

ALAWAR ONLINE PRIVACY POLICY

A. INTRODUCTION

This privacy statement was last updated on October 22, 2018. Alawar Entertainment, Inc., a Delaware corporation, and its affiliates (collectively, "Alawar") has created this privacy statement in order to disclose our information gathering and dissemination practices for the internet websites alawar.com, alawarhry.cz, alawar.pl, alawar.es, alawar.fr, alawar.nl, alawar.com.br, alawar.com.pt, atarata.com, atarata.pl, atarata.cz, atarata.com/de, atarata.com/tr, atarata.ru, gamextazy.com and others (collectively, "Website"). While some of Alawar's Websites are deemed to be a U.S. websites, Alawar abides by the safe harbor framework as set forth by the U.S. Department of Commerce regarding the processing, collection, use, and retention of data from the European Union. Alawar will be the data controller within the meaning specified in The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). Upon reading this privacy statement, you will know:

1. The organization collecting the information.
2. What Personal information of yours or third party Personal information is collected from you through the Website.
3. How the information is used.
4. With whom the information may be shared.
5. Information relating to the use of this Website by children, and how parents can access their children's information.
6. The kind of security procedures that are in place to protect the loss, misuse or alteration of information under Alawar's control.
7. What choices are available to you regarding collection, use, distribution and other processing of the information.
8. How you can access, rectify, erasure Personal information collected and processed about you.

Questions regarding this statement should be directed to the Alawar Data Protection Officer by emailing privacy@alawar.com or writing at the following address:

Alawar Entertainment, Inc.
244 Fifth Avenue, Suite F164
New York, N.Y. 10001

To return to the Alawar home page, please use the "Back" button on your browser.

Word from the Company

Alawar has a strong commitment to providing superior service to all of our customers and visitors of this Website and particularly respecting your concerns about privacy. We understand that you may have questions about how this Website collects and uses information and we have prepared this statement to inform you of the privacy principles that govern the Website (the "Privacy Policy"). We will not sell or rent your Personal information or a list of our customers to third parties. However, as described in more detail in Part C below, there are limited circumstances in which some of your information will be shared with third parties, under strict restrictions, so it is important for you to review this Privacy Policy.

This Privacy Policy contains numerous general and technical details about the steps we take to respect your privacy concerns. We have organized this Privacy Policy by major processes and areas so that you can quickly link to the information of most interest to you.

In the sense of GDPR "Personal information" means any information that identifies directly or indirectly a particular individual, such as individual's name, postal address, e-mail, telephone number.

Changes in Privacy Policy

Alawar wants you to be always aware of what Personal information we collect, how we process and use it and under what circumstances we disclose it. All Personal information, as further described in Part B, that we process will be subject to the version of the Privacy Policy in effect at the time of such processing. Alawar reserves the right to change the Privacy Policy from time to time at its sole discretion, and will prominently post any material changes on the home page of the Website. You will be given the opportunity to opt-out. If as the result of such changes, you want to alter the ways in which Alawar is allowed to use your Personal information, you can do so by following the procedure described in Section Choices and Rights Available to You. You will be deemed to have been made aware of, and will be subject to, the changes to the Privacy Policy by your continued use of the Website after such notice has been posted for thirty (30) days with the following exception: if at the time you provide Personal information to Alawar you limit how such information will be used to communicate with you, either by Alawar or by third parties, Alawar will not change your preference in this regard without your express consent.

Third Party Websites

Alawar does not control the information collection and distribution policies on Internet domains other than those Internet domains that are under the control of Alawar itself. When you are on the Alawar Website, you may be directed to other sites that are beyond our control. These other sites may independently process data, solicit personal information, or send their own cookies to you. Alawar is not responsible for any use of the information including click-stream data created when using such third party sites.

Alawar may establish relationships with various service providers whose services may become available to you from this Website or from other websites that are linked to this Website. Typically, these providers would offer services that Alawar customers might find useful, such as those that can be used in conjunction with Alawar services and products. In order to use those services, you may be required to provide Personal information to the providers. Unless expressly provided to the contrary, Personal information that you provide while you are visiting a provider's website will be subject to the privacy policy posted on such site, and personal information that you provide while on this Website in conjunction with a provider's service will be subject to this Privacy Policy. You should be aware that our agreements with these service providers often provide that they will share with Alawar Personal information collected from you. In such instances, Alawar may use this information in a manner consistent with this Privacy Policy.

Legal Issues

Some of the Websites are United States websites and are subject to the laws of the United States. Alawar will disclose personal information without your permission when required by law, or in good faith belief that such action is necessary to investigate or protect against harmful activities to Alawar guests, visitors, associates, or property (including this Website), or to others. Laws related to Personal information vary by country. For example, personal information processed in the European Union is subject to the EU Directives and Regulations concerning personal data, privacy and electronic communications, including but not limited to The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector.

Alawar may be required by law enforcement or judicial authorities to provide Personal information to appropriate governmental authorities. If requested by law enforcement or judicial authorities, we will provide this information upon receipt of the appropriate documentation. Alawar may also provide information to law enforcement to protect its property and the health and safety of individuals as permitted by statute.

B. COLLECTED INFORMATION

Browsing

This Website does not collect Personal information from your Device (as this term is defined below) when you browse the Website and request pages from our servers. This means that, unless you voluntarily and knowingly provide us with Personal information, we will not know your name, your e-mail address, or any other Personal information. When you request a page from our Website, our servers log the information provided in the HTTP request header, JavaScript or similar technical

tools, including the IP number, the time of the request, the URL of your request and other passive, technical, aggregated information. We collect such indirect and passive information through Technologies as further specified in Section Online Tracking Technologies in order to make our Website function correctly and provide you the functionality that you see on this Website, as our servers use this information to deliver to you the pages on this Website. We also use this information to better understand how visitors use our Website and how we can better tune our Website, its contents and functionality to meet your needs.

Information We Collect

As a visitor to this Website, you can engage in many activities without providing any Personal information as described above in Section Browsing above. In connection with other activities, such as subscribing to the services offered on the Website, subscribing to periodic newsletters sent by Alawar, requesting customer support, downloading trial versions of software, utilizing online software applications or purchasing any of the products and services available on the Website, Alawar may ask you to voluntarily supply us with certain Personal information about yourself by filling out and submitting an online form. It is completely optional for you to engage in these activities and/or make any purchases. If you elect to engage in these activities or make purchases, however, Alawar may ask that you provide us Personal information, including but not limited to your first and last name, date of birth, e-mail address, telephone number and photo. This information is requested in conjunction with the purchase of our products, registration of an account on the Website, contacting us for customer support. In addition, as noted below, minimum information is requested if you choose to subscribe to our newsletter service.

You never have to answer any questions, and you can decline this exchange of information at any time. However, if you should choose to withhold requested information, we may not be able to provide you with some of the services dependent upon the collection of this information. Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity or purchase, you will not be able to engage in that activity or make such a purchase.

Credit Card information is not retained by us as part of the registration process. This information is processed by our payment and billing providers during the purchase process and never disclosed to us except that we may receive from our payment and billing partners and process a part of your credit card number (the last 4 numbers) and information about your credit card issuer. We keep this data to make your future purchases at our Website simpler.

You are provided an opportunity on the Alawar Website to subscribe to a periodic newsletter. This newsletter is a marketing tool that allows Alawar to inform you of new products or services, as well as other news relevant to the company. The subscription service requires you to provide your first and last name as well as your email address. Optionally, you are asked to provide the name of the company you represent. You are given the opportunity to choose the type of information we provide to you.

While the subscription list is maintained by a trusted third party affiliate, the list remains the sole exclusive property of Alawar. Your name and email address is not shared with any third party and will not be used to send you unsolicited communications. A link is provided to allow you to change your subscription preferences, including cancellation of your subscription.

When processing is required in order to comply with a legal obligation to which we are subject, we may also obtain information about you from our partners, e.g. from our payment and advertising partners. We only use the data controlled by our partners in accordance with their legitimate instructions and applicable laws.

In addition, we may use the information made publicly available, e.g. through YouTube, vk.com, Facebook, Instagram and Twitter, in order to find out your opinion about Website and our products, so that we could take them into account while improving our Website and products.

Alawar may collect information about the use of the Website, such as the types of services used and how many users we receive daily. This information is collected in aggregate form, without identifying any user individually. Alawar may use this aggregate, non-identifying statistical data for statistical analysis, marketing, or similar promotional purposes.

Alawar is the sole owner of the information it gathers on the Website. Alawar will only share your information with outside parties in ways that are described in this privacy statement or if we are

required to do so by law or in the good-faith belief that such action is necessary in order to conform to the edicts of the law, cooperate with law enforcement agencies, or comply with a legal process served on our Website.

Online Tracking Technologies

When you use the Website, Alawar or **third parties authorized by Alawar** that provide content, advertising, or other functionality on our Website, may use cookies, pixel tags, local storage, **mobile device identifiers** and other technologies (“Technologies”) to automatically collect information through the Website. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a “Device”) that allow us to record certain pieces of information whenever you visit or interact with our Website, and to recognize, identify you across Devices and when you sign into our Website. Such Technologies also help us to identify irregular Website behavior, prevent fraudulent activity, improve security, understand how our visitors use our Website, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our Website. The list of Technologies is specified below.

✓ **Cookies.** Our Website uses "cookie" technology. "Cookies" are short pieces of data generated by a web server that a website stores on a user's computer. Certain pages on our Website may require the use of a cookie for purposes of keeping information you enter on multiple pages together. Cookies also enable us to customize our Website and offerings to your needs and provide you with a better online experience with us. In addition, cookies are used to:

- allow registered users to sign in without typing their sign in name each time;
- measure usage of various pages on our Website to help us make our information; more pertinent to your needs and easy for you to access; and
- provide functionality such as online orders, Alawar's services and other functionality that we believe would be of interest and value to you.

Cookies do not, under ordinary circumstances, corrupt or damage your computer, programs, or computer files.

You may set your browser to block cookies (consult the instructions for your particular browser on how to do this), although doing so may adversely affect your ability to perform certain transactions, use certain functionality and access certain content on our Website.

Analytics Cookies. We use third-party analytics providers, including, but not limited to, Google Analytics, Google Optimize, Doubleclick and Yandex.Metrica (collectively “Third Party Analytics Providers”). These Third-Party Analytics Providers use Cookies on our Website. The information generated by the Cookies about your use of our Website may be transmitted to and stored by Third-Party Analytics Providers’ servers, which also may be located outside of the European Economic Area. On our behalf, the Third-Party Analytics Providers will use this information for evaluating your use of our Website, compiling reports on Website activity, and providing other services relating to Website activity.

We use the following Google Analytics cookies:

- **_ga** (also known as **_rollupGa**). The cookie is used to collect information and report website usage statistics. It expires after 2 years.
- **_gid** (also known as **_rollupGa_gid**). The cookie is used to distinguish users. It expires after 24 hours.
- **_gat**. The cookie is used to throttle request rate. It expires after 1 minute.
- **_gac_**. This cookie contains campaign related information for the user. AdWords website conversion tags will read this cookie in an anonymous form. It expires after 90 days.

We use the following Doubleclick cookies:

IDE and DSIS. This cookie enables features in Google Analytics that are not available through standard implementations. Advertising features include: remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting integrated services that require Google Analytics to collect data for advertising purposes, including the collection of data via advertising cookies and identifiers. The cookies expire after 2 years.

You can prevent Google’s collection and use of data (cookies and IP address) by

downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout>. Further information can be found under <http://www.google.com/analytics/terms/gb.html> (Google Analytics Terms of Service & Privacy). Please note that on our Website, Google Analytics, Google Optimize and Doubleclick code is supplemented by "gat._anonymizelp();" to ensure an anonymized collection of IP addresses (so called IP-masking). Also, you can prevent Google Analytics, Google Optimize and Doubleclick to collect such data on behalf of Alawar by clicking on the following link: <https://tools.google.com/dlpage/gaoptout>.

We use the following Yandex.Metrica cookies:

_ym_isad. This cookie helps to check if Adblock is enabled in user browser. It expires after 24 hours.

_ym_uid. This cookie is used to collect information and report website usage statistics. We use these cookies to improve user experience. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. It expires after 2 years.

_ym_visorc. This cookie enables session replays. This cookie is used for Webvisor feature in Yandex.Metrica reports, which enables "Sessions replays" (<https://yandex.com/support/metrica/general/counter-webvisor.html>). Yandex ensures that all collected information is depersonalised. The cookie expires after less than 1 day.

We also use some additional Yandex.Metrica cookies with the following expiry terms: sync_cookie_csrf expires after 1 day, i expires after 10 years, yandexuid expires after 10 years, yp expires after 10 years, sync_cookie_ok expires after 2 days.

While you can disable Yandex.Metrica cookies through your browser settings, you can also block collection of any data related to you by going to <https://yandex.com/support/metrica/general/opt-out.html>.

Alawar Cookies.

Some of our Websites use Cookies to store your account details to avoid you having to re-enter your information when re-joining our Websites.

actionBanner - Saved information if user already see our notification (2 hours)

cookieconsent_dismissed - Saved information that the user has been notified about using cookies on the site (1 year)

ALAWAR_AA - Saved account data for user to avoid re-enter information when re-joining our Sites. (1 year)

ALAWAR_SKIN_VER - Saved site background (1 hour)

ALAWAR_REDIRECT_SITE - Saved site address where user would be redirect according with his language preferences. (1 year)

ALAWAR_DESIGN - We use it for displaying a specific site design. (1 year)

ALAWAR_SM_ALAWAR_PID - Saved partner ID from whom user came to our site. (1 year)

ALAWAR_PARTNER_LANG - Saved preferred language for the affiliate program (till the end of the session)

ALAWAR_lastVisit - Saved users last visit (1 year)

ALAWAR_timezone_offset - Saved users timezone (1 year)

ALAWAR_visits - Saved number of visits to the site by user (1 year)

ALAWAR_downloaded_games - Saved a list of games downloaded by the user (1 year).

✓ **Other Third-Party Identifiers.** We may also use advertising identifiers of third party advertising companies for recognizing your Device, serving ads on our behalf that may be relevant to your interests, understanding the usefulness to you of such ads, measuring advertising effectiveness, allowing more effective targeted advertising. Depending on your Device, you can choose to change or limit the transmission of your advertising identifier by going into your Device

settings.

✓ **Social Media Widgets.** Some of our Websites include social media features such as the Facebook, vk.com “Like” button and other. These features may collect information including your IP address and which page you are visiting on our Website, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

Information for Affiliates and Software Developers

From time to time, companies or individuals who develop software may access this Website in an effort to enter into a business relationship with Alawar. In addition, owners of third-party websites may access this Website in an effort to affiliate with Alawar. Contact information for this purpose is posted on our Website. For these individuals and entities, in addition to information related to your business, Alawar reserves the right to request Personal information including but not limited to your full name, physical address, email address, telephone contact number, employer, etc. This information will normally be requested only in those situations where you are not contacting Alawar in the capacity of an agent or representative of an established business, and only in those circumstances where the information is required in order to consummate a business relationship. You may elect not to provide Personal information. However, failure to provide the requested information may hinder Alawar's ability to do business with you.

Information Relating to Children

The Alawar Website and any products or services available on that site are not directed at children under 13 years of age and, therefore, the Children's Online Privacy Protection Act ("COPPA") does not apply. However, we recognize that children under the age of 13 may access this Website and subscribe to the newsletter, purchase products and services, or download trial versions of software programs. The collection of information is covered above.

Parents and Legal Guardians may request from us to review, delete or stop the collection of the Personal information of their child. You may do so in one of two ways. If you know the user name and password or email address, follow the instructions below regarding Choices and Rights Available to You or you may contact us by letter, or email using the address information provided at the bottom of this page.

C. USE AND DISCLOSURE OF INFORMATION

How your Personal information is used

Alawar acquire, hold, use and process Personal information based on the legal grounds, in order to fulfill contract with you and for the legitimate business purposes outlined herein and according to Article 6(1) of the GDPR. We will use your e-mail address to send a confirmation and, if necessary, might use the other information to contact you for help to process the purchase or service you have selected. If you subscribe to a service or register a product, for example, the information is used to register your rights, if any, to technical support or other benefits that may be made available to registered users. Your Personal information is also used to keep you informed about product upgrades, patches, special offers, features on our Website and other products and services of Alawar and selected third parties if you have so opted to receive such communications.

Alawar uses the information required for our detection, investigation and prevention of cheating in the products or Website and end user license agreement violations only for the purposes of detection, investigation and prevention of such cheating. If the data can be used to prove that cheating or another fraud or end user license agreement violation has occurred, we will further store the data for the establishment, exercise or defense of legal claims during the applicable statute of limitations.

Alawar recognizes and appreciates the importance of responsible use of information collected on this Website. Without your consent, Alawar will not communicate any information to you regarding products, services, and special offers available from Alawar or its affiliates, although we may find it necessary to communicate with you regarding your use of the services on this Website. Except in the particular circumstances described in this Privacy Policy, Alawar will also not provide your Personal information to other companies or organizations without your consent.

Securing the Transmission and Storage of Information

Alawar operates secure data networks protected by industry standard firewall and password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary, and only authorized individuals have access to the information provided by our users. Even your registration account password is encrypted before it is sent to our computers. Any other particularly sensitive information, such as a customer's credit card number collected for a commerce transaction, is also encrypted prior to transmission.

Alawar takes steps to ensure that your information is treated securely and in accordance with our Terms of Use and this Privacy Policy. Unfortunately, no data transmission over the Internet can be guaranteed secure. As a result, while we strive to protect your Personal information, we cannot guarantee the security of any information you transmit to us or from our online products or services, and you use these services at your own risk.

We treat the information you provide to us as confidential information; it is, accordingly, subject to our company's security procedures and corporate policies regarding protection and use of confidential information. After Personal information reaches Alawar it is stored on a server with physical and electronic security features as customary in the industry, including utilization of login/password procedures and electronic firewalls designed to block unauthorized access from outside of Alawar. Because laws applicable to Personal information vary by country, our offices or other business operations may put in place additional measures that vary depending on the applicable legal requirements. Information collected on the Website covered by this Privacy Policy is processed and stored in the United States and also in other countries where Alawar and its service providers conduct business. By providing information to Alawar you consent to the storage of your Personal information in these locations. All Alawar employees are aware of our privacy and security policies. Your information is only accessible to those employees who need it in order to perform their jobs.

Disclosure of Information to Third Parties

Alawar does use the services of third parties, such as e-mail service providers, purchase and order processing merchants, web hosting, data management and storage service providers, marketing, advertising companies for delivery targeted advertisements, business partners providing services, products that you have requested or may be of interest to you that act as independent contractors on behalf of Alawar. These parties are contractually prohibited from processing Personal information for any purpose other than for performing legitimate contractual obligations or to comply with applicable legal requirements.

We do provide non-personal information to certain service providers for their use on an aggregated, anonymized basis for the purpose of performing their contractual obligations to us. We prohibit the sale or transfer of Personal information to entities outside of the Alawar's affiliates for their use without your approval.

Alawar may disclose your Personal information if we believe in good faith that we are required to do so in order to comply with applicable law, a subpoena, or other legal process. Alawar may also disclose Personal information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our Terms of use, this Privacy Policy or to protect the safety of our users and the public or under confidentiality and licensing agreements with certain third parties which assist us in developing, operating and maintaining the Website and its content.

In the event that all or substantially all of Alawar's stock and/or assets are transferred or sold to another entity, Alawar may transfer Personal information to the acquiring entity. If, as a result of such a business transition, your Personal information will be used in a materially different manner, you will be given choice consistent with our policy regarding notification of changes.

Choices and Rights available to you

You can always choose whether or not to disclose Personal information and that choice will not prevent you from using the Alawar Website. Please note, however, if you should choose to withhold requested information, we may not be able to provide you with some of the services dependent upon the collection of this information.

You control which name, date of birth, email, photo, phone number we associate with your account. If they change, please modify the data in your personal account directly. Please inform us if any of

the personal data we retain about you is inaccurate.

You can choose at anytime to opt out of receiving emails from Alawar or from having your Personal information shared with selected companies. If you want to opt out, you can do so by editing your preferences with respect to email or the sharing of information. If you elect to "opt out" we will not, as applicable, share your Personal information with third parties or send you emails.

We reserve the right to send a one-time registration confirmation email, and infrequent Service Alert messages to users to inform them of specific changes that may impact their ability to use a service they have previously signed up for, regardless of email contact opt-in status. We also reserve the right to contact you if compelled to do so as part of a legal proceeding or if there has been a violation of our Terms of Use or applicable licensing agreements.

You have the right to obtain deletion by Alawar of Personal information concerning you by deleting your account on the Website. If you request us to erasure your Personal information we will delete all Personal information about you, except for the data that are required for our compliance with the requirements of applicable laws (e.g. tax and accounting requirements) or for our detection, investigation and prevention of cheating in the products, Website and end user license agreement violations. We will retain anonymous information after your account has been closed.

Alawar is retaining these rights because in limited cases we feel that we may need the right to contact you as a matter of law or regarding matters that will be important to you. These rights do not allow us to contact you to market a new or existing service if you have asked us not to do so, and issuance of these types of communications are rare.

You may access and correct your Personal information and privacy preferences, opt out of receiving emails, newsletters, the sharing or retention of any Personal information, by writing at privacy@alawar.com or regular mail at Alawar Entertainment, Inc. 244 Fifth Avenue, Suite F164 New York, N.Y. 10001.

To ensure that your request is honored, you must provide Alawar with information sufficient for us to accurately identify and access your records. The information we require is your full name, date of birth and the email address you provided to Alawar when you requested services or products. Alawar reserves the right to contact you to verify that we have accurately identified your record.

Where processing of your Personal information is based on legitimate interests according to Article 6(1)(f) of the GDPR, you can use your right to object at any time. If you object we will no longer process your Personal information unless there are compelling and prevailing legitimate grounds for the processing or the data is necessary for the establishment, exercise or defence of legal claims.

You also have the right to lodge a complaint at a supervisory authority.

D. PRIVACY-RELATED INQUIRIES AND COMPLAINTS

Alawar takes and addresses its users' privacy concerns with utmost respect and attention. If you believe that there was an instance of non-compliance with this Online Privacy Policy with regard to your Personal information or you have other related inquiries or concerns, you may write or contact Alawar at privacy@alawar.com or Alawar Entertainment, Inc. 244 Fifth Avenue, Suite F164 New York, N.Y. 10001.

In your message, please describe in as much detail as possible the nature of your inquiry or the ways in which you believe that the Alawar Online Privacy Policy has not been complied with. We will investigate your inquiry or complaint promptly.

Please note that if you provide Alawar with inconsistent privacy preferences (for example, by indicating on one occasion that third parties may contact you with marketing offers and indicating on another occasion that they may not), Alawar cannot guarantee that your most recent privacy preference will be honored.



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