

### **Privacy Policy**

WN Media Group LLC ("WNMG", "we", "our") respect the privacy rights of our users and are committed to protecting the information collected through its games, websites (including http://wn.games as well as other websites that refer to this privacy policy) and related services, collectively referred here as the Services. WNMG has adopted this privacy policy ("Privacy Policy") to explain how WNMG collects, stores, and uses the information collected in connection with the Services and what rights users have about their personal data.

WNMG provides Services that can be used with friends or in a social network. Users share, sample and design games with other people – our services unite people in fun and enjoyment. At the same time though, we take the privacy of the user's personal details very seriously and handle them with great care, in keeping with data protection law. Where applicable, before commencing play, the user consents to its personal data being recorded and used by us in the way described in this Privacy Policy. We may periodically update this Privacy Policy by posting a new version on wn.games, so be sure to check it periodically.

For the purposes of the EU General Data Protection Regulation 2016 (the "GDPR") WNMG is the controller of personal information and responsible for any personal data we process.

If you as the user have any questions or concerns about this Privacy Policy, including those related to exercise any of your rights, please contact us by email :support@wn.games so we can reply to you more quickly.

The data controller: WN Media Group LLC

#### Contact details:

Email: support@wn.games

Registered office: 197198, Russia, St.Petersburg, Bolshoi Prospect P.S., office 300. Postal address: 197198, Russia, St.Petersburg, Bolshoi Prospect P.S., office 300.

#### **1. WHAT PERSONAL DATA WE COLLECT**

- 1.1 Data you provide us
- Contact information (such as name and email address)
- User name and password
- Profile information (such as profile photo)
- Your messages to the Service
- Other data you choose to give us (such as data to identify a lost account)
- 1.2 Data we collect automatically
- Data about your account and game progress

- Your IP address and mobile device identifiers (such as your device ID, advertising ID, MAC address, IMEI)

- 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)
- General location data
- Precise geo-location data (GPS, with your consent)

- Data about your use of the Service, such as gameplay data and your interactions with other players inside the Service

Sometimes we could create a WNMG-specific ID for you when you use the Services.

1.3 Data we collect from our partners

- Data we receive if you link a third party tool with the Service (such as Facebook, WeChat or Google)

- Demographic data (such as to determine the coarse location of your IP address)
- Data to fight fraud (such as refund abuse in games or click fraud in advertising)
- Data from platforms that the games run on (such as to verify payment)
- Data for advertising and analytics purposes, so we can provide you a better Service

#### 2. WHY DO WE COLLECT YOUR DATA

We may source, use and otherwise process user's personal data for the following purposes:

- to fulfil our contract obligations to the user (e.g. the License Agreement between WNMG and the user according to Terms of Use)

- to provide you with our Services (for example, play one of our online games and make online purchases)

- to create accounts and manage game registration
- to personalise subsequent visits, and to operate the Services

- if it is needed for billing any Service that has been used (e.g. to verify and confirm payments)

- to obtain technical and statistical information for rectifying faults or improving the Services, or for doing research and analysis

- to comply with retention periods laid down by law or required by contract
- to show personalized advertisements
- to send you Service-related communications
- to update and develop user profiles (e.g. updates, security alerts, and support messages)
- develop and improve the Service and player experience
- manage our relationship with you

#### - provide social features as part of the Service

- respond to your comments and questions and provide player support

- provide you WNMG's offers in the Service as well as in other websites and services, and by email

- enable you to communicate with other players

With your consent, we may process your data for additional purposes, such as using your GPS location to show you local events.

### 3. LOG FILES WHEN USING SERVICES; COOKIES

Every time the Service is accessed, that communication automatically generates data. WNMG only stores and uses Log files related data that does not enable a person to be identified (e.g. by making the IP address anonymous), the purpose being to obtain technical and statistical information for rectifying faults or improving the Services, or for doing research and analysis.

What are known as "cookies" (session IDs) are also may be used. Cookies are miniature text files that can be saved temporarily or permanently on the user's computer by the browser. Cookies guarantee the consistency of each communication process. Temporary cookies can be used to identify which visits are all part of a single session. Permanent cookies are for re-recognising a user, for instance so that individual settings can be made. Users are free to decide whether to let their browser use cookies: all browser programs allow cookies to be deactivated or deleted. Functions for which the computer has to be recognised will then only be available to a limited extent, or not at all.

### 4. NEWSLETTERS AND ADVERTISING

**4.1** Every user has the opportunity (when registering for a game, for example) to state its email or other electronic addresses, so that we can send out news regarding the Service. Users may also order newsletters from us about our Services at any time.

**4.2** We never sell the user's personal data to third parties for marketing purposes.

Where we use your email to communicate marketing information to you we will seek your prior consent where required to do so by law. If the user has given consent, we may display personalized advertising in Services, or we may place or arrange for a cookie (see Item 3 above) so that personalized advertising can be displayed in the user's browser. This might include advertising that could be of particular interest to the user in view of the game being played for instance, or its age group or where it lives. We mainly advertise our own games and other Services. If we ever advertise for a third party, we will not provide the advertiser with any personal data and IP addresses will be duly abbreviated.

**4.3** Users may at any time decline to receive email advertising or a newsletter, and can withdraw consent with immediate effect. The simplest way for a user to do this is to use the special link in newsletter to unsubscribe. If the user sends an objection, advertising that does not use its personal data will not be affected.

Withdrawing consent may result in services no longer being available, or to a user's contractual agreement being terminated.

You can opt-out of interest-based advertising on mobile applications by checking the privacy settings of your Android or iOS device and selecting "limit ad tracking" (Apple iOS) or "opt-out of interest based ads" (Android). For personalized in-game offers opt-out, you can use the options provided in the game settings (if it is provided).

#### 5. WHO MAY SEE YOUR PERSONAL DATA

#### **5.1** Other players and users

Depending on the user settings, other players may see personal data in the game or on the relevant platform (e.g. scores). We do not allow other players to use this information outside a game. If another player obtains personal data because of the way the user has adjusted the settings, we can no longer guarantee the protection of that information any more. For this reason, each user should check beforehand that its settings only allow its data to be viewed by people it trusts.

#### 5.2 Platforms

WNMG's games are offered through a variety of platforms, such as on iOS, Mac, Android and other platforms for apps and software including various social networks. Any platform of this kind might collect and use personal details whenever the user accesses it, registers with it or uses it. WNMG has no control over this whatsoever. Users will find all the relevant information in the terms and conditions and in the data privacy policies of the platform concerned.

#### 5.3 Partners working for WNMG

WNMG has partners to perform services for us. These partners process your data only at and according to WNMG's instructions to provide the Service, such as hosting, player support, advertising, analytics and fraud prevention.

#### **5.4** Other companies and public authorities

In order to combat fraud and illegal activity, we may exchange data with other companies and organizations and provide it to public authorities in response to lawful requests. We may also disclose your data based on your consent, to comply with the law or to protect the rights, property or safety of us, our players or others.

#### 5.5 Advertising and Social Media partners

The Service includes features from our partners, such as social media interaction tools and in-game advertising. These partners may access your data and operate under their own privacy policies. We encourage you to check their privacy policies to learn more about their data processing practices.

#### 6. INTERNATIONAL DATA TRANSFER

Our Service is global by nature and your data can therefore be transferred to anywhere in the world. Because different countries may have different data protection laws than your own country, we take steps to ensure adequate safeguards are in place to protect your data as explained in this Privacy Policy. Adequate safeguards that our partners may use include standard contractual clauses approved by EU Commission.

#### 7. FACEBOOK PLUGINS

WNMG uses social plugins, e.g. the "like" button, from the social networking site facebook.com. These plugins are operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The plugins can be identified from one of the Facebook logos (a white "f" on a blue tile or a "thumbs up" sign), or we have specially marked them "Facebook Social Plugin". The list of Facebook Social Plugins and what they look like can be viewed on Facebook at http://developers.facebook.com

If a user accesses one of our websites that contains one of these plugins, its internet browser connects directly with the Facebook servers. Facebook sends the content of the plugins directly to the user's browser and back. Since we have absolutely no control over the amount of data that Facebook collects with the help of these plugins, we would like to share our latest knowledge with the user:

The plugins that are incorporated mean that Facebook receives notification that the user has called up the appropriate page on our website. If the user is logged in on Facebook at the same time, Facebook can allocate the visit to the user's personal Facebook account. If the user interacts with the plugins, such as by pressing the "like" button or posting a comment, that information is immediately transmitted by the browser directly to Facebook, where it is saved. If the user is not using Facebook, the service can still collect and store the IP address. More information on how much data is collected and why, and how it is then processed and used by Facebook, as well as details about the users' rights and the settings available for protecting users' privacy, can be obtained from Facebook's data protection policy at www.facebook.com/policy.php

If a user has signed up to Facebook but does not want Facebook to collect data via WNMG's website or other Service and link it up with the data stored on Facebook, it must log off Facebook before using Services.

If a user does not belong to Facebook or has not (yet) consented there to having its data collected and used, we recommend not clicking on Facebook plugins.

#### 8. USE OF OTHER PLUGINS

Our games and other Services may also contain other plugins. Each plugin is the responsibility of its provider (e.g. Twitter, Google). Again, this means that we have no control over the amount of information that the respective provider collects with the help of its own plugin, or how it then uses that information.

If the user is not yet a customer of the provider or has not (yet) consented there to having its data collected and used, we recommend not clicking on these plugins.

If, on the other hand, the user is already a customer of the plugin provider, it should refer directly to the relevant provider for information on the kind and amount of personal data it collects and uses, and for what purpose.

#### 9. USER'S RIGHTS

In certain circumstances, you have rights under the GDPR in relation to your personal data.

- You have the right to request access to any personal information we hold about you as well as related information, including the purposes for processing the personal information, the recipients or categories of recipients with whom the personal information has been shared, where possible, the period for which the personal information will be stored, the source of the personal information, and the existence of any automated decision making.

- You are entitled to obtain information from us on how we handle your personal data, to get a copy of your personal data in an electronic format and to request that your personal data is amended, corrected or deleted from our systems. You can also limit, restrict or object to the processing of your data.

- You have the right to obtain without undue delay the rectification of any inaccurate personal information we hold about you.

- You have the right to request transfer of your personal information directly to a third party where this is technically feasible.

- You can always withdraw your consent, for example by turning off GPS location sharing in your mobile device settings.

If you would like to exercise any of your above rights, contact us: support@wn.games. We will respond to all requests within a reasonable timeframe.

Where you believe that we have not complied with our obligation under this Privacy Policy or European data protection law, you have the right to make a complaint to an EU Data Protection Authority.

WNMG will provide information free of charge on any other user data and inventory data – electronically or in writing, if so requested. Before furnishing any information, we may insist on being sent some form of documentation to prove the enquirer's identity and confirm its authenticity.

#### **10. HOW LONG DO WE RETAIN PERSONAL DATA**

We will process your personal data only for as long as is necessary for the purposes for which it was collected in connection with the provision of Service to you, unless we have a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defence of legal claims. WNMG will not be able to erase data that is available on third-party recourses (facebook, twitter etc). Users can do it by themselves.

#### **11. HOW DO WE PROTECT YOUR DATA**

In order to help ensure a secure and safe player experience, we are continuously developing and implementing administrative, technical and physical security measures to protect your data from unauthorized access or against loss, misuse or alteration.

We use standard security practices, including encryption, passwords and physical security measures, to protect your personal data from unauthorised access and disclosure. Your user account information is stored on a secure server with firewall protection. If a user enters sensitive data (such as a credit card number), we encrypt that information using secure socket layer technology (SSL).



If you have any queries about the security of our services, please do not hesitate to contact us at any time: <u>support@wn.games</u>

#### **12. AGE LIMITS**

We do not knowingly collect or solicit personal data about or direct or target interest based advertising to anyone under the age of 13 or knowingly allow such persons to use our Services. If you are under 13, please do not send any data about yourself to us, including your name, address, telephone number, or email address. No one under the age of 13 may provide any personal data. If we learn that we have collected personal data about a child under age 13, we will delete that data as quickly as possible. If you believe that we might have any data from or about a child under the age of 13, please contact us.