

# PRIVACY POLICY

Last updated: [ December 3, 2024 ]

This privacy policy ("Policy") applies to personal information we hold on our players, people who visit our websites, and anyone else whose personal data we hold.

In this Policy, "we," "us," and "our" means Overworld LLC. This Policy deals with where we are acting as a 'data controller' under the data protection legislation: which essentially means where we are responsible for deciding what personal data we collect and how we use it. We also often geoperate as a 'data processor', meaning that we are processing personal data on behalf of another entity (for example a publisher of one of our games). When we refer to "personal data", we mean data relating to you personally or from which you can be identified. Some of the information mentioned in this Policy is not "personal data" as is meant under data protection legislation, but we may refer to it to help you understand what we do.

We are committed to protecting and respecting the personal information of everyone we deal with – that is important to us and we know it is important to you. In this Policy you will find information about what types of personal data we hold about you, how and why we collect it, how we use it, and how we keep it secure. You will also find the information about your rights and how you may exercise them.

If you are younger than 18 years of age, you must review this Policy with your parent(s) or guardian(s) and they have agreed to these terms on your behalf and take full responsibility for your compliance with them.

Please read this Policy carefully and if you need to contact us about anything that is in here, or for anything else related to your personal data, you can reach us by email at [privacy@reachlabs.net](mailto:privacy@reachlabs.net).

## **1. WHAT INFORMATION DO WE COLLECT ABOUT YOU?**

The type of personal data we collect about you depends on your relationship with us. In general, we collect the following information:

A. Personal data that you provide directly to us:

your contact information such as your name, email address, phone/mobile number and date of birth;

your account name and password;

data that you provided to us to verify your account;

other data you choose to provide us, such as data to identify a lost or lapsed account or the answer to a special question we may ask you in order to permit you to unlock or recover a lost or lapsed account;

information about your purchases and payments (in addition, exclusively our payment service providers will collect your payment details in connection with any purchases you make in our games);

personal data you provide in connection with surveys, promotions, sweepstakes, competitions, campaigns and other events; and

other personal data that may be collected based on your explicit consent or our legitimate business interest for a specific purpose.

B. Personal data that we collect automatically when you play our games or otherwise use our services:

your player profile in our games, including your profile picture and any information needed for the relevant game to function, such as an inventory of in-game items;

your game user ID(s) – game-specific ID(s) generated by our game server for you;

Analytics ID – a randomly generated anonymous identifier used to distinguish activity from one game account versus another in our analytics data;

your account ID and its related account and profile information from third party service providers or platform operators (e.g. Apple or Google) when such account is used in connection with our games or services;

your contact and profile information if you choose to use a social login service such as Instagram, LinkedIn, X, Facebook, Xbox, Game Center, VK, WeChat, Google, Steam or PSN or other similar services to create or access your account;

your internet protocol (IP) address and mobile device identifiers (such as for example your device ID, advertising ID, MAC address, IMEI);

data to fight fraud (such as refund abuse in games or click fraud in advertising);

usage data including information about how you use our website, products, and services, and your game progress;

data about your device, such as device name and operating system, browser type, and language; and

marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences and it is at your full own discretion and control to adjust the settings on your device to turn off the function.

#### C. Personal data that we collect from third parties:

third party account ID – for example, your account with Facebook, Xbox, Game Center, VK, WeChat, Google, Steam or PSN which you may use to sign into your game account, leverage your social graph, or integrate with third-party features (such as achievements);

payment confirmation details, including the purchases you make and the amount you spend; and

your Discord account.

## **2. HOW WE COLLECT INFORMATION ABOUT YOU**

We will collect this information in a variety of ways depending on how we interact with you.

Direct interactions

You may give us your identity, contact or other information by filling in online forms or by corresponding with us by post, phone, in-game, email or otherwise. This includes personal data you provide when you:

- use our products or services;
- create a game account in one of our games or on our website, if any;
- interact with our Customer Services or our Data Protection Officer;
- subscribe to our mailing lists;
- enter a competition, promotion or survey;
- give us feedback; or
- otherwise communicate with us.

Third parties

We may receive personal data from third parties. This includes personal data we receive from the following:

- if you link your account(s) with such third party with our games or services or otherwise make it available to us via your privacy settings. This may include personal data from your account with Facebook, Game Center, VK, WeChat, Google, Xbox, Steam or PSN;
- technical data from advertising networks and
- search information providers.

Automated  
technologies  
or interactions  
(optional)

As you interact with our website or our games we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, pixels, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. You can reject our collection of cookies through individual browser settings. Please see our Section 4 for further details.

### **3. HOW WE USE YOUR PERSONAL DATA**

We use different personal data in different ways:

- to send you communications related to our games and services, answer your enquiries or deal with your complaints;
- providing and managing our services including our games;
- allowing you to participate in our website features;
- verifying and confirming payments (where relevant interacting with third party payment providers);
- account verification and clearance;
- direct marketing, letting you know about products and services that may be of particular interest to you;
- administering surveys and opinion polls;
- managing competitions and/or promotions and your registration for the same;
- technical and usage information/analytics to help us develop games that our customers want to play and to improve them and to detect cheating and activities that ruin the experience of players using our games, security risks, fraud and other unlawful activity;
- business and website analysis and improvement;
- the provision of social features as part of our services;
- customising your personal experience;

to send you related information such as updates, security alerts and support messages;

on-site and in-app advertising and promotion of our goods and services and those of our service providers and trusted third parties;

website, system administration and account verification;

leader boards, Discord and community information, nicknames and club name/club information;

to moderate communications between players either automatically or manually;

to answer or satisfy legal or regulatory requirements; and

when you interact with third party social networking features to serve you with advertisements and engage with you on third party social networks (we encourage you to review the privacy notices/policies of these social networks to enable you to opt out of such activities).

#### **4. COOKIES**

Like most online services, we and our partners may use cookies and similar technologies to provide and personalize our services, analyze gaming usage, target advertisements and prevent fraud. Cookies are small text files stored by browser(s) on your desktop computer or mobile device. To clarify, a cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can modify browser setting to decline cookies if you wish so. In that case, some aspects of the relevant service may then not function properly.

We and our partners, may use tracking technologies such as cookies, beacons, tags and scripts. These technologies are used in analyzing trends, administering the websites, tracking users' movements around the websites, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our websites and services, but your ability to use some features or areas of our websites or services may be limited.

## **5.LEGAL BASIS FOR PROCESSING**

There are a number of different legal grounds for processing personal data. Which one is applicable will depend on how we are using your data and for what purpose. In the majority of cases this condition will be that:

you have provided your consent to us using your personal data in that way (for example where you provide us with consent to send you marketing communications about our products and services);

our use of your personal information is in our legitimate interest as a commercial organisation. For example, we may use cookies to track information about how our website is used in order to continually improve its layout based on how you and other users interact with its content, and to personalise it to the user (for example, by showing content or a language which is relevant to your geographic location), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights;

our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you (e.g. to manage your account);

and/or

our use of your personal information is necessary to comply with a relevant legal or regulatory obligation.

We generally do not collect or process any 'special categories' of personal data (including information regarding your health, religious or political beliefs, ethnic background, sexual life and sexual orientation). If this would apply, we will generally rely on obtaining additional specific consent from you at the time we collect the information unless there is a legal requirement or other justification for processing that information.

## **6. CHILDREN**

Protecting children's privacy is of high importance for us. Our websites and our games are not intended for children under the age determined by data protection regulations or applicable laws in your country of residency, and in any case, no less than 13 years old, and we do not knowingly collect data relating to children. In respect of games or services that are not directed at children, but which may nonetheless appeal to them, we take additional steps to limit access to such games or services based on the player's age.

## **7. SHARING YOUR INFORMATION**

The personal data you provide to us may be shared with third party companies, agents, contractors, service providers or our affiliated companies if this is necessary to provide you with our services, respond to your inquiries or for any of the purposes described in this Policy. This may include:

- Our business partners and suppliers;

- Sub-processors who store or process information on our behalf, in particular data analytics providers and data storage providers. Information shared with such providers is supplied in an anonymised format such that, that data cannot be linked to any particular individual and is therefore not considered to be 'personal data';

- Our auditors, insurers, lawyers and other professional advisers;

- Credit reference agencies;

- Law enforcement agencies, other governmental agencies or third parties if we are required by law to do so;

- Other business entities should we plan to merge with or be acquired by that business entity, or if we undergo a re-organisation with that entity.

## **8. SOCIAL FEATURES**

Social features are a core component of our games. Other players and users may, for example, see your profile data, in-game activities and read the messages you have posted.

Our games and services may include features from our partners, if any, such as social media interaction tools (and albeit not currently, in the future may also relate to in-game advertising). These partners, if any, may in such case, following your consent, 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 and opt out where you deem relevant.

## **9. INTERNATIONAL DATA TRANSFERS**

Due to the nature of our services, you are aware and agree that your personal data may be transferred to, stored in, and processed by affiliated companies, subcontractors and/or our partners, located in countries outside the country where you live or work. Because different countries may have different data protection laws than your own country, and they may not provide you with protection of the same level to your personal information as the data protection law in the country where you live or work, in which case, we will take steps according to applicable laws and regulations in your country to ensure adequate safeguards are in place and that your personal information is adequately protected within the data process location. For example, we will make sure to protect your personal data by requiring that the third party applies the level of protection required under the applicable local data protection laws, or by requiring that the third party acts in accordance with our written instructions and our policies and standards.

## **10. YOUR RIGHTS**

Under applicable data protection laws in your country of residency you have a number of rights in relation to your personal data. We respect and honour these rights and will help you to exercise them insofar as we are able.

The following rights may apply to you:

- to request access to or a copy of any personal data which we hold about you;
- to request the rectification of your personal data, if you consider that the personal data we are holding is inaccurate;
- to request to delete your personal data, or object to the processing of your personal data;
- to ask us to delete your personal data, if you consider that we do not have the right to hold it;
- to withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- to ask us to stop or start sending you marketing messages as described below in the marketing section;
- to restrict processing of your personal data;

to data portability (moving some of your personal data elsewhere) in certain circumstances;

to object to your personal data being processed in certain circumstances; and

to not be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.

Please note that these rights are not absolute – in some cases they will not apply to you, or to the particular use that we are making of your data, and there are exceptions (for example if we have to process the data to comply with our own legal obligations) but if that is the case we will let you know if you make a request that we believe we cannot comply with.

Any request from you for access to or a copy of your personal data must be in writing to [privacy@reachlabs.net](mailto:privacy@reachlabs.net) and we will endeavour to respond within a reasonable period and in any event within one month in compliance with data protection legislation. We will comply with our legal obligations as regards your rights as a data subject.

You understand and agree that in accordance with applicable laws, we may have the right to charge you for a certain amount of fee depending on the complexity of your requests to cover our operational expenditure.

If there are other special provisions provided by applicable laws and regulations in the country where you live or work, we will process your personal data in accordance with applicable laws.

## **11. MARKETING**

If you have accepted to receive notifications for a certain game, we may use your personal data to send you tailored suggestions, offers or auction information about the game. For personalised in-game offers opt-out, you can use the options provided in the game settings. You can easily turn off the notification in each different category within the game or opt out from receiving notifications or alerts on your device.

You can opt-out of interest-based advertising on mobile applications, if any, 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).

## **12. HOW LONG WILL WE KEEP YOUR INFORMATION?**

We will only keep the information we collect about you for as long as required for the purposes set out in this notice or as required to comply with any legal obligations to which we are subject. This will involve us periodically reviewing our files to check that information is accurate, up-to-date and still required.

In some circumstances you can ask us to delete your data: see "Your Rights" for further information.

You acknowledge and agree that to improve the quality of our services, sometimes we may need your user data for research or statistical purposes, in which case we will make sure your personal data has been desensitized, de-identified and anonymized first (so that it can no longer be associated with you) and we may use this information without further notice to you.

If you opt out from marketing, we may retain the necessary information to enable us to respect your wishes to not be contacted for marketing purposes.

### **13. DATA SECURITY**

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal data we collect. Such measures will be appropriate to the nature of the data concerned and the level of risk.

If you have been provided with a password to access any of our services you should not share that password with anyone else.

However, no security measures are perfect and can be 100% secure. We cannot guarantee our security measures but we will do our best to protect your personal data in accordance with the applicable data protection laws and international security standards.

### **14. LINKS TO OTHER SITES**

Our websites may contain links to other sites, including via our social media buttons. While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other websites and a link does not constitute an endorsement of that website. Once you link to another website from our website you are subject to the terms and conditions of that website, including, but not

limited to, its internet privacy policy and practices. Please check these policies before you submit any data to these websites.

## **15. CONTACT**

Questions, comments and requests regarding this policy are welcomed and should be addressed to our Data Protection Officer by email at [privacy@reachlabs.net](mailto:privacy@reachlabs.net).

## **16. CHANGES TO THIS PRIVACY POLICY**

Any changes we make to our policy in the future will be posted on this page and, where material and appropriate, notified to you by in-game message. We urge you to check regularly to see any updates or changes to our policy. All changes to the Privacy Policy will be effective when posted unless otherwise regulated by applicable laws, and your continuous use of any of our services after the update will be deemed as your acceptance for the updated Privacy Policy unless material changes are involved, in which case we may notify you in advance in accordance with applicable laws and obtain your consent again in the form of a pop-up window when you log into our services again.

## **17. ADDITIONAL INFORMATION FOR CALIFORNIA; UNITED STATES RESIDENTS**

In this section, we provide additional information about how we handle personal data about California residents as required by the California Consumer Privacy Act of 2028 (CCPA) as amended by the California Privacy Rights Act (CPRA). The information enumerated in this section is in addition to and does not replace the information under this Policy.

A. No sale of personal data: We do NOT sell your personal data to any third party to provide the games described in this Policy. We also do NOT sell personal data of players who we know are younger than 16 years old.

B. Personal data disclosure: We may share your personal data with third parties as described in Section 7. Our third-party companies, agents, contractors, service providers, or our affiliated companies who work with us may have access to your personal data in order to provide you with the services within the time limits and throughout the duration of the agreements. We ensure that our service providers cannot use your personal data for any other purposes than what has been instructed by us.

C. Look back disclosure: In the preceding 12 months, we have collected, used, and disclosed the following categories of personal data as part of our services:

- Identifiers
- Customer records information
- Commercial Information
- Geolocation data

The details of how the above categories of personal data are collected, used, and disclosed are set out in Sections 2, 3 and 7 respectively.

D. California Resident rights: If you are a California resident, you may exercise the following rights:

- The right to request a copy of the personal data that we have collected about you in the prior 12 months.
- The right to request details about the categories of personal data we collect, the categories of sources, the business or commercial purposes for collecting information, and the categories of third parties with which we share information.
- The right to request deletion of the personal data that we have collected about you, subject to certain exemptions.
- The right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

An authorised agent may submit an access or deletion request on your behalf by sending a written authorization signed by you using the contact information in Section 15. We may still require you to directly verify your identity or confirm that you provided the authorised agent permission to submit the request.

## **18. ADDITIONAL INFORMATION FOR EEA AND UK RESIDENTS**

If you are in the European Economic Area (EEA) or the United Kingdom (UK), this section contains additional information that applies to you. The information enumerated in this section is in addition to and does not replace the information under this Policy.

A. Cross-Border Data Transfer: Where we transfer your personal data to countries and territories outside of the EEA and the UK, which have been formally recognised as providing an adequate level of protection for personal data, we rely on the relevant “adequacy decisions” from the European Commission, where applicable. Where the transfer is not subject to an adequacy decision, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this Policy. The safeguards used are no less stringent than the European Commission’s Standard Contractual Clauses.