

## Moonton Games Privacy Policy

*Last Updated : September 28, 2023.*

### Welcome to Moonton

We appreciate your trust in our products and services. Shanghai Moonton Technology Co., Ltd., (“**Moonton**”, “**we**”, “**us**” or “**our**”) with address at Building 41, South District, Shanghai Business Park, No. 1015 Tianlin Road, Minhang District, Shanghai City, China is dedicated to developing and providing extraordinary games for our players all over the world.

This Privacy Policy (“Policy” or “Privacy Policy”) applies to the personal information that Moonton processes in connection with the apps, websites, software, and related services (the “Services”), that link to or reference this Privacy Policy.

By accessing the Services, you acknowledge that you have read this Policy and that you understand your rights in relation to your personal data and how we will collect, use and process it.

If you have any questions about how we use your personal data, please contact us at [dpo@moonton.com](mailto:dpo@moonton.com).

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#### 1. What information we collect

We collect your information in three ways: Information You Provide, Automatically Collected Information, and Information From Other Sources. More detail is provided below.

#### Information You Provide

- **Profile and Account Information.** When you create a guest account, we may collect your guest ID, nickname and data you voluntarily elect to provide in order to customize game play. If you set up a game account, we will also collect information, including your

account ID, password, language, and email address. You may also choose to provide your gender on your personal profile page.

- **Surveys.** We collect information through surveys, challenges, and competitions in which you may participate, including gender, likeness, age and preferences.
- **Messages.** If you communicate with others using direct messages, we may collect the content of the message and information about when the message has been sent, received and/or read, as well as the participants of the communication. We do this to block spam, detect crime, and to safeguard our users.
- **User Content.** We may also collect the content you create or publish through the Services, such as on the games' message boards, chat rooms and in the Services, including comments, images, photos, links, stickers and emojis. Any actions you perform with other players are considered public and are solely at your discretion. You should be aware that any personal information you submit in the course of these public activities can be read, collected, or used by other users of the Services.
- **Information When You Contact Us.** We also collect information and content of messages you provide to us through your feedback such as product reviews you write, or questions and information you provide for customer support. When you contact us, such as for customer support, phone conversations or chat sessions with our representatives may be monitored and recorded.
- **Purchase Information.** When you make a purchase or payment on or through the Services, we collect information about the purchase or payment transaction.
- **Your Contacts.** If you choose to find other users through your social network contacts, we will collect your public profile information as well as names and profiles of your social network contacts.

#### Automatically Collected Information

- **Technical Information.** We automatically collect certain information about the device you use to access the Services, such as IP address, time zone settings, language, network type, mobile carrier, network type, device IDs, device apps, identifiers for advertising purposes, and operating system. Where you log-in from multiple devices, we use information such as your device ID to identify your activity across devices to give you a seamless log-in experience and for security purposes.
- **Usage Information.** We collect information about how you engage with the Services, including the duration and frequency of your use and your settings.
- **Cookies.** We and our service providers and business partners may use cookies and similar tracking technologies (e.g., web beacons, flash cookies, etc.) ("Cookies") to automatically collect information and to measure and analyze how you use the Services, including to understand how you interact with content, to enhance your experience using the Services, to improve the Services, to provide you with advertising, and to measure the effectiveness of advertisements and other content. We and our partners also use Cookies to promote the Services on other platforms and websites. Cookies enable the Services to provide certain features and functionality. We will obtain your consent to our use of Cookies where required by law.

- **Location Information.** We may collect information about your approximate location, including location information based on your SIM card and/or IP address. With your permission and depending on the jurisdiction in which you live, we may also collect precise location data (such as GPS). You may have choices in your device settings relating to the disclosure of your location information.

#### Information from other sources

- **Third Party Platforms.** Third party platforms provide us with information (such as your user ID, user token, public profile and your email address (if associated with your accounts)) when you choose to sign up for or log in to the Services using sign-in features provided by those third parties (e.g. Tiktok, Facebook, Google, Apple, or Twitter). We may also receive contact information that you hold or is held about you when contact information is synced with our Services by you or another user. In addition, if you choose to log in to our Services via your social media account(s), your social media profile picture and nickname will be set as your profile picture by default. You can elect to change your default profile picture to other options in the Services.
- **Payment and Transaction Fulfillment Providers.** We receive information about you from payment and transaction fulfillment providers, such as payment confirmation details, including the purchases you make and the amount spent.

## 2. How we use your information

We use your information to operate, provide, develop, and improve the Services, including for the following purposes.

- Provide and administer the Services, such as enabling you to create, share, and consume content, to interact with other users, and provide user support.
- Enable you to purchase virtual items and complete the related payment transactions.
- Enforce our terms, guidelines, and other policies that apply to you. We review User Content and other information to protect the safety and well-being of our community.
- Allow you to participate in social and interactive features of the Services.
- Provide and improve our advertising initiatives, including to serve ads (including personalized ads, where permitted) and to measure and understand the effectiveness of the ads and other content.
- Maintain and enhance the safety, security, and stability of the Services by identifying and addressing technical or security issues or problems (such as technical bugs, spam accounts, and detecting abuse, fraud, and illegal activity).
- Review, improve, and develop the Services, including by reviewing interactions and usage across your devices and analyzing how people are using it.
- Promote the Services or third party services through marketing communications, contests, or promotions.
- Comply with our legal obligations, or as necessary to perform tasks in the public interest, or to protect the vital interests of our users and other people.

- Notify you about changes to the Services and send Game-related communications to you including information regarding other games under Moonton.

### 3. How we share your information

#### Service Providers

We engage service providers that help us provide, support, and develop the Services and understand how it is used. They may provide services such as cloud hosting, content delivery, customer and technical support, content moderation, marketing, analytics, and online payment. We may share your information with these service providers as necessary to enable them to provide their services.

#### Business Partners

**Third Party Game Developers.** We may operate games developed and licensed by third party game developers, in which case we may share your data with such third party game developers to ensure the continuous development and operation of the third party games.

**Third Party Platforms.** We share limited information with third party platforms whose platforms or services are integrated with the Services. We do this to give you a seamless experience, allow your content to be shared on other platforms, and/or enable third party platforms and partners to better authenticate users. Some examples include if you:

- Sign-up or log-in to the Services using your account details from a third party platform (such as Facebook or Google), we will share certain Technical Information to facilitate this.
- Share User Content you publish on the Services on other social media platforms, we will share your User Content and related information.

**Advertising and Analytics Partners.** We may share information collected through your use of the Services with our advertising or analytics partners. These partners help us to display advertising to you on the Services and to promote the Services through advertising displayed on other platforms, some of which, in some jurisdictions, may be based on your activity across other sites and services. These partners may also help us and our partners measure the effectiveness of our advertising campaigns.

#### Our Corporate Group

As a global company, the Services are supported by certain entities within our corporate group ("Corporate Group"). These entities may process your information, as necessary to provide certain functions, such as storage, content delivery, security, research and development, analytics, online payments, customer and technical support, and content moderation.

#### Others

We share your information in other limited scenarios as follows:

**Other Users.** Your Profile Information and User Content may be visible to other users. Your profile and content may also be visible to third parties. You and other individuals may be able to share your User Content both on and off the Services, depending on the choices you make.

**Corporate Transactions.** Your information may be disclosed to third parties in connection with a corporate transaction, such as a merger, sale of assets or shares, reorganization, financing, change of control, or acquisition of all or a portion of our business.

**Legal Obligations and Rights.** We may access, preserve, and share your information with law enforcement agencies, public authorities, copyright holders, or other third parties if we have good faith belief that it is necessary to:

- comply with any applicable laws, regulations, codes of practice, governmental guidelines, or other legal and regulatory obligations, or to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims, or government inquiries, as consistent with internationally recognized standards,
- protect the rights, property, and safety of our users, copyright holders, and others, including to protect life or prevent imminent bodily harm. For example, we may provide information (such as your IP address) to law enforcement in the event of an emergency where someone's life or safety is at risk,
- investigate potential violations of and enforce our terms, guidelines, or any other applicable terms, policies, or standards, or
- detect, investigate, prevent, or address misleading activity, copyright infringement, or other illegal activity.

**With Your Consent.** We may share personal information with the proper authorization or to provide the Services you have requested or authorized.

**Third-party Content.** The Services may contain links to policies, functionality, or content maintained by third parties who we do not control. We are not responsible for, and make no representations regarding, such policies, functionality, or content or any other practices or operations of such third parties. If there are links to third party websites, please note that these websites are governed by their own Terms and Conditions of Use and Privacy Policy.

#### 4. Your rights and choices

Depending on where you live, you may have certain rights with respect to your personal information, such as a right to know and be informed on how we collect and use your personal information. You may also have a right to access, update, rectify, and change your data, oppose to its processing, request a copy of your authorization, file complaints before the competent authorities, withdraw your consent, or limit our collection and use of your personal information as well as to request that we delete it, and potentially others. In certain circumstances, you can also ask us to provide additional information about our collection and use of your personal information. Please note that your exercise of certain rights may impact your ability to use some or all of Moonton's features and functionalities. Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

If you have registered for an account, you may also access, review, and update certain personal information that you have provided to us by logging into your account and using available features and functionalities.

Please send an email to [dpo@moonton.com](mailto:dpo@moonton.com) if you would like to exercise any of your rights. We will respond to your request consistent with applicable law and subject to proper verification.

In addition:

- You may be able to refuse or disable Cookies by adjusting your browser settings. Because each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of Cookies. For example, due to differences in how browsers and mobile apps function, you may need to take different steps to opt out of Cookies used for personalized advertising in a browser and to opt out of personalized advertising for a mobile application, which you may control through your device settings or mobile app permissions. In addition, your opt-out selection is specific to the particular browser or device that you are using when you opt out, so you may need to opt-out separately for each browser or device. If you choose to refuse, disable, or delete Cookies, some of the functionality of the Services may no longer be available to you.
- You may opt out of receiving advertising and/or marketing communications by following the instructions in such communications or by using options that may be available to you in your app settings.
- Your mobile device may include a feature that allows you to opt out of some types of personalized advertising (“Limit Ad Tracking” on iOS and “Opt out of Interest-Based Ads” on Android).

## 5. Data security and retention

Security of your information is important to us. We maintain appropriate technical, administrative, and physical security measures that are designed to protect your information from unauthorized access, theft, disclosure, modification, or loss. We regularly review our security measures to consider available new technology and methods.

We retain information for as long as necessary to provide the Services and for the other purposes set out in this Privacy Policy. We may also retain information when necessary to comply with contractual and legal obligations, when we have a legitimate business interest to do so (such as improving and developing the Services, and enhancing its safety, security and stability), and for the exercise or defense of legal claims.

## 6. International data transfers

Although we store the information we collect in secure servers located in different countries and territories, such as the United States, the European Union, Brazil, Hong Kong and Singapore, the personal information we collect from you may be stored on a server located outside the country where you live. If we transfer any personal information out of the country where you live, including for one or more of the purposes as set out in this Policy, we will do so in accordance with the requirements of applicable data protection laws.

## 7. Information Relating to Minors

Moonton is not directed at children under the age of 13. The minimum age to use the Services may differ depending on the country or region you are in. If you believe that we have collected personal information from a minor under the minimum age, please contact us at [dpo@moonton.com](mailto:dpo@moonton.com).

## 9. Privacy policy updates

We may amend or update this Privacy Policy from time to time. When we update the Privacy Policy, we will notify you of any material changes to this policy by updating the “Last Updated” date at the top of the new Privacy Policy, posting the new Privacy Policy, or providing any other notice required by applicable law. We recommend that you review the Privacy Policy from time to time to stay informed of our privacy practices.

## 10. Contact Us

Questions, comments and requests regarding this Privacy Policy should be addressed to [dpo@moonton.com](mailto:dpo@moonton.com).

## 11. Supplemental Terms – Jurisdiction-Specific

If you are using the Services in the following jurisdictions, the respective jurisdiction- specific terms below would additionally apply. In the event of a conflict between the provisions of the Supplemental Terms –Jurisdiction-Specific that are relevant to your jurisdiction from which you access or use the Services, and the rest of this Privacy Policy, the relevant jurisdictions’ Supplemental Terms – Jurisdiction-Specific will supersede and control.

### ASIA-PACIFIC JURISDICTIONS

#### Australia

Certain entities in our corporate group, located outside of Australia, are given limited remote access to your information so that they can provide certain functions, as described in the “How we share your information” section above. The personal data that we collect from you may be transferred to, and stored at, a destination outside of Australia, in particular in Singapore and the United States of America.

The following shall replace Section 12 (Contact):

- If you have any questions about the Privacy Policy, or would like to complain about a breach of the Australian Privacy Principles, or are concerned about the handling of your personal data, please contact the privacy officer [dpo@moonton.com](mailto:dpo@moonton.com). You have the right to access your personal data and seek correction of it. Please contact the privacy officer on the details provided in this Privacy Policy if you wish to access your personal data and/or seek

correction of your personal data. If you are not satisfied with the response or do not receive a response within a reasonable time frame, you may have the right to take your complaint to the Office of the Australian Information Commissioner (OAIC). Current contact details for the OAIC are available on the OAIC's website at [www.oaic.gov.au](http://www.oaic.gov.au).

### **European Economic Area (EEA), Switzerland, and UK**

If you are using the Services in the EEA, Switzerland, or the UK (the “European Region”), the following additional terms apply.

#### **Legal bases for processing**

We use your personal data only as permitted by law. Our legal bases for processing the <Information We Collect> about you are described in the table below.

<b>Processing purpose</b>	<b>Legal basis</b>
<p>We use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Profile and Account Information;</li> <li>● User Content and Usage Information;</li> <li>● Messages;</li> <li>● Purchase Information;</li> <li>● Location Information; and</li> <li>● Technical Information</li> </ul> <p>to provide and administer the Services, such as enabling you to create, share, and consume content, to interact with other users and allow you to participate in social and interactive features of the Services.</p>	<p>Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for an account to use the Services.</p>
<p>We use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Profile and Account Information</li> <li>● Purchase Information</li> <li>● Payment and Transaction Fulfillment Providers</li> </ul>	<p>Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for an account to use the Services.</p>



<ul style="list-style-type: none"> <li>● Technical Information</li> </ul> <p>to facilitate the purchase and delivery of products, goods and services made through the shopping features on our Services. This includes sharing your information with payment and transaction fulfillment providers, and other service providers in order to process your orders.</p>	
<p>We share your information with third parties whose platforms or services are integrated with the Services. For example, if you:</p> <ul style="list-style-type: none"> <li>● sign-up or log-in to the Services using your account details from a third party platform (such as Facebook or Google), we will facilitate the process by sharing certain Technical Information.</li> <li>● share User Content you publish on the Services with other social media platforms, we will share your User Content and related information.</li> </ul>	<p>This processing is necessary for our legitimate interests, namely to provide you with a seamless experience, allow your content to be shared on other platforms, enable third parties to authenticate users, and optimise user experience.</p>
<p>We use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Profile and Account Information;</li> <li>● User Content and Usage Information;</li> <li>● Surveys;</li> <li>● Location Information;</li> <li>● Information When You Contact Us; and</li> <li>● Technical Information</li> </ul> <p>to review, improve, and develop the Services, including by reviewing interactions and usage across your devices and analyzing how you are using the Services.</p>	<p>The processing is necessary for our legitimate interests, namely, to improve and develop the Services.</p>

<p>The categories of information that we use will depend on the specific circumstances of each request or obligation. Depending on the circumstances, we could use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Profile and Account Information;</li> <li>● User Content and Usage Information;</li> <li>● Purchase Information;</li> <li>● Location Information;</li> <li>● Messages; and;</li> <li>● Technical Information</li> </ul> <p>to comply with our legal obligations and rights, including where necessary to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority.</p>	<p>In some circumstances, this processing is necessary in order to comply with our legal obligations under European Union or Member State law. This includes situations where we have obligations to take measures to ensure the safety of our users or comply with a valid legal request such as an order from law enforcement agencies or courts. Similarly processing may be necessary to respond to regulatory requests requiring the processing of information under Chapters IV and VI of the GDPR.</p> <p>In other circumstances, the processing is necessary for our legitimate interests, namely, to disclose and share information with regulators or other government entities.</p>
<p>We use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Profile and Account Information;</li> <li>● Information When You Contact Us; and</li> <li>● Technical Information</li> </ul> <p>to communicate with you, including to notify you about changes to the Services, provide customer support to you and send you other service-related messages.</p>	<p>The processing is necessary for the performance of a contract with you.</p>
<p>We use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Account and Profile Information;</li> <li>● User Content and Usage Information;</li> <li>● Location Information; and</li> </ul>	<p>The processing is necessary for our legitimate interests, namely to promote new developments and features of the Services. We will obtain your consent to send you messages where required by law.</p>

<ul style="list-style-type: none"> <li>● Technical Information</li> </ul> <p>to send you marketing communications in accordance with your preferences. This includes sending Game-related communications to you including information regarding other games under Moonton. We may also send you contests or promotions.</p>	
<p>We use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Profile and Account Information;</li> <li>● User Content and Usage Information;</li> <li>● Purchase Information;</li> <li>● Location Information;</li> <li>● Messages; and</li> <li>● Technical Information</li> </ul> <p>to enforce our <a href="#">Terms of Service</a>, guidelines and policies.</p>	<p>The processing is necessary for the performance of a contract with you.</p>
<p>We use the &lt;Information You Provide&gt;, &lt;Automatically Collected Information&gt;, and &lt;Information From Other Sources&gt;, for example:</p> <ul style="list-style-type: none"> <li>● Profile and Account Information;</li> <li>● User Content and Usage Information;</li> <li>● Purchase Information;</li> <li>● Location Information;</li> <li>● Messages; and</li> <li>● Technical Information</li> </ul> <p>to maintain and enhance the safety, security, and stability of the Services by identifying and addressing technical or security issues such as technical bugs and spam accounts, and detecting abuse, fraud, and illegal activity on the Services including by scanning and reviewing User Content and other information..</p>	<p>The processing is necessary for our legitimate interests, namely to ensure that the Services are safe and secure.</p>

In some cases, we may aggregate or anonymize the <Information You Provide>, <Automatically Collected Information>, and <Information From Other Sources> and use it in a way that is designed to be unable to identify you, for research or other purposes, to the extent allowed by applicable law.	The processing is necessary for our legitimate interests, namely to conduct research and protect personal information through aggregation or anonymization, consistent with data minimization and privacy by design principles.
We may use the <Information You Provide>, <Automatically Collected Information>, and <Information From Other Sources> where it is necessary to protect your or someone else's life, physical integrity, or safety. This could include providing law enforcement agencies or emergency services with information in urgent situations to protect health or life. The specific types of information we use will depend on the specific situation.	The processing is necessary to protect the vital interests of you or other individuals.
We may use your information where it is necessary to perform a task in the public interest, including undertaking research, preventing and detecting crime, safeguarding children and promoting public safety, security, and integrity as laid down by applicable law. We generally use <Information You Provide> and <Automatically Collected Information>, although it depends on the specific situation.	We process your information where it is necessary to perform a task in the public interest.

### **International data transfers**

If you normally reside in the European Region, the personal information that we collect about you may be further transferred to, and stored at, a destination outside of the European Region (for instance, to our service providers and partners). For example, we may store the information that we collect in secure servers located in the United States and Singapore.

When we transfer your information outside of the European Region, we ensure it benefits from an adequate level of data protection by relying on:

- Adequacy decisions. These are decisions from the European Commission under Article 45 GDPR (or equivalent decisions under other laws) where they recognise that a country offers an adequate level of data protection. We transfer your information as described in What Information We Collect to some countries with adequacy decisions; or
- Standard contractual clauses. The European Commission has approved contractual clauses under Article 46 of the GDPR that allows companies in the EEA to transfer data

outside the EEA. These (and their approved equivalent for the UK and Switzerland) are called standard contractual clauses. We rely on standard contractual clauses to transfer information as described in What Information We Collect to certain entities in our Corporate Group and third parties in countries without an adequacy decision.

For a copy of these adequacy decisions or standard contractual clauses, please contact us by using the contact information for your region provided in the “Contact Us” section.

## **Your rights**

You have the following rights:

- The right to request free of charge (i) confirmation of whether we process your personal information and (ii) access to a copy of the personal information retained;
- The right to request proper rectification or erasure of your personal information or restriction of the processing of your personal information;
- Where processing of your personal information is either based on your consent or necessary for the performance of a contract with you and processing is carried out by automated means, the right to receive the personal information concerning you in a structured, commonly used and machine-readable format or to have your personal data transmitted directly to another company, where technically feasible (data portability);
- Where the processing of your personal information is based on your consent, the right to withdraw your consent at any time (withdrawal will not impact the lawfulness of data processing activities that have taken place before such withdrawal);
- The right not to be subject to any automatic individual decisions, including profiling, which produces legal effects on you or similarly significantly affects you unless we have your consent, this is authorised by Union or Member State law or this is necessary for the performance of a contract;
- The right to object to processing if we are processing your personal information on the basis of our legitimate interest unless we can demonstrate compelling legitimate grounds which may override your right. If you object to such processing, we ask you to state the grounds of your objection in order for us to examine the processing of your personal information and to balance our legitimate interest in processing and your objection to this processing;
- The right to request the restriction of the processing of your information where (a) you are challenging the accuracy of the information, (b) the information has been unlawfully processed, but you are opposing the deletion of that information, (c) where you need the information to be retained for the pursuit or defence of a legal claim, or (d) you have objected to processing and you are awaiting the outcome of that objection request.
- The right to object to processing your personal information for direct marketing purposes; and
- The right to lodge complaints before your local supervisory authority in your Member State through your local data protection authority.

Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

## **Representatives**

If you are based in the United Kingdom, our designated GDPR representative is:

**Cosmo Technology Private Limited**  
2 Temple Back East  
Temple Quay  
Bristol  
United Kingdom  
BS1 6EG

If you are based in the EEA or Switzerland, our designated GDPR representative is:

**Mikros Information Technology Ireland Limited**  
Mespil Business Centre  
Mespil House  
Sussex Road  
Dublin 4  
Ireland

For more information about cookies, please visit our [Cookies Policy](#):

#### India

If you are using our Services in India, the following additional terms apply. Your continued access to or use of the Services after the date of the updated Privacy Policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop accessing or using the Services.

**Grievance Officer For India.** In accordance with Information Technology Act 2000 and rules framed thereunder, a Grievance Officer has been appointed and a complaint or other issue faced by a user of our platform or other issue faced may be submitted through the email provided in the “Contact Us” section.

The complaint should provide: (i) username of the relevant account holder (ii) specific content that is of concern and (iii) reason(s) for the request.

#### South Korea

If you are using the Services in South Korea, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

- **How we use your personal data.** In addition to the main text of this policy, we intend to use your personal data (email address) to send you promotional messages concerning new products, features, enhancements, special offers, upgrade opportunities, contests and events of interest in relation to the Services. We require your express consent before we do so.
- **Data retention.** We destroy personal data whose purpose of collection as consented to by you have been achieved, or whose periods of and use to which you consented to or which were provided in this privacy policy have expired; provided, however, we will

continue to store your personal data for the following statutorily-prescribed periods, where applicable, including, but not limited to:

- Act on Consumer Protection in Electronic Commerce:
  - Records on your cancellation of an order, your payment on a purchased item, and our supply of a good/service: 5 years
  - Records on the handling of consumer complaints or disputes: 3 years
  - Records on advertisements and labels: 6 months
- Protection of Communications Secrets Act:
  - Records on your visits to our website: 3 months
- ***Destruction of personal data.*** In principle, we will promptly destroy your personal data in our possession once we achieve the purpose of collection and use of your personal data. Your personal data will be destroyed after storage for a certain period pursuant to our internal policy or applicable laws and regulations (please refer to the provisions on retention and use period). Personal data stored in electronic file format will be deleted by using technical means that will not allow data recovery.
- ***Data rights.*** You have the right to access personal data we hold about you, to rectify any personal data held about you that is inaccurate, to request the deletion of personal data held about you, and the right to request the suspension of the processing of your personal data. You can exercise your rights by contacting us at the information listed in the “Contact Us” section.
- ***Data security.*** We work hard to protect our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. To this end, we have in place technical, managerial and physical safeguards, including internal policy for data protection, limiting the access to personal data on a need-to-know basis and controlling access to the facilities where personal data is processed.
- ***Information relating to children.*** The Services are not directed at children under the age of 14 and we do not knowingly collect or solicit personal data from children under 14. If you believe that we have personal data about or collected from a child under the relevant age, please contact us at [dpo@moonton.com](mailto:dpo@moonton.com) and we will ensure that it is deleted. For children under the age of 14, their legal guardians have the right to exercise the rights of their children with respect to data protection.
- ***Entrustment and/or overseas transfer of personal data.*** We entrust your data to our affiliates, cloud storage providers, IT service providers, and data centers, some of whom are located abroad, subject to your consents or notifications to you, if applicable. The entities receiving and processing your data are committed to using and storing personal data in compliance with domestic and international regulations and to taking all available physical and technical measures to protect personal data. You may opt-out of such transfer so long as the transfer is not necessary to provide you with the Service, by contacting us at the information listed in the “Contact Us” section



If you are using our services in the Philippines, the following additional terms shall apply pursuant to the Data Privacy Act of 2012 (Republic Act No. 10173) and all relevant laws, rules and regulations and issuances by the Philippines National Privacy Commission (“NPC”) on data privacy.

- **Your Rights.** To the extent that the relevant laws, rules and regulations on data privacy recognize your rights and freedoms as data subjects, you shall have the right to information, object, access, rectification, erasure or blocking, lodge complaints before the NPC, damages and data portability. Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

**Contact Us.** If you have any questions about the Privacy Policy, or would like to complain about a violation of the Data Privacy Act of 2012, or are concerned about the handling of your personal data, please contact the data protection officer (DPO) at [dpo@moonton.com](mailto:dpo@moonton.com). You have the right to access your personal data and seek correction of it. Please contact the DPO on the details provided in this Privacy Policy if you wish to access your personal data and/or seek correction of your personal data. If you are not satisfied with the response or do not receive a response within a reasonable time frame, you have the right to file a complaint with the National Privacy Commission (NPC). Current contact details for the NPC are available on the NPC's website at [www.privacy.gov.ph](http://www.privacy.gov.ph).

## Vietnam

If you are using the Services in Vietnam, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

**Age, Parental and Guardian Consent.** By accessing and/or using this Services, you represent that you are at least 16 years of age or not under guardianship. If you are below 16 years old or under guardianship:

- you must obtain approval from your parent(s) or legal guardian(s); and
- your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Services; (ii) your compliance with this policy; and (iii) ensuring that any of your participation in the Services will not, in any event, result in any violation of applicable laws and regulations relating to child protections.

If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or legal guardian(s) is not willing to open the account under their name, you must cease accessing the Services.

## Indonesia

If you are using the Services in Indonesia, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this Policy, the following terms shall apply.



**Age, Parental and Guardian Consent.** By accessing and/or using the Services, you represent that you are at least 21 years of age or married or not under guardianship. If you are below 21 years old and you are not married, or under guardianship:

- you must obtain approval from your parent(s) or legal guardian(s); and
- your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Services; (ii) your compliance with this Policy; and (iii) ensuring that any of your participation in Services will not, in any event, result in any violation of applicable laws and regulations relating to child protections.

If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or guardian(s) is not willing to open the account under their name, you must cease accessing the Services.

**Your Choices.** You may withdraw your consent to Moonton's disclosure of personal data to third parties. Upon your request, we will cease to display, publish, transmit, disseminate, and/or open the access to your personal data to third parties. Please note that by withdrawing your consent to the disclosure and/or collection of your personal data, we may not be able to fulfill your requests and you may not be able to use some features and functionality of the Services. You may request Moonton to (i) disclose the history of personal data that we have collected; and/or (ii) erase and dispose of your personal data that we have collected on our server. Please note that by requesting us to erase and dispose of your personal data, you may not be able to use some features and functionality of the Services. To exercise any of your rights, contact us at the information listed in the "Contact Us" section.

**Notification.** In the event of any breach of personal data, we will notify you and provide you with information regarding such breach of personal data.

**Data Retention.** We retain your information for as long as it is necessary to provide you with the service. Where we do not need your information in order to provide the service to you, we retain it only for so long as we have a legitimate business purpose in keeping such data. However, there are occasions where we are likely to keep this data for five (5) years (or longer if required) in accordance with our legal obligations or where it is necessary for the establishment, exercise or defence of legal claims.

After you have terminated your use of our Services and the five (5) years retention period has lapsed, we store your information in an aggregated and anonymised format. Non-personally identifiable information may be retained indefinitely for analytics.

## THE AMERICAS

### Canada

If you are using the Services in Canada, the following additional terms apply.

**Your Rights.** Subject to limited exceptions under applicable law, you have the right to access, update, rectify and correct inaccuracies in your personal data in our custody and control and to withdraw your consent to our collection, use and disclosure of your personal data. To exercise these rights, you may contact us using the contact information set out below. We may require

certain personal data for the purpose of verifying the identity of the individual making the request.

**Your Choices.** You can unsubscribe from our marketing emails at any time by clicking the “unsubscribe” link included at the bottom of each email we send.

**Transfer Outside Your Jurisdiction.** We and our service providers (including members, subsidiaries, or affiliates of our corporate group) may access, store and otherwise process personal information outside of Canada (and, for residents of Quebec, outside of Quebec), including in the United States and Singapore, and other foreign jurisdictions where we or our service providers are located. For information about the manner in which we or our service providers (including service providers outside Canada) process personal data, please contact us using the contact information set out below.

**Contact.** If you are a resident of Canada, you can contact our Privacy Office using the contact information provided in the “Contact Us” section.

## United States

If you are using our Services in the United States, the following additional terms apply:

### Your Rights and Choices

Depending on where you live, you may be entitled to certain rights with respect to your personal information, as described below:

- **Right to Know.** You may have the right to know what personal information we have collected about you, including the categories of personal information, the categories of sources from which it is collected, the business or commercial purposes for collecting, selling, or sharing it, and the categories of third parties to whom we disclose it.
- **Access and Data Portability.** Subject to certain exceptions, you may have the right to request a copy of the personal information that we collected about you.
- **Deletion.** You may have the right to request that we delete information that we collected from or about you, subject to certain exceptions.
- **Correct Inaccurate Information.** You may have the right to request that we correct inaccuracies in the personal information we maintain about you.

You may also have the right to opt out of the sale of your personal information and the use or disclosure of your personal information for purposes of serving you advertisements based on your activity across other sites and services (“cross-context behavioral advertising” or “targeted advertising”). Although Moonton does not sell your personal information for money, we do process and disclose your personal information collected through some of our games websites (such as *Watcher of Realms*) to third parties for cross-context behavioral or targeted advertising purposes. You may opt-out of the use and disclosure of your personal information for these advertising purposes by navigating to the “Your Privacy Choices” link in the footer of applicable sites. Moonton does not knowingly sell or share personal information for cross-context behavioral advertising or targeted advertising of users under 16 where restricted by applicable law.

Please note that because the Global Privacy Control is a browser-based mechanism, your opt-out preference will apply only to the browser from which you enabled the signal.

Although some of the information we collect may be considered sensitive personal information, we only process such information in order to provide the Services and within other exemptions under applicable law, such as when we process your sensitive personal information in order to perform the services or provide the goods you request from us.

You may contact us to exercise these rights via the information listed in the “Contact Us” section above.

You may be entitled, in accordance with applicable law, to submit a request through an authorized agent. To designate an authorized agent to exercise choices on your behalf, please provide evidence that you have given such agent power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf.

We will respond to your request consistent with applicable law and subject to proper verification. We will verify your request by asking you to send it from the email address associated with your account or to provide information necessary to verify your account.

You may appeal any decision we have made about your request by replying to the communication you receive from us communicating your decision. We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on this Services may change or no longer be available to you.

#### **Other California Rights**

- Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and/or across different websites. Our products do not support Do Not Track requests at this time.

#### **Brazil**

If you are using our Services in Brazil, the following additional terms apply:

Exercise of data protection rights. Brazilian law provides certain rights to individuals with regard to their personal data. Thus, we seek to ensure transparency and access controls in order to allow users to benefit from the mentioned rights.

We will respond and/or fulfill your requests for the exercise of your rights below, according to the applicable law and when applicable, to the Brazilian General Data Protection Law - LGPD:

- confirmation of whether your data are being processed;
- access to your data;
- correction of incomplete, inaccurate or outdated data;
- anonymization, blocking or erasure of data;
- portability of personal data to a third party;
- object to the processing of personal data;
- information of public and private entities with which we shared data;
- information about the possibility to refuse providing personal data and the respective consequences, when applicable;
- withdrawal of your consent.

- request an analysis of decisions taken exclusively based on the automated processing of personal data that affect your interests, including decisions taken to define your personal, professional, consumer or credit profile, or aspects of your personality.

**Verifying your identity.** For your safety and to allow us to make sure that we do not disclose any of your personal data to unauthorized third parties, in order to verify your identity and guarantee the adequate exercise of your rights, we may request specific information and/or documents from you before we can properly respond to a request received concerning your data. All data and documents received from you in the process of responding to your requests will be used for the strict purposes of analyzing your request, authenticating your identity, and finally responding to your request.

**Limitations to your rights.** In certain situations, we may have legitimate reasons not to comply with some of your requests. For instance, we may choose not to disclose certain information to you when a disclosure could adversely impact our business whenever there is a risk of violation to our trade secrets or intellectual property rights. In addition, we may refrain from complying with a request for erasure when the maintenance of your data is required for complying with legal or regulatory obligations or when such maintenance is required to protect our rights and interests in case a dispute arises. Whenever this is the case and we are unable to comply with a request you make, we will let you know the reasons why we cannot fulfill your request. In case of doubt about your privacy, your rights or how to exercise them, please contact us using the information in the "Contact Us" section. If you have any questions about the processing of your personal data, we would like to clarify them.

**International Transfer of Data.** We share your personal data globally with companies of our business group to carry out the activities specified in this Policy. We may also subcontract the processing of data involved in the Services or share your personal data with third parties located in other countries. Your personal data may therefore be subject to privacy laws other than those applicable in your country.

Whenever we transfer your personal data to third parties located in other countries, we will ensure that these companies comply with applicable data protection laws and we will take all measures that are reasonably necessary to ensure the existence of adequate safeguards to protect your personal data and to ensure that it is processed safely.

**Language.** The Policy may have been prepared in the English language and in the Portuguese language, and if you are a user located in Brazil, you shall refer to such Portuguese version if available, which shall prevail.

DPO. If you wish to contact the Data Protection Officer, please contact us at [dpo@moonton.com](mailto:dpo@moonton.com)

## Argentina

If you are using our services in Argentina, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this Policy, the following terms shall prevail.

**Your rights and options.** According to Law No. 25,326, Regulatory Decree No. 1558/2001 and the provisions and/or binding resolutions issued by the Agency for Access to Public Information ("AAIP"), you have the following rights with respect to your personal data: access, rectification and deletion regarding data protection. If you have questions about your rights or how to exercise them, please contact us using the information in the "Contact Us" section. If you have any questions about the processing of your personal data, we would like to clarify them.

We encourage you to contact us if you are not satisfied with how we have responded to any of your rights requests. You also have the right to lodge a complaint with the AAIP. You can contact AAIP through the site: <https://www.argentina.gob.ar/aaip/datospersonales/derechos>.

## Mexico

If you are using our services in Mexico, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this Policy, the following terms shall prevail.

**Data Controller.** Shanghai Moonton Technology Co., Ltd. with address at Room 810, No. 655, Yinxian Road, Jiading District, Shanghai City, China 201802

**How we use your personal data.** Almost all of the purposes of the processing data indicated above in the main section of this Privacy Policy are necessary purposes. However, the following are secondary purposes:

- Provide you with personalized advertising, marketing communications, contests and promotions.

These purposes are not necessary for us to provide the Services but allow us to provide you with a better experience.

**Your Rights.** You have the following rights with respect to your personal data: access, rectification, cancellation, objection, consent withdrawal, limitation to the use and disclosure of your data. You can exercise your rights by contacting us at the information listed in the "Contact Us" section. To know more about the applicable requirements and procedure to exercise your rights, contact us to the mentioned email address. If you are under 18 years, you may exercise your rights through a parent or guardian. Your rights requests will be resolved as soon as possible according to the applicable data protection law and the nature of your request.

**How we share your information.** We may share your personal data with a third party for purposes other than processing on our behalf. We will obtain your consent to such disclosure as required by applicable law.

By providing us with your personal data and using the Services, you agree to transfers that require your consent. You can always revoke your consent and exercise your rights as outlined below

**Information relating to children.** You may review more information on parental consent in the [Terms of Service](#).

**Language.** The Policy may have been prepared in the English language and in the Spanish language. If you are a user located in Mexico, you shall refer to the Spanish version, which shall prevail

## MIDDLE EAST JURISDICTIONS

### Israel

**Data relating to children.** We not do not knowingly collect or solicit personal data from children under 18 for prohibited purposes under applicable Israeli law. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 13 and that you have read and acknowledged Moonton Privacy Policy and [Terms of Service](#) and agree to the use by your child of the Services and registration for an account. Further, if you believe that we have personal data about or collected from a child under the relevant age, please contact us at [dpo@moonton.com](mailto:dpo@moonton.com) and we will ensure that it is deleted.

### Türkiye

If you are using our services in Türkiye, the following additional terms apply along with the contents of the foregoing Policy. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

**Data Controller Representative.** You may contact our data controller representative in Turkey by email at [dpo@moonton.com](mailto:dpo@moonton.com) to handle questions and complaints in connection with the processing of your personal data if you are in Turkey.

**Legal bases for the processing of your personal data.** Moonton relies on the following legal bases while processing your personal data in accordance with Article 5 of the Law No. 6698 on Protection of Personal Data:

- processing is explicitly laid down or dictated by laws
- processing of your personal data is necessary provided that it is directly related to the conclusion or fulfillment of the contract between us
- processing is mandatory for us to be able to comply with our legal obligations
- the relevant data is made available to the public by yourself
- processing is mandatory for the establishment, exercise or protection of a right
- processing is mandatory for our legitimate interests, provided that it does not violate your fundamental rights and freedoms

- your explicit consent (Please note that we rely on this legal basis only when we require your consent for the processing and we do not rely on this legal basis if and when we rely on one of the other legal grounds above)

**Your rights.** According to Article 11 of the Data Protection Law, you have the following rights with respect to your personal data:

- the right to learn whether we process your personal data,
- the right to request information with regard to such processing, if we process your personal data,
- the right to learn the purposes of the processing and whether they are used for such purpose or not;
- the right to know the third parties within or outside the country, to whom we transfer your personal data,
- the right to request correction of incomplete or inaccurate personal data,
- the right to request deletion or destruction of your personal data under the conditions set forth in Article 7 of the Data Protection Law,
- the right to request that we notify the third parties, to whom we transferred your personal data, about the correction, deletion and/or destruction of your personal data per your request within the scope of the foregoing two items,
- the right to object to the negative results about you that are due to the analysis of your personal data processed solely by automated means,
- the right to claim indemnification for damages incurred due to illegal processing of your personal data.

Please send an e-mail to [dpo@moonton.com](mailto:dpo@moonton.com) if you would like to exercise any of your rights.

Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

We will respond to your request as soon as possible according to the nature of your request and within thirty days at the latest, free of charge. However, if your request incurs additional cost to us, then you may be charged over the tariff fee determined by the Turkish Personal Data Protection Board.

**Data relating to children.** The Services are not directed at children under the age of 18 and we do not knowingly collect or solicit personal data from children under 18. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 12 and that you have read and acknowledged Moonton Privacy Policy and [Terms of Service](#) and agree to the use by your child of the Services and registration for an account. Further, if you believe that we have personal data about or collected from a child under the relevant age, please contact us at [dpo@moonton.com](mailto:dpo@moonton.com) and we will ensure that it is deleted.

United Arab Emirates



If you are using the Services in the United Arab Emirates (“UAE”), the following additional terms apply. If any conflict arises between the main Privacy Policy and the additional terms, the following terms shall prevail:

**How we share your personal data.** In addition to the main text of this policy, by using the Services in the UAE you agree to the terms of this Privacy Policy and consent to our sharing of your personal data in line with the main text of this Privacy Policy.

**Governing law and dispute resolution.** By using our Services in the UAE, this Privacy Policy will be governed by and interpreted in accordance with the laws of the UAE. In the event of a dispute arising between the parties in connection with this Privacy Policy:

- where the dispute relates to a claim for a sum within the limits specified by the DIFC Small Claims Tribunal from time to time, then the dispute shall be referred by either party to the said Tribunal; and
- for all other disputes, the parties shall seek settlement of that dispute by mediation in accordance with the Mediation Rules of the DIFC-LCIA Arbitration Centre, which Rules are deemed to be incorporated by reference to this clause. If the dispute is not settled by mediation within 30 days of the commencement of the mediation, or such further period as the parties shall agree in writing, the dispute shall be referred to and finally resolved by arbitration under the Arbitration Rules of the DIFC-LCIA Arbitration Centre, which Rules are deemed to be incorporated by reference to this clause. The language to be used in the mediation and in the arbitration, shall be English. In any arbitration commenced pursuant to this clause the number of arbitrators shall be one and the arbitration shall be conducted in Dubai.

## Egypt

If you are using our Services in Egypt, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this Policy, the following terms shall prevail.

You declare that you are over the age of 18. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 13 and that you have read and acknowledged the Privacy Policy and **Terms of Service** and agree to the use by your child of the Services and registration for an account.

## South Africa

If you are using our Services in South Africa, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this Policy, the following terms shall prevail.

You declare that you are over the age of 18. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 13 and that you have read and acknowledged the Privacy Policy and **Terms of Service** and agree to the use by your child of the Services and registration for an account.