**QALANG CORPORATION (“QALANG”) PRIVACY POLICY**

Last Updated: March 10, 2017

Qalang develops and publishes games and related applications for the web and mobile devices (each game or application is a “Service”). In this policy, “Qalang” refers to Qalang Corporation, a Delaware corporation. We may also refer to Qalang as “We” or “Us.”

When you use a Service, you agree to be bound by all of the terms, conditions and restrictions in this Privacy Policy. Please read them carefully. IF YOU DO NOT AGREE TO THIS POLICY, PLEASE DO NOT USE ANY SERVICE.

This Privacy Policy describes:

* The personally identifiable information (“personal information”) and other information We collect and hold, how we do so and the purposes of our collection
* How We use and with whom We share such information
* How you can access and update such information
* The choices you can make about how We collect, use and share your information
* How We protect the information We store about any user of the Services (“you” or “user”)

If you have questions regarding this Privacy Policy or our collection and use of information, please contact us as described in the Section "Contact Us".

**INFORMATION WE COLLECT ABOUT YOU AS A USER OF THE SERVICE**

When you use any Service, you may also get access to its online community within that Service and you allow Qalang to access certain information about you. The information you allow Qalang to access varies by application, and it is affected by the privacy settings you and your friends establish in that application. You can control and find out more about these settings within the application. For example, Qalang may access and store some or all of the following information:

* Your in-Service username
* Your device's MAC address
* Facebook User ID
* Facebook Fan Status
* Your physical location and that of your access devices

By accessing a Qalang Service, you are consenting and authorizing Qalang to collect, store, and use in accordance with this Privacy Policy any and all information that you agreed the application could provide to Qalang through our Terms of Use, as well as through any other Terms of Use posted on the portal you downloaded or accessed the Service from. Your agreement takes place when you "accept" or "allow" (or similar terms) in one of our Services.

**INFORMATION WE COLLECT FROM YOU DIRECTLY**

We may allow you to "register" with Us by using Facebook or other application authentication options to create an account or profile within a Service. We may also provide a more typical registration flow where you may be required to provide the following information: your age or birthday (for age screening and/or to better understand who our users are); your e-mail address; a password and other information that helps Us confirm that it is you accessing your account.

When you interact with a Service, at **[qalang.com](http://www.qalang.com/)**, any Qalang-owned website, or download a Qalang Service from a third-party app store, we may collect and store information from you directly as described below:

**REGISTRATION INFORMATION**

We may allow you to "register" with Us by using Facebook or other application authentication options to create an account or profile within a Service. We may also provide a more typical registration flow where you may be required to provide the following information: your age or birthday (for age screening and/or to better understand who our users are); your e-mail address; a password and other information that helps Us confirm that it is you accessing your account.

We may also offer you the option to complete a user profile that is visible to other Qalang users. Your user profile may include: a profile image; one or more Service username(s); and a Qalang user ID number that is created by Qalang and used to identify your profile.

**INFORMATION WE RECEIVE OR COLLECT WHEN YOU ACCESS QALANG GAMES ON A MOBILE DEVICE**

If you access a Qalang Service on your mobile telephone or other mobile device, including iPads and tablets, we may collect information about you, including but not limited to, your mobile device identifier, MAC Address, WiFi information, and possibly your IP Address and geo-location. In certain Services we may create and assign to your device an identifier that is similar to an account number. We may also collect the name you have associated with your device, device type, telephone number, country, geo-location, and any other information you choose to provide, such as user name, character name, or e-mail address. We may also access your contacts to enable you to invite friends to join you in the Service.

**PAYMENT INFORMATION**

Qalang may also receive the billing and payment information that you provide when your purchase is processed by another party, such as Apple (for purchases on iOS devices), Google (for purchases on Android devices), or Amazon (for purchases on Kindle devices).

**CUSTOMER SUPPORT CORRESPONDENCE**

When you ask for assistance from our Customer Support team, we may collect and store the contact information you provide (generally your name and e-mail address), information about your activity on the Service, and your username or ID number. We may also store the correspondence and any information contained within.

**PUSH NOTIFICATIONS & LOCAL NOTIFICATIONS**

With your consent we may send push notifications to your mobile device to provide Service updates and other relevant messages. You can manage any push notifications from within the relevant Service.

**TECHNICAL AND USAGE INFORMATION**

When you access our Services, We may collect (i) technical information about your mobile device or computer system, including your MAC Address, WiFi information, IP Address, geo-location, and mobile device ID; and (ii) usage statistics about your interactions with the Service. This information is typically collected through the use of server log files or web log files ("Log Files"), mobile device software development kits and tracking technologies like browser cookies to collect and analyze certain types of technical information. Some of the cookies the Service places on your computer are linked to your user ID number(s). For more information on how We utilize cookies and other tracking technologies, please review the "Cookies and Automated Information Collection" discussion under ("How We Collect Information about You").

**HOW WE COLLECT INFORMATION ABOUT YOU**

We may collect information about you in any one or more of the following ways:

**INFORMATION ABOUT PLAYERS AND PLAY**

To provide a richer game play and social experience in our Services, We may collect information about your play and interaction with other players and users. The bulk of this information is collected and stored through web servers that record actions taken on our Services.

**COMMUNICATIONS FEATURES**

You may be able to take part in certain activities on our Services that give you the opportunity to communicate or share information not just with Qalang, but also with other users of our Service. These may include:

* Participating in player forums and message boards
* Posting public comments to other users' profiles or games
* Sending private messages or invitations to other users, either directly on our websites or to their e-mail accounts
* Chat with other users
* Posting web links

We may record and store archives of these communications on Qalang's servers to protect the safety and well-being of our users and Qalang's rights and property in connection with the service. You acknowledge and consent to the recording and storage of such communications for these purposes.

**COOKIES AND AUTOMATED INFORMATION COLLECTION**

When you access the Services, We may collect certain technical information in order to (i) analyze the usage of our sites and Services; (ii) provide a more personalized experience; and (iii) manage advertising. We and service providers acting on our behalf, such as Google Analytics, may use Log Files and other tracking technologies to collect and analyze certain types of technical information over time and across different websites following your use of the Service, including cookies, WiFi information, IP addresses, geo-location, device type, device identifiers, browser types, browser language, referring and exit pages, and URLs, platform type, the number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, Service state and the date and time of activity on our Services, and other similar information. In some cases, We may associate this information with your user ID number for our internal use. Our Service currently does not respond to “Do Not Track” (DNT) settings in your web browser and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do so in the future, we will describe how we do so in this Privacy Policy. For further details regarding DNT, visit [**donottrack.us**](http://donottrack.us/).

We may also employ other technologies including (i) web beacons, which allow Us to know if a certain page was visited or whether an e-mail was opened; (ii) tracking pixels, which allow Us to advertise more efficiently by excluding our current users from certain promotional messages, identifying the source of a new installation or delivering ads to you on other websites; and (iii) local shared objects also known as flash cookies, which help Us to prevent fraud, remember your in-Service preferences and speed up load times.

You can set your web browser to warn you about attempts to place cookies on your computer or limit the type of cookies you allow. Flash cookies operate differently than browser cookies and cookie management tools available in a web browser may not remove flash cookies. To learn more about and manage flash cookies you can visit adobe.com and make changes at the privacy settings panel. If you disable cookies, you may lose some of the features and functionality of playing our Services, as Qalang cookies may be necessary to track and enhance your Service activities. Please note that companies delivering advertisements in our Services or on our websites may also use cookies or other technologies, and those practices are subject to their own policies.

Google Analytics uses cookies to help the website analyze how users use the Service and enhance your experience when you use the Service. For more information on how Google uses this data, go to [**google.com/policies/privacy/partners/**](http://www.google.com/policies/privacy/partners/). The NAI (Network Advertising Initiative) allows for the central opting out of all its members’ cookies from a single opt-out page. If you prefer not to receive relevant advertising on web pages, please click on the following link: [**networkadvertising.org/choices/**](http://www.networkadvertising.org/choices/). If you delete your cookies, use a different browser or buy a new computer, you will need to renew your opt-out choice.

**OTHER SOURCES**

We may collect or receive information from other sources including (i) other Qalang users who choose to upload their email contacts; and (ii) third party information providers. This information will be used to supplement your profile - primarily to help you and your friends connect. It will be combined with other information We collect.

**HOW WE USE THE INFORMATION WE COLLECT**

In general, We collect, store and use your information to provide you with a safe, smooth, efficient, fun, and customized experience. For example, We may, and you expressly consent for us to, use information collected from you in any one or more of the following ways:

* To create your Service accounts and allow access to our Services
* To identify and suggest connections with other Qalang users
* To enable user-to-user communications
* To provide technical support and respond to user inquiries
* To prevent fraud or potentially illegal activities, and enforce our Terms of Use
* To deliver and target advertising
* To notify users of in-Service updates
* To provide in-Service leader boards and promote in-Service player achievements
* To solicit input and feedback to improve Qalang products and services and customize your user experience
* To inform users about new products or promotional offers

One important use of your information is communication. If you have provided your e-mail address to Qalang, We may use it to respond to (i) customer support inquiries, and (ii) keep you informed of your in-Service activity, including comments from friends, notifications about in-Service status and requests. Some messages, such as invites for friends to join you in a Service, may include your name and profile photo. We may also send promotional e-mail messages and promotional messages ("Promotional Communications") directly or in partnership with parties other than Qalang. Each Promotional Communication will generally offer recipients choices about receiving additional messages.

**SHARING OF YOUR INFORMATION**

We may share your information (in some cases personal information) with third parties (i.e., parties other than Qalang), in the following circumstances:

**THIRD PARTY SERVICE PROVIDERS**

We may provide your information to third party companies to perform services on our behalf, including payment processing, data analysis, e-mail delivery, hosting services, customer service, placement of ads and assisting Us in other marketing efforts. We direct all such third party service providers to maintain the confidentiality of the information disclosed to them and to not use your information for any purpose other than to provide services on Qalang's behalf.

**SAFETY, SECURITY AND COMPLIANCE WITH LAW**

Your information, and the contents of all of your online communications (including without limitation chat text, voice communications, IP addresses and your personal information) may be accessed and monitored as necessary to provide the Service and may be disclosed: (i) when We have a good faith belief that We are required to disclose the information in response to legal process (for example, a court order, search warrant or subpoena); (ii) to satisfy any applicable laws or regulations; (iii) where We believe that the Service is being used in the commission of a crime, including to report such criminal activity or to exchange information with other companies and organizations for the purposes of fraud protection and credit risk reduction; (iv) when We have a good faith belief that there is an emergency that poses a threat to the health and/or safety of you, another person or the public generally; and (v) in order to protect the rights or property of Qalang and users of any Qalang Service.

**YOUR CALIFORNIA PRIVACY RIGHTS**

We do not share personal information with third parties for their direct marketing purposes unless you affirmatively agree to such disclosure, typically by “opting in” to receive information from a third party that is participating in a sweepstakes or other promotion on one of our sites. If you do ask us to share your personal information with a third party for its marketing purposes, we will only share information in connection with that specific promotion, as we do not share information with any third party (other than our service providers) on a continual basis. To prevent disclosure of your personal information for use in direct marketing by a third party, do not opt in to such use when you provide personal information on one of our sites. Your access to the Services will not be affected if you do not “opt in” to receive information from such third parties.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our customers who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to: Customer Service c/o Qalang Corporation, 3553 Castro Valley Blvd., Suite K, Castro Valley, CA 94546.

**SALE OR MERGER**

In the event that Qalang undergoes a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, We may transfer all of your information, including personal information, to the successor organization in such transition. If material changes to Qalang's privacy practices will occur as a result of the business transition, We will notify you and other users (in the manner described in Changes to Our Privacy Policy below) of the business transition prior to transferring your personal information.

**OUR POLICIES CONCERNING CHILDREN**

Without obtaining verifiable parental consent consistent with federal law, we do not knowingly collect or solicit any personal information from children under the age of 13, and we do not knowingly allow children under the age of 13 to register for or use the Services. Children under the age of 13 should not use our Services or send us any personal information about themselves at any time unless we have first obtained verifiable parent consent. In the event We learn that We have inadvertently gathered personal information from children under the age of 13 without such consent, We will take reasonable measures to promptly erase such information from our records, and we reserve the right to terminate the your ability to use the Services. If you believe that we might have information from or about a child under the age of 13, please contact us at once.

**HOW TO ACCESS AND UPDATE YOUR INFORMATION**

**INFORMATION WE RECEIVE FROM AN SNS WHERE YOU ACCESS OUR SERVICES**

To manage the information Qalang receives about you from an SNS where you play our Services, you will need to follow the instructions at that site for updating your information and changing your privacy settings. The privacy management tools for applications on Apple can be found [**here**](http://www.apple.com/privacy/manage-your-privacy/). The privacy management tools for Google can be found [**here**](https://www.google.com/safetycenter/everyone/start/). The privacy management tools for Amazon can be found [**here**](https://aws.amazon.com/compliance/data-privacy-faq/). You can manage certain aspects of information collection and use by going to the settings of your (mobile) device and reviewing the permissions of each application.

Once Qalang receives your information from an SNS, that information is stored and used by Qalang in accordance with this Privacy Policy, and you may access and update that information as described below. Service or other accounts created with Qalang are considered active until We receive a user request to delete them or deactivate them.

**OTHER METHODS OF ACCESSING AND CONTROLLING YOUR INFORMATION**

If you no longer want Qalang to make active use of your information, you may send an e-mail to [**support@qalang.com**](mailto:support@qalang.com). Place "Delete My Account" in the subject line and include your first name, last name, e-mail address and any user identification (such as an identification) number used in connection with access a Service (if applicable) in the body of the e-mail. We will respond to your request within thirty (30) days. Qalang may use your information unless and until you send Qalang such a request. Please note that your information, for example those records pertaining to payments or customer service matters, may be retained for legal and accounting purposes. If you have sent or posted content on the Service, We may not be able to delete it. If you wish to review, change or correct the information Qalang has about you, e-mail us at [**support@qalang.com**](mailto:support@qalang.com). You can turn off push notifications and local notifications by visiting the "notifications" page within the relevant Service. You can stop further use of your geo-location by visiting your device's settings for the relevant application or the "settings" page for the relevant Service. If you have additional questions about this Privacy Policy, contact us at [**support@qalang.com**](mailto:support@qalang.com)

**YOUR CHOICES**

You can visit our website without providing any personal information. If you choose not to provide any personal information, you may not be able to use certain aspects of the Services.

**OPTING OUT OF PUSH COMMUNICATIONS**

When you install our apps on your mobile device you can choose to receive push notifications. You can turn off push notifications by visiting the "options" or "settings" page within the relevant Service. You may also receive local notifications. You can turn off local notifications by visiting the "options" or "settings" page within the relevant Service.

**PRIVACY POLICIES OF LINKED SITES**

Our Services may contain links to third-party websites. We are not responsible for the privacy practices or the content of such websites. If you have any questions about how these other websites use your information, you should review their policies and contact them directly.

**SECURITY OF YOUR INFORMATION**

Qalang implements reasonable security measures to protect the security of your information both online and offline, and We are committed to the protection of customer information. While We take reasonable precautions against possible security breaches of our Services and our customer databases and records, We cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. Unfortunately, the transmission of information over the Internet is not completely secure. Although we strive to protect your personal data, we cannot guarantee the security of your data while it is being transmitted to our site; any transmission is at your own risk. Once we have received your information, we have procedures and security features in place to try to prevent unauthorized access. We urge you to take steps to keep your personal information safe (including your account password), and to log out of your account after use. If your account is hacked, this may lead to unauthorized access to your Qalang Services, so be careful to keep your account information secure. If you have questions about the security of our Services, please contact us at [**support@qalang.com**](mailto:support@qalang.com).

**CHANGES TO OUR PRIVACY POLICY**

If We decide to make material changes to our Privacy Policy, We will notify you and other users by placing a notice on [www.qalang.com](http://www.qalang.com) or by sending you a notice to the e-mail address We have on file for you. We may supplement this process by placing notices in our Services and on other Qalang websites. It is your responsibility to periodically check this privacy page for updates.

**RIGHT TO ACCESS**

Users in certain jurisdictions have a right to access personal information held about them. Your right of access can be exercised in accordance with applicable law. At your request, and per applicable law, we will use commercially reasonable efforts to correct inaccurate personal information or delete personal information, but please note that we may be required to retain personal information by law or for legitimate business purposes. When we delete any information, it will be deleted from our active databases but may remain in our archives. Please note that we may also decline to process requests that are frivolous, vexatious, that jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Please submit any requests related to access, correction, or deletion of your personal data in writing to [**support@qalang.com**](mailto:support@qalang.com).

**INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION**

Any information you provide to us, or that we collect through your use of the Services or otherwise, may be stored, processed, and transferred within, or to, the United States, or any other country in which we or our affiliated companies or third party partners maintain facilities. As a result, it is possible that your information could be accessed by foreign governmental authorities, or otherwise, in accordance with applicable local laws.

By using the Services, you consent to the collection, storage, processing, and transfer of your information in and to the United States, and/or other countries and territories. Please be aware that countries and jurisdictions other than the one in which you are located may not have the same data protection laws as your own jurisdiction.

If we transfer your information outside of your country of residence, we will protect that information as described in this Privacy Policy. If you are located in the European Economic Area or Switzerland, we comply with applicable legal requirements providing adequate protection for the transfer of personal information to countries outside of the EEA or Switzerland.

**CONTACT US**

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please send an e-mail to [**support@qalang.com**](mailto:support@qalang.com). We will seek to respond to any complaints within 30 Days.

**REGION-SPECIFIC ADDENDUM TO PRIVACY POLICY:**

The following additional information applies, and supplements the above Privacy Policy, if your personal information is collected from one of the countries below:

**Canada:**

Personal information maintained and processed by us and third party service providers in the U.S. and other foreign jurisdictions may be subject to disclosure pursuant to a lawful access request by U.S. or foreign courts or government authorities. We will not provide your information to third parties for marketing purposes without your prior consent.

For more information about our privacy practices; to access, update or correct inaccuracies in your personal information; or if you have a question or complaint about the manner in which we or our service providers treat your personal information, please contact [**support@qalang.com**](mailto:support@qalang.com).

**Japan:**

We comply with Japanese laws and regulations, including the Act on the Protection of Personal Information. We are primarily responsible for the management of the personal information that is jointly used with our affiliates or third parties. We will not provide your information to third parties for marketing purposes without your prior consent.