

Privacy and Cookie Policy

1. General

This Privacy and Cookie Policy (hereinafter – the “Privacy Policy”) governs collection, processing and use by VIREYE ENTERTAINMENT LTD (hereinafter – the “Vireye”) of user’s Personal Information that users provide when visiting the website <https://oumua.vireye.com/> and mobile application (hereinafter – the “Website”) to play the game “OuMua” or using the services provided by Vireye at the Website (hereinafter – “Services”).

2. Changes to this Policy

Vireye may occasionally update this Privacy and Cookie Policy. The user should frequently check this Privacy and Cookie Policy for any updates.

3. Collection of information

This Privacy Policy applies to all personal information the user provides to Vireye or that Vireye collects in connection with the use of Vireye’s services. Personal information does not include anonymized and/or aggregated data that does not identify a specific user.

The personal information that Vireye collects from the user may include but not limited to:

3.1. Information provided by you. If an online visitor submits information to Vireye, it will usually take the form of one of the following: (1) the purchase of goods or services through our online store , (2) product or account registration, or registration for online game participation, (3) player match-up services, (4) message boards, (5) a consumer complaint, (6) surveys, (7) customer service or technical support and/or (8) newsletters. Information collected may include your name, username, home address, country of residence, phone number, date of birth, and/or e-mail address, including the user's IP address and geolocation. We do not require this information to gain access to our websites, however, you will not be able to utilise certain products, services, or features that require registration or receive materials such as newsletters unless such information is provided.

In some very rare, specific and restricted cases, we may ask you to provide a copy partially obfuscated of a document or government-issued ID to verify your identity, location, and/or account ownership to comply with our legal obligations.

3.2. Information we get or generate from your use of our games or services. We collect information related to your game play and in-game activity, the services that you use and how you use them, and your devices and activities when you install or access our services to improve your player experience. Vireye may also monitor your computer, console, or other device (including mobile device) used to access and play games for the signatures of unauthorised programs and communicate this information back to Vireye about that unauthorised activity to prevent cheating and fraud.

3.3. Information collected from external sources. Vireye may enhance or merge the personal information collected from Vireye Website, application, and our game with data from third-party partners and vendors, in order to update your contact information, perform market analysis, improve our products, services, or systems, or for other purposes described in this Privacy Policy. As such, we may receive information about you and your activities from third parties when you link your account with external accounts (such as Facebook or Twitch) and from advertisers or service providers about your experiences or interactions with them. We might also obtain information about you from public sites on the internet, such as Twitch, Instagram and YouTube, to mention a few. For example, if you login to a site or app using Facebook Log In, you may be asked if you wish to share information from your Facebook account with us.

The user is not required to provide all of this information, but if the user chooses not to, the user may not be able to experience all of the services and features available on Vireye’s website.

We recognise that we have a special obligation to protect personal information obtained from children. We do not knowingly collect personal information from any child, or process such information, without parental consent. For the purpose of this Privacy Policy, a child means any individual who is under the age of 18 (or the minimum legal age to consent to the collection and processing of personal information where this is different under applicable law). If you are a parent or guardian and believe we have collected your child's information in violation of applicable law, contact us at legal@vireye.com. We will remove the information in accordance with applicable law.

4. Use of the personal information

Vireye will use the personal information collected from the user by Vireye for the following purposes:

- to provide you with the services you request, i.e., to allow your installation of the games, operate the services and verify and confirm your payments;
- to communicate with you about your account or transactions with us and send you information about features on our site or changes to our policies;
- to provide support including, but not limited to, product updates, services patches and fixes and other similar communications;
- receipt of gifts and awards, to which you may be entitled as a result of winning an offline competition, etc.

4.1. Communication purposes

We will use your personal information for our legitimate interests to advertise our services in accordance with this Privacy Policy. Namely, once you have created an account we may use your email address, nickname, IP address, mobile phone number, in order to send you personalized marketing emails, messages, targeted in-game and web offers about games. Also, if you opt-in, we will send you personalized marketing emails, messages and in-game and web offers.

4.2. In-game offers

We will also use the game-related information to send you in-game offers that we believe are most useful to you. To make the offer we first collect game-related information from various players, identify patterns in their behaviour, and create algorithms that identify pools of players following the pattern or particular players who follow the pattern. To those players who actually follow the pattern – we send the in-game offers, which can be personalized (i.e., we want the in-game offer to reach you or a relatively small number of players specifically) or non-personalized (i.e., we want the in-game offer to reach a large number of players following a pattern). We always make sure that such offers have no significant impact on you or our other players. You can unsubscribe from personalized in-game offers.

4.3. Services improvement purposes

We analyse your information to identify how to improve the services and our operations to make them more suitable and interesting for our players in general. We also may ask you to respond to our services-related surveys or questionnaires, and you always have the choice about whether to respond to them and which information you provide.

5. Disclosing personal information

Vireye may share user's personal information in the following ways:

- if the user enters a competition and the prize is being provided by a third party (which will be made clear to the user), Vireye may disclose the information the user submits when the user enters the competition to that third party;
- share user personal information with Vireye's partners, including but not limited to third-party data, service and software providers. Vireye's third-party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. Vireye ensures that such third parties are bound by terms that are no less protective than those described in this Privacy Policy, or those Vireye is subject to under applicable data protection laws. International transfers (e.g. to data centers) shall be undertaken in accordance with legal and regulatory requirements, using protected channels;

- Vireye may share user's personal information if and when required to fulfill legal and regulatory requirements by the Regulator, Tax authorities, other financial institutions and authorities in order to detect, investigate, including but not limited to, litigation proceedings, suspected illegal activities and fraudulent transactions investigation and/or reporting and/or prevention;
- Vireye may also disclose depersonalized/aggregated data about the users of Vireye's services in order to describe site information to prospective partners, advertisers, investors and other reputable third parties and for other lawful purposes such as to analyse and understand site usage, but these statistics will include no personally identifying information. In case of merge or acquisition, reorganization, etc, Vireye may need to disclose personal information to new entities within the group or potential acquirers and their advisers. Vireye will do so on the basis that the information is kept in confidence and used only in accordance with applicable law and this Privacy Policy.

Vireye may transfer your data outside of the European Economic Area ("EEA"). To ensure compliance with applicable data protection rules Vireye puts in place suitable technical, organizational and contractual safeguards (including Standard Contractual Clauses), the transfer is carried out in compliance with applicable data protection rules, except where the country to which the data is transferred has already been determined by the European Commission to provide an adequate level of protection.

6. User's acknowledgments

User clearly understands and, by continuing to use this website, gives the consent herewith that he is responsible for maintaining the confidentiality of user's password which, together with user's login and e-mail address, allows user to access certain features of the website.

By providing Vireye with user's e-mail address, user agree to receive all required notifications to that e-mail address. It is user's responsibility to update or change that address, when required.

In case of any unauthorized use of the personal/registration information, user agrees to notify Vireye immediately.

Vireye has the right to terminate or temporarily suspend user's access to all or any part of the website, without notice, for conduct that Vireye believes is violating or is in breach with these Terms of use and the Privacy policy or any of its policies or guidelines, or for any other reason in its sole discretion. Vireye will bear no responsibility or liability from such action.

When using the website, user must comply with all applicable laws, any applicable foreign or domestic regulatory authority, including rules against making false or misleading statements to manipulate the price and / or costs or any other data.

The user understands that Vireye may modify the terms of use and privacy policy at any time, without prior notice, and that continued use of the website constitutes acceptance of any such modifications.

7. Information Security

We design our systems with your security and privacy in mind. We work to protect the security of your personal information during transmission by using encryption protocols and software.

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your personal information. Our security procedures mean that we may ask you to verify your identity to protect you against unauthorized access to your account password. We recommend using a unique password for your account that is not utilized for other online accounts and to sign off when you finish using a shared computer.

8. The requirements of data protection laws

Vireye is committed to complying with applicable data protection laws and regulations. We will only collect and process personal information for the purposes stated in this Privacy Policy and will not use such information for any other purpose without obtaining the user's explicit consent. We will collect and retain personal information only as long as necessary to fulfill the purposes for which it was collected or as required by law. Vireye will ensure that appropriate technical and organizational measures are implemented to protect user's personal information from unauthorized access, disclosure, alteration, or

destruction. Users have the right to access, rectify, erase, and object to the processing of their personal information in accordance with applicable data protection laws.

9. User's data subject rights

If you have any questions or objection as to how we collect and process your personal information, please contact legal@vireye.com. We respect your data subject rights under relevant laws and regulations, including GDPR. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time.

In addition, subject to applicable law, you have the right to request access to, correct, and delete your personal data, and to ask for data portability. You may also object to our processing of your personal data or ask that we restrict the processing of your personal data in certain instances, by contacting legal@vireye.com.

Specifically, you have the following data subject rights:

- Right to access: you have the right to obtain confirmation that your data are processed and to obtain a copy of it as well as certain information related to its processing;
- Right to rectify: you can request the rectification of your data which are inaccurate, and also add to it. You can also change your personal information in your account at any time
- Right to delete: you can, in some cases, have your data deleted;
- Right to object: you can object, for reasons relating to your particular situation, to the processing of your data. For instance, you have the right to object to commercial prospection;
- Right to limit the processing: in certain circumstances, you have the right to limit the processing of your data;
- Right to data portability: in some cases, you can ask to receive your data which you have provided to us in a structured, commonly used and machine-readable format, or, when this is possible, that we communicate your data on your behalf directly to another data controller;
- Right to withdraw your consent: for processing requiring your consent, you have the right to withdraw your consent at any time. Exercising this right does not affect the lawfulness of the processing based on the consent given before the withdrawal of the latter;
- Right to define the instructions relating to the use of your personal data post mortem: you have the right to define instructions relating to the retention, deletion and communication of your data after your death;
- Right to lodge complaint to the relevant data protection authority.

10. Use of cookies

Vireye site uses 'cookies' to collect information in accordance with applicable data protection laws and regulations. Cookies are used for purposes such as enhancing user experience, providing analytics, and delivering personalized content. Vireye ensures that any use of cookies is lawful, fair and transparent to the user.

Users can manage their cookie preferences through their browser settings or through Vireye's preference management tools, if available. By using the website, users consent to the use of cookies in accordance with this Privacy Policy.

It is important to note that if the user chooses to decline cookies, some parts of Vireye's services may not function properly, and the user may not be able to fully experience all features of the website.

11. Retention

Vireye will hold the user's personal information for the period the user uses Vireye's services and no more than five years after. Personal data will be securely deleted or anonymized when it is no longer needed for the purposes for which it was collected or as required by applicable law. In the event of service termination, Vireye will securely delete the data or transfer it to a new service provider in accordance with legal and regulatory requirements. Please note that some data may be retained for longer periods as required by law, such as tax or accounting purposes.

12. Links to other websites

Vireye's services may contain links to, or have integration with, other websites or apps such as an exchange websites and apps and social media sites. Vireye shall bear no responsibility for the content, security or privacy policies used by other websites and apps. The user should carefully review these third parties' privacy policies to understand how these websites/apps proceed the personal information, in particular with regards to the data you provide Vireye with via such websites/apps.

13. Contact

In case the user shall have the queries regarding this policy, please contacted Vireye at legal@vireye.com. Vireye shall use all the efforts to provide the user with all the explanations and answers, and will work to address any questions or issues that you have with respect to the collection and processing of your personal information.