

PRIVACY POLICY

Version 2.0

Last update: December 24, 2025

This Privacy Policy (“**Policy**”) sets forth how Exbo (“**we**”, “**us**”, “**our**”) processes personal data of:

- visitors of our websites, including <https://exbo.net/>, <https://stalcraft.net/> and their subdomains (“**Websites**”),
- players of our “STALCRAFT: X” computer game (“**Game**”), and
- inbounds.

We keep our Policy under regular review, so it will be updated from time to time.

The company responsible for processing of your data (**data controller**) is Exbo East LLP.

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1. WHAT DATA WE COLLECT AND FOR WHAT PURPOSES

We process personal data primarily so that you can access and use our Game, the Websites, including account creation, gameplay, in-game interactions, transactions, content updates, security features, technical support, and other services linked to our products. We also process certain data to improve and develop the Game and Websites, maintain the reliability and safety of the services, comply with legal requirements, and communicate with you where relevant (for example, about updates or account-related matters).

You are not obliged to provide your personal data to us. However, if we need personal data to enter and perform the contract with you and you do not provide this data, we may not be able to perform the contract we have or are entering into with you and you may not be able to use the Game or Websites.

We do not collect any special categories of personal data about you (i.e. details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We also don't use your data for profiling and making automated decisions concerning you.

For each scenario of processing, we have set out below, in a table format, a description of all the ways we plan to use your personal data, and which legal bases we rely on to do so.

When you're use the Game or Websites

What are the purposes	What data we collect	What is the legal basis	For how long we store the data
Providing access to the Game, including - conclusion, performance and termination of the License Agreement - account registration and management - access to in-game functionality - sending service messages - processing and performing payments	- Full name - Contact details - Email - Username/account identifier - Identifiers in third-party platforms (e.g., Steam, Gmail, Twitch) - Device and system information (including IP address, MAC address, system IDs, hardware identifiers) - Data regarding usage of the Game - Financial/transactional data: information about payment instruments, payment and order history - In-game chats - Game data (behavioural data, game logs) - Data contained in requests and reports	Performance of a contract (License Agreement) Legal obligations under accounting, tax laws	- For the duration of the agreement and no longer than 3 years after the account is deactivated (either by you or due to 2 years of inactivity). - Financial/transactional data: up to 5 years to comply with applicable accounting and tax laws.
Providing access to the Websites, including - account registration and management - access to Websites' functionality - support requests	- Full name - Email - Username/account identifier - Identifiers in third-party platforms (e.g., Steam, Gmail, Twitch) - Device and system information (including IP address, MAC address, system IDs, hardware identifiers) - Data regarding usage of the Websites - Data contained in requests and reports	Performance of a contract (License Agreement) Legal obligations under accounting, tax laws	- For the duration of the agreement and no longer than 3 years after the account is deactivated (either by you or due to 2 years of inactivity). - Financial/transactional data: up to 5 years to comply with applicable accounting and tax laws.
Detection, investigation and prevention of unlawful actions, including - violations of the Policy, License Agreement - infringement of our intellectual property rights or those of third parties' - protection from harmful actions, cheating, fraud and financial abuse	- Device and system information - Username/account identifier - Payment metadata - Data regarding usage of the Game - In-game chats - Game data (behavioural data, game logs) - Data contained in requests and reports	Legitimate Interest (ensuring security of services, protecting users and our rights, preventing fraud and misuse)	- For the duration of the agreement and no longer than 3 years after the account is deactivated (either by you or due to 2 years of inactivity), unless further processing is not necessary for purposes of legal claims. - Data needed to prevent re-registration of banned users for the period necessary to ensure the security of the Game and interests of other users

What are the purposes	What data we collect	What is the legal basis	For how long we store the data
Improving, modifying, updating and maintaining functionality of the Game and Websites , including - fixing errors - supporting updates - enhancing user experience and introducing new features	- Device and system information - Username/account identifier - Data regarding usage of the Game - Data contained in requests and reports	Performance of a contract (License Agreement) Legitimate Interest (ensuring functionality and improving Game and Websites)	For the duration of the agreement and no longer than 3 years after the account is deactivated (either by you or due to 2 years of inactivity)
Direct marketing and promotional communication , including sending newsletters and direct communication for promotional purposes	- Full name - Contact details - Username/account identifier - Consent records	Consent if required by applicable laws	For the duration of a valid consent, or for the duration of the agreement and no longer than 3 years after the account is deactivated if consent is not required
Digital marketing, analytics and advertising measurement , including use of cookies, pixels and web analytics tools to analyse Websites' traffic and effectiveness	- Pixel IDs and analytics system identifiers - IP address - Device and system information (including MAC address, system IDs) - Data regarding usage of the Websites	Legitimate Interest (improving marketing efficiency and evaluating traffic and user interaction)	Up to 13 months after the last Website visit

When you participate in our events and contests

What are the purposes	What data we collect	What is the legal basis	For how long we store the data
Organising events, giveaways and contests , including performance of event rules, determining winners, and prize delivery	- Full name - Contact details - Tax residency - Username/account identifiers - Delivery address - Other data in event applications	Performance of a contract Legal obligations under accounting, tax laws	- For the duration of the event / contest and no longer than 1 year after. - Financial/transactional data: up to 5 years to comply with applicable accounting and tax laws.

When you contact us for inquiries

What are the purposes	What data we collect	What is the legal basis	For how long we store the data
Processing requests and inquiries	- Full name (if applicable) - Contact details - Language - Other information provided in web forms or inquiries	Legitimate Interest (answering inquiries and assessing our performance in handling those)	Within 1 year from the date of closure of the request

2. COOKIES AND OTHER TRACKERS

We use cookies (small text files that are stored on your browser or device) and other web-analytics technologies (local storage, session storage, pixels) (all referred to as "**cookies**" for being simpler) on our Websites.

Cookies allow us to obtain information from your device, such as your device type or operating system, IP address, time of visit and other technical details which allow us to learn how you interact with our Websites.

Essential cookies (necessary and preferences) are necessary for the provision of our website, securing the network, and remembering your choices. Analytical and marketing cookies may be used for the collection and statistical analysis of data related to the use of the Websites.

You can set in your browser to remove or reject browser cookies. To do so, please follow the instructions provided by your browser which are usually located within the 'Help' or 'Preferences' menu.

Please also click below for detailed information on how to disable and delete cookies in some commonly used browsers:

[Microsoft® Internet Explorer](#)

[Google Chrome™](#)

[Safari®](#)

Most mobile devices also allow you to change your cookie settings. Please refer to the setting of the operating system of your device.

3. HOW WE SHARE YOUR DATA

We share your data only in limited cases with the following recipients:

- affiliates and other companies of our group to efficiently perform our business activities,
- SaaS, hosting service providers for the use of SaaS software and hosting our IT systems we use to provide our Service, payment, analytics, notification providers,
- new business owner if we ever sell our business,
- law enforcement or other governmental body if required by a lawful order,
- professional advisors, such as lawyers, banks, auditors, and insurers, where necessary in the course of the professional services that they render to us.

4. HOW WE TRANSFER DATA INTERNATIONALLY

Our business is international by nature, which means that the provision of the Game and the Websites involves the transfer of personal data across borders to our affiliates and service providers in third countries that have different data protection laws.

Some of these countries may not provide the same level of data protection as your jurisdiction. In such cases, we take appropriate measures to ensure that your data remains protected. These measures include relying on adequacy decisions issued by the European Commission or other competent authorities in third countries, entering into Standard Contractual Clauses (SCCs) adopted by the European Commission or similar contractual clauses issued by other competent authorities with our affiliates and partners, assessing the risks associated with international transfers, and implementing additional safeguards, where appropriate.

5. WHAT ARE YOUR RIGHTS

Under the applicable privacy laws you have certain rights, which are briefly summarised below, in relation to any personal data about you which we hold. Please note that the name, scope or list of your rights may be different depending on the privacy law applicable. Should you have any questions, about whether you have certain rights and how to exercise them, please contact us as specified in Section 7.

Accessing data

You have the right to ask us to provide information on whether we process your data and how we do it. Also, you can request a copy of your personal data we hold about you. In some cases, we may need to ask for additional information before we are able to disclose any data to you to protect the privacy of third parties.

Data portability

You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

Changing or updating data

You have the right to rectify data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Deleting data

You have the right to ask us to delete your data in certain circumstances. In some cases, we may be required to continue processing your data for other purposes even though you have asked us to delete it. Should this be the case, we will provide you with further information.

Objecting, restricting processing

You have the right to request that we stop using all or some of your personal data, or that we limit (restrict) our use of their data. This includes objecting to use of personal data that is based on legitimate interests. If we process your personal data for direct marketing purposes, we will stop such processing without any exceptions after we receive such a request from you. But, in other cases we may continue to process data after such objection or request to the extent required or permitted by applicable law.

Revoking consent

You have the right to withdraw your consent at any time after which we will stop any processing of your data for such purposes. Specifically, you can withdraw your consent to direct marketing by following the “unsubscribe” link or contacting us in accordance with Section 7 below.

Complaints

If you believe we have violated your rights you may lodge a complaint with the data protection authority in the country you reside in or work. You also have a right to the judicial remedy. Nevertheless, we kindly ask to contact us first to see if we can resolve your issue amicably.

You can also access, delete, and correct some of your personal data directly in your account settings and on your device.

If you would like to exercise the rights above, please contact us as specified in Section 7.

6. THE SAFETY AND SECURITY OF DATA

No IT system or online service is 100% safe. But we do our best to ensure security of your personal data. We take technical, organisational, and administrative measures, including, where relevant, access management, encryption, logging, etc., to ensure that your personal

data is protected from unauthorised or accidental access, deletion, modification, blocking, copying and dissemination.

Access to your account is authorised using your login (email address) and password. You are responsible for keeping your credentials confidential. If you suspect any misuse or loss of, or unauthorised access to your data, you should let us know immediately.

We also have procedures in place to deal with any suspected data breach. We will notify you and any applicable authority of a suspected data breach where we are legally required to do so.

7. CONTACTS

If you have any questions regarding this Policy or how we process your personal data, please contact us:

- by email: law@exbo.net or
- by mail:

Exbo East Limited Liability Partnership

Registration number: 221140035112

Legal address: Building 12A, Kerey-Zhanibek Khandar street, Yesil district, Astana, 010000, the Republic of Kazakhstan