

[Privacy Policy] Mobile Legends: Bang Bang

Effective Date: December 16, 2021

Thank you for playing our game!

Please carefully read this privacy policy (“**Privacy Policy**”) when you use Shanghai Moonton Technology Co., Ltd.’s services. This Privacy Policy will come into effect for all existing users. Your use of the service from that day will be subject to this Privacy Policy.

The Data Controller under this Privacy Policy is Shanghai Moonton Technology Co., Ltd. (“**we**”, “**us**”, “**our**”).

We are dedicated to protecting users’ privacy rights. This Privacy Policy has been crafted to inform users as to how we collect, store, use, manage, process, transfer, and implement any other possible operation to the personally identifiable information (“**Data**”) that users provide during the use of our services.

If you do not agree to the processing of your Data in the way that this privacy policy describes, please do not provide your information (when we request) and stop using the Mobile Legends: Bang Bang (“**Game**”) or any services associated with the Game (“**Services**”).

We may amend the Privacy Policy from time to time according to the relevant laws, users can find the updated Privacy Policy on the website of Moonton as well as on the Game application. We will notify users if we make any material changes to the Privacy Policy.

TABLE OF CONTENTS

1. Data and How We Collect them
2. How We Use and Share Data
3. Managing Your Data
4. Your Rights and Options
5. How We Protect Data
6. Children’s Privacy
7. Updates to Our Privacy Policy
8. How to Contact Us
9. How to Contact the Appropriate Authority

1. Data and How we Collect them

We collect or receive Data in three ways:

- (1) you directly provide Data to us, such as by creating an account or signing up for email alerts.
- (2) we collect Data on an ongoing basis, such as through cookies and related technologies.
- (3) we receive Data from third party with your consent, such as social media platforms.

1.1 Data You Provide to Us

You may provide your Data to us when you choose to use our Service. As we change our offerings and features from time to time, the Data we collect from you may vary depending on the services you are using. You do not have to provide certain Data when we ask you for it, but if you decline, you might not be able

to access or enjoy Services or certain services, offering or features.

In general, we collect Data and other information as set forth in the table below for specific purposes:

Data	Use	Legal Basis
<p>Data of Account</p> <ol style="list-style-type: none"> Nickname The password of Moonton account Email Nationality Gender Profile pictures 	<ol style="list-style-type: none"> To register, update, maintain your accounts; Activate or authenticate your games and save game progress and stats; Recover your account, locate your account when you receive rewards; To help identify your account to enable us to troubleshoot problems with your account or games and enable you to enjoy certain game features. 	<p>Necessary for our performance of a contract with you.</p> <p>Necessary for our legitimate interests in establishing you as a user of our service and ensuring that we can take appropriate steps to maintain your account.</p>
<p>Region Location</p> <p>GPS (Only if the option to provide such information is manually selected by you)</p>	<ol style="list-style-type: none"> To set up your gameplay on a regional server; To display the flags of the area in the game; To show your ranking in the game (in your country or your neighborhoods), search for nearby friends who can play the game with you and see your game profile information. 	<p>Necessary for our legitimate interests in providing enhanced game functionality to you if you want it.</p>
<p>Customer Support Data:</p> <p>We use AIHelp customer supporting system to provide the customer service.</p> <ol style="list-style-type: none"> The purchase information, including purchase time, product, currency, cost. The screenshot photo (if you choose to upload the photo) User ID, Nickname, Server ID Device ID 	<ol style="list-style-type: none"> Help identify and troubleshoot problems with your account or games; To survey your opinions through surveys or questionnaires; Communicate with you and respond to your specific requests or questions; Enable you to ask for help from customer service if there is a problem streaming your game ; Manage and send you confirmations and important Data about your account, purchases, subscriptions, and warranties. 	<p>Necessary for our performance of a contract with you.</p> <p>Necessary for our legitimate interests in providing you with support in relation to the game, responding to your communications, and updating you in relation to your account.</p>
<p>The other data you provide to us</p>	<ol style="list-style-type: none"> When you participate in online 	<p>Necessary for our legitimate</p>

	<p>discussions or otherwise interact with us;</p> <ol style="list-style-type: none"> 2. When you voluntarily complete a customer survey or provide feedback / requests on any of our message boards or via email; 3. When you choose to share the live video content (voice, face) in game, we will collect the same (note that it is optional for you to share this data). 4. If you are located specific area (e.g., the Middle East), and turn on the video recording function (if any) in the game and agree us to record your in-game behavior, we will collect and process video content (is different from the live video content) which show your in-game behavior to identify the main problems encountered by you in the novice stage and optimize your experience. 5. If you get the prize(s) for participating in our game-based events, we may collect your name, ID number or passport ID, delivery address, postal code, telephone number, in-game account ID and zone ID, to deliver the physical prize(s) to you, we may collect your email address to send the digital prize(s) to you. We collect such data with your consent. 	<p>interests in responding to your interactions with us and ensuring that we deal appropriately with any requests that you have.</p>
<p>Any of the above data (to the extent required and permitted under applicable laws)</p>	<p>To represent ourselves in legal proceedings or comply with court orders, litigation procedures and other legal processes.</p>	<p>Necessary for a legal obligation.</p> <p>Necessary for our legitimate interests to protect the operations of our business entities; to obtain legal remedies or limit our damages; and to protect the rights, safety, or property of our employees, you, or others.</p>

1.2 Data We Collect on an Ongoing Basis

We may also collect Data and other information through technologies, from you when you use our Services. We use these Data and information for purposes such as modifying or improving features, managing advertising, addressing technical issues, preventing fraud, and conducting data analytics and it is necessary for provision of Service. The type of information that we collect includes:

Data	Use	Legal Basis
<p>Android Device Data:</p> <ol style="list-style-type: none"> 1. MAC address, 2. IP address 3. Device Hardware Information (e.g., storage, CPU, device type, operating system, language) 4. Device ID 	<ol style="list-style-type: none"> 1. To modify and improve our Game or Service; 2. To improve the security of the Game or Service; 3. For verification purpose; 4. To address technical issues and prevent fraud; 5. To identify who you are with your device ID, MAC when you need our help with the services; 6. To assign servers based on IP address of the users. 	<p>Necessary for us to provide the Game or Service and to ensure the security.</p> <p>Necessary for our legitimate interests in establishing you as a user of our service, and ensuring that we can take appropriate steps to maintain your account</p>
<p>iOS Device Data:</p> <ol style="list-style-type: none"> 1. IP address 2. OS Version 3. MAC, 4. Hardware Information (e.g., storage, CPU, device type, operating system, language) 5. Device ID 6. IDFA 	<ol style="list-style-type: none"> 1. To modify and improve our Game or Service; 2. To improve the security of the Game; 3. For verification purpose; 4. To address technical issues and prevent fraud; 5. To assign servers based on IP address of the users. 	<p>Necessary for us to provide the Game or Service and to ensure the security.</p> <p>Necessary for our legitimate interests in establishing you as a user of our service and ensuring that we can take appropriate steps to maintain your account.</p>
<p>Advertising ID and Market analytics Data (e.g., Google Advertising ID)</p>	<ol style="list-style-type: none"> 1. To monitor the advertising data and marketing programs; 2. To manage advertising 	<p>Necessary for us to manage advertising and conduct data analytics.</p>
<p>Transaction Records:</p> <ol style="list-style-type: none"> 1. Transaction information of payment platform, such as Google Play or iOS App Store (purchase time, order number, in-game product purchased, cost, email address (if the payment platform provides to us)) 2. Purchase history in-game, (e.g. item purchased, number of transactions, payment channel, order number, excluding financial information) 	<ol style="list-style-type: none"> 1. To process transactions that you make; 2. To maintain the purchase history; 	<p>Necessary for our performance of a contract with you.</p> <p>Necessary for our legitimate interests, and/or those of the third-party payment processors with whom we work, in processing any transaction that you make when using the Game or Services</p>
<p>Data of Use of the Service:</p>	<ol style="list-style-type: none"> 1. To provide Game services; 	<p>Necessary for us to provide</p>

<ol style="list-style-type: none"> 1. Gameplay data (such as game setting, level, heroes, scores) 2. In-game interactions (such as friends list) 3. Click record (battle record, mall record, activity record, social category) 4. Live time of player's play 5. Game Guard (information about your use of plugins) 6. Information indicating your use of other software 	<ol style="list-style-type: none"> 2. To distribute rewards in conjunction with game promotion activities if we collect Redemption Code; 3. To analyze the usage of Game feature, optimize and improve Game experience if we collect click record; 4. To achieve offline push function and in-game chat function if we collect live time of player's play(online time); 5. To monitor the background records crashes to provide better service and solve the users' problem if we collect the Game Health (Flash back); 6. To monitor whether you use plugin if we collect the Game guard information. 	<p>the Game or Service.</p> <p>Necessary for our legitimate interests in providing you with support in relation to the game, providing enhanced game functionality to you responding to your communications, and ensuring the security.</p>
<p>Any of the above data (to the extent required and permitted under applicable laws)</p>	<p>To represent ourselves in legal proceedings or comply with court orders, litigation procedures and other legal processes.</p>	<p>Necessary for a legal obligation.</p> <p>Necessary for our legitimate interests to protect the operations of our business entities; to obtain legal remedies or limit our damages; and to protect the rights, safety, or property of our employees, you, or others.</p>

6.1 Data Received by Us through Third Party

We may also collect your Data through third parties. Such as:

Data	Use	Legal Basis
<p>Data you provided to Third Party Services:</p> <ol style="list-style-type: none"> 1. Facebook: Name, Facebook ID, Profile Picture, Email Address (optional) 2. Google Play: Google ID, Display Name 	<ol style="list-style-type: none"> 1. To enable you to link, connect, or login to your Account with a third-party service; 2. To enable us to make our service available through certain platforms (e.g. iTunes, Google Play); 	<p>Necessary for our legitimate interests in making the Game available through third party services, and enabling the Game to link to third party services to enhance user experience.</p>

<ul style="list-style-type: none"> 3. iOS Game Center: User ID, Nickname, Profile Picture 4. iTunes, 5. Vkontakte <“VK”> 6. Other third-party payment platforms listed in the following website: https://m.mobilelegends.com/en/payment/countrylist 	<ul style="list-style-type: none"> 3. To help you share your gaming experience with friends, if you and your friends agree to do this and log into our game through a third party account; 4. To enable you to purchase in-game items, if you purchase in-game items (virtual currency) through the third-party payment platforms, you will provide your User ID and nickname to the third-party payment platforms. The third-party payment platforms will send your data of account, in-game items you purchased and other transaction information to us. 	
<p>AIHelp (Customer supporting service system)</p> <ul style="list-style-type: none"> 1. Gaming platform (Android or iOS) 2. Device Language 3. Game Version 4. Country Code 5. Battery level and status 6. Device ID 7. Available storage of device/ Total storage of device 8. OS Version 9. Custom Field 10. SDK Version 11. Carrier 12. Network type 	<ul style="list-style-type: none"> 1. Help identify and troubleshoot problems with your account or games; 2. To survey your opinions through surveys or questionnaires; 3. Communicate with you and respond to your specific requests or questions; 4. Help you find your friends or share your related gaming experience; 5. Enable to streaming your game within the game; 6. Manage and send you confirmations and important Data about your account, purchases, subscriptions, and warranties. 	<p>Necessary for us to provide the Game or Service.</p>
<p>Any of the above data (to the extent required and permitted under applicable laws)</p>	<p>To represent ourselves in legal proceedings or comply with court orders, litigation procedures and other legal processes.</p>	<p>Necessary for a legal obligation.</p> <p>Necessary for our legitimate interests to protect the operations of our business entities; to obtain legal remedies or limit our damages; and to protect the rights, safety, or property of our employees, you, or others.</p>

With regard to clause 1.3 above, please bear in mind that a third party controls your Data and you may vary your authorization and revoke your consent (if applicable) through privacy settings on such third party's platform. Please ensure that you read the privacy policy of any third-party platform that you access.

7. How We Use and Share Data

7.1 Using Your Data

We collect, use, store, and process your Data based on:

- a. The principle of lawfulness, fairness and transparency;
- b. Your consent that we may take from you time to time;
- c. Specified, explicit and legitimate purposes;
- d. The extent that is adequate, relevant and limited to what is necessary in relation to the purposes;
- e. The manner that ensures appropriate security of the personal data;
- f. Performing the obligations under Terms of Use and providing our Services;
- g. Your and our legitimate interests;
- h. Other legal reasons including if required under any law or required by governmental and regulatory bodies.

Managing Notifications

- a. Information on managing notifications from your iOS device is available here:
<https://support.apple.com/en-hk/HT201925#manage-alerts>
- b. Information on managing notifications from your Android device is available here:
<https://support.google.com/android/answer/9079661?hl=en>.

1.1 Sharing Your Data

We do not share personal data that directly identifies you (such as your name, e-mail) with independent third parties unless:

- (i) your prior authorization or consent is obtained;
- (ii) if we are required to do so by law, legal process, or a reasonable request from law enforcement authorities or other government officials;
- (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; or
- (iv) if necessary, to protect the vital interests of us and any of its users (such as to prevent death, bodily harm, or serious damage to property), public security and public interests; or
- (v) if we sell part or all of our assets to the third parties, we may share your Data with the buyer. In the event of this circumstance, the buyer will comply with this privacy policy, the related laws and regulations.

We may share anonymous or aggregated data, or other data that does not directly identify you with:

- (i) Other players and users. Social features are a core component of our games, other players and users may, for example, see your profile data, in-game activities and read the messages you have posted

- depending on the setting adopted by you;
- (ii) Other companies and public authorities in order to identify and/or prevent fraud and illegal activity, we may exchange data with other companies and public authorities in response to lawful requests;
 - (iii) Other companies which help us to optimize our games services. We may share in-game click record to other companies to optimize and improve Game experience. Under this circumstance, we will enter into the agreement with such companies and the companies are prohibited from retaining, using, or disclosing your personal data for any purpose other than providing us with their services in support of our game services.
 - (iv) Advertising Partners, Social Media Platform and third-party payment platforms. The Service includes features from our partners, such as social media interaction tools, in-game advertising and purchasing in-game items. When you use the service, application, other site provided by these partners related to our Game, these partners may access your data and operate under their own privacy policies and their terms of service. We encourage you to check their privacy policies to learn more about their data processing practices and exercise due caution while accessing any third-party website which is beyond our control.

Advertising Partners:

- a. Topon (<https://www.toponad.com/>).
- b. Appsflyer (<https://www.appsflyer.com/>).
- c. AWS
- d. Google Play(<https://policies.google.com/privacy>)

Social Media Platforms:

- e. YouTube (<http://www.google.com/policies/privacy>)
- f. Facebook(<https://www.facebook.com/privacy>)
- g. VK.
- h. Agora

Third-Party Payment Platforms:

- i. Adjust (for Payment analysis)
- j. Google Play
- k. Apple store

We may share your data with our affiliates and companies in the same group of companies as us. This includes our subsidiaries (any organization or brand we own or control); our parent company; and any of its subsidiaries. These companies may use your personal information to help us provide the Service.

1.2 Data transfers

Our Service is global by nature and your Data can therefore be transferred to third parties or service providers or business partners located within or outside your jurisdiction. In such cases, we will contractually oblige the receiving parties to ensure that same level of data protection is accorded to your Data that is adhered to by us under applicable law. Further, we contractually ensure that such information is not disclosed, published or transferred further. As different countries may have different Data Protection and Privacy laws, we take steps to ensure adequate safeguards are in place to protect your data. Adequate safeguards that our partners may use include standard contractual clauses approved by EU Commission or other jurisdictions.

2. Managing Your Data

You may access and update some of your Data through your Account settings. If you have chosen to connect your Account to a third-party application, such as Facebook or VK, you can do so within the Game. You are responsible for keeping your Data accurate and up-to-date.

We securely store your data by using the Storage service provided by Amazon Web Services (referred to AWS) (<https://aws.amazon.com/>) and Appsflyer (<https://www.appsflyer.com/>). You can find more information regarding Amazon Web Services' Security, Identity, & Compliance at <https://docs.aws.amazon.com/>, Appsflyer's Data Security and Privacy Principles for Services at: <https://www.appsflyer.com/product/security-and-privacy/>.

3. Your Rights and Options

You may exercise any of the rights described in this section by using any functionality available while using the Service and/or sending an email to **mobilelegendsgame@moonton.com** and we will respond without delay and in any event within one month of your request. Please note that we may ask you to verify your identity before taking further action on your request.

4.1 Rectification of Inaccurate or Incomplete Data

You have the right to review your Data provided to us, ask us to correct any inaccurate or incomplete personal Data concerning you.

4.2 Data Access

In some jurisdictions, applicable law may entitle you to request copies of your Data held by us. You may also be entitled to request copies of Data that you have provided to us in a structured, commonly used, and machine-readable format, should you have such requirement, please contact us. We may charge a reasonable fee based on administrative costs, or refuse to act on your request, if your request is manifestly unfounded or excessive. We may also refuse to act on a request where it adversely affects the rights and freedoms of others.

4.3 Withdrawing Consent and Restriction of Processing

Where you have provided your consent to the processing of your Data by us, you can always withdraw your consent at any time by contacting us. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. You may also change certain data preferences at any time, for example you may turn off GPS location sharing in your mobile device settings.

Furthermore, if you have used the service of YouTube API in our Game, you also can revoke our access to your Data via the Google security settings page at <https://security.google.com/settings/security/permissions>.

Additionally, in some jurisdictions, you have the right to object and/or limit the ways in which we use your Data, in particular where:

- (i) you contest the accuracy of your Data;
- (ii) the processing is unlawful and you oppose the erasure of your Data;
- (iii) we no longer need your Data for the purposes of the processing, but you require the Data for the establishment, exercise or defense of legal claims; or

4.4 Data Retention and Erasure.

We generally retain your Data for as long as is necessary for the performance of our service and to comply with our legal obligations and then it is deleted or erased based on our internal protocols.

If you no longer want us to use your Data to provide our Service to you, you can request that we erase your Data and close your Account. Also if you have not been using our Service for a significant period of time, it will be deemed as you no longer need our Service, then we may erase your Data and close your Account, by a prior notice.

In certain jurisdictions, you can request to have all your personal information deleted entirely. Please note that if you request the erasure of your personal information:

If you ask us to remove or delete your Data, we may retain your Data as necessary for our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements.

We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend an Account for fraud or safety reasons, we may retain certain Data or information from that Account to prevent that member from opening a new account in the future.

We may retain and use your personal information or Data to the extent necessary to comply with our legal obligations. For example, we or third parties engaged by us may keep some of your information for tax, legal reporting and auditing obligations.

Information you have shared with others may continue to be publicly visible in the Game, even after your Account is cancelled. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers. Data protection and information security is important for us. While providing services to you and other users, we operate and maintain the Services or Game so as to protect Data and our systems from accidental or malicious loss and destruction. Therefore, as part of provision of Service and on account of overall safety of Data of all users, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

Retention Schedule

TYPE OF DATA	RETENTION PERIOD
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Nickname, gender, profile data	The duration of player's use of the Game / [the game Mobile Legends: Bang Bang (the "Game")] (i.e., until account deletion in accordance with a player's request) and then deleted within 30 days.
Personal data relating to players collected via the following third parties: 1. Facebook 2. Google Play 3. Game Center 4. VKontakte	The duration of player's use of the Game i.e. until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.
Player email address	The duration of player's use of the Game i.e. until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.
Location and nationality	The duration of player's use of the Game (i.e. until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.
Device information:	The duration of player's use of the Game (i.e. until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.
Game play statistics (level, heroes, score/s), date and time stamps of actions	The duration of player's use of the Game (i.e. until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.
Advertising ID and select device information (Device ID, IP address)	The duration of player's use of the Game (i.e. until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.
Chat communications (text messages between friends)	Stored for 3 days (up to 10 messages per friend) and then automatically deleted.
Transaction records	Stored for the lifetime of player's use of the Game (i.e. until account deletion in accordance with player's request) and then for the duration of any retention periods for which such data must be retained in order to comply with our legal obligations.
Customer support ticket ID & support communications	Stored for 2 years and then automatically deleted.

Security-Related Information	The duration of player's use of the Game i.e., until account deletion in accordance with a player's request) and then deleted within 30 days.
Survey Information Country/area, gender, occupation, education, email address, survey answer	The duration of player's use of the Game (i.e., until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.
Webpage information Browser information (browser name, engine type, version), phone brand, OS version	The duration of player's use of the Game (i.e., until account deletion in accordance with a player's request) and then deleted within 30 days. Where a player does not request account deletion, such data will be retained for 1 year after the Game is shut down, before it is deleted.

4.5 Objection to Processing

In some jurisdictions, you may be entitled to object to the processing of your Data where such processing is based on legitimate interest. If you object to such processing, we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims, or we are relying upon another legal basis to process your Data.

Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes in accordance with clause 8.

4. How We Protect Personal Data

5.1 Security Safeguards

We have implemented reasonable security practices and standards and documented information security policies comprising of all relevant security control measures that are commensurate for protection of the information assets (including your data). We shall also comply with audit requirements as may be required under applicable law. The company's service provider responsible for hosting of Data has implemented ISO/IEC 27001:2013 standards for its management system and we work with our service providers to ensure that adequate security measures are taken to afford protection to your Data.

Security of our users' Data is a priority at us, and we are continuously implementing and updating administrative, technical, and physical security measures such as access control, compressed encryption to help protect your Data against unauthorized access, loss, destruction, or alteration. However, in a digital world, you will appreciate that we cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. This means we cannot guarantee the security of your Data and do not assume any responsibility for the unauthorized use or access to your Data under our control.

If we learn of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. If there is a security breach occurs, we may also post a notice on the Website. We will send an emergency report to authorities in case that the security breach is serious and assist

authorities to take steps to prevent further harm.

If you know or have reason to believe that your Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Moonton Account, please contact us in accordance with clause 8, and we will take action in relation to your notification without undue delay and in any event within 30 days, and respond to you as soon as possible when we have any update.

Please keep in mind that whenever you voluntarily disclose Data online through certain channels (for example on message boards, through email, or in chat areas), that Data can be collected and used by others. We are not responsible for Data that you share on services/platforms other than the Game or our services. We remind you to use caution before sharing or making such disclosures. Ultimately, you are solely responsible for maintaining the secrecy of your passwords or any account Data. Please be careful and responsible whenever you are online.

5.2 Additional Information for California Residents.

Below, we provide information, as required under California privacy laws, including the California Consumer Privacy Act ("CCPA"), which requires that we provide California residents certain specific information about how we handle their personal information, whether collected online or offline. This section does not address or apply to our handling of publicly available information made lawfully available by state or federal governments or other personal information that is subject to an exemption under Section 1798.145(c) – (f) of the CCPA.

Categories of Personal Information We Collect and Disclose

Our collection, use and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident. The table below sets out generally the categories of personal information (as defined by the CCPA) about California residents that we collect, sell, and disclose to others for a business purpose. We collect these categories of personal information from the sources described above, in Section 1. Data and How we Collect them, and for the purposes described above, in Section 2. How We Use and Share Data.

Categories of Personal Information We Collected	Data Usage and Disclosure
Device Data: IP address, CPU, device type, operating system, language, Storage, device ID, MAC, IDFA;	Identify, fix, and troubleshoot bugs and service errors; generate device code; provide software updates.
Transaction Data: If you choose to make a purchase, we will collect transaction-related Data such as number of transactions, object of transaction, payment channel, your name, address, card number;	Enable purchasing related functions; enhance your game experience
Data of Use of the Service: gameplay data (such as game setting), promotion clicks, in-game interactions (such as friends list), referral/exit pages, geolocation information.	Help you find your friends or share your related gaming experience; serve and measure the effectiveness of advertising; adhere to your preferences and to deliver dynamic content.
Profile figure, such as your battle data	To improve and advance our Application and

Categories of Personal Information Sold. The CCPA defines a "sale" as disclosing or making available to a third party personal information in exchange for monetary or other valuable consideration. We do disclose or make available personal information to third parties, in order to receive certain services or benefits from them. For example, we may allow third party tags to collect information such as browsing history through our Sites and Apps in order to better reach Users with relevant ads and to improve and measure our ad campaigns, or to display third party ads in our Services.

In the past 12 months, we have not sold Personal Information of California residents within the meaning of "sale" in the CCPA.

California Residents' Rights.

California law grants California residents' certain rights and imposes restrictions on particular business practices as set forth below.

Do-Not-Sell. California residents have the right to opt-out of our sale of their personal information. You can click the button 'Do Not Sell My Personal Information' on the screen if do not want us to provide your personal information to any third parties. We do not sell personal information about residents who we know are younger than 16 years old.

Initial Notice. We are required to notify California residents, at or before the point of collection of their personal information, the categories of personal information collected and the purposes for which such information is used. We will make this Privacy Policy available to Users online, in order to satisfy this requirement.

Requests to Delete. Subject to certain exceptions, California residents have the right to, at no charge, request deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exemption applies. To send the request, please email to mobilelegendsgame@moonton.com, and we will proceed with it within 30 days.

Request to Know. California residents have the right to request and subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered, free of charge by email, readily useable format that allows the individual to transmit this information to another entity without hindrance. To send the request, please email to mobilelegendsgame@moonton.com and we will proceed with it within 30 days. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the:

- a. categories of personal information collected;
- b. categories of sources of personal information;
- c. business and/or commercial purposes for collecting and selling their personal information;
- d. categories of third parties/with whom we have disclosed or shared their personal information;
- e. categories of personal information that we have disclosed or shared with a third party for a business purpose; and
- f. categories of third parties to whom the residents' personal information has been sold and the specific

categories of personal information sold to each category of third party.

- g. California residents may make a Request to Know up to twice every 12 months.

We will respond to verifiable requests received from California residents as required by law.

Right to Non-Discrimination. The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices, rates, or penalties on residents who exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents' data.

Financial Incentives. A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, provided it is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time, and may not be included in such incentives without their prior informed opt-in consent; we do not offer any such incentives at this time.

You Rights Under California's Shine-the-Light Law. We do not share personal information collected online with unaffiliated third parties for their own direct marketing purposes and will not do so unless you agree to such disclosure. If you are a California resident and you still believe your information has been shared or you have general questions about how your information may have been shared, you may contact us by requesting a list of the third parties to which we have disclosed personally identifiable information about you for their own direct marketing purposes. You may make one request per year. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. You may request this information in writing by contacting us via the contact details set out in Section 8. How to Contact us.

5.3 Additional Information for India Users

Sensitive Personal Data or Information Rules. The Sensitive Personal Data or Information Rules (SPDI) includes sensitive information pertaining to a natural person like password, financial information (such as bank account, credit card, debit card or other payment instrument details), biometric information, medical records and history etc. However, it does not include information available in the public domain or the information provided under Indian laws.

Age Restrictions. The Indian user under the age of 18 shall not play our Game without the consent of parent or guardian.

6. Children's Privacy

Countries/ Region	The age of legal majority that you access the services
Russia	14
Kingdom of Saudi Arabia	15
Brazil	18
EU	16

India	18
Singapore	18
Turkey	18
Thailand	20
United Arab Emirates	21

Protecting children's privacy online is extremely important to us. We do not directly serve children under the age of 13. **If you are a user of the country/region listed above and under the age of legal majority, you shall not play the Game without the consents of your parent or guardian.** We also do not intentionally collect Data from children or minors through the Service. If you are the parent or guardian of a child and you believe that we have inadvertently received Data about that child, please contact us in accordance with clause 8. We will delete the Data from our records as soon as possible. If you believe that we might have any Data from or about a child under the age of 13, please contact us as well.

7. Updates to Our Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in technology, law, our operations, or any other reason we determine is necessary or appropriate, so please review it frequently. We will indicate on the cover page of this Privacy Policy to indicate the recent most date on which the policy was last updated. Please review this Privacy Policy every time you access or use Service to make sure that you have reviewed the most recent version. We will notify you if there is any substantial change occurs.

8. How to Contact us

If you have any questions about this Privacy Policy or grievances with respect to processing of your information, or you would like to exercise any of your data protection rights, please do not hesitate to reach out to our Grievance Officer. The contact details of the Grievance Officer is set out below:

Name of Grievance Officer: **Zheng Ming**

Contact details/ email: **mobilelegendsgame@moonton.com**

We will redress the grievances on an expeditious basis within 30 days of receipt of grievance.

9. How to Contact the appropriate Authority

Should you wish to report a complaint or if you feel that we are not addressed your concern in a satisfactory manner, you may contact your local Data Protection Authorities at:

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm or any other authorities in your jurisdiction.