

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

Sensitive Information. We do not process sensitive information.

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by Google Payment. You may find their privacy notice link(s) here:

https://payments.google.com/payments/apis-secure/u/0/get_legal_document?Ido=0&Idt=privacynotice&Id=en-GB

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information automatically collected

Information automatically collected

In Short: Some information such as your Internet Protocol (IP) address and/or browser and device characteristics-is collected automatically when you visit our

Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact

information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences,

referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily

needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

The information we collect includes:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

- **Device Data.** We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: We process *your* information to provide, improve, and administer *our* Services, communicate with *you*, for *security and fraud prevention*, and to comply with *law*. We may *also* process *your information for other purposes* with *your* consent.

We process your personal information for a variety of reasons, depending on how you interact **with** our Services, including:

- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: We *only* process *your* personal information *when* we believe *it is* necessary and we have a *valid* legal reason (i.e. *legal* basis) to do so under applicable law, *like*

with your consent, to *comply* with laws, to provide *you* with services to *enter* into or *fulfill* our contractual obligations, to protect your rights, or to *fulfill* our legitimate business interests.

If you are located in **the EU or UK**, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As

such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
 - **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
 - Diagnose problems and/or prevent fraudulent activities
 - **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
 - **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e. express consent) to use your personal information for a specific purpose, or in situations

where your permission can be inferred (i.e. implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention

- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for
 - purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In **Short:** We may share information *in* specific situations described in this section and/or *or* with the following *third* parties.

We may need to share your personal information in the following situations:

- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- Offer Wall. Our application(s) may display a third-party hosted 'offer wall'. Such an offer wall allows third-party advertisers to offer virtual currency, gifts, or other
 - items to users in return for the acceptance and completion of an advertisement offer. Such an offer wall may appear in our application(s) and be displayed to you
 - based on certain data, such as your geographic area or demographic information. When you click on an offer wall, you will be brought to an external website belonging to other persons and will leave our application(s). A unique identifier, such as your user ID, will be shared with the offer wall provider in order to prevent fraud and properly credit your account with the relevant reward.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In **Short:** We keep your information for as long as necessary to *fulfil* the purposes outlined in this *privacy* notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or

permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. WHAT ARE YOUR PRIVACY RIGHTS?

In **Short:** In some regions, such as the European *Economic* Area (*EEA*), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to

and control over *your* personal information. You may review, change, or terminate *your* account at *any* time.

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request

access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to

data portability; and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal

information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?'

below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State

data protection authority or [UK data](#) protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the

applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided

in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your

personal information conducted in reliance on lawful processing grounds other than consent.

7. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy

preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing

DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not

to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy

notice.

8. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: If *you* are a resident of California, Colorado, *Connecticut*, Utah or Virginia, *you* are *granted specific* rights *regarding* access to *your* personal information.

What categories of personal information **do** we collect?

We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	NO
B. Personal information as defined in the California		

Customer Records statute	Name, contact information, education, employment, employment history, and financial information	NO
C. Protected classification characteristics under state or federal law		
D. Commercial information		
E. Biometric information	Gender and date of birth	NO
	Transaction information, purchase history, financial details, and payment information	NO
	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behaviour, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO
G. Geolocation data	Device location	
H. Audio, electronic, visual, thermal, olfactory, or similar Images and audio, video or call recordings created in connection with our business information	activities	NO
	Inferences drawn from any of the collected personal information listed above to create	NO
I. Professional or employment-related information	Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	NO
K. Inferences drawn from collected personal information a profile or summary about, for example, an individual's preferences and		NO
L. Sensitive personal Information	characteristics	NO

We will use and retain the collected personal information as needed to provide the Services or for:

- Category B - As long as the user has the app installed on their device

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the

context of:

- Receiving help through our customer support channels,
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

How do we use and share your personal information?

Learn about how we use your personal information in the section, "[HOW DO WE PROCESS YOUR INFORMATION?](#)"

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we

disclose personal information to in the section, "[WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?](#)"

Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we

disclose personal information to in the section, "[WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?](#)"

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This

is not considered to be 'selling' of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

California Residents

California Civil Code Section 1798.83, also known as the 'Shine The Light' law permits our users who are California residents to request **and** obtain from us, once a year

and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses

of all third parties with which we shared personal 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 us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated

with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

CCPA [Privacy](#) Notice

CCPA [Privacy](#) Notice

This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below.

The California Code of Regulations defines a 'residents' as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as 'non-residents'.

If this definition of 'resident' applies to you, we must adhere to certain rights and obligations regarding your personal information.

Your rights with respect to your personal data

Right to request deletion of the data Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

Right to be informed – Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell or share personal information to third parties;
- the categories of personal information that we sold, shared, or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, selling, or sharing personal information; and
- the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

Right to Limit Use and Disclosure of Sensitive Personal Information

We do not process consumer's sensitive personal information.

Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These

verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the

type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file,

or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the

circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting

additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request

that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Other [privacy rights](#)

- You may object to the processing of your personal information.

You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.

- You can designate an authorised agent to make a request under the CCPA on your behalf. We may deny a request from an authorised agent that does not submit

proof that they have been validly authorised to act on your behalf in accordance with the CCPA.

- You may request to opt out from future selling or sharing of your personal information to third parties. Upon receiving an opt-out request, we will act upon the

request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission.

To exercise these rights, you can contact us by visiting contactsefwgames@gmail.com, by email at contactsefwgames@gmail.com, or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

Colorado Residents

Colorado Residents

This section applies only to Colorado residents. Under the Colorado Privacy Act (CPA), you have the rights listed below. However, these rights are not absolute, and in

certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are processing your personal data

- Right to access your personal data

- Right to correct inaccuracies in your personal data

- Right to request deletion of your personal data

- Right to obtain a copy of the personal data you previously shared with us

Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that

produce legal or similarly significant effects ('profiling')

To submit a request to exercise these rights described above, please visit contactsefwgames@gmail.com.

If we decline to take action regarding your request and you wish to appeal our decision, please email us at

Within forty-five (45) days of receipt of an appeal,

we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Connecticut Residents

This section applies only to Connecticut residents. Under the Connecticut Data Privacy Act (CTDPA), you have the **rights** listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- Right to be informed whether or not we are processing your personal data

Right to access your personal data

Right to correct inaccuracies in your personal data

■ Right to request deletion of your personal data

■ Right to obtain a copy of the personal **data** you previously shared with us

■ Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

To submit a request to exercise these rights described above, please visit contactsefwgames@gmail.com.

If we decline to take action regarding your request and you wish to appeal our decision, please email us at sefwgames@gmail.com.

Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Utah Residents

This section applies only to Utah residents. Under the Utah Consumer Privacy Act (UCPA), you have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

■ Right to be informed whether or not we are processing your personal data

■ Right to access your personal data

Right to request deletion of your personal data

■ Right to obtain a copy of the personal data you previously shared with us

Right to opt out of the processing of your personal data if it is used for targeted advertising or the sale of personal data

To submit a request to exercise these rights described above, please visit contactsefwgames@gmail.com.

Virginia Residents

Under the Virginia Consumer Data Protection Act (VCDPA):

'Consumer' means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

'Personal data' means any information that is linked or reasonably linkable to an identified or identifiable natural person. 'Personal data' does not include de-identified data or publicly available information.

'Sale of personal data' means the exchange of personal data for monetary consideration.

If this definition of 'consumer' applies to you, we must adhere to certain rights and obligations regarding your personal data.

Your rights with respect to your personal data

■ Right to be informed whether or not we are processing your personal data

■ Right to access your personal data

■ Right to correct inaccuracies in your personal data

■ Right to request deletion of your personal data

■ Right to obtain a copy of the personal **data** you previously shared with us

■ Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that

produce legal or similarly significant effects (profiling')

Exercise your rights provided under the Virginia VCDPA

You may visit contactsefwgames@gmail.com.

If you are using an authorised agent to exercise your rights, we may deny a request if the authorised agent does not submit proof that they have been validly authorised to act on your behalf.

Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorised

agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

Right to appeal