

PLAYPAL PRIVACY POLICY

Last Updated: August 14, 2019

Protecting your private information is our priority. This Privacy Policy applies to Playpal Corp. a Cayman corporation (the “**Company**”), and describes how the Company will gather, use, and maintain your personal information. This Privacy Policy also applies to your use of the website operated by Company (the “**Site**”), as well as your use of the mobile applications (whether iOS or Android) offered by Company (the “**Apps**”). Collectively, the Site and the Apps are referred to as the “**Platform**.”

By using the Platform, you confirm that you have read and understand this Privacy Policy, as well as Company’s **Terms and Conditions**. The **Terms and Conditions** are hereby incorporated by reference into this Privacy Policy as if set forth fully herein.

GENERAL DEFINITIONS

In addition to the terms defined above, the following terms have the meanings described below as follows:

- “**We**,” “**our**,” or “**us**” refers to the Company and the Company’s use of the Platform;
- “**User**” or “**Users**” refers to individuals who are users of the Platform; and,
- “**You**” or “**your**” refers to individual you, the User of the Platform.

LEGAL BASIS FOR COLLECTING AND PROCESSING YOUR INFORMATION.

Under the GDPR and Data Protection Act, we are only allowed to use personal information if we have a proper reason or ‘legal basis’ to do so. In the case of the Platform, these legal grounds are:

- Where you have given your consent, for example, you have asked to sign-up for an account with us to use the Platform.
- Where you to provide “special category (sensitive) personal data,” we must rely on an additional ‘legal basis’ for the processing of that data, which will be:
 - where you have given your **explicit** consent, for example, where we have chosen to provide specific and optional information about yourself (such your ethnicity or racial origin), when you choose to take part in certain surveys, consultations or other research through the Platform; and
 - Where it is necessary for equality of opportunity or treatment, for example, so we can ensure that the views of all sections of the community population are given proper representation.

COLLECTION AND USE OF YOUR PERSONAL INFORMATION

In order to better provide you with products and services offered through the Platform, to verify your age, and to facilitate payment, We may be required collect personally identifiable information, such as your:

- First and Last Name
- Email Address
- Date of Birth
- Phone Number
- Street Address
- City
- Zip Code

- Billing and payment information (bank account information, credit and/or debit card information, and other such information necessary to facilitate payment).

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use certain products or services available through the Platform. These may include: (a) registering for an account on the Platform; (b) entering a sweepstakes or contest sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting your credit card or other payment information when using services through the Platform. To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

We collect and use your personal information you provide to operate the Platform and deliver the services you have requested. We may also use your personally identifiable information to inform you of other products or services available from the Company and its affiliates.

Some Specific Uses Include:

Payment Information: We may collect financial information such as credit card numbers, bank account information, billing information, and other similar payment information. We use only financial information that you authorize. To keep your financial information secure, the Company does not store full payment card information, and instead relies on a third party to process payment card payments.

Phone Numbers: To contact Users via text message or pre-recorded messages regarding services, including notifications, updates, reminders regarding the services requested.

TRACKING USER BEHAVIOR

The Company may keep track of the pages Users visit within the Platform, in order to determine what products and services are the most popular. This data is used to deliver customized content and advertising within the Platform to customers whose behavior indicates that they are interested in a particular subject area.

AUTOMATICALLY COLLECTED INFORMATION

Information about your computer hardware and software may be automatically collected by the Company. This information can include: User session information, your IP address, browser type, domain names, access times and referring website addresses. When using the Apps, the Company may also collect your location. If you do not wish to share your location, you may disable location settings through the App. This information is used for the operation of the Platform, to maintain quality of the Platform, and to provide general statistics regarding use of the Platform.

Analytics Information.

We may directly collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Platform. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving the

Platform. We collect and use this analytics information in aggregate form such that it cannot reasonably be manipulated to identify any particular individual User.

Cookies.

When you use the Platform, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Platform (e.g., the pages you view, the links you click and other actions you take on the Platform) and allow us or our business partners to track your usage of the Platform over time. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Platform may not function properly if the ability to accept cookies is disabled.

Log File Information.

Log file information is automatically reported by your browser or mobile device each time you access the Platform. When you use the Platform, our servers automatically record certain log file information. These server logs may include anonymous information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, the number of clicks and how you interact with links on the Platform, domain names, landing pages, pages viewed, and other such information.

Clear GIFs/Web Beacons.

When you use the Platform, we may employ clear Graphics Interchange Format (GIF), also known as web beacons, which are used to anonymously track the online usage patterns of our Users. In addition, we may also use clear GIFs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Platform.

Device Identifiers.

When you access the Platform by or through a mobile device (including but not limited to smartphones or tablets), we may access, collect, monitor and/or remotely store one or more unique device identifiers. Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by the Company. A device identifier may convey information to us about how you browse and use the Platform. A device identifier may remain persistently on your device, to help you log in faster and enhance your navigation through the Platform. Some features of the Platform may not function properly if use or availability of device identifiers is impaired or disabled.

Use of Information.

We use or may use cookies, log file, device identifiers, and clear GIFs information to (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content, and information; (c) to provide and monitor the

effectiveness of the Platform; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; and (e) diagnose or fix technology problems.

SHARING INFORMATION WITH THIRD PARTIES

We may disclose aggregated information about our Users, and information that does not identify any individual, without restriction. We may disclose personal and business information that we collect or you provide as described in this privacy policy:

- To our affiliates;
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- To fulfill the purpose for which you provide the information;
- For any other purpose disclosed by us when you provide the information;
- With your consent;
- Financial transactions (we currently use Stripe);
- As required by law, such as to comply with a subpoena, or similar legal process;
- When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; and,
- If the Company is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

The personal information we collect is stored and processed in the Cayman Islands, or where we or our partners, affiliates and third-party providers maintain facilities. By providing us with your personal information, you consent to the disclosure to these and overseas third parties. If you are located in a jurisdiction outside of the United States, please be aware that the personal information we collect about you will be transferred to the United States. By using the Platform, or providing us with any Personal Data, you consent to the transfer, processing and storage of your personal information in the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside.

We strive to comply with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. We are working on certifying to the Department of Commerce that we will adhere to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov/>. We are responsible for the processing of personal information we receive, and under Privacy Shield we may subsequently transfer that Information to a third party acting as an agent on our behalf. We strive to comply with the Privacy Shield Principles for all onward transfers of personal information from the EU and Switzerland, including the onward transfer liability provisions. With respect to personal information received or transferred pursuant to the Privacy Shield Framework, we are subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We will ensure that any transfer of personal information from countries in the European Economic Area (EEA) to countries outside the EEA will be protected by appropriate safeguards, for example by using standard data protection clauses approved by the European Commission, or the use of binding corporate rules or other legally accepted means. You are entitled to the rights under Chapter III of the EU General Data Protection Regulation or Section 2 of the Swiss Federal Act on Data Protection with respect to the processing of your personal data, which include the right to access and rectify and to request erasure of Personal Data. To exercise these rights, contact legal@goplaypal.com and provide as complete a description of your request as possible.

Where we transfer personal information from a non-EEA country to another country, you acknowledge that third parties in other jurisdictions may not be subject to similar data protection laws to the ones in our jurisdiction. There are risks if any such third party engages in any act or practice that would contravene the data privacy laws in our jurisdiction and this might mean that you will not be able to seek redress under our jurisdiction's privacy laws.

LINKS

The Platform may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

SECURITY OF YOUR PERSONAL INFORMATION

The Company secures your personal information from unauthorized access, use, or disclosure. The Company uses the following methods for this purpose:

- The Platform is encrypted with SSL certificates

When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption.

We strive to take appropriate security measures to protect against unauthorized access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed. Nonetheless, to the extent allowed under law, the Company expressly disclaims any liability that may arise should any other individuals obtain the information you submit via the Platform.

DATA RETENTION, DISPOSAL, AND DESTRUCTION

The Company will retain both automatically collected data and user-provided data for as long as you use the Platform and for a reasonable time thereafter. If you would like us to delete your user-provided data that you have provided via the Platform, please contact us at subscriptions.accounts@goplaypal.com and we will respond within a reasonable time. Please note that some or all of the user-provided data may be required for the Platform to function properly.

If a user requests the disposal/destruction of personally identifying information, the Company will dispose of/destroy the data in accordance with the Company's data disposal/destruction policies.

CHILDREN

The Site is not directed towards individuals under 18 years of age and the Company does not knowingly collect any information from individuals under 18 years of age through the Site.

YOUR CALIFORNIA PRIVACY RIGHTS

If you are a resident of the State of California and the Company has an established business relationship with you, then, pursuant to Section 1798.83 of the California Civil Code, you have the right to request the following at any time: (a) information from the Company free of charge regarding the manner in which the Company shares certain personal information collected through the Platform with third parties who use such information for direct marketing purposes; and (b) the discontinuation (or opt-out) of the Company sharing of such information with such third parties. Please submit any such request (“California Privacy Rights Request”) to any one of the following:

By mail: Playpal Corporation
 PO Box 2775, Artemis House
 67 Fort Street
 Grand Cayman, KY1-1111,
 Cayman Islands

By e-mail: subscriptions.accounts@goplaypal.com with a subject line of “Your California Privacy Rights.”

For each California Privacy Rights Request, please state “Your California Privacy Rights” in the e-mail or letter subject line, and clearly state the following in the body:

- the nature of your request;
- that the request is related to “Your California Privacy Rights;”
- your name, street address, city, state, zip code, and e-mail address; and
- Whether you prefer to receive a response to your request by mail or e-mail.
- If you send a California Privacy Rights Request by mail, then please do so by U.S. Certified Mail, Return Receipt Requested to allow for confirmation of mailing, delivery, and tracking. The Company will not accept a California Privacy Rights Request via telephone or fax; and is not responsible for a California Privacy Rights Request that is incomplete, incorrectly labeled, or incorrectly sent.
- You are solely responsible for the accuracy and content of your personal information, and for keeping your personal information current and correct.

CHOICES ABOUT YOUR INFORMATION

Your Account Information and Settings.

You may update your profile information and email-communication preferences at any time by logging in to your account. You can also stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications. We make every effort to promptly process all unsubscribe requests. As noted above, you may not opt out of Service-related communications (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the Platform, technical and security notices). If you have any questions about reviewing or modifying your account information, you can contact us directly through the message center.

Tracking Technology.

The Platform does not respond to “do not track” (DNT) signals. The only way to completely opt out of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or mobile device. Please refer to your mobile device or browser’s technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. To learn more about cookies, clear GIFs/web beacons and related technologies, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative’s online resources, located at <http://www.networkadvertising.org>. Depending on your type of device, it may not be possible to delete or disable tracking mechanisms on your mobile device. Note that disabling cookies and/or other tracking tools prevents this organization and its partners from tracking your browser’s activities in relation to the Platform. However, doing so may disable many of the features available through the Platform. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly through the message center.

Termination or Deactivation of Your User account.

We may retain your profile information and User Content following termination of your User account. We may also continue to display your profile information and/or personal story on the site unless you request that we discontinue use. Please contact us directly through the message center to request that your information be disabled from public view.

THIRD PARTY COLLECTION

The Company does not authorize third parties to collect your personal information when you use the Platform, except as expressly stated in this Privacy Policy. TO THE FULLEST EXTENT PERMITTED BY LAW, THE COMPANY IS NOT RESPONSIBLE FOR, AND YOU HEREBY RELEASE THE COMPANY FROM ANY AND ALL LIABILITY WHICH MAY ARISE FROM, SUCH THIRD PARTIES’ UNAUTHORIZED COLLECTION OF YOUR PERSONAL INFORMATION.

CHANGES TO THIS STATEMENT

The Company reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our site, and/or by updating any privacy information on this page. Your continued use of the Platform after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

CONTACT INFORMATION

The Company welcomes your questions or comments regarding this Privacy Policy. If you believe that the Company has not adhered to this Privacy Policy, please contact the Company at legal@goplaypal.com