

# Privacy Policy

## Introduction

Blockchain Cuties Universe team (the “Company”, “We”, “Us”) is committed to protect the privacy of the Player’s information. We provide this Privacy Policy (the “Policy”) to inform you of our policies and procedures regarding the collection, use, and disclosure of personal information received from our Sites and App.

By using or accessing the Sites and the App, you confirm that you have carefully read and understood this Policy. We respect your right for privacy. The only personal data related to you that We store is your digital wallet address, email address and digital signature of Terms of Use (<https://blockcaincuties.com>) and this Policy. Optionally the nickname can be provided by the player and stored in the database.

In most cases refusal to provide reliable information will lead to inability to provide necessary services to you.

Personal data related to you cannot be used without your consent. But We also have the right to use the personal data without your consent in order to perform the contract (agreement) with you, to fulfill lawful governmental requirements, as well as in other cases expressly permitted by applicable law.

The same definitions as in the Terms of Use (<https://blockchaincuties.com>) are used in this Policy.

## Information Collection

We undertake to ensure the safe processing of personal data and avoidance of unauthorized access, deletion or modification of such personal data. The above-mentioned measures must comply with the existing level of technological development and shall be applied taking into account the degree of harm that may be caused to you in case of unauthorized access, deletion or modification of personal data, but in any event such measures should be not lower than the requirements of the applicable legislation.

### What Information Do We Collect?

We collect data necessary to process your payment if you make purchases in the App, such as player identification numbers, payment ids and the amount and type of currency processed/received. All payment data, including your payment instrument number (such as a credit card number) is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

We collect your publicly available blockchain wallet address. We use your digital wallet address to guarantee your right of ownership of the Cuties that you have purchased.

We do not collect any other personally identifiable information about you unless you contact Us directly via email, application form or social network.

In some cases some other information might be accessible to Us, including such information which is necessary to identify players in specific payment systems, to solve claims of the subject of the

data or other third parties, some other technical information, including IP and software used for access to the websites or online services.

We automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. This information is primarily needed to maintain the security and operation of our Sites, and for our internal analytics and reporting purposes.

We do not collect any special category of personal data (such as racial origins, political opinions, health or biometric data).

### *Information collected through our App*

If you use our native mobile App, We may also collect the following information:

- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's (Bluetooth, calendar, camera, contacts, microphone, reminders, sensors, SMS messages, social media accounts, storage) and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.

### *Information collected from other sources*

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook, Twitter), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

*Here is a list of such other sources and their privacy policies:*

Facebook – <https://www.facebook.com/policy.php>;

Twitter – <https://twitter.com/ru/privacy>;

Google Analytics – <https://policies.google.com/privacy?hl=en-US>;

Hotjar – <https://www.hotjar.com/legal/policies/privacy/>; VK – <https://vk.com/terms>.

## **How Do We Use Your Information?**

We process your information for purposes based only on legal grounds such as legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.

Processing of your personal data shall mean any action (operation) or a combination of actions (operations) carried out with personal data including collection, recording, systematization, accumulation, storage, adjustment (update, change), extraction, use, transfer (distribution, assignment, access), depersonalization, blocking, deletion, destruction.

Personal data is collected and processed to the extent and in manner necessary to achieve purposes of such data processing. The purpose of data processing shall be indicated to you before or immediately after your personal data collected. If failed to do so, the purpose of data processing shall be considered solely the purpose of fulfilment of our obligations in accordance with the agreement or contract entered with you. We seek the ways and methods of using only anonymous personal data to the extent and degree as necessary to obtain the purpose of such personal data processing. When transferring personal data of the subject, we comply with the following requirements:

- not to disclose personal data to third parties without your consent, except in cases established by applicable legislation;
- not to disclose personal data for commercial purposes without your prior consent; ● grant access to personal data only to specially authorized persons.

*We use the information we collect or receive:*

- To facilitate account creation and logon process (with your consent). If you choose to link your account with Us to a third party account \*(such as your Google or Facebook account), we use the information you allowed Us to collect from those third parties to facilitate account creation and logon process. See the section below headed "How Do We Handle Your Social Logins" for further information.
- To send you marketing and promotional communications (for business purposes and/or with your consent). We and/or our third party marketing partners may use the personal information you send to Us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time.
- To send administrative information to you (for business purposes, legal reasons and/or possibly contractual). We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
- Fulfill and manage your orders (for contractual reasons). We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Sites.
- To post testimonials (with your consent). We may post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update, or delete your testimonial, please contact Us at [social@blockchaincuties.com](mailto:social@blockchaincuties.com) and be sure to include your name, testimonial location, and contact information.
- Deliver targeted advertising to you (for our business purposes and/or with your consent). We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

- Administer prize draws and competitions (for our business purposes and/or with your consent). We may use your information to administer prize draws and competitions when you elect to participate in competitions.
- Request feedback (for our business purposes and/or with your consent). We may use your information to request feedback and to contact you about your use of our Sites.
- To protect our Sites (for business purposes and/or legal reasons). We may use your information as part of our efforts to keep our Sites safe and secure (for example, for fraud monitoring and prevention).
- To enable user-to-user communications (with your consent). We may use your information in order to enable user-to-user communications with each Player's consent.
- To enforce our terms, conditions and policies (for business purposes, legal reasons and/or possibly for contractual reasons).
- To respond to legal requests and prevent harm (for legal reasons). If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- For other business purposes (for our business purposes and with your consent). We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites, products, services, marketing and your experience.

## **Will Your Information Be Shared with Anyone?**

We only share and disclose your information in the following situations:

- Compliance with Laws. We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Vital Interests and Legal Rights. We may disclose your information where We believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third party vendors, service providers, contractors or agents who perform services for Us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Sites, which will enable them to collect data about how you interact with the Sites over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all

or a portion of our business to another company. We also may share information with any third party to whom We assign or novate any of our rights or obligations under a relevant agreement with you.

- Third-Party Advertisers. We may use third-party advertising companies to serve ads when you visit the Sites. These companies may use information about your visits to our website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.
- Affiliates. We may share your information with our affiliates, in which case we will require those affiliates to honor this Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with Us.
- Business Partners. We may share your information with our business partners to offer you certain products, services or promotions.
- With your Consent. We may disclose your personal information for any other purpose with your consent.
- Other Players. When you share personal information (for example, by posting comments, contributions or other content to the Sites) or otherwise interact with public areas of the Site or App, such personal information may be viewed by all Players and may be publicly distributed outside the Site and our App in perpetuity. If you interact with other Players of our Sites and register through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other Players will be able to view descriptions of your activity, communicate with you within our Sites, and view your profile.

## **Do We Use Cookies and Other Tracking Technologies?**

Like many businesses, we also collect information through cookies and similar technologies. We use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. We also use cookies to store session identifiers, tutorial and daily quests states and Google Analytics required information. The server stores the public information obtained from the Smart Contracts. In addition, the server stores user generated content, such as items, adventure reports, Cutie marketplace featuring slots, leaderboards, raid boss reports, achievements and other App related activity information.

## **Do We Use Google Maps?**

No, we do not use Google Maps, but some of the services we may or are already using, might use Google Maps APIs. You may find the Google Maps APIs Terms of Service here – <https://developers.google.com/maps/terms>. To better understand Google’s Privacy Policy, please refer to this link – <https://www.google.com/policies/privacy/>.

## **How Do We Handle Your Social Logins?**

Our Sites offers you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public. If you login using Facebook, we may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny Us access to each individual permission.

We will use the information we receive only for the purposes that are described in this Policy or that are otherwise made clear to you on the Sites. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

## **Is Your Information Transferred Internationally?**

We store your personal information in the United States, and in the EEA and in Russia, depending on the country you live.

If you are a resident in the European Economic Area (the “EEA”), your personal information may be transferred to recipients outside the European Economic Area , including countries which has not been recognized by the European Commission as providing an adequate level of personal data protection (these countries may not have data protection or other laws as comprehensive as those in EEA) and you agree with this.

We will however take all necessary measures to protect your personal information in accordance with this Policy and applicable law. Such measures implement: 1) the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between Us and our third-party providers, which require all such recipients to protect personal information that they process from the EEA in accordance with European data protection laws or 2) protection by [Privacy Shield](#)

If you are located in a jurisdiction where the transfer of your personal information to another jurisdiction requires your consent, then, by using the Sites and App, you provide Us with your express and unambiguous consent to such transfer, storage, and/or processing of the information in such other jurisdictions.

## **What is Our Stance on Third-Party Websites?**

The Sites may contain advertisements from third parties that are not affiliated with Us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Sites. You should review the policies of such third parties and contact them directly to respond to your questions.

## How Long Do We Keep Your Information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this Policy will require Us keeping your personal information for longer than two (2) years past the termination of your account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## How Do We Keep Your Information Safe?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites is at your own risk. You should only access the services within a secure environment.

## Do We Collect Information from Minors?

We do not knowingly solicit data from or market to children under 16 years of age. By using the Sites, you represent that you are at least 16 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Site and the App. If we learn that personal information from the Players less than 16 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data We have collected from children under age 16, please contact Us at [social@blockchaincuties.com](mailto:social@blockchaincuties.com).

## What Are Your Privacy Rights?

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

So, we provide you with list of rights under applicable data protection laws in EU:

- **Right to access your personal information:** at any time, you can ask Us about what your personal data do We have, what do We do with it, why do We process them, who We have told about you, etc. You also can ask Us to give you a copy of the processed personal data, if you like;

- *Right to rectify your personal information:* at any time, you can request that We update, block or delete your personal data if the data is incomplete, outdated, incorrect, unlawfully received or there is no need to proceed it anymore;
- *Right to erasure:* at any time, you can ask us to delete all the personal data that We have about you – it is your right to be forgotten, like if We have never met before. We will also deactivate your account. If you do so, you will no longer have access to the App or the Sites;
- *Right to restrict the use of your personal information:* for example, if you think that your personal data is not accurate and We need time to check it, We can make a pause in the processing of your personal data enough to clarify, is it so or not. If you do not request deletion, then it is possible to request the reactivation of your account if it was accidentally or wrongfully deactivated. Please note that We cannot restore permanently deleted accounts;
- *Right to object to the processing of your personal information:* at any time, you can tell Us to stop and We will no longer process your personal data, but We can still keep it if there is a legitimate ground for that;
- *Right to data portability:* if you wish, you can ask Us to download (export) all your personal data that We have in the acceptable format to give it to someone else or ask Us to give them your data directly;
- *Right not to be subject to an automated decision:* if We process your personal data automatically and We make some decisions according to it, and it affects you in any serious way, you can express your point of view and contest such decision.
- *Right to lodge a complaint with a supervisory authority:* you always can complain about Us and about the way, We are processing your personal data.

If We are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

You may at any time review or change the information in your account or terminate your account by contacting Us using the contact information provided below.

Upon your request to terminate your account, We will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites. To opt-out of interest-based advertising by advertisers on our Site visit <http://www.aboutads.info/choices/>.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting Us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account.



## **Do California Residents Have Specific Privacy Rights?**

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our Players who are California residents to request and obtain from Us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to Us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Sites, you have the right to request removal of unwanted data that you publicly post on the Sites. To request removal of such data, please contact Us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Sites, but please be aware that the data may not be completely or comprehensively removed from our systems.

## **Do We Make Updates to This Policy?**

We may update this Policy from time to time. We notify about changes in this Policy by replacing the current version of this Policy on the website <https://blockchaincuties.com>. We encourage you to review this Policy frequently to be informed of how we are protecting your information.

## **How Can You Contact Us About This Policy?**

If you have questions or comments about this Policy, email our Privacy Officer, Helmut Bazis at [helmut@blockchaincuties](mailto:helmut@blockchaincuties).

The questions that are not regulated by the Policy shall be resolved in accordance with the legislation of the United Kingdom.