

# PRIVACY POLICY

Version 3.0

Last updated: June 17, 2026

**FOR THE USERS FROM THE UNITED STATES:** To get the information on how we collect and process your data, please follow this link to see our U.S. Privacy Policy: [https://exbo.games/legal/us\\_privacy.pdf](https://exbo.games/legal/us_privacy.pdf).

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

- visitors of our websites, including <https://exbo.games/>, <https://stalzone.com/> and their subdomains (“**Websites**”),
- players of our STALZONE computer game (“**Game**”),
- media partners, and
- inbounds.

This Policy applies to personal data collected through gameplay, in-game systems, account activity, communications, customer support interactions, enforcement processes, and the technical infrastructure supporting the Game and Services.

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

When we make changes, we will update the “Last update” date at the top of this Policy and, where required by applicable law, provide additional notice, for example, through in-game notifications, email, or other appropriate channels. Personal data is handled in accordance with the Policy in effect at the time the data is collected, unless otherwise required or permitted by applicable law. Your continued use of the Game or Websites after an updated Policy has been posted constitutes your acknowledgement of the updated Policy, to the extent permitted by applicable law.

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

Exbo generally acts as a data controller in respect of personal data collected and processed in connection with the Game, the Websites, and related services. This means that Exbo determines the purposes and means of processing, including for account management, gameplay functionality, enforcement of our terms, security, fraud prevention, and improvement of the services.

Some aspects of the services involve third parties — for example, distribution platforms, payment processors, infrastructure providers, and analytics services. Such third parties may act as independent data controllers under their own privacy policies. Exbo does not control and is not responsible for the independent data-processing practices of such third parties.

Where Exbo engages service providers to process personal data on its behalf, those providers act under Exbo’s instructions and are bound by contractual obligations to apply appropriate technical and organisational safeguards. Exbo remains responsible for ensuring that such processing is carried out in accordance with applicable law.

## 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.

### **Data collected from other sources; third-party payment processors**

EXBO may receive personal data about you from third-party sources where permitted by applicable law. These sources may include public databases, business or marketing partners, analytics providers, event or promotional partners, and other third parties that support the operation, distribution, or promotion of the Game and Services. The information obtained from such sources may include contact details, account identifiers, platform-related information, and other data relevant to providing, maintaining, or improving the Services. EXBO may use this information to update, verify, or supplement the information we maintain, to support service functionality, and to tailor user experience.

EXBO may also receive personal data from authorized third-party platforms through which the Game is distributed or accessed, such as platform operators or storefront providers. This information may include platform-specific user identifiers, account details, transaction confirmations, and support-related data, and is subject to the respective platform's privacy practices.

Certain third-party partners may assist EXBO with analytics, advertising, performance monitoring, or related services. These partners may collect or provide information about interactions with the Game, Websites, and Services to support EXBO's operations. EXBO does not control and is not responsible for the independent privacy practices of such third parties.

Payments and transactions relating to the Game, Websites, and Services may be processed by third-party payment processors or platform providers acting as merchants of record. In such cases, payment information (such as payment card or bank account details) is provided directly to the applicable payment processor and is processed in accordance with that provider's privacy policy. EXBO does not collect or store full payment card numbers, bank account numbers, or other sensitive financial information, except as necessary to maintain transaction records, confirm payments, or comply with legal, accounting, or tax obligations.

When you 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
<p><b>Providing access to the Game,</b> including</p> <ul style="list-style-type: none"> <li>• conclusion, performance and termination of the <a href="#">Licence Agreement</a></li> <li>• account registration and management</li> <li>• access to in-game functionality</li> <li>• sending service messages</li> <li>• processing and performing payments</li> </ul>	<ul style="list-style-type: none"> <li>• Full name</li> <li>• Contact details</li> <li>• Email</li> <li>• Username/account identifier</li> <li>• Identifiers in third-party platforms (e.g., Steam, EGS, Gmail, Twitch)</li> <li>• Device and system information (including IP address, MAC address, system IDs, hardware identifiers)</li> <li>• Data regarding usage of the Game</li> <li>• Financial/transactional data: information about payment instruments, payment and order history</li> <li>• In-game chats</li> <li>• Game data (behavioural data, game logs)</li> <li>• Data contained in requests and reports</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Performance of a contract</b> (License Agreement)</li> <li>• <b>Legal obligations</b> under accounting, tax laws</li> </ul>	<ul style="list-style-type: none"> <li>• For the duration of the agreement and no longer than <b>3 years after the account is deactivated</b> (either by you or due to 2 years of inactivity).</li> <li>• Financial/transactional data: <b>up to 5 years</b> to comply with applicable accounting and tax laws.</li> </ul>
<p><b>Providing access to the Websites,</b> including</p> <ul style="list-style-type: none"> <li>• account registration and management</li> <li>• access to Websites' functionality</li> <li>• support requests</li> </ul>	<ul style="list-style-type: none"> <li>• Full name</li> <li>• Email</li> <li>• Username/account identifier</li> <li>• Identifiers in third-party platforms (e.g., Steam, EGS, Gmail, Twitch)</li> <li>• Device and system information (including IP address, MAC address, system IDs, hardware identifiers)</li> <li>• Data regarding usage of the Websites</li> <li>• Data contained in requests and reports</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Performance of a contract</b> (License Agreement)</li> <li>• <b>Legal obligations</b> under accounting, tax laws</li> </ul>	<ul style="list-style-type: none"> <li>• For the duration of the agreement and no longer than <b>3 years after the account is deactivated</b> (either by you or due to 2 years of inactivity).</li> <li>• Financial/transactional data: <b>up to 5 years</b> to comply with applicable accounting and tax laws.</li> </ul>
<p><b>Detection, investigation and prevention of unlawful actions,</b> including</p> <ul style="list-style-type: none"> <li>• violations of the Policy, License Agreement</li> <li>• infringement of our intellectual property rights or those of third parties'</li> <li>• protection from harmful actions, cheating, fraud and financial abuse</li> </ul>	<ul style="list-style-type: none"> <li>• Device and system information</li> <li>• Username/account identifier</li> <li>• Payment metadata</li> <li>• Data regarding usage of the Game</li> <li>• In-game chats</li> <li>• Game data (behavioural data, game logs)</li> <li>• Data contained in requests and reports</li> </ul>	<p><b>Legitimate Interest</b> (ensuring security of services, protecting users and our rights, preventing fraud and misuse)</p>	<ul style="list-style-type: none"> <li>• For the duration of the agreement and no longer than <b>3 years after the account is deactivated</b> (either by you or due to 2 years of inactivity), unless further processing is not necessary for purposes of legal claims.</li> <li>• 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</li> </ul>

What are the purposes	What data we collect	What is the legal basis	For how long we store the data
<b>Improving, modifying, updating and maintaining functionality of the Game and Websites</b> , including <ul style="list-style-type: none"> <li>fixing errors</li> <li>supporting updates</li> <li>enhancing user experience and introducing new features</li> </ul>	<ul style="list-style-type: none"> <li>Device and system information</li> <li>Username/account identifier</li> <li>Data regarding usage of the Game</li> <li>Data contained in requests and reports</li> </ul>	<ul style="list-style-type: none"> <li><b>Performance of a contract</b> (License Agreement)</li> <li><b>Legitimate Interest</b> (ensuring functionality and improving Game and Websites)</li> </ul>	For the duration of the agreement and no longer than <b>3 years after the account is deactivated</b> (either by you or due to 2 years of inactivity)
<b>Direct marketing and promotional communication</b> , including sending newsletters and direct communication for promotional purposes	<ul style="list-style-type: none"> <li>Full name</li> <li>Contact details</li> <li>Username/account identifier</li> <li>Consent records</li> </ul>	<b>Consent</b> if required by applicable laws	For the duration of a valid consent, or for the duration of the agreement and no longer than <b>3 years after the account is deactivated</b> if consent is not required
<b>Digital marketing, analytics and advertising measurement</b> , including use of cookies, pixels and web analytics tools to analyse Websites' traffic and effectiveness	<ul style="list-style-type: none"> <li>Pixel IDs and analytics system identifiers</li> <li>IP address</li> <li>Device and system information (including MAC address, system IDs)</li> <li>Data regarding usage of the Websites</li> </ul>	<b>Legitimate Interest</b> (improving marketing efficiency and evaluating traffic and user interaction)	Up to <b>13 months after the last Website visit</b>

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
<b>Organising events, giveaways and contests</b> , including performance of event rules, determining winners, and prize delivery	<ul style="list-style-type: none"> <li>Full name</li> <li>Contact details</li> <li>Tax residency</li> <li>Username/account identifiers</li> <li>Delivery address</li> <li>Other data in event applications</li> </ul>	<ul style="list-style-type: none"> <li><b>Performance of a contract</b></li> <li><b>Legal obligations</b> under accounting, tax laws</li> </ul>	<ul style="list-style-type: none"> <li>For the duration of the event / contest and no longer than 1 year after.</li> <li>Financial/transactional data: <b>up to 5 years</b> to comply with applicable accounting and tax laws.</li> </ul>

When you participate in our Social Media Reward Program

What are the purposes	What data we collect	What is the legal basis	For how long we store the data
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<p><b>Audience identification</b> Linking game accounts with social media accounts to build a unified player profile.</p>	<ul style="list-style-type: none"> <li>• OAuth identifiers (where applicable)</li> <li>• platform user ID (e.g., Telegram User ID, Steam ID, EGS, Google Account ID)</li> <li>• STALZONE account ID</li> <li>• authentication tokens (where technically required)</li> <li>• refresh tokens</li> <li>• token expiry metadata</li> <li>• linked account mapping (game account - platform account).</li> </ul>	<p><b>Performance of contract</b> (providing requested in-game feature and rewards) <b>Consent</b> (processing of social media data carried out when the player voluntarily connects a platform)</p>	<ul style="list-style-type: none"> <li>• For the duration of the game account or until the player withdraws consent.</li> <li>• Authentication tokens (one-time identifiers) - stored in a separate database; invalidated after use. Logs retained for no more than 90 days.</li> </ul>
<p><b>Subscription verification</b> Confirming that a player has subscribed to or joined official game channels and communities in order to award in-game rewards.</p>	<ul style="list-style-type: none"> <li>• Subscription verification result (yes/no)</li> <li>• verification records</li> <li>• platform user ID (e.g., Telegram User ID, Steam ID, EGS, Google Account ID)</li> <li>• relevant public membership status exposed by platform API server/channel/group membership status where available.</li> </ul>	<p><b>Performance of contract</b> (providing requested in-game feature and rewards) <b>Consent</b> (processing of social media data carried out when the player voluntarily connects a platform)</p>	<ul style="list-style-type: none"> <li>• For the duration of the game account</li> <li>• Verification records may be retained for the duration of the account plus up to 3 years for fraud prevention and recordkeeping.</li> </ul>
<p><b>Reward distribution</b> Automatically crediting in-game items and consumables to the player's personal storage upon successful verification.</p>	<ul style="list-style-type: none"> <li>• STALZONE account ID</li> <li>• platform user ID (e.g. Telegram User ID, Steam ID, Google Account ID)</li> <li>• connection status</li> <li>• reward claim status</li> <li>• timestamps of connection / verification / reward issuance</li> <li>• anti-fraud technical logs</li> </ul>	<p><b>Performance of contract</b> (providing requested in-game feature and rewards)</p>	<ul style="list-style-type: none"> <li>• Verification and distribution records retained for the duration of the account plus up to 3 years for fraud prevention and recordkeeping.</li> </ul>
<p><b>Segmentation &amp; analytics</b> Building interest and behavioural profiles across platforms (activity, subscriptions, content preferences) to improve the gaming experience.</p>	<ul style="list-style-type: none"> <li>• Publicly available profile data</li> <li>• public channel / group memberships</li> <li>• public engagement signals</li> <li>• inferred interest segments</li> <li>• campaign attribution data</li> <li>• aggregated analytics data</li> </ul>	<p><b>Legitimate interests</b> (Analytics, audience segmentation, fraud prevention, and ensuring the integrity of the reward system) <b>Consent</b> if required by applicable laws</p>	<ul style="list-style-type: none"> <li>• No more than 24 months from the date of last activity; aggregated or deleted upon expiry.</li> </ul>
<p><b>Fraud prevention</b> Preventing reward farming, multi-accounting, and other forms of abuse via one-time unique identifiers and account-link verification.</p>	<ul style="list-style-type: none"> <li>• IP-derived security signals</li> <li>• device / session identifiers</li> <li>• claim patterns</li> <li>• repeated token usage</li> <li>• duplicate platform links</li> <li>• fraud scores</li> <li>• security event logs.</li> </ul>	<p><b>Legitimate interests</b> (security, fraud prevention, protecting game economy).</p>	<ul style="list-style-type: none"> <li>• Typically, up to 3 years, or longer where needed for investigation or legal claims.</li> </ul>

When you participate in our media partnership program ▼

What are the purposes	What data we collect	What is the legal basis	For how long we store the data
<p><b>Collaboration with partners, influencers and content creators, including</b></p> <ul style="list-style-type: none"> <li>• outreach, negotiation, conclusion and performance of agreements</li> <li>• arrangement of promotional activities, tracking and providing statistics for referral/share programmes</li> <li>• communication and payment processing</li> </ul>	<ul style="list-style-type: none"> <li>• Full name</li> <li>• Contact and bank details</li> <li>• Age</li> <li>• Tax residency</li> <li>• Region and country</li> <li>• Social media channel identifiers and statistics (audience size, engagement, referral activity)</li> <li>• Username/account identifiers</li> <li>• Photo</li> <li>• Payment and billing information</li> <li>• Performance metrics associated with promotional activity</li> </ul>	<p><b>Performance of a contract</b> and precontractual communication upon your request</p> <p><b>Legal obligations</b> under accounting, tax laws</p>	<p><b>For the duration of the contract.</b></p> <p><b>Financial/transactional data:</b> up to 5 years to comply with applicable accounting and tax laws.</p>

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
<p><b>Processing requests and inquiries</b></p>	<ul style="list-style-type: none"> <li>• Full name (if applicable)</li> <li>• Contact details</li> <li>• Language</li> <li>• Other information provided in web forms or inquiries</li> </ul>	<p><b>Legitimate Interest</b> (answering inquiries and assessing our performance in handling those)</p>	<p>Within <b>1 year</b> from the date of closure of the request</p>

## **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. ANTI-CHEAT AND ENFORCEMENT DATA**

To maintain the integrity, security and fair use of the Game, we process certain personal data and technical information, including behavioural data and gameplay activity, device and system signals, in-game interactions and logs, reports submitted by other users, and indicators of potential violations of our terms. We may use such data to detect, investigate and prevent cheating, exploitation, fraud, abuse and other prohibited conduct.

The processing of this data may result in enforcement actions, including warnings, restrictions, suspensions, or termination of accounts, in accordance with our terms and applicable law. The legal basis for this processing is our legitimate interest in protecting users, ensuring the integrity of the services, and preventing misuse, and, where relevant, the performance of our contract with you and compliance with legal obligations.

## **4. GAME-SPECIFIC PROCESSING AND RISKS**

Use of the Game involves operational features and consequences relating to gameplay systems, user interactions, and enforcement of our terms. These systems are designed to support fair gameplay and the proper functioning of the services. As a result, user activity within the Game may be monitored, evaluated, and subject to enforcement actions as described in this Policy and in our terms.

Certain actions, including violations of our terms or detection of prohibited conduct such as cheating, exploitation, or abuse, may result in warnings, restrictions, suspension, or termination of access to the Game and related services.

Virtual items, in-game currency, user accounts, and gameplay progress are subject to the rules and systems governing the Game and may be affected by enforcement actions, technical updates, security measures, or system changes.

## **5. 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.
- third-party vendors, service providers, contractors, or agents that perform services on our behalf and require access to personal data to support the operation of the services, including providers of hosting, infrastructure, data storage, cybersecurity, analytics, customer support, anti-cheat and fraud-prevention services, and payment-processing coordination,
- platform operators, payment providers, and storefront partners where necessary to operate the Game, process transactions, handle refunds and chargebacks, enforce our terms, or comply with applicable platform requirements,
- any third party where we reasonably believe disclosure is necessary to (a) investigate, prevent or take action regarding potential violations of our terms or applicable law; (b) detect, prevent or address fraud, abuse, cheating or security issues; (c) protect against harm to the rights, property or safety of Exbo, its users, or the public; (d) respond to or defend against legal claims; or (e) comply with applicable legal obligations, in each case limited to what is reasonably necessary and proportionate,
- any other recipient where you have provided your consent.

## **6. 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.

Where appropriate, we also rely on technical, organisational, and contractual measures designed to maintain a level of protection consistent with this Policy, including encryption in transit and at rest, access controls, contractual data-protection commitments, and the use of service providers operating under a shared-responsibility model for security.

If you would like more information about the specific transfer mechanisms we use, you may contact us as set out in Section 11.

## **7. MINORS**

The Game and Websites are not directed to children under the age of 13, and we do not knowingly collect personal data from children under 13 without appropriate parental authorisation where required by applicable law. Where we have actual knowledge that a user is under 13, we will either restrict or block access to the services or obtain verifiable parental consent prior to collecting or processing personal data, in accordance with applicable law.

Users between the ages of 13 and 17 (or the applicable age of digital consent in their jurisdiction) may use the services, but must obtain parental or legal-guardian consent where

required by applicable law. Parents and legal guardians are responsible, to the extent permitted by applicable law, for the activities of minors using the services, including gameplay activity, account use, and transactions.

We may implement age-gating mechanisms, including date-of-birth entry, self-declared age screening, or reliance on platform-provided age signals, and may restrict access to certain features, limit functionality, or deny transactions based on age-related information. We may also suspend or terminate accounts where age information is inaccurate, inconsistent, or indicates that the user is not eligible to use the services.

If we become aware that personal data has been collected from a user under 13 without the required parental consent, we will take reasonable steps to delete such data and, where appropriate, deactivate the associated account. Parents or legal guardians who believe a child has provided personal data to us without appropriate consent may contact us as set out in Section 11.

## **8. 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 the 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 your data. This includes objecting to the 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 11 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 11.

Before responding to a request, we may take reasonable steps to verify your identity to confirm that the request is made by the individual to whom the data relates or by an authorised representative. Verification procedures may vary depending on the jurisdiction, the sensitivity of the data involved, and the nature of the request. We may also request additional information necessary to process the request.

We will respond to verified requests within the timeframe required by applicable law and, where permitted, may extend such timeframe as necessary, in which case we will notify you of the reasons for the extension. We may deny, limit, or condition a request where necessary to comply with applicable law, protect the rights or safety of Exbo or others, prevent fraud or abuse, enforce our terms, or maintain the integrity and security of our services. Where we decline to take action on a request, we will notify you of the reasons for the decision unless prohibited by law, and, where permitted by applicable law, you may appeal the decision by contacting us at the address in Section 11 with "Privacy Request Appeal" in the subject line.

Withdrawing consent will not affect the lawfulness of processing carried out before the withdrawal. Certain processing may continue after you withdraw consent where another lawful basis applies, including compliance with legal obligations, establishment, exercise or defence of legal claims, fraud prevention, and enforcement of our terms.

## **9. 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.

In the event of a security incident affecting personal data, we will take steps consistent with applicable law to investigate the incident, mitigate potential harm, and, where required, notify affected individuals and relevant supervisory authorities within the timeframes prescribed by law.

## **10. COMMUNICATIONS FROM US**

We may contact you by email or other communication channels in connection with your use of the Game, Websites, and services. These communications may include administrative notices, service-related messages, security alerts, account notifications, enforcement-related communications (including warnings, restrictions, suspensions, or other actions under our terms), gameplay or system updates, and responses to inquiries. Because these communications are required for the proper functioning of the services, you may not opt out of receiving them.

Where permitted by applicable law, we may also send marketing or promotional communications. You may opt out of receiving marketing communications at any time by following the unsubscribe instructions included in those communications or by contacting us as set out in Section 11. Opting out of marketing communications will not affect your ability to access or use the services, nor the lawfulness of any communications sent before your opt-out request was processed.

## **11. CONTACTS**

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

- by email: [legal.gl@exbo.games](mailto:legal.gl@exbo.games) 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