# PRIVACY POLICY

Last Updated: February 1, 2024

Bitsworld INC ("we," "our," and/or "us") value the privacy of individuals who use our website, mobile applications ("Apps"), and related services (collectively, our "Services"). This privacy policy (the "Privacy Policy") explains how we collect, use, and share information from users of our Services ("Users") to improve the gaming experience. If you reside in California or Virginia, please refer to our U.S. Privacy Addendum below for supplemental information.

By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond this Privacy Policy, your use of our Services is subject to our Terms of Service.

# INFORMATION WE COLLECT

We may collect a variety of information from or about you or your devices from various sources, as described below. If you do not provide your information as requested, you may not be able to use our Services if that information is necessary to provide our Services or we are legally required to collect it.

#### Information You Provide Us.

Registration and Profile Information. If you link our Services to a third party account, such as a Game Center, Google Play, or Facebook account, we may receive information about you from these third party services such as your email address, profile information, and friends list. If you wish to limit the information these third parties make available to us, we encourage you to

visit the privacy settings for those third party accounts to learn about your options.

**Payment Information.** All purchases, including all in-app purchases, are handled by App store platforms such as Apple and Google. Outside of a payment receipt, which we receive for refund purposes and includes the date of purchase, the item purchased, and an anonymous identification number, we do not collect any payment information.

Communications. If you contact us directly, we may receive additional information about you. For example, if you contact our customer support team, we will receive your name, email address, device identifiers, phone manufacturer, operating system version (e.g., iOS or Android) the contents of the message and any attachments you may send to us, and any other information you choose to provided. If you subscribe to our newsletter, we will collect certain information from you such as your email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.

**Careers.** If you decide that you wish to apply for a job with us, you may submit your contact information and your resume online. We will collect the information you choose to provide on your resume, such as your education and employment experience.

### Information We Collect When You Use Our Services.

**Location Information.** When you use our Services, we infer your general location information based on technical information such as your internet protocol (IP) address, which may indicate your more general geographic region. **Device Information.** We automatically collect certain technical

information about the device and software you use to access our Services, including your IP address, operating system version (e.g., iOS, Android), web browser type, phone manufacturer, device identifiers, media access control (MAC) address, and push notification tokens.

**Your Contacts.** If you give us permission to import your contacts from a third party account you link to our Services, such as your Game Center, Google Play, or Facebook account, we may access and store names and contact information from your address book to facilitate invitations and social interactions that you initiate through our Services and for other purposes described in this Privacy Policy or at the time of consent or collection. We also collect your contacts if you invite them to use our Services or share information or content with them from our Services.

Information from Cookies and Similar Technologies. We and third party partners collect information using cookies, pixels, or similar technologies. Our third party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files that contain a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services. Please review your web browser "Help" file to learn the proper way to modify your cookie settings. Please note that if you delete, or choose not to accept, cookies from our Services, you may not be able to utilize the features of the Service to their fullest potential.

Information We Receive from Third Parties. Other Third

**Parties.** We may receive additional information about you, such as demographic data, from third parties such as data or marketing partners and combine it with other information we have about you.

# HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect:

- To provide, maintain, improve, and enhance our Services;
- To personalize your experience on our Services such as by providing tailored content and recommendations;
- To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- To communicate with you, provide you with updates and other information relating to our Services, provide you with information that you request, respond to comments and questions, and otherwise provide customer support;
- To facilitate the connection of third party services or applications, such as social networks and gaming apps;
- For marketing and advertising purposes, such as developing and providing promotional and advertising materials that may be relevant, valuable, or otherwise of interest to you;
- To send you push notifications;
- To facilitate transactions and payments;
- To process your job application;
- To find and prevent fraud and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and • For other purposes for which we provide specific notice at

the time the information is collected.

# HOW WE SHARE THE INFORMATION WE COLLECT

**Affiliates.** We may share any information we receive with our affiliates for any of the purposes described in this Privacy Policy.

**Vendors and Service Providers.** We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

**User Content.** Our Services are social services in which you can find, enjoy, and share content. If you choose to share content, like the games you're playing, with other Users, your username will be viewable by those Users. We are not responsible for the other users' use of available information, so you should carefully consider whether and what to post or how you identify yourself on the Service.

**Third Party App Integrations.** If you connect a third party application to our Services, we may share information such as your device identifier with that third party.

Social Networks and Other Online Services. The Service allows you to, upon your direction, share information with social networking services, such as Twitter, Facebook and Instagram. You understand and agree that the use of your information by any social networking websites will be governed by the privacy policies of these third party platforms and your settings on that platform. We encourage you to review their privacy policies.

Marketing. We may share information about you with third

parties that is in an aggregate or de-identified form that cannot reasonably be used to identify you.

Analytics Partners. We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information regarding your use of other websites, apps, and online resources. You can learn about Google's practices by going to <a href="https://www.google.com/policies/privacy/partners/">https://www.google.com/policies/privacy/partners/</a>, and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.

Advertising Partners. We work with third party advertising partners to show you ads that we think may interest you. These advertising partners may set and access their own cookies, pixel tags and similar technologies on our Services and they may otherwise collect or have access to information about you which they may collect over time and across different online services. If you do not wish to

receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt out of personalized ads in mobile apps.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through our Services.

Merger, Sale, or Other Asset Transfers. We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable information was collected.

**Consent.** We may also disclose your information with your permission.

### THIRD PARTIES

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your interaction with these third parties and any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

# **SECURITY**

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, because our Services are hosted electronically, we can make no guarantees as to the security or privacy of your information.

### CHILDREN

No part of our Services is directed to children, and we do not knowingly collect, maintain, or use personal information from children under 13 years of age. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at <a href="mailto:support@bitsworld.com">support@bitsworld.com</a>.

### INTERNATIONAL VISITORS

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use our Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our Services. By providing any information, including personal information, on or to our Services, you consent to such transfer, storage, and processing.

# ACCESSING/UPDATING INFORMATION

You can update your account and profile information through your profile settings. If you have any questions about your privacy on our Services or as described in this Privacy Policy, please contact us at <a href="mailto:support@bitsworld.com">support@bitsworld.com</a>.

## **DELETING/RESTRICTING INFORMATION**

You can request the deletion of your personal information by submitting a request to <a href="mailto:support@bitsworld.com">support@bitsworld.com</a>. You can ask us to restrict the processing of your personal information by submitting a request to <a href="mailto:support@bitsworld.com">support@bitsworld.com</a>. If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time by submitting a request to <a href="mailto:support@bitsworld.com">support@bitsworld.com</a>.

# INFORMATION RETENTION

We retain your personal information where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements) and for a period of time consistent with the original purpose as described in this Privacy Policy. We determine the appropriate retention period for personal information on the basis of the amount, nature, and sensitivity of your personal information processed, the potential risk of harm from unauthorized use or disclosure of your personal information, and whether we can achieve the purposes of the processing through other means, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation).

After expiration of the applicable retention periods, we will either delete or anonymize your personal information or, if this is not possible, then we will securely store your personal information and isolate it from any further processing until deletion is possible.

# **CONTACT INFORMATION**

BITSWORLD INC is responsible for processing your information.

you have any questions, comments, or concerns about our processing activities, please email us at <a href="mailto:support@bitsworld.com">support@bitsworld.com</a> or write to us at 2005 Walnut St, Cary, NC 27518.

We also work with third party service providers who may also collect persistent identifiers through the Services.

# **U.S. PRIVACY ADDENDUM**

This U.S. Privacy Addendum supplements the information contained in the Privacy Policy. This section applies to: California residents from whom we collect Personal Information as a business under the California Consumer Privacy Act of 2018 as

amended by the California Privacy Rights Act of 2020 (California Civil Code §§ 1798.100 to 1798.199) and its implementing regulations, as amended or superseded from time to time ("CCPA"); and Virginia residents from whom we collect Personal Data as a controller under the Virginia Consumer Data Protection Act as amended or superseded from time to time ("VCDPA").

Last Updated: February 1, 2024

#### California Residents

Personal Information Collection, Disclosure, and Sale For the purpose of this section for California residents, "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, or as otherwise defined by the CCPA. Personal Information does not include information that is publicly available, identified or aggregated (as those terms are defined in the CCPA), or otherwise excluded from the scope of the CCPA. The chart below provides the categories of Personal Information and Sensitive Personal Information (as defined by the CCPA) we have collected, disclosed for a business purpose, or sold or "shared" (for cross-context behavioral advertising purposes) in the preceding twelve months since this notice was last updated. The examples of Personal Information and Sensitive Personal Information provided for each category reflect each category's statutory definition and may not reflect all of the specific types of Personal Information and Sensitive Personal Information associated with each category.

Category: Collected | Disclosed | Sold/Share

#### A. Identifiers

Examples: Name, internet protocol address, email address, or other similar Yes Yes

# B. Categories of Personal Information in Cal. Civ. Code Section 1798.80

Examples: Name.

Yes Yes No

# C. Characteristics of Protected Classifications under California or Fede

Examples: Race or color, ancestry or national origin, religion or creed, age (o

pregnancy, childbirth, breastfeeding or related medical conditions), sexual o

genetic information, marital status, military and veteran status. No N/A N/A

#### **D.** Commercial Information

*Examples:* Records of personal property, products or services purchased, o or tendencies.

No N/A N/A

#### **E.** Biometric Information

Examples: Physiological, biological, or behavioral characteristics, including

with other identifying data, to establish individual identity, such as imagery o

voice recordings, from which an identifier template, such as a faceprint, a m

patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise

No N/A N/A

# F. Internet or Other Electronic Network Activity Information

Examples: Browsing history, search history, and information regarding a con

advertisement. No N/A N/A

#### G. Geolocation Data

Example: Precise physical location.

No N/A N/A

# H. Sensory Information

Examples: Audio, electronic, visual, thermal, olfactory, or similar information
No N/A N/A

# I. Professional or Employment-Related Information

Examples: Job application or resume information and past and current job h
Yes Yes No

# J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34

Examples: Records that are directly related to a student maintained by an ed or institution.

No N/A N/A

### K. Inferences Drawn from Personal Information

Examples: Consumer profiles reflecting a consumer's preferences, characte intelligence, abilities, and aptitudes. No N/A N/A

# L. Sensitive Personal Information (Identifiers)

Examples: A consumer's social security, driver's license, state identification
No N/A N/A

# M. Sensitive Personal Information (Log-In and Financial Information)

Examples: Account log-in, financial account, debit card, or credit card numb

password, or credentials allowing access to an account. No N/A N/A

Use of Personal Information
We collect your Personal Information for the following specific business and commercial purposes:

- **1. Providing Services:** Providing our services.
- **2. Communicating** Communicating with you, providing you with updates and other information relating to our services and products, providing information that you request, responding to comments and questions, and otherwise providing customer support.
- **3. Connecting Third Party Services:** Facilitating the connection of third-party services or applications, such as social networks and gaming apps.
- **4. Marketing:** Marketing purposes, such as developing and providing promotional and advertising materials that may be useful, relevant, valuable or otherwise of interest to you.
- **5. Personalization:** Personalizing your experience on our services, such as presenting tailored content.
- N. Sensitive Personal Information (Precise Geolocation)
  Geolocation data used to locate a consumer within a geographic area that i feet.

No N/A N/A

# O. Sensitive Personal Information (Group Membership)

Examples: Racial or ethnic origin, religious or philosophical beliefs, or union
No N/A N/A

# P. Sensitive Personal Information (Contents of Communications)

Examples: The contents of a consumer's mail, email, and text messages un No N/A N/A

- Q. Sensitive Personal Information (Genetic Data) No N/A N/A
- R. Sensitive Personal Information (Identifying Biometric Information)

No N/A N/A

# S. Sensitive Personal Information (Personal Information Collected and A

No N/A N/A

# T. Sensitive Personal Information (Personal Information Collected and A Orientation)

No N/A N/A

- **6. Sending Messages:** Sending you push notifications.
- **7. Facilitating Payments:** Facilitating transactions and payments.
- **8. Job Applications:** Processing your job application.

- **9. Safety Issues:** Responding to trust and safety issues that may arise.
- **10. Compliance:** For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.
- **11. Fraud and Incident Prevention:** Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- **12. Debugging:** Debugging to identify and repair errors that impair existing intended functionality.
- **13. Transient Use:** Short-term, transient use.
- **14. Contracting Vendors:** Contracting with vendors and service providers to perform services on our behalf or on their behalf, including providing customer service, providing advertising or marketing services, providing analytics services, or providing similar services on behalf of the business or service provider.
- **15. Improving Our Services:** Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
- **16. Notified Purpose:** For other purposes for which we provide specific notice at the time the information is collected. Collection of Personal Information We collect Personal Information from the following categories of sources:

**1. You/Your Devices:** You or your devices directly. Disclosure of Personal Information

In the preceding twelve months since this notice was last updated, we disclosed Personal Information to the following categories of third parties for the purposes of Providing Services, Marketing, and Contracting Vendors:

- Advertising Providers: Advertising technology companies, such as advertising networks.
- Personal Information we disclosed:Identifiers
- Analytics Providers.
- Personal Information we disclosed: Identifiers
- Vendors: Vendors and service providers.
- Personal Information we disclosed: Identifiers
   Selling and Sharing of Personal Information
   In the preceding twelve months since this notice was last updated, we sold or shared Personal Information to the following categories of third parties for the purpose of Marketing:
- Advertising Providers: Advertising technology companies, such as advertising networks.
- Personal Information we have shared or sold: Identifiers
   Your California Privacy Rights
   If you are a California resident, you may exercise the following rights.

Right to Know and Access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information collected, sold, or disclosed by us; (2) purposes for which categories of Personal Information are collected or sold by us; (3) categories of sources from which we collect Personal

Information; (4) categories of third parties with whom wedisclosed or sold Personal Information; and (5) specific pieces of

Personal Information we have collected about you during the past twelve months.

**Right to Delete.** Subject to certain exceptions, you may submit a verifiable request that we delete Personal Information about you that we have collected from you.

**Right to Correct.** You may submit a verifiable request that we correct inaccurate Personal Information that we maintain about you.

**Verification.** Requests for access to, deletion of, or correction of Personal Information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations. To verify your access, deletion, or correction request, please email us at <a href="mailto:support@bitsworld.com">support@bitsworld.com</a>. In order to verify a request, we may

ask you for certain information, including your device ID.

**Right to Opt Out.** In some circumstances, you may opt out of the sale or sharing (for cross-context behavioral advertising purposes) of your Personal Information. Click here to opt out of the sale or sharing of your Personal Information.

**Right to Limit Use and Disclosure of Sensitive Personal Information.** In some circumstances, you may limit our use and disclosure of your Sensitive Personal Information. We do not collect Sensitive Personal Information, so therefore we do not use or disclose your Sensitive Personal Information for purposes other than the limited purposes permitted by the CCPA.

**Right of No Retaliation.** You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations, including if you are an employee, applicant, or independent contractor of our business.

**Submit Requests**. To exercise your rights under the CCPA, please send an email via our Contact Information section or complete the form on our website bitsworld.io/privacyoptout.php.

**Authorizing an Agent**. If you are acting as an authorized agent to make a request to know, delete, or opt out on behalf of a California resident, please submit a written authorization signed by the resident with your request, and we will contact you and the resident with any further steps required to verify the resident's identity.

#### **Additional Disclosures**

**Minors.** We do not knowingly sell or share Personal Information of consumers under 16 years of age.

## Virginia Residents

Personal Data Processing and Sharing

For the purpose of this section, "Personal Data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. Personal Data does not include deidentified data, publicly available information (as these terms are defined under the VCDPA) or any other Personal Data otherwise excluded from the scope of the VCDPA.

Please see the sections "Information We Collect" and "How We Use the Information We Collect" for information about the categories of Personal Data we process as a controller and the purposes for processing such data. Additionally, please see the section "How We Share the Information We Collect," for

information about the categories of third parties with whom we share the categories of Personal Data described in the section "Information We Collect." Your Virginia Privacy Rights
If you are a Virginia resident, you may exercise the following rights with respect to your Personal Data:

- To confirm whether or not we process your Personal Data and request access to such data;
- To delete Personal Data you have provided to us or that we have obtained about you;
- To correct inaccuracies in your Personal Data;
- To opt out of the processing of your Personal Data for purposes of: (i) targeted advertising; (ii) the sale of Personal Data; and (iii) the processing of your Personal Data for certain types of profiling in furtherance of decisions that produce legal or similarly significant effect. Please note that we do not engage in such profiling. You may exercise your right to opt out of the processing of Personal Data for targeted advertising and sale of your Personal Data by submitting a request here;
- To obtain a copy of your Personal Data in a portable and, to the extent technically feasible, readily usable format;
- To appeal any decision with regard to your privacy request. Please note that there are exceptions and limitations to each of the rights listed above. To exercise any of the above privacy rights, email us at <a href="mailto:support@bitsworld.com">support@bitsworld.com</a> or visit <a href="mailto:bitsworld.com">bitsworld.com</a>/ privacyoptout.php.