.

We also operate the website www.PlayToTrade.com, and related features, (collectively, “**Sites**”, and together with the Games, collectively – the “**Services**”).

SuperPro respects your privacy and is committed to making our practices regarding your data transparent and fair. This Privacy Policy describes how we collect, store, use and share your personal data, and it applies whenever you install our App and play our Games, interact with us through our Sites or otherwise access or use any of our Services.

We strongly urge you to read this Privacy Policy and make sure that you fully understand and agree to it. If you do not agree to this Privacy Policy, please discontinue and avoid using our Services. You have the right to cease using our Services, pursuant to this Privacy Policy at any time.

SuperPro is a “data controller”. This means that we are responsible for deciding how we hold and use Personal Data about you. We are required under data protection legislation to notify you of the information contained in this Privacy Policy. You are not legally required to provide us with any Personal Data, but without it we may be prevented from offering some or all of our Services.

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1. Data Collection

We collect four main categories of data and to the extent it may enable the identification of a specific person, or is linked to such potentially identifying data, we will deem it as “**Personal Data**”:

a. **Data automatically collected or generated:**

When someone visits, interacts with or uses our Services, including any e-mail or messages sent to them by us or via our Services, we may collect or generate technical data about them. We collect or generate such data either independently or with the help of third party services, including through the use of “cookies” and other tracking technologies (as further detailed below).

This data can consist of connectivity, technical or aggregated usage data, such as IP address, in-game identifier, game statistics, game preferences, unique advertising ID, non-identifying data regarding a device, operating system, browser or App version, mobile carrier, locale and language settings, user activity on our Services, in-App or Game activity (such as game play content/product interaction and advertising data); diagnostic data (i.e. crash data and game performance data). We do not use such data to learn a person’s true identity or contact details, but usually to improve our understanding of how our users typically use and engage with our Services. The use of such technical and device data also helps us and our partners to deliver interest-based or otherwise more effective advertisements and content, to optimize our ad management and our users' viewing experience), and to improve the overall performance and your user experience of our Services. For more information about our advertising uses, please see Section 8 below.

b. **Data received from you:**

You may provide us Personal Data voluntarily, such as when you set up an account with us, contact us (through e-mail, in-game chat or any other channel, including any

communicating with our support services), when you provide us your e-mail address (such as when you sign-up to receive e-mail updates), when you participate in competition, contest, tournaments and other promotions, when you place any purchases in a Game, when you interact with other users through the in-game chat or other similar means.

c. Data received from Apple and other channels:

Once you register through your Apple account, we will receive access to your public profile, including (to the extent you defined it as “public”), as applicable, your full name, e-mail address(es) provided to Apple, gender, profile picture or similar photo, location, time zone. In addition, we or our advertising partners may receive from other marketing channels general information concerning the performance of our advertising campaigns, such as the targeted age group or interests, and we or our partners may be able to link such general data to any other data in our possession. To learn more about our advertising practices, please refer to **Section 9** below. If you access our Services through a third party such as Apple, you should also read their terms and conditions and privacy policies. If you are unclear about what information a third-party application is sharing with us, please visit that third-party application's website in order to learn more about their privacy practices.

d. Transaction Data:

In-Game purchases will typically be processed by the relevant platform provider (e.g. Apple), and we will not collect or store your financial data, e.g. your credit card numbers or bank account. We may still however receive your non-financial Personal Data related to the purchase, such as your name, billing address, e-mail address and the items purchased, these are in order to fulfil your purchase and for our accounting purposes.

2. Data Uses

Our legal basis for collecting and using your Personal Data will depend on the particular purpose for which your data is being processed, however, we generally use the following:

- a. *Performance of a contract.* We will use this basis for necessary processing to make the Game (including social gaming when you choose to log in with Apple), and support services, available to you, and to send you service communications, gifts and awards.
- b. *Consent.* In limited cases (where you choose to sign up to receive direct marketing emails, where you accept cookies on our Sites, we will process your Personal Data based on your consent. You can withdraw your consent at any time by contacting us using the details in Section 13.
- c. *Legitimate interests.* We will process your Personal Data based on our legitimate interests in maintaining and improving our Services and offerings, understanding how our Services are used, serving effective advertisements within our Games and through other channels, matching users to create in-game friends lists, improving our customer service and support operations, fraud detection and protecting and securing our users, ourselves and our Services.
- d. *Compliance with a legal obligation.* In limited cases we may process your Personal Data where we need to do so to comply with a legal obligation e.g. which is set out in an applicable law, or if we receive an order from a court or regulatory body.

The purposes for which we use Personal Data are described in more detail below:

- a. To facilitate, operate, and provide our Services;
- b. To authenticate the identity of our players, and allow them access to additional features;

- c. To provide our users with customer care, assistance and technical support services;
- d. To enable you to interact with other players in the game;
- e. To further develop, customize and improve the Services and your user experience, based on common or personal preferences, experiences and difficulties, including by personalizing your profile and friends list;
- f. To manage and deliver advertisements more effectively, including contextual, behavioural and interests-based advertising based on in-Games progress and activity, based on your preferences or other data available to us or to our Service Providers, including for re-targeting purposes;
- g. To contact our users (via e-mail, push notifications or any other available channels) with general or personalized service-related messages (such as purchase confirmations or system maintenance notices); to contact our users with promotional messages (such as Games updates, bonuses, new features, VIP services, etc.); and to facilitate, sponsor and offer certain events and promotions;
- h. To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error or any illegal or prohibited activity;
- i. To create aggregated statistical data, inferred non-personal data or anonymized or pseudonymized data (rendered non-personal), which we or our Service Providers may use to provide and improve our respective services; and
- j. To comply with any applicable laws and regulations.

3. Storage and Retention

While privacy laws may vary between jurisdictions, SuperPro has taken reasonable steps to ensure that your Personal Data is treated by our affiliates and Service Providers in a secure and lawful manner, and in accordance with common industry practices, regardless of any lesser legal requirements that may apply in their jurisdiction.

We retain your Personal Data in order to maintain our relationship and to provide you with our Services. We will retain your Personal Data for only as long as necessary to fulfil the purposes for which we collected it. In other words, we will retain your Personal Data for as long as you remain our user and have not notified us otherwise. We will take reasonable measures to delete your Personal Data if you delete your account. We may also retain your Personal Data for legal and accounting purposes (i.e., as required by laws applicable to record and bookkeeping, and in order to have proof and evidence concerning our relationship, should any legal issues arise following your discontinuance of use), in accordance with our Data Retention Policy. If you have any questions about our Data Retention Policy, please contact us at privacy@playtotrade.com.

Please note that except as required by applicable law, we will not be obligated to retain your data for any particular period, and are free to securely delete it for any reason and at any time, with or without notice to you.

In some circumstances, we may anonymize your Personal Data so that it can no longer be associated with you, in which case we may use such information without further notice to you and it is no longer considered Personal Data within the meaning of this Privacy Policy.

4. Personal Data Deletion and Closure of Accounts

In addition to any other rights set out in this Privacy Policy, you at any time may direct that SuperPro delete your Personal Data by accessing the "Account Deletion" button in the applicable Game and following the instructions. Selection of this option will result in closure of your Account and deletion of all of your playing history, purchase information, social media log-in and other information associated

with you in connection with the Game. Deletion is irreversible. If you maintain Accounts with multiple Games, you should request closure of each.

Upon receipt of your request, we will comply promptly but please allow some time for processing. We also reserve the right to retain a copy of any Personal Data that we are required by applicable law to retain.

5. Data Sharing

We may share your data with certain third parties, including law enforcement agencies, our Service Providers and our affiliates. The circumstances in which we share data are summarised below:

- a. **Compliance with Laws, Legal Orders and Authorities:** We may disclose or allow government and law enforcement officials access to certain Personal Data, in response to a subpoena, search warrant or court order (or similar requirement), or in compliance with applicable laws and regulations, including for national security purposes. Such disclosure or access may occur with or without notice to you, if we have a good faith belief that we are legally compelled to do so, or that disclosure is appropriate in connection with efforts to investigate, prevent, or take action regarding actual or suspected illegal activity, fraud, or other wrongdoing.
- b. **Service Providers:** We may engage selected third party companies, contractors and individuals to perform services complementary to our own (e.g. hosting services, data analytics services, marketing agencies and advertising services and tools, data and cyber security services, fraud detection and prevention services, payment processing services, customer support partners, external moderators and testers, user engagement services, e-mail distribution and monitoring services, session recording, and our business, legal, financial and compliance advisors) (collectively, "**Service Providers**"). These Service Providers may have access to your Personal Data, depending on each of their specific roles and purposes in facilitating and complementing our Services, and may only process your Personal Data for the purposes for which we have instructed them. We may also share anonymous, statistical or aggregated information with our Service Providers for legitimate business purposes.
- c. **Third Party Integrations:** The Services allow you integrate with certain third party services, such as in order to connect your Facebook or Apple account to a certain Game, Login with Google, Facebook or sign in with Apple or to place purchases, in which case you will be bound by the terms and conditions and privacy notices of said third parties (e.g., Apple, Google or Facebook) – so please make sure that you read and accept them in advance. We do not receive or store your passwords for any of these third party services.
- d. **Protecting Rights and Safety:** We may share your Personal Data with others, with or without notice to you, if we believe in good faith that this will help protect the rights, property or personal safety of any of our users or any members of the general public or SuperPro.
- e. **SuperPro Subsidiaries and Affiliated Companies:** We may share Personal Data internally within our family of companies, for the purposes described in this Privacy Policy. In addition, should SuperPro or any of its affiliates undergo any change in control, including by means of merger, acquisition or purchase of substantially all of its assets, your Personal Data may be shared with the parties involved in such event. If we believe that such change in control might materially affect your Personal Data then stored with us, we will notify you of this event and the choices you may have via e-mail and/or prominent notice on our Services.

NB: For the avoidance of doubt, SuperPro may share your Personal Data in additional manners, pursuant to your explicit approval, or if we are legally obligated to do so, or if we have successfully rendered such data non-personal and anonymous. We may transfer, share or otherwise use non-personal data in our sole discretion and without the need for further approval.

6. Communications

- a. *Service Communications:* We may contact you with important information regarding our Services. For example, we may notify you (through any of the means available to us) of changes or updates to our Services, billing issues, etc. You will not be able to opt-out of receiving such service communications.
- b. *Promotional Communications:* If you have signed up to receive such communications from us, we may also notify you about new services, events and special opportunities or any other information we think you will find valuable. We may provide such notices through any of the contact means available to us (e.g. phone, mobile or e-mail), through the Services, or through our marketing campaigns on any other sites or platforms.

You have the right to withdraw your consent to receiving such promotional communications at any time. You can do this by contacting us at privacy@PlayToTrade.com or by following the “unsubscribe”, “stop” or “change e-mail preferences” instructions in the promotional communications you receive.

7. Data Security

In order to protect your Personal Data held with us and our Service Providers, we use appropriate physical, procedural and electronic security measures, including encryption where deemed appropriate. However, please be aware that regardless of any security measures used, we cannot and do not guarantee the absolute protection and security of any Personal Data stored with us or with any third parties. If you discover any security or vulnerability issues related to the Services you should send an email to: privacy@PlayToTrade.com.

8. Cookies and Tracking Technologies

Our Services and some of our Service Providers utilize “cookies”, anonymous identifiers and other tracking technologies (collectively, “**Tracking Technologies**”) which help us provide and improve our Services, personalize your experience and monitor the performance of our activities and campaigns, as well as the usage of our Apps, Games and Services as a whole. To learn more, please visit our website.

9. Advertising

Our Games may include advertising for third party services and products. We and our advertising partners can use certain data about you in order to improve our advertising practices and make the ads we deliver more effective, relevant and enjoyable, including by deploying interest-based advertising, as well as targeting and ad measurement and attribution systems.

Such data includes your device advertising identifiers (e.g. IDFA or Advertising ID, to the extent available), data related to your connected Apple profile (if any, such as your gender, region or country), gameplay content, user in-game ID, product interaction data and other demographic and interests-based information that we or our advertising partners may have received from or about you, based on your consent or another legal basis (i.e., as required in order to provide you with our respective services, or based on the legitimate interests that we described above).

The ads we or our advertising partners deliver may be shown within our Games, our Services, or through other channels, such as third party websites and applications.

This Privacy Policy does not apply to the practices of companies that we do not own or control, or to employees or Service Providers that we do not manage. Any information you provide to sites, applications or services advertised through our Services will be covered by the applicable privacy policies specified therein. Please be sure to read the privacy policies of any third-party applications, services and sites that you visit or provide permission to access your information. It is those third parties' responsibility to protect any information you give them, so we will not be held liable for their use of your personally identifying information. To learn more, please visit our Cookie Policy.

a. ***How to adjust your preferences regarding interest-based advertising***

If you wish to prevent the use of your device's advertising ID or other identifiers for interest-based advertising, you may change your device settings to reset such advertising ID or opt-out of such advertising (typically, this is available under the "Privacy" or "Ads" section in your device settings). If you live in the USA, Canada or Europe, you can also opt-out from the collection of your data by our advertising partners who participate in the Digital Advertising Alliance, by visiting www.aboutads.info/choices (for US users), www.youradchoices.ca/choices (for Canadian users), www.youronlinechoices.eu (for European users).

Please note that if you reset your advertising ID or opt-out of interest based advertising, you may still see advertisements in our Game, or on any other channels, but those ads will not be targeted based on the above mentioned identifiers. For example, such ads may be instead based on context, such as your progress and actions in the Game, or your language preferences. Please note that such actions may result in a less enjoyable user experience.

b. ***Aggregated and analytical information***

We may use standard analytics tools including Google Analytics and other analytics tools from time to time. The privacy practices of these tools are subject to their own privacy policies.

10. Data Subject Rights – European Economic Area, Switzerland and United Kingdom

If you are a resident of the European Economic Area (EEA), Switzerland or the United Kingdom (UK) about whom we process Personal Data, you have the right to:

1. **Request access** to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
2. **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have exercised your right to object to processing (see below).
4. **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
5. **Request the restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
6. **Request the transfer** of your Personal Data to another party.
7. **No fee usually required.**
You will not have to pay a fee to access your Personal Data (or to exercise any of the other

rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

8. **What we may need from you.**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

9. **Right to Withdraw Consent.**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact privacy@PlayToTrade.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you wish to exercise your rights under applicable law (e.g., the General Data Protection Regulation (**GDPR**) or the UK GDPR) please contact us at: privacy@PlayToTrade.com.

If you reside in the EEA or UK you may also contact our EEA or UK representative at: privacy@PlayToTrade.com.

You have the right to file complaints with a data protection supervisory authority. For EEA residents, you can find details of your national supervisory authority at: https://edpb.europa.eu/about-edpb/board/members_en. UK residents can contact the Information Commissioner's Office at: <https://ico.org.uk/global/contact-us/>.

11. Data Transfers

SuperPro is based in the UK, a jurisdiction which is considered by authorities of the European Commission and Switzerland to be offering an adequate level of protection for the Personal Data of residents of the EEA and UK.

Your Personal Data may be maintained, processed, accessed and stored by SuperPro and our authorized affiliates and Service Providers, including in and from the United States and other jurisdictions, as necessary for the proper delivery of our Services, or as may be required by law.

We may transfer Personal Data we collect about you outside the EEA, Switzerland or UK, in order to perform our contract with you. To ensure that your Personal Data receives an adequate level of protection, we have put in place measures to ensure that your Personal Data is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection, through Standard Contractual Clauses and countries that are the subject of an EU adequacy determination. If you require further information about the protective measures, you may contact us using the details in Section 13.

12. Minors

The Game "Play To Trade" is available to individuals who are thirteen (13) years of age and over.

We reserve the right to request proof of age or parental consent at any stage. We may block Users whom we suspect are under the applicable age. We do not knowingly collect Personal Data from minors below the age of 13 and do not wish to do so. If we learn that a minor is using the Services or

playing any of our Games, we may prohibit and block such use and will make all efforts to promptly delete any Personal Data stored with us with regard to such minor.

If you believe that we might have any such data, please contact us at privacy@PlayToTrade.com

13. Amendments and Controlling Version

We may amend this Privacy Policy from time to time by posting an amended version on our Services. The amended version will be effective as of the published effective date. We will provide an advance notice if any substantial changes are involved, via any of the communication means available to us, or on the Services. After this notice period, all amendments shall be deemed accepted by you. If you do not agree to be bound by the terms of the new or modified Privacy Policy, you are required to stop using the Services.

The Privacy Policy has been drafted in the English language, which is the original and controlling version of this Privacy Policy. All translations of this Privacy Policy into other languages shall be solely for convenience and shall not control the meaning or application of this Privacy Policy. In the event of any discrepancy between the meanings of any translated versions of the Privacy Policy and the English-language version, the meaning of the English language version shall prevail.

14. Contact Us

If you have any comments or questions about this Privacy Policy or if you have any concerns regarding your Privacy, or to contact SuperPro's Data Protection Manager, please contact us here: privacy@PlayToTrade.com