

The Phoenix Entertainment Privacy Policy

Effective date: 3rd December 2019

The Phoenix Entertainment India Private Limited is hereinafter referred to as “**The Phoenix Entertainment**”, “**We**”, or “**Us**”.

We thank you for playing our games. Your privacy is most significant to us, and we deem it as our duty to care for it seriously; therefore, we conduct our business in compliance with applicable laws on data privacy protection and data security. We hope the policy outlined below will help you understand what data The Phoenix Entertainment may collect, how The Phoenix Entertainment uses and safeguards that data and with whom we may share it.

PRIVACY POLICY

This privacy policy (“Privacy Policy”) is incorporated by reference into the The Phoenix Entertainment Terms of Service (the “Terms Of Service”). This Privacy Policy explains our online and offline information practices, the kinds of information we may collect, how we intend to use, store, protect, disclose and share that information, and how you can opt out of a use or correct or change such information.

WHAT DOES THIS PRIVACY POLICY APPLY TO?

This Privacy Policy applies to personal information (“**Personal Information**”) and other information that is processed by The Phoenix Entertainment in the course of our business, including on the The Phoenix Entertainment website (“**Site**”), mobile applications (“**Apps**”), forums, blogs, and other online or offline offerings (together with any and all future online and offline offerings operated by or on behalf of The Phoenix Entertainment (the “**Services**”)). All individuals whose responsibilities include the processing of Personal Information on behalf of The Phoenix Entertainment are expected to protect that data by adhering to this Privacy Policy.

By visiting, installing, using or otherwise accessing the Services, you agree to this Privacy Policy and the Terms of Services of The Phoenix Entertainment and give an explicit and informed consent to the processing of your Personal Information in accordance with this Privacy Policy. Please do not install or use the Services if you do not agree to this Privacy Policy or the Terms of Services.

We do everything we reasonably can to protect your rights of privacy on downloadable software in the nature of mobile applications, games on mobile app-stores like Apple, Google and other partners, but we are not liable for any unauthorised or unlawful disclosures of your personal and confidential information made by third parties who are not subject to our control (for example advertisers and websites that have links to our Site or Apps). You should take note that the information and privacy practices of our business partners, advertisers, sponsors or other sites to which we provide hyperlinks, may be different from ours. Please note that The Phoenix Entertainment is not responsible for the actions of third parties, the content of their sites, the use of information you provide to them or any services they may offer.

We also use third parties for various activities related to our Services, including customer support, technical support, contest data collection, and email fulfillment. When you enter a contest or sign up to receive a newsletter, we may share your personal information as necessary for third parties to provide services on our behalf.

The Phoenix Entertainment reserves the right to modify this Privacy Policy and your continued use of the Services shall mean your acceptance of the changes to this Privacy Policy.

WHO DO WE COLLECT INFORMATION FROM?

The Phoenix Entertainment collects Personal Information and other information regarding its current, prospective, and former clients, customers, users, visitors, and guests (collectively “**Individuals**”).

WHAT INFORMATION DO WE COLLECT?

The types of Personal Information we may collect (directly from you or from third-party sources) and our privacy practices depend on the nature of the relationship you have with The Phoenix Entertainment and the requirements of applicable law. Some of the ways that The Phoenix Entertainment may collect Personal Information include:

you may provide Personal Information directly to The Phoenix Entertainment through interacting with the Services, participate in Services feedback, questionnaires, surveys, or contests or participating in forums discussions, and requesting Services, or information; and

as you navigate the Services, certain passive information may also be collected about your visit, including through cookies and similar technologies as described below.

Primary goals in collecting information are to provide and improve our Services, to administer your use of the Services and to enable you to enjoy and easily navigate our Services. We endeavor to collect only that information that is relevant for the purposes of processing. Below are the ways we collect Personal Information and how we use it.

1. Information Collected from Third-parties when Installing and Playing the Games

If you play any of the games or use any of the Services on connected third-party applications or connect the Services to any third-party applications, like Apple or Google and/or from Social Networking Sites ("SNS") such as Facebook, we may receive certain information about you from the provider of the third-party application. The information received depends on the third-party application, your privacy settings and, if applicable, your friends' privacy settings on that third-party application.

When you connect with the Services through an SNS, the information that The Phoenix Entertainment collects may include your first and last name, your SNS user identification number and/or user name, your profile picture or its URL, location, sex, the login e-mail you provided to that third-party application when you registered with the SNS, age-range (e.g. min 21), locale, language of your application, time zone and the SNS user identification numbers for your friends who are also connected to the Services.

When you use any of the Services, games or applications on a mobile platform, The Phoenix Entertainment may collect and record certain information such as your unique device ID (persistent/non-persistent), your device operating system, version, model, CPU, amount of RAM and disk space, hardware type, Identifier For Advertising (IDFA), Advertising ID, the version of your operating system ("OS"), your device name, Game Center ID, and your location based on your Internet Protocol ("IP") address. This information is useful to The Phoenix Entertainment for troubleshooting and helps The Phoenix Entertainment understand usage trends.

As part of the payment processing through third parties, The Phoenix Entertainment does not collect, store and use personally identifiable information, such as your name, address, credit card number, phone number, and your e-mail address. The Phoenix Entertainment does not have access to your credit card or bank account data. However, third party payment processors may share non-financial information with us related to your purchases, like the items purchased to fulfill your order.

You can manage the information The Phoenix Entertainment receives about you from a third-party application, like Facebook, on which you play our games and you will need to follow the instructions for the third-party application for changing your privacy settings. You also can manage some aspects of information collection and use by visiting the settings page of your mobile device and reviewing the permissions of each application (app).

If you access our Services from a third-party application or connect our Services to a third-party application, you should also read that third-party application's terms of service and privacy policy.

2. Information collected directly from you

You may provide information directly to The Phoenix Entertainment when you:

- use or access the Services or make in-app purchases;
- connect with or access our Services using a third party ID or log-in, such as an ID for a social networking site or gaming service;
- contact others using our Services, including when you use chat, "tell a friend," "email this page," or other similar features;
- contact us, including for customer or technical support;
- register for The Phoenix Entertainment offers, contests, or special events;

- subscribe to newsletters; and/or
- complete surveys sent by us or on our behalf.

Depending on how you choose to use the Services, this information may include things like your first and last name, user name or handle, third party service ID, email address, phone number, photo, avatar or other image, date of birth, gender, purchase or payment information, address or shipping information, chat data, friends' names and contact information, location information and other information.

3. Information collected from your devices / Automated data collection:

Automated data collection includes:

- data about your account and game progress;
- your IP address and mobile device identifiers (such as your device ID, advertising ID, MAC address)
- data about your device, such as device name and operating system, browser type and language
- data we collect with cookies and similar technologies (see more below)
- data about your use of the Service, such as gameplay data and your interactions with other players inside the Service

In certain cases, we may also create a Unique ID and Encrypted ID for you when you use the Service.

You may limit sharing of this information at any time by changing the relevant preferences and permissions on your mobile device.

4. Cookies and similar technologies

We or the service providers acting on our behalf may use cookies, beacons, software development kits, mobile analytics software, and/or similar technologies for a number of purposes, including to authenticate users, prevent fraud, remember preferences and settings, analyze advertising and messaging campaigns, analyze traffic and trends, personalize content (including ads), and otherwise provide the Services. These technologies may collect information about your use of our Services, pages you view, links you tap, messages you open, and other actions taken in connection with our Services. You can disable cookies in your browser settings, but this could affect the availability and functionality of our Services. For information on interest-based advertising and how to opt out, see the Interest-Based Advertising section below.

5. Transactional information

Transactional history (other than banking details) about your e-commerce activities (if requested and provided).

6. Ad Networks

The Phoenix Entertainment may feature advertising within the Services. The advertisers may collect and use information about you such as:

- performance and game contextual data like your games session activity;
- aggregated and/or de-identified information that is not intended to specifically identify a user; and
- technical information such as device identifier, Advertising ID, and IP address.

Ad Networks may use this information to provide interest-based or targeted advertisements to you.

In some cases, we may enable you to access third party products or services through our Services. Please note that those products or services are offered by people or companies not affiliated with or controlled by us, and we are not responsible for their actions, their terms, their use of information, or their products or services. If you submit your information to a third party, that third party's treatment of your information is governed by their privacy policy, which may differ from this Privacy Policy and which we encourage you to review.

WHO DO WE COLLECT INFORMATION FROM?

1. We collect, store, use and process Personal Information for a variety of business purposes, including:

- to operate, improve and optimize our games and other Services;
- to create game accounts and allow users to play our games;
- to personalize our Services, understand our users and their preferences to enhance user experience and enjoyment using our Services and improve our users' experience;
- to provide access to certain areas, functionalities and features of our Services;
- to notify you about in-game updates, new products or promotional offers;
- to send related information, including confirmations, technical notices, updates, and security alerts and support and administrative messages;
- to enable players to communicate with each other in games;
- to respond to your comments and inquiries and provide customer support services;
- to prevent potentially prohibited or illegal activities and protect our players;
- to measure interest in our Services;
- to ensure internal quality control; and
- to verify Individual identity.

2. Inform you about our games, products and Services

The Phoenix Entertainment may use Personal Information to provide you with materials about offers, products and Services that may be of interest, including new games, content or Services. The Phoenix Entertainment may provide you with these materials by in-game offers, push notification, online or offline marketing or email, as permitted by applicable law, including:

- to deliver advertising and marketing and promotional information to you;
- to tailor content, advertisements and offers;
- to notify you about products and services or upcoming special offers/events that may be interest of you; and
- to notify you about rewards, surveys, contests or other promotional activities or events sponsored or managed by us or our business partners.

You can opt out at any time from receiving such materials by clicking on the opt out link provided in all marketing mailings, by turning off notifications from mobile device or by sending an email to [dpo@The Phoenix Entertainment .com](mailto:dpo@ThePhoenixEntertainment.com) without incurring any costs.

3. Send Push Notifications

The Phoenix Entertainment may occasionally use push notifications through The Phoenix Entertainment ' mobile applications to send you game updates, high scores and other Services-related notifications that may be important to you. You may at any time opt out from receiving these types of communications by turning them off at the device level through your settings.

4. Use Anonymous and Aggregated Information

We may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services or other analyses we create. Anonymized and aggregated information is used for several functions, including the measurement of visitors' interest in and use of various portions or features of the Services. Anonymized or aggregated information is not Personal Information, and we may use such information in a number of ways, including research, internal analysis, Analytics and any other legally permissible purposes. We may share this information

within The Phoenix Entertainment and with third parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

HOW WE MAY DISCLOSE YOUR INFORMATION

We may share the information we collect about you in various ways, including:

1. Service providers

We may share any information we receive with Service Providers. The types of Service Providers (processors) to whom we entrust Personal Information include Service Providers for: (i) provision of IT and related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the Services. The Phoenix Entertainment has executed appropriate contracts with the Service Providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.

2. Other players and users

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

3. Marketing - Interest-based or targeted advertising and third-party marketing.

Through our Services, The Phoenix Entertainment may allow third-party advertising partners to set tracking tools (e.g., cookies) to collect the following information within our Services:

- performance data (like the number of clicks on an advertisement);
- certain technical information (for example, IP addresses, non-persistent device identifiers such as Advertising ID and de-identified persistent device identifiers such as a hashed Android ID);
- other contextual data about your game play (for example, your level and session length); and
- pseudonymous data, not directly identifying information (e.g., OS name and versions, device models, time stamp).

These advertising partners may use this information (and similar information collected from other websites) to measure how effective ads are for delivering targeted advertisements to you about our games within their networks. This practice is commonly referred to as “interest-based or targeted advertising.” We may allow access to other data collected by the Services to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to you.

4. Disclosures under applicable law

We may access, preserve, and disclose your Personal Information, other account information and content if we believe doing so is required or appropriate: (i) to comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) to respond to your requests; (iii) to protect yours, ours or others’ rights, property or safety; (iv) to enforce The Phoenix Entertainment’s policies or contracts; (v) to collect amounts owed to The Phoenix Entertainment; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vii) if we, in good faith, believe that disclosure is otherwise necessary or advisable.

In addition, from time to time, server logs may be reviewed for security purposes—e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be shared with law enforcement bodies, so they may identify users in connection with their investigation of the unauthorized activities.

5. Merger, sale, or other asset transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, The Phoenix Entertainment will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

INTEREST-BASED ADVERTISING

We work with third party advertising partners like Google, Apple and their partners. We may share certain of your information with these partners to make advertising more relevant, measure its effectiveness, and help recognize your devices and serve ads. We or they may also employ cookies or similar technologies, as described above, to ensure appropriate advertising and personalized experiences. Please note that our ad partners may combine your information with other information they have independently collected, and may treat that information in accordance with their privacy policies.

If you would prefer to opt out of having information about your mobile app usage used for interest-based advertising, you may do so through your device settings ("Limit Ad Tracking" on iOS and "Opt Out of Ads Personalization" on Android). Please note that you may continue to receive generic ads that are not based on your preferences.

THIRD-PARTY PAYMENT PROCESSING

We may sell virtual items or merchandise through our Services. When you make purchases through the Services, we process your payments through a third-party application, including the Apple App Store and Google Play App Store (together with any similar applications, "App Stores"). The third-party application may collect certain financial information from you to process a payment on behalf of The Phoenix Entertainment, including your name, email address, address and other billing information. App Stores do not share this information they collect from you with us.

THIRD-PARTY ADVERTISING COMPANIES:

ADcodes and Analytics Partners

Our app contains ADS from Ad networks/ Ad Mediation networks/ AD agencies ("Advertisers") and codes from Analytic tools company and can contain codes for profiling the device on media consumption and other device data and utilizing the same to target relevant content and ads to the device. To comply with the European Union GDPR guidelines and pursuant to our agreement with the Advertisers and Analytics Tool Companies, we are hereby including Privacy Policy Link of such companies. By agreeing to our Privacy Policy you are giving consent for processing any personal information or information by the Advertisers in connection with the agreement between The Phoenix Entertainment and the Advertisers.

- IronSource Privacy Policy : <https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>
- Facebook Privacy Policy : <https://www.facebook.com/about/privacy>
- Applovin Privacy Policy : <https://www.applovin.com/privacy/>
- MoPub Privacy Policy : <https://www.mopub.com/legal/privacy/>
- Mintegral Privacy Policy : <https://www.mintegral.com/en/privacy/>
- Unity Privacy Policy : <https://unity3d.com/legal/privacy-policy>
- Pubnative Privacy Policy : <https://pubnative.net/privacy-policy/>
- Soomla Privacy Policy : <https://soomla.com/privacy-policy.html>
- MobFox Privacy Policy : <https://www.mobfox.com/privacy-policy/>
- Fyber Privacy Policy : <https://www.fyber.com/legal/privacy-policy/>
- Ogury Privacy Policy : <https://www.ogury.com/privacy/>
- WP Engine : <https://wpengine.com/wp-content/uploads/2018/05/WP-Engine-Privacy-Policy-05-10-2018-1.pdf>
- Microsoft : <https://privacy.microsoft.com/en-us/privacystatement>
- AdColony : <https://www.adcolony.com/privacy-policy/>
- AppsFlyer Privacy Policy : <https://www.appsflyer.com/privacy-policy/>

- InMobi Privacy Policy : <https://www.inmobi.com/privacy-policy/>
<https://www.inmobi.com/privacy-policy-for-eea/>
- Smaato Privacy Policy : <https://www.smaato.com/privacy/>
- VRTCAL Markets, Inc Privacy Policy : <https://vrtcal.com/docs/PrivacyPolicy-Advertising.pdf>
- Oath, Flurry, AOL, Verizon : <https://www.oath.com/our-brands/>
<https://policies.oath.com/us/en/oath/privacy/index.html>
- Vungle: <http://vungle.com/privacy/>
- Tapjoy: <https://www.tapjoy.com/legal/tapjoy-users/#privacy-policy>
- YouAppi: : <https://www.youappi.com/privacy-policy/>
- Google Adwords, Google AdSense, Google Admob, Double Click:
<https://privacy.google.com/businesses/controllerterms/>
- Chartboost: <https://answers.chartboost.com/en-us/articles/200780269>
- Yandex: <https://yandex.com/legal/confidential/?lang=en>

Using the Google Ads Settings <https://www.google.com/settings/ads>, you can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads. You can also opt-out by downloading and installing the Google Analytics Opt-out Browser Add-on <https://tools.google.com/dlpage/gaoptout/> for your web browser.

In addition to the general limitations in the above terms, we will not be liable to you or any other third party for any damages suffered by you or any other third party howsoever arising from the disclosure of your Personal Information. Your only remedy under such circumstances will be to end this agreement.

GDPR CLASSIFICATIONS

Many types of data we process qualify for multiple legal bases for processing under the General Data Protection Regulation ("GDPR"). Below is the primary legal basis for each type of data that we process:

- We have a legitimate interest in conducting analytics, measurement of usage and conversions, and game telemetric to improve our Services. We and our processors have multiple measures in place to minimize the privacy impact.
- We have a legitimate interest in storing users' purchase history for the purpose of providing users help in fixing purchase and payment issues
- We have a legitimate interest in enabling third party ads and data collection on our sites and apps to help provide a more customized ad experience for our users and site visitors. Our reputable partners provide opt outs and numerous other privacy measures to minimize the privacy impact of online ads.
- We have a legitimate interest in periodic email and direct marketing, to inform registered users of updates and offers. We make clear disclosures when users sign up and offer opt outs for anyone not interested.

It is contractually necessary to process your username, email, password, cookie data, IP address, game network IDs, game information and similar information to fulfil our obligations in the Terms of Services to provide you with high quality games and a social game network from ourselves and our partners.

INTERNATIONAL TRANSFER

All Personal Information collected via or by The Phoenix Entertainment may be stored anywhere in the world, in the cloud or the servers of our service providers. When we transfer your Personal Information internationally, we will take reasonable steps to ensure that it is treated securely, lawfully and in the manner we describe in this Privacy Policy. Please note that laws vary from jurisdiction to jurisdiction, so the privacy laws applicable to the places where your information is transferred to or stored, used or processed in may be different from the privacy laws applicable to the place where you are resident.

By providing information to The Phoenix Entertainment , you consent to the storage of your Personal Information in these locations.

If you are using our Services from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to India and other countries and to the processing of your data globally. This transfer is required to host the Services, provide you with technical and customer support services, perform backups of your data, and to process your payment details if you make any in game purchases.

By choosing to visit the Site, using our Apps, utilizing the Services or otherwise providing information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the laws of India and the adjudication of any disputes arising in connection with The Phoenix Entertainment or the Site will be in accordance with the Terms Services.

OPT OUT (RIGHT TO RESTRICT PROCESSING)

You have the right to opt out of certain uses and disclosures of your Personal Information. When you have consented to The Phoenix Entertainment ' processing of your Personal Information other information, you may withdraw that consent at any time and opt out to further processing by opening an in-game support ticket or, alternatively, by contacting dpo@ThePhoenixEntertainment.com. Even if you opt out, we may still collect and use anonymized, non-Personal Information regarding your activities on our Services.

Please also note that certain records, for example, those relating to payments or customer service matters, will be held for legal and accounting purposes. If you have sent content through or posted content on the Service, we may not be able to delete it.

■ **1. Email Communications**

- If you receive an unwanted email from us, you can use the unsubscribe link at the bottom of the email to opt out of receiving future emails. We will process your request within a reasonable time after receipt. Note that you will continue to receive transaction-related emails regarding products or Services you have requested.

Mobile devices

- The Phoenix Entertainment may occasionally send you push notifications through our mobile applications with game updates, high scores and other notices that may be of interest to you. You may at any time opt out from receiving these types of communications by changing the settings on your mobile device. The Phoenix Entertainment may also collect location-based information if you use our mobile applications. You can opt out of this collection by changing the settings on your mobile device.

3. Cookies and internet-based or targeted advertising

As noted, you may stop or restrict the placement of Cookies on your computer or remove them from your browser by adjusting your web browser preferences.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from our data partners and our other advertising partners that participate in self-regulatory programs. You can also choose not to be included in Google Analytics [here](#). Please note that these opt out tools are provided by third parties, and The Phoenix Entertainment does not operate or control these tools or the choices that advertisers and others provide through these tools.

On mobile devices, you can reset the Advertising Identifier (like an IDFA) from your mobile device's settings page, which will prevent continued use of existing behavioral data tied to the previous Advertising Identifier. Furthermore, depending on the platform provider (such as Apple or Google), you may be able to download apps, such as the Digital Advertising Alliance's "AppChoices" app, that provide you with control regarding the collection and use of cross-app data for tailored advertising. Like the opt out tools mentioned for web, these opt out tools are provided by third parties, and The Phoenix Entertainment does not operate or control these tools or the choices that advertisers and others provide through these tools.

To be clear, whether you are using our opt out or an online industry opt out, these cookie-based opt outs must be performed on each device and browser that you wish to have opted out. For example, if you have opted out on your computer browser, that opt out will not be effective on your mobile device.

RIGHTS OF ACCESS, RECTIFICATION, ERASURE AND RESTRICTION

You have the right to request access to and rectification or erasure of Personal Information. You can manage your information as described in this Privacy Policy, and you may have additional rights related to that information as described below. You can exercise these rights by opening a help ticket directly in-game via the 'Help' section, or by emailing The Phoenix Entertainment at [dpo@The Phoenix Entertainment .com](mailto:dpo@ThePhoenixEntertainment.com). Please note that we will need sufficient information establishing your identity in order for us to fulfill your request. Where we can validate your identity, we will process any such request within a reasonable timeframe and in accordance with applicable law.

- **1. Accessing, Updating, or Correcting Your Data**

- You are expected to maintain accurate, complete, and up-to-date information in connection with your account, but we provide you functionality to update or correct your information directly in-app. You can also access a range of information in-app, including things like your user name, picture or avatar, game performance and progress, virtual items, chats, or other information you may have entered in-app. For any information that you are not able to access or update directly, please open an in-game help ticket via the 'Help' section for that particular game, or contact [dpo@The Phoenix Entertainment .com](mailto:dpo@ThePhoenixEntertainment.com). **2. Deletion of Your Data**

You have the right to request deletion of your personal information, subject to our data retention policy mentioned below. If you would like to have your personal information deleted with respect to any games you've played, please open an in-game help ticket via the 'Help' section for that game. If you have played multiple The Phoenix Entertainment games and want to have your personal information deleted as to all of them, please open a help ticket directly in-game via the 'Help' section for each of those games, or contact [dpo@The Phoenix Entertainment .com](mailto:dpo@ThePhoenixEntertainment.com) for help. Please note that if you delete your personal information, you may no longer use or access the Services, and that if you share devices with someone else who uses the Services, that person may lose game progress or related account information and access. If you decide to use or access the Services again, The Phoenix Entertainment may consider this a new account and may collect personal information associated with that account in accordance with this Privacy Policy.

DATA RETENTION

The Phoenix Entertainment retains the Personal Information collected as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements and comply with applicable laws.

SECURITY OF YOUR INFORMATION

We follow generally accepted industry standards and maintain reasonable safeguards designed to secure and prevent unauthorized access to the information in our possession. Personal information is stored in secure operating environments, and only those at The Phoenix Entertainment with a legitimate business need to do so may access your personal information. We also take reasonable steps to assure that third parties to whom we transfer information will provide protections appropriate to that type of information. If you have reason to believe that your interaction with us is no longer secure, please immediately contact us.

LINKS TO NON-The Phoenix Entertainment WEBSITES

We may also provide you with general links to non-The Phoenix Entertainment websites. Your use of these links is subject to the third parties' privacy policies, and you should become familiar with the third-party sites' privacy policies before using the links. The Phoenix Entertainment is not responsible for the privacy practices or the content of those other websites.

CHILDREN'S PRIVACY

The Services are not directed to children under 13, and The Phoenix Entertainment does not knowingly collect Personally Information from children under 13. If you are under 13, please do not send any data about yourself to us, including your name, address, telephone number, or email address. If you are a parent or legal guardian of a child under the age of 13 (or under 16 in certain jurisdictions in the European Union) who uses our games, please contact us at [dpo@The Phoenix Entertainment .com](mailto:dpo@ThePhoenixEntertainment.com). We will delete your child's Personal Information if we are able to identify your child unless you provide us with your verifiable consent for your child to continue to use our games.

REDRESS/ COMPLIANCE AND ACCOUNTABILITY

If you have any questions about our privacy practices or this Privacy Policy, please contact The Phoenix Entertainment by email at [dpo@The Phoenix Entertainment .com](mailto:dpo@ThePhoenixEntertainment.com). We will address your concerns and attempt to resolve any privacy issues in a timely manner.

Complaint Escalation

If you are not satisfied with the way your query or complaint is handled by The Phoenix Entertainment , please let us know by emailing us at [management@The Phoenix Entertainment .com](mailto:management@ThePhoenixEntertainment.com).

CHANGES TO OUR PRIVACY POLICY AND PRACTICES

1. Revision to the Privacy Policy

We may revise this Privacy Policy at our sole discretion, so review it periodically. If you continue to visit this Site and use the services made available to you after such changes have been made, you hereby provide your consent to the changes.

2. Posting of Revised Privacy Policy

If there are any material changes to this Privacy Policy, The Phoenix Entertainment will notify you by email or as otherwise required by applicable law. We will post adjustments to the Privacy Policy on this web page, and the revised version will be effective immediately when it is posted (or upon notice as applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.

3. New Uses of Personal Information

Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. When consent of the Individual for the processing of Personal Information is otherwise required by law or contract, The Phoenix Entertainment will endeavor to comply with the law or contract.