

# Privacy Policy

## 1. General Provisions

- 1.1. This Privacy Policy (hereinafter referred to as the Policy) defines the procedure for processing and protecting the personal data of individuals using E-Global Products.
- 1.2. The purpose of the Policy is to ensure proper protection of personal data, including protection of personal data from unauthorized access and disclosure.
- 1.3. E-Global respects the privacy of its online visitors and customers of its products and services and complies with applicable laws to protect your privacy, including, but not limited to, the California Consumer Privacy Act (hereinafter referred to as CCPA), the European Union General Data Protection Regulation (hereinafter referred to as GDPR) and the UK GDPR.
- 1.4. E-Global reserves the right to make changes to the Policy and provides an opportunity to review it before continuing to use E-Global Products.
- 1.5. If you do not agree with any of the provisions of this Policy, please stop using the E-Global Products immediately and do not download or install them.
- 1.6. Restriction of personal data processing. Personal data is processed in accordance with the purposes of the Privacy Policy.

## 2. Definitions and basic terms

- 2.1. **Automated processing of personal data** Processing of personal data using computer technology.
- 2.2. **Game** A video game, the right of ownership or the right to use which legally belongs to the Company, which is a computer program and is a set of data, commands and generated audiovisual displays (hereinafter referred to as Data and Commands), activated sequentially to obtain a certain result by the User within the framework of the game process (game scenario) without payment (activated Data and Commands) or after payment of a license fee (non-activated Data and Commands).  
The Game also includes (but is not limited to): (a) game chat, (b) servers, (c) server and other software, (d) applications, (e) Game Forum, Game Site, (f) databases and (g) other resources necessary for using the Game.
- 2.3. **Company** When this Policy refers to the words “Company,” “Copyright Holder,” “we,” “us,” or “our,” it refers to E-Global, which is responsible for your information in accordance with this Privacy Policy.
- 2.4. **Controller** The company that determines the purposes and methods of processing Personal data.

2.5.	<b>Device</b>	Any Internet-connected device such as a phone, tablet, computer or any other device that can be used to access the Game and other E-Global Products.
2.6.	<b>IP address</b>	Every device connected to the Internet is assigned a number known as an Internet Protocol (IP) address. These numbers are usually assigned in geographical blocks. An IP address can often be used to determine the location from which a device connects to the Internet.
2.7.	<b>Personal data</b>	Any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an internet identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
2.8.	<b>Processing</b>	Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
2.9.	<b>Products</b>	<p>ProductsE-Global includes:</p> <p>(i) our websites that contain a link to this Policy (hereinafter referred to as the Site, Website);</p> <p>(ii) products and applications (including support applications and forums) related to the Game.</p> <p>(iii) an account (hereinafter referred to as the “Account”) and any other products administered by us that contain a link to this Policy.</p> <p>This Policy also applies to any of our offline activities that provide you with access to this Policy.</p>
2.10.	<b>Rights to non-activated data and commands</b>	The rights to use data, commands (in particular, in-game currency, premium equipment, premium account, other data, commands) and audiovisual displays of the Game generated by them, activated sequentially to obtain a certain result by the User, provided for by the Game scenario, provided for by the End User License Agreement, are acquired by the User after payment of the license fee established by the Company.
2.11.	<b>Services</b>	Access to the Game provided by the Copyright Holder, use of functions and services under the conditions specified in End User License Agreement. The Copyright Holder provides services only with the User's participation in the game.
2.12.	<b>Third party</b>	Refers to advertisers, contest sponsors, advertising and marketing partners

<b>services</b>	and others who provide our content or whose products or services we think may be of interest to you.
<b>2.13. User</b>	When this Policy refers to “User”, “you”, “your”, it refers to the person who participates in the Game and is the end consumer of the E-Global Products.

### **3. Why does the Company collect and process personal data?**

The Company collects and processes Personal Data for the following reasons:

- 3.1. Develop, test, improve E-Global products, eliminate errors in the operation of services.
- 3.2. Providing advertising and marketing purposes to personalize E-Global products.
- 3.3. To authenticate accounts, detect and prevent malicious behavior or unsafe activities, reduce security threats and protect E-Global products.
- 3.4. To communicate with Users regarding E-Global products and services, account, changes to the Policy and other E-Global documents.
- 3.5. Comply with applicable laws and comply with legal obligations in connection with potential claims.

These reasons for collecting and processing Personal Data determine and limit what Personal Data we collect and how we use it (Section 4 below), how long we retain it (Section 7 below), and what rights and other controls are available to you as a user (Section 8 below).

### **4. List of personal data collected**

- 4.1. **User information** User-related information: login, email address, password, device and connection information such as operating systems and platforms.
- 4.2. **Information about IP** Internet Protocol (IP) address and/or device characteristics.
- 4.3. **Device information** Information about phones and other devices that Users use when interacting with the Products, which may include information about the device and its usage, such as: IP address, device characteristics, operating system, language preferences, device name, country, location, information about who is using our Products and when, and other technical information.
- 4.4. **Payment details** Data required to process the payment (payment instrument number (credit card), associated security code, etc.).

### **5. List of advertising services**

Google Play Services  
Unity

<https://policies.google.com/privacy>  
<https://unity3d.com/legal/privacy-policy>

## **6. Purposes of processing each type of personal data**

- 6.1. **User information** For fraud prevention and diagnostic purposes.
- 6.2. **Information about IP** This information may be used to connect your computer to the Internet.
- 6.3. **Device information** This information is primarily needed to maintain the security and operation of our platform, as well as for our internal analytics and reporting.

## **7. How long do we retain personal data?**

7.1. We will only store your information for as long as necessary to achieve the purposes for which it is collected and processed or, if applicable law provides for a longer storage and retention period, for the storage and retention period required by law. After that, your Personal Data will be deleted, blocked or anonymized as provided for by applicable law.

7.2. In particular:

7.2.1. If you delete your user account, your personal data will be marked for deletion unless legal requirements or other overriding legitimate purposes require longer retention.

7.2.2. In some cases, Personal Data may not be completely deleted to ensure consistency of gameplay. For example, games you have played that affect other players' game data and results will not be deleted; instead, your connection to these games will be permanently anonymous.

7.2.3. Please note that the Company is required to retain certain transaction data in accordance with commercial and tax laws for a period of up to ten (10) years.

7.2.4. It should be noted separately that the uploaded image and the image passed through the neural network will be stored on the game server for seven (7) days.

7.2.5. If you withdraw your consent on which the processing of your Personal Data or your child's Personal Data is based, we will delete your Personal Data or, respectively, your child's Personal Data without undue delay to the extent that the collection and processing of the Personal Data was based on the withdrawn consent.

7.2.6. If you exercise your right to object to the processing of your Personal Data, we will consider your objection and delete your Personal Data that we processed for the purposes to which you objected without undue delay, unless there is another legal basis for processing and storing this data or unless applicable law requires us to retain the data.

## **8. Your rights and control mechanisms**

The data protection laws of the European Economic Area, the United Kingdom, California, and other territories provide their residents with certain rights regarding their Personal Data. While other jurisdictions may provide fewer statutory rights, we make tools designed to exercise those rights available to our users worldwide. (When we talk about the GDPR in this section, we mean the version of the GDPR that applies to you in the EU or the UK.)

As a resident of the European Economic Area or the United Kingdom, you have the following rights in relation to your personal data:

#### 8.1. Right of access.

You have the right to access your personal data that we store about you, i.e. the right to request free of charge:

(i) information about whether your personal data is stored,

(ii) access to and/or

(iii) duplicates of stored personal data.

If the request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee (taking into account the administrative costs of providing the information or message or performing the requested action) or to refuse to comply with the request.

#### 8.2. Right to rectification.

If we process your Personal Data, we will endeavour to ensure, by implementing appropriate measures, that your Personal Data is accurate and relevant for the purposes for which it was collected. If your Personal Data is inaccurate or incomplete, you can change the information.

#### 8.3. Right to erasure.

You have the right to request that Personal Data concerning you be deleted if the reason for which we may have collected it no longer exists or if there is another legal basis for deleting the personal data.

#### 8.4. Right to object.

If our processing of your Personal Data is based on legitimate interests in accordance with Article 6 of the GDPR, you have the right to object to this processing. If you object, we will no longer process your Personal Data unless there are compelling and overriding legitimate grounds for the processing as described in Article 21 of the GDPR; in particular, if the data is necessary for the establishment, exercise or defence of legal claims. You also have the right to lodge a complaint with a supervisory authority.

#### 8.5. The right to restrict the processing of your personal data.

You have the right to restrict the processing of your personal data in accordance with the conditions set out in Article 18 of the GDPR.

#### 8.6. Right to portability of personal data.

You have the right to receive your Personal Data in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller under the conditions set out in Article 20 of the GDPR.

#### 8.7. The right to posthumous control of your personal data

If French data protection law applies to you, you have the right to establish rules for the retention, deletion and transfer of personal data after your death, in accordance with Article 40-1 of Law No. 78-17 of 6 January 1978 on information, technology, data files and civil liberties.

### **9. Child safety**

The minimum age to create an E-Global user account is 13 years old. The Company will not knowingly collect personal information from children under this age. In cases where a higher age of consent for the collection of personal information applies in some countries, the Company requires parental consent before creating a user account and collecting personal information related to it. The Company encourages parents to teach their children never to disclose personal information online.

### **10. Third party services**

10.1. We may display, include or make available third party content (including data, information, applications and other products, services) or provide links to third party websites or services.

10.2. You acknowledge and agree that E-Global is not responsible for any Third Party Services, including their accuracy, completeness, timeliness, validity, copyright compliance, legality, decency, quality, etc. E-Global does not assume and will not have any liability or responsibility to you or any other person or entity for any Third Party Services.

10.3. Third party services and links to them are provided solely as a convenience to you, and you access and use them solely at your own risk and subject to the terms and conditions of such third parties.

### **11. Procedure for processing personal data**

11.1. The operator carries out automated processing of personal data with or without the receipt and transmission of the received information via information and telecommunications networks.

11.2. The Controller processes personal data only with the consent of the user, which is expressed by clicking the “I agree” button when starting the Game.

11.3. The data subject independently decides to provide his personal data and gives consent to this freely, of his own free will and in his own interests.

### **12. Transfer of personal data**

12.1. The operator has the right to transfer personal data on the grounds provided by law or agreement.

12.2. The transfer of personal data with the consent of the Subject of personal data is carried out to the following persons:

(i) the Controller's partners - in the event of a sale, merger or other transfer of all or substantially all of the assets of or any of its Corporate Affiliates (as defined herein), or that portion of E-Global or any of its Corporate Affiliates to which the Game relates, or in the event that we cease our business or file or are subject to a petition for bankruptcy, reorganization or similar proceeding, provided that the third party agrees to be bound by the terms of this Privacy Policy;

(ii) third parties acting as service providers of the Controller.

12.3. The transfer of personal data without the consent of the Personal Data Subject may be carried out to third parties in order to comply with the legislation of the European Union.

12.4. We may provide information in response to a request if we believe disclosure is required by law, including to meet national security or law enforcement requirements.

## **13. Branches**

We may disclose information (including personal data) about you to our corporate affiliates. For the purposes of this Privacy Policy, "corporate affiliate" means any person or entity that directly or indirectly controls, is controlled by, or is under common control with E-Global, whether by ownership or otherwise. Any information concerning you that we provide to our corporate affiliates will be processed by those corporate affiliates in accordance with the terms of this Privacy Policy.

## **14. Additional information for users in the European Economic Area, the United Kingdom and Switzerland**

As a US-based company operating a global gaming service, we may transfer your Personal Data outside the European Economic Area or the United Kingdom. In such cases, we take additional steps to ensure that your personal data is protected by appropriate legal safeguards and is treated securely in accordance with this Privacy Policy. In this regard, the Company has implemented appropriate contractual and organizational measures to ensure the confidentiality, security and integrity of user data in connection with its collection, processing and transfer. The measures we have taken include, but are not limited to:

14.1. Minimize data collection.

14.2. Data pseudonymization.

14.3. Industry standard encryption.

14.4. Providing access to data on a need-to-know basis.

14.5. Use of standard contractual clauses in their current version, approved by the European Commission and the UK ICO, to protect transfers.

## **15. Additional Information for California Users**

The California Consumer Privacy Act (CCPA) requires us to disclose the categories of Personal Information we collect and how we use it, the categories of sources from which we collect Personal Information, and the third parties with whom we share it, as described above.

We are also required to provide information about the rights that California residents have under California law. You may exercise the following rights:

15.1. The right to know and have access.

You may submit a verifiable request for information regarding:

- (i) the categories of Personal Information that we collect, use or share.
- (ii) the purposes for which we collect or use the categories of Personal Information.
- (iii) the categories of sources from which we collect Personal Information; and
- (iv) the specific pieces of Personal Information we have collected about you.

15.2. The right to equal service.

We will not discriminate against you if you exercise your privacy rights.

15.3. Right to erasure.

You may submit a verifiable request to close your account and we will delete the personal information we have collected about you.

15.4. Ask a company that sells a consumer's personal information not to sell the consumer's personal information.

If you make a request, we will have one month to respond to you. If you wish to exercise any of these rights, please contact us. We do not sell our users' Personal Information.

For more detailed information about these rights, please contact us.

## **16. Contacts**

If you have any questions or comments about this Policy, please send an email.

Feel free to contact us if you have any questions by email: [info@l2daily.com](mailto:info@l2daily.com)