

# PLAYAFI

## Privacy Policy

At PLAYAFI, we want you to know that we respect your privacy, the privacy of our members and the privacy of our customers. This document provides information regarding our policy as it relates to the collection, use and disclosure of personal information. It also outlines our customer's rights to limit the collection use or disclosure of personal information. Personal information may include your name, email, mailing and/or business address, phone numbers, or other information that identifies you personally. We at PLAYAFI hold this personal information seriously and we maintain this information in the strictest of confidence. We do not sell any information to any third party. We also maintain a secured web site on all pages that require you to provide any personal information. This policy applies to users of PLAYAFI services anywhere in the world.

The practices described in this policy are subject to applicable laws in the places in which we operate. This means that we only engage in the practices described in this policy in a particular country or region if permitted under the laws of those places. Please contact us if you have questions on our practices in your country or region.

**By using the Website and/or the Services and providing us with Personal Information you agree to the practices described in this Privacy Policy and the Cookie Policy referenced below and to the updates to these policies posted here from time to time. To make sure you stay informed of all changes, you should check these policies periodically. Updates will be referenced by the "Last Updated" date shown above.**

### 1. Definition of Personal Information

For purposes of this Privacy Policy, except where a different definition is noted, "Personal Information" means information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device.

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Other information excluded from the CCPA's scope, such as:

- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## 2. California "Shine the Light" Law/Your California Privacy Rights

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits consumers who are California residents, to request and obtain from us once a year, free of charge, information about the categories of personal information (as defined in the Shine the Light law), if any, that we disclosed in the preceding calendar year to third parties for those third parties' direct marketing purposes. Our disclosure requirements apply only if we share our consumers' personal information with third parties for them to directly market their own products to those consumers, instead of assisting us with our own business. If you are a California resident and would like to make such a request, contact us as provided in the "Contact Us" section below.

## 3. What personal information do we collect?

We may have collected Personal Information in the following categories from consumers within the last twelve (12) months. The categories and examples provided in the chart below are those defined in the CCPA. This does not mean that all examples of that category of Personal Information were in fact collected but reflects our good faith belief to the best of our knowledge that some of that information may have been collected about consumers. We will update this disclosure from time to time as appropriate.

In response to a verified consumer request for categories of information collected, we will investigate and provide an individualized response to the consumer, and will not merely refer the consumer to our general practices outlined in this Privacy Policy unless our response would be the same for all consumers and this Privacy Policy discloses all the information that is otherwise required for the response to such a consumer request.

Category	Examples
<b>A. Identifiers.</b>	A name, alias, postal address, unique personal identifier, online identifier, Internet Protocol

	address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
<b>C. Protected classification characteristics under California or federal law.</b>	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
<b>D. Commercial information.</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies
<b>F. Internet or other similar network activity.</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
<b>G. Geolocation data.</b>	Physical location or movements.

<b>H. Sensory data.</b>	Audio, electronic, visual, thermal, olfactory, or similar information.
<b>I. Professional or employment-related information.</b>	Current or past job history or performance evaluations.
<b>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</b>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
<b>K. Inferences drawn from other personal information.</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

PLAYAFI collects information on the Site at two different stages. First, we collect anonymous aggregate information (such as a domain name or IP address) from all visitors to the Site. This type of information is never linked to any personally identifiable information and is only used in the aggregate to generate general statistical reports about the use of the Site.

Second, we require the submission of certain personally identifiable information when you use the services available for the site. We collect information from you when you register on our site, place an order or fill out a form. When ordering or registering on our site, as appropriate, you may be asked to enter your: name, e-mail address, mailing address, phone number, credit card information, banking information or social security number. You may, however, visit our site anonymously.

Like most websites, we use cookies and/or web beacons to enhance your experience, gather general visitor information, and track visits to our website. Please refer to the 'do we use cookies?' section below for information about cookies and how we use them.

**4. Sources of Personal Information.**

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, during account registration from forms you complete, subscriptions you purchase or comments you provide on our Websites.
- Indirectly from you. For example, from observing your actions on our Website.
- From third parties. For example, third party social networking providers and advertising companies, our affiliates and service providers who provide services or information to us. If you do not want us to collect information from social networks, you should review and adjust your privacy settings on those networks as desired before linking or connecting them to our Websites.
- From publicly available sources. For example, online database searches.

## **5. Use and Disclosure ("Sale") of Personal Information**

We may have "sold" (as that term is defined in the CCPA) Personal Information in the following categories from consumers within the last twelve (12) months. Please note that the CCPA uses an expanded definition of the term, in which "sell" means:

"Selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for valuable consideration; or (B) sharing orally, in writing, or by electronic or other means, a consumer's personal information with a third party, whether for valuable consideration or for no consideration, for the third party's commercial purposes."

When we disclose that we may have sold Personal Information, it means that we may have received some kind of benefit to our PLAYAFI in return for sharing Personal Information, but not necessarily received any money in exchange.

The categories below are those defined in the CCPA. This does not mean that all examples of that category of Personal Information were in fact "sold" but reflects our good faith belief to the best of our knowledge that some of that information may have been shared for value in return. We will update this disclosure from time to time as appropriate.

In response to a verified consumer request for categories of Personal Information "sold," we will investigate and provide an individualized response to the consumer, and will not merely refer the consumer to our general practices outlined in this Privacy Policy unless our response would be the same for all consumers and this Privacy Policy discloses all the information that is otherwise required for the response to such a consumer request.

**Category:**

- Identifiers.
- Personal information categories listed in the California Customer Records statute.
- Protected classification characteristics under California or federal law.
- Commercial information.
- Internet or other similar network activity.
- Geolocation data.
- Sensory data.
- Professional or employment-related information.
- Non-public education information.
- Inferences drawn from other personal information.

**6. Use of Personal Information for Business Purposes or Commercial Purposes.**

We may use or disclose Personal Information we collect for "business purposes" or "commercial purposes" (as defined under the CCPA), which may include the following examples. The examples provided are illustrative and not intended to be exhaustive.

**(a) Auditing Interactions with Consumers.** For example: monitoring traffic to our Websites, counting ad impressions, and auditing legal and regulatory compliance.

**(b) Security.** For example, maintaining the safety, security, and integrity of our Website, products and Services, databases and other technology assets and our business, including preventing fraud, detecting security breaches and prosecuting violators, and responding to law enforcement requests and meeting requirements of applicable law, court order, or governmental regulations.

**(c) Debugging/Repair.** For example, identifying and repairing errors in our Websites' functionality.

**(d) Certain Short-term Uses.** For example, ad customization that does not involve or contribute to profiling.

**(e) Performing Services.** For example, creating, maintaining, customizing and securing your account with us, processing your purchases, transactions, and payments, hosting our Websites, fulfilling subscription orders, managing databases, performing analyses, billing, and marketing services such as managing promotions and contests.

**(f) Internal Research for Tech Development.** For example, testing, research, analysis, and product development, including to develop and improve our Website, products, and Services.

**(g) Quality and Safety Maintenance and Verification.** For example, improving, upgrading or enhancing our products, Services or Websites, and verifying the quality or safety of our Websites or Services.

**(h) Other Commercial Purposes.** For example, as described to you when collecting your Personal Information such as for promotions or contests, or to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which Personal Information we hold is among the assets transferred.

If we decide to collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes we will update this Privacy Policy.

In response to a verified consumer request to know what Personal Information was collected or sold, we will investigate and provide an individualized response to the consumer, which will include the business or commercial purpose for collecting and/or sharing that information. We will not merely refer the consumer to our general practices outlined in this Privacy Policy unless our response would be the same for all consumers and this Privacy Policy discloses all the information that is otherwise required for the response to such a consumer request.

## **7. Disclosing Personal Information to Other Parties**

We may disclose your Personal Information to the following categories of other parties for a business purpose or commercial purpose, as those terms are defined in the CCPA:

- Our affiliates
- Service providers
- Advertisers, advertising technology companies, analytics companies and other third parties with whom we have business relationships
- Government regulators
- Our legal advisors and parties involved in a legal process
- To an entity involved in the sale of our business
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or Services we provide to you

In order to provide advertisements and content that are more relevant to you, we and our advertising and content providers may collect Personal Information when you use our Websites (such as the IP address of your device, the identifier on your mobile device, or cookies stored on your device), and may share the information we collect with third parties. Please see our Cookie Policy for more information.

## **8. Your CCPA Privacy Rights and Choices**

The CCPA provides California residents with specific rights regarding their Personal Information as described below.

### **(a) Right to Know about Personal Information Collected or "Sold"**

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. After we receive and confirm your verifiable consumer request, we will disclose to you within the time required by the CCPA, the relevant information, which may include:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold your Personal Information, or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  1. sales, identifying the Personal Information categories that each category of recipient purchased; and
  2. disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

### **(b) Right to Request Deletion of Personal Information**

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions, including if we need the Personal Information for a reason related to our business, such as:

1. providing goods or Services to you;
2. detecting and resolving issues related to security or functionality;
3. complying with legal obligations;



4. conducting research in the public interest;
5. exercising free speech or insuring another's exercise of free speech; or
6. using the information for internal purposes that a consumer might reasonably expect.

After we receive and confirm your verifiable consumer request, we will delete your Personal Information from our records within the time period required by the CCPA, unless an exception applies.

## **8.1 Exercising Your Rights**

To exercise the rights described above, please submit a verifiable consumer request to us through the web form link provided below in Contact Us.

**You may only make a verifiable consumer request for access or data portability twice within a 12-month period.**

The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include: **providing your email and phone verification, known customer information, and/or account sign-up authentication or other information needed to verify your identity depending on the sensitivity of the Personal Information in question.**

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **8.2 Response Timing and Format**

We use good faith efforts to respond to a verifiable consumer request within forty-five (45) days after its receipt. If we need more time (up to 90 days), we will inform you of the reason and the needed extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by email.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. If we cannot comply with any portion of a request, the response we provide will also explain why, if applicable. For data portability requests, we will select a commercially reasonable format to provide your Personal Information that is commonly useable and should allow you to transmit the information from one entity to another entity without hindrance, but we do not guarantee that all formats are useable in all media. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **8.3 Non-Discrimination for the Exercise of CCPA Privacy Rights**

We will not discriminate against you for exercising any of your CCPA rights. In particular, we will not:

- Deny you goods or services
- Charge you different prices for goods or services, whether through denying benefits or imposing penalties
- Provide you with a different level or quality of goods or services
- Threaten you with any of the above

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your Personal Information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

We currently do not offer any financial incentive, benefit, or price differences in return for the disclosure, deletion, or sale of Personal Information. However, in general, our business model is based on providing a certain amount of monthly free content to readers, after which we may require that additional content access must be paid for. On some of our Websites and apps, this content may be paid for either through the delivery of advertisements, or through subscriptions. On those Websites and apps, consumers who use ad-blocking technology will be notified of the option to turn off the ad blocking or to pay for a subscription to access the content. On some other Websites and apps, content must be paid for after a certain number of monthly free articles, whether advertising is present or not.

## **9. Do Not Sell My Personal Information.**

The CCPA requires businesses to provide a web page where consumers can opt out of the "sale" of their Personal Information. The link to our Do Not Sell web form is located [here](#).

In addition, you may opt out of certain interest-based advertising by using the following resources:

(a) You may opt-out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices).

(b) You may opt-out of receiving permissible targeted advertisements by using the NAI Opt-out tool available at [optout.networkadvertising.org](http://optout.networkadvertising.org) or visiting About Ads.

(c) You may opt-out of having your activity on our Websites and Services made available to coo Analytics by installing the Google Analytics opt-out add-on for your web browser by visiting: [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout) for your web browser.

## **10. What do we use your information for?**

PLAYAFI collects a variety of information for many different purposes that are related to the use and sale of our products. These purposes include product interest and purchasing trends, credit information, payment information, contact information, usage information as it relates to our products, service requirements. We do this to develop a good understanding of your needs, analyze those needs and respond to those needs. This is done to identify products and services offered by our PLAYAFI affiliates or by other companies that we believe could be of interest to you. When doing so, we may offer these products or services to you for your purchasing consideration.

Further to the above, any of the information we collect from you may be used in one of the following ways:

- . To personalize your experience (your information helps us to better respond to your individual needs)
- . To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you)
- . To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs)

. Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

. Verify your identity

. To process transactions. Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.

. To administer a contest, promotion, survey, or other site feature

. To send periodic emails. The email address you provide for order processing, may be used to send you information and updates pertaining to your order, in addition to receiving occasional PLAYAFI news, updates, related product or service information, etc.

. Legal proceedings and requirements. We may use the information we collect to investigate or address claims or disputes relating to your use of PLAYAFI services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

## **11. How do we protect your information?**

We implement a variety of security measures to maintain the safety of your personal information when you place an order or access your personal information. Protecting the security of your personal information is very important to us.

We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential. All transactions are processed through a third party via SSL API. We do not store date OF ANY KIND on this website with exception to the fields noted herein.

After a transaction, your private information (credit cards, social security numbers, financials, etc.) will be kept on file for more than 60 days in order to facilitate future orders as some customers maintain ongoing, monthly purchasing transactions with PLAYAFI .

If you register with us, your online account information is protected by a password chosen by you. The site does not store plaintext (human-readable) passwords, nor does it store encrypted (computerdecryptable) passwords. Alternatively, this site uses password hashes and if exposed/compromised, cannot reveal your human-readable password. This is to help limit any

further use of your password on unrelated sites. Access to that online account requires your username and password. We recommend that you do not disclose your username and password to any other person. To prevent unauthorized access or disclosure, maintain data accuracy, and ensure the appropriate use of information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect online. We use the latest in encryption technology when collecting or transferring sensitive data, such as credit card and bank account information.

When registering for access to a secure area of the Site, we will ask you to select a username and password. We recommend that you do not divulge your password to anyone. We will never ask you for your password in an unsolicited phone call or in an unsolicited email. Also, remember to sign out of the registered site and close your browser window when you have finished your work. This is to ensure that others cannot access your personal information and correspondence when accessing your computer.

We use commercially reasonable procedures and various technical, administrative and physical safeguards to help protect the confidentiality of Personal Information. However, no data transmitted over the Internet or stored or maintained by us or our third-party service providers can be 100% secure given the reality of communication via technology systems. Therefore, although we believe the measures implemented by us are commercially reasonable and reduce the likelihood of security problems to a level appropriate to the type of data involved, we do not promise or guarantee, and you should not expect, that your Personal Information or private communications sent to us over those systems will always remain private or secure. We are not responsible for the circumvention of any privacy settings or security features.

If you believe that your Personal Information has been accessed or acquired by an unauthorized person, please promptly Contact Us so that necessary measures can quickly be taken.

## **12. Do we use Cookies?**

Yes (Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information.

We use cookies to authenticate users, help us remember and process the items in your shopping cart, understand and save your preferences for future visits, keep track of advertisements, and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. Session data is used to help us remember and process the items in your shopping cart and fetch your customer data from third party API. It expires and is destroyed after 1 hour based on inactive use OR is destroyed at log out. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify cookies. If you turn off cookies, some of the features that make your site experience more efficient may not function properly.

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users.

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We use Google AdSense Advertising on our website. Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

### **13. California Do Not Track Disclosures**

We do not currently respond to browser Do Not Track signals or other browser or device based mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. Unless and until the law requires us to respond to browser Do Not Track signals, we will not respond to those signals as an opt out, but if we do so in the future, we will describe how we do so here. However, we do provide consumers with the ability to manage their cookie choices as described in our Cookie Policy. For more information on Do Not Track, please visit [allaboutdnt.com](http://allaboutdnt.com).

### **14. Do we disclose any information to outside parties?**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses. Further to this, we may use customer identifiable information to investigate and help prevent potentially unlawful activity or if required by subpoena, search warrant, or other legal process. We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services.

### **15. Third party links:**

Occasionally, at our discretion, we may include or offer third party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

## **16. Disclosure of Personal Information:**

Some of PLAYAFI products, services and features require that we share information with other users or at your request. We may also share your information with our affiliates, subsidiaries and business partners, for legal reasons or in connection with claims or disputes.

1. As required by law. We will disclose personal information when required by law or if we have a good faith belief that such action is necessary to (a) comply with a current judicial proceeding, a court order or legal process served on us, (b) protect and defend our rights, or (c) protect the rights, property, and other interests of our users or others.
2. At your request. You may share information to others, per your request.
3. With general public when you submit content to a public forum. When you communicate with us through the internet via blogs, social media etc., your communications may be viewable by the public.
4. With Subsidiaries and Affiliates. We share information with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf.
5. With Service providers and business partners. PLAYAFI may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners.
6. With your consent. PLAYAFI may share your information other than as described in this policy if we notify you and you consent to the sharing.

## **17. Fair Information Practices Principles**

The Fair Information Practices Principles (FIPP) form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protect laws around the globe. Understanding the FIPP and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with FIPP we will take the following responsive action, should a data breach occur: we will notify you via email within 7 days.

## **18. Can Spam Act**

The Can-Spam Act is a law that sets the rules for commercial email, established requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations. To be in accordance with Can Spam, we agree to the following: not use false or misleading subjects or email addresses, identify the message as an

advertisement in some reasonable way, include the physical address of our business or site headquarters, monitor third-party email marketing services for compliance, if one is used, honor opt-out/unsubscribe requests quickly, and allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us at [info@PLAYAFI.com](mailto:info@PLAYAFI.com) and we will promptly remove you from ALL correspondence.

Questions, comments and complaints about PLAYAFI data practices can be submitted to PLAYAFI data protection office through the contact information provided above.

We process personal information inside and outside of the United States. PLAYAFI transfers information of users' outside the United States on the basis of mechanisms approved under applicable laws.

### **19. Information Retention and Deletion:**

PLAYAFI retains user profile and other information for as long as you maintain your PLAYAFI account.

PLAYAFI retains transaction, location, usage and other information for 7 years in connection with regulatory, tax, insurance or other requirements in the places in which it operates. PLAYAFI thereafter deletes or anonymizes such information in accordance with applicable laws.

Users may request deletion of their accounts at any time. Following such request, PLAYAFI deletes the information that it is not required to retain, and restricts access to or use of any information it is required to retain. You may request deletion of your account at any time by emailing to [info@PLAYAFI.com](mailto:info@PLAYAFI.com). Following such request, PLAYAFI deletes the information that it is not required to retain. In certain circumstances, PLAYAFI may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, PLAYAFI will delete your account as described above.

PLAYAFI may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if PLAYAFI shuts down a user's account because of unsafe behavior or security incidents, PLAYAFI may retain certain information about that account to prevent that user from opening a new PLAYAFI account in the future.

### **20. Business Transfers:**

In the event PLAYAFI goes through a business transition or transfer, our users' personal information may be part of the assets transferred. You acknowledge that such transfers may



occur, and that any acquirer of PLAYAFI or its assets may continue to use your personal information as set forth in this Privacy Policy.

## **21. California Online Privacy Protection Act Compliance:**

Because we value your privacy, we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personal information to outside parties without your consent.

As part of the California Online Privacy Protection Act, all users of our site may make any changes to their information at anytime by logging into their control panel and going to the 'Edit Profile' page.

## **22. Children's Online Privacy Protection Act Compliance:**

These Websites are not intended for use by children under the age of 13.

In addition, we do not knowingly collect information from children under the age of 16, although certain third party sites that we link to may do so. These third-party sites have their own terms of use and privacy policies and we encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide information on our Websites without their permission.

Involvement of parents: In accordance with the provisions of the Children's Online Privacy Act, in the event that we do begin collecting any Personal Information or data from children under the age of 13, we will notify parents first, and will seek parental or guardian consent to collect, use and/or disclose certain Personal Information from children under the age of 13. A parent may review and have deleted their child's Personal Information, and may refuse to permit further collection or use of their child's information by contacting us as noted at the end of this Privacy Policy. Parents may consent to our collection and use of their child's Personal Information without consenting to the disclosure of that information to others.

If you have reason to believe that a child under the age of 16 has provided Personal Information to us through a Website without the appropriate consent, please contact us as provided in the Contact Us section below with sufficient detail to enable us to delete that information from our databases.

### **22.2 Grounds for Processing**

The privacy policy requires that companies processing the personal data of EU users do so on the basis of specific legal grounds. As described below, PLAYAFI processes the information of EU users based on one or more of the grounds specified under the GDPR:

- a. The processing is necessary to provide the services and features you request

- PLAYAFI must collect and use certain information in order to provide its services. This includes:
  - User profile information that is necessary to establish and maintain your account, including to verify your identity; enable communications you're your orders and accounts; and to enable you to make payments or receive earnings.
  - Transaction information, which is necessary to generate and maintain in connection with your use of PLAYAFI services.
- b. The processing is necessary to protect the vital interests of our users or of others**
  - PLAYAFI may process personal information, including disclosing data with law enforcement authorities in case of threats to the safety of users or of others.
- c. The processing is necessary for PLAYAFI legitimate interests**
  - PLAYAFI collects and uses personal information to the extent necessary for its legitimate interests. This includes collecting and using information:
    - To maintain and enhance our users' safety and security.
    - To prevent, detect and combat fraud in connection with the use of our services.
    - To inform law enforcement officials regarding criminal acts or threats to public safety.
    - To provide customer support.
    - To optimize our service and develop new services.
    - For research and analytical purposes. This includes, for example, analyzing usage trends to improve the user experience and enhance the safety and security of our services.
    - For direct marketing purposes. This includes, for example, analyzing data to identify trends and tailor marketing messages to user needs.
    - To enforce PLAYAFI Terms of Use.
- d. The processing is necessary for the legitimate interests of other persons or parties**
  - PLAYAFI collects and uses personal information to the extent necessary for the interests of other persons or the general public. This includes sharing information in connection with legal or insurance claims, to protect the rights and safety of others.
  - PLAYAFI may also process personal information when necessary in regards to a substantial public interest, on the basis of applicable laws.
- e. The processing is necessary to fulfill PLAYAFI ENTERPRISES legal obligations**
  - PLAYAFI is subject to legal requirements in the jurisdictions in which it operates that require us to collect, process, disclose and retain your personal data.
  - PLAYAFI may also share information with law enforcement, or requests by third parties pursuant to legal processes. For more information about such sharing, please see PLAYAFI Guidelines for Law Enforcement Authorities in the United

States, Guidelines for Law Enforcement Authorities Outside the United States, and Guidelines for Third Party Data Requests.

**f. Consent**

- PLAYAFI may collect and use your information on the basis of your consent. You may revoke your consent at any time. If you revoke your consent, you will not be able to use any service or feature that requires collection or use of the information we collected or used on the basis of consent.
- PLAYAFI relies on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you.
- Please see the Choice & Transparency section below for further information about these data collections and uses and how to opt in or out of them.
- PLAYAFI may also collect personal information about you through voluntary surveys. Your responses to such surveys are collected on the basis of consent, and will be deleted once no longer necessary for the purposes collected.

**22.3 Choice and Transparency:**

PLAYAFI provides means for you to see and control the information that PLAYAFI collects.

You may also request that that PLAYAFI provide you with explanation, copies or correction of your data.

**1. Explanations, Copies and Correction**

You may request that PLAYAFI :

- Provide a detailed explanation regarding the information PLAYAFI has collected about you and how it uses that information.
- Receive a copy of the information PLAYAFI has collected about you.
- Request correction of any inaccurate information that PLAYAFI has about you.
- You can make these requests by contacting the Company at [info@PLAYAFI.com](mailto:info@PLAYAFI.com).

**2. Marketing Opt-Outs**

You may opt out of receiving promotional emails from PLAYAFI here. You may also opt out of receiving emails and other messages from PLAYAFI by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages.

**23. Terms and Conditions:**

Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website at PLAYAFI.com.

## **24. Your Consent:**

By using our site, you consent to our web site privacy policy. If we decide to change our privacy policy, we will post those changes on this page.

## **25. Policy Updates:**

We may occasionally update this policy.

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through email. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.

## **26. Contacting Us:**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your information described here, your choices and rights regarding such use, or you wish to exercise your rights under California law, please contact us as provided below:

Questions regarding this privacy policy?

<https://www.PLAYAFI.com/>

To fill out a Data Information or Deletion Request, [info@PLAYAFI.com](mailto:info@PLAYAFI.com)

Do Not Sell My Personal Information: Click here (<https://www.PLAYAFI.com/>)

Call us at \_\_\_\_\_

Email us at [info@PLAYAFI.com](mailto:info@PLAYAFI.com)