

This privacy policy applies to personal data of individuals located in the European Union (“EU”) and the European Economic Area (“EEA”) that are collected by, transferred to and processed by Bushiroad International Pte. Ltd., 331 North Bridge Road, #03-03 Odeon Towers,

Singapore 188720 (“Company”).

PLEASE READ THIS PRIVACY POLICY CAREFULLY

1. OUR PRIVACY STATEMENT

The protection of your personal data is of great importance to the Company. This privacy policy (“this Privacy Policy”) informs you about how the Company is acting as non-EU data controller, collects and processes your personal data. We process personal data in accordance with all applicable data protection laws, including the laws of Japan and the EU and the EU Member States including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, General Data Protection Regulation (“GDPR”). This Data Privacy Policy describes how we process your personal data within the meaning of the GDPR.

2. HOW DO WE USE YOUR PERSONAL DATA?

We process your personal data for specified, explicit and legitimate purposes, and will not further process the data in a way that is incompatible with these purposes unless we have informed you and where necessary obtained your consent in accordance with the GDPR.

2.1 Game Services

We process personal data, which you have actively provided to us or which have been automatically collected otherwise for the provision of our games and related services (“Game Services”).

2.1.1. Actively provided personal data

All personal data that you actively provide to us for the use of our Game Services is voluntarily provided. However, without providing such personal data, you will not be able to receive our Game Services in full or partly. The legal basis for the processing of these personal data for the provision of our Game Services is the performance of the respective contract with you (Art. 6 (1) lit. b GDPR).

No.	Processed personal data	Purpose
1	First name (given names), last name, phone number, e-mail address, game data, your user identifier (e.g., Game Center ID or Google ID), and data related to your marketplace receipt (e.g., iTunes, Google Play)	to provide you with customer and technical support services; to process payments, orders and other services requested from you or from us; to send important notices, such as communications about your purchases and changes to our terms of use, this Privacy Policy, or other service-specific policies; to allow the Company to keep you posted regarding our latest services announcements, software updates

2.1.2. Automatically collected personal data

In addition to the personal data, you actively provide to us, we automatically collect and process certain information from you, which we have received (i) via the applications that you use for the provision of our Game Services, (ii) from our service providers, that we use to offer our Game Services on online marketing platform and (iii) from your internet browser when you visit our website. Without collecting or receiving such personal data, you will not be able to receive our Game Services in full or partly. The legal basis for the processing of these personal data for the provision of our Game Services is the performance of the respective contract with you (Art. 6 (1) lit. b GDPR). In respect of the personal data that we receive from our service providers, that we use to offer our Game Services on online marketing platform, the legal basis for the processing of your personal data is our legitimate interest to support the performance of the respective contract with you, which would without the service providers otherwise not be possible (Art. 6 (1) lit. f GDPR). Within the provision of our Game Services, we process the following actively provided and passively collected personal data for the following purposes:

No.	Processed personal data	Purpose
1	IP address, UUID (universal unique identifier) , and Instance IDs	to identify you as a game user and provide you our Game Services
2	Game Center ID, Google ID, or Facebook ID	to enable you to save and continue your games within your profile across multiple devices
3	IP address, your country (no other geographical information will be included), and other similar technologies	to assist debugging, and to improve our service and its stability
4	IP address, cookies, user ID (hashed), useragent, referrer data	to prevent auto-operational tools that are prohibited in the Terms of Use

5	Device information, application-related data	to detect the use of automated programs in order to prevent cheating
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2.2 Subscription to Service-Related Information

If you would like to be informed about the latest news and upcoming events you will have the option of using your email address for this purpose (or your SNS account). We will use your email address or SNS account for regularly sending you service-related information. Providing your email address or SNS account for this purpose is voluntary. However, without providing your email address or SNS account you will not receive information about news and upcoming events from those sources. The legal basis for the processing of your personal data for sending service-related information is your consent (Art. 6 (1) lit. a GDPR). If you have declared your consent you can withdraw your consent at any time with future effect under: support_sif2_en@bushiroad.com. Please note that a withdrawal will not affect the lawfulness of the processing prior to the consent.

2.3 Website Services

We automatically collect and process certain information from you via our website. Please refer to our [cookie policy](#) regarding the collection of these data. The legal basis for these purposes is our legitimate interest to support the promotion and provision of our Game Services via our website (Art. 6 (1) lit. f GDPR). Within the provision of Website, we process the following personal data for the following purposes:

No.	Processed personal data	Purpose
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1	<p>IP address, your country (no other geographical information will be included), other similar technologies, device and usage information – that may include (i) information specific to the used device to access the Website (including, but not limited to, model, operating system, IP address, language, carrier and similar information) and (ii) information about the use of features, functions, or notifications on the device, how often a user uses the Website, aggregated usage, performance data</p>	<p>maintain the performance, stability and security of our website, simplify the use and recognize trends and activities associated with our website and make our website more user-friendly and effective overall to assist debugging, and to improve our service and its stability</p>
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2.4 Online Advertising and Advertising Measurement

With your consent (Art. 6 (1) lit. a GDPR), the Company may automatically collect and process certain information from you, which we have received (i) via the applications that you use for the provision of our Game Services and (ii) from your internet browser when you visit our website to analyze your behavior online (e.g., websites visited by you), and conduct behavioral and targeted advertising to support our efforts to deliver a more valuable service and to send messages with informative or commercial content about the Company and its services and also related third party products and services that we think may be of interest to you. Please refer to our cookie policy regarding the collection of these data. We will not use your personal data for these purposes unless you have consented to such use of your personal data. Please note that without providing your consent, you will be still able to use our Game Services. Providing your consent is voluntary, however, without providing your consent, you will not be able to receive any of the service information. If you have declared your consent you can withdraw your consent at any time with future effect under: support_sif2_en@bushiroad.com. Please note that a withdrawal will not affect the lawfulness of the processing prior to the consent.

To help the Company develop, deliver, manage and improve the Services and advertising, we process the following personal data for the following purposes:

No.	Processed personal data	Purpose
1	IP address, cookie data, advertising ID and other similar technologies	for market research purposes that support the Company's efforts to deliver a more valuable service to its users
2	IP address, cookie data, advertising ID and other similar technologies	to serve ads that contain links to services, websites or application, and the Company may further utilize your Device ID to track clicks or other ad fulfillment metrics
3	IP address, cookies (necessary cookies, preference cookies, and statistics cookies), and other similar technologies	to send you messages with informative or commercial content about the Company, the Services, or third party products and services that the Company thinks may be of interest to you

4	cookies for marketing	to audit and analyze data to improve the Services and customer communications
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3. HOW DO WE SHARE YOUR PERSONAL DATA?

For the purposes and within the scope set forth in this Data Privacy Policy, we may share your personal data with our affiliated entities and with third party providers, who act as data processors of the Company. When providing their services to the Company, the affiliates and third party providers may have access to and/or may process your personal data and will be subject to contractual obligations under data processing agreements (DPA) to implement appropriate technical and organizational security measures to safeguard the personal data and to process the personal data only as instructed and on a strict need to know basis. Furthermore, the affiliates and third party providers will be bound by applicable data protection laws and the Company will conduct regular data privacy audits on the processing of personal data for the Company. Where we share your data with a data processor, your personal data may be transferred to and processed by processors which are located outside the EU or EEA and which do not provide for an adequate level of data protection from an EU law perspective. To the extent your personal data are transferred to countries that do not provide for an adequate level of data protection from an EU law perspective, we will base the respective transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission and such safeguards may be made available on a need to know basis pursuant to the GDPR upon request.

3.1. Affiliated Companies

For the provision of our Game Services (see above 2.1), we share your personal data with some of our affiliated companies, which are directly or indirectly 100% controlled by the Company. The affiliated company is Mynet Inc. (Japan).

3.2 Service Providers

3.2.1 Game services and news

For the provision of our Game Services (see above 2.1) and for providing news to you via your e-mail upon your consent (see above 2.2), we share your personal data with third party service providers which provide services on our behalf, such as hosting, maintenance, support services,

email services, auditing, fulfilling your orders, processing payments, data analytics, providing customer service, and conducting customer research and satisfaction surveys.

3.2.2. Websites

For the provision of our Website (see above 2.3), we share your personal data with third party service providers which provide services on our behalf, such as hosting, maintenance, and support services.

3.2.3. Online advertising and advertising measurement

For the provision of online advertising and advertising measurement (see above 2.4), we share your personal data with third party service providers which provide services on our behalf.

3.2.4. Legal compliance and security

It may be necessary for us – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – to disclose your personal data. We may also disclose your personal data if we determine that, due to purposes of national security, law enforcement, or other issues of public importance, the disclosure is necessary or appropriate. The legal basis for such processing is compliant with the legal obligation to which the Company is subject to (Art. 6 (1) lit. c GDPR) or are legitimate interests, such as exercise or defense of legal claims (Art. 6 (1) lit. f GDPR).

4. HOW LONG DO WE STORE YOUR DATA?

We will store your personal data for as long as processing is necessary for the respective purpose, (i) to provide you with our Game Services, (ii) provide you with news, (iii) support our website services, (iv) provide news and (v) conduct online advertising and advertising measurement. Where the processing is no longer necessary or the processing is based upon your consent, which has been withdrawn, we will remove your personal data from our systems and records and/or take steps to properly anonymize such information so that it can no longer be identified from it unless we need must keep your personal information to comply with a legal or regulatory obligation to which we are subject (Art. 6 (1) lit. c GDPR), e.g. statutory retention periods resulting from the commercial code or tax laws or when we need data to obtain evidence within the statutes of limitations.

5. SECURITY MEASURES

We maintain up-to-date technical and organizational measures to ensure the security of data processing to ensure their appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage. These measures will be adapted to the state of the art, the protection of personal data and the risks to your rights and freedoms. Insofar as third parties act as processors for us, we ensure the up-to-date technical and organizational measures at such processors to ensure the security of data processing.

6. YOUR RIGHTS UNDER GDPR

In particular, without limitation, you may have the following rights under applicable European data protection

law:

- **Information regarding your data processing:** You have the right to obtain from us all the requisite information regarding our data processing activities that concern you, all pursuant to Articles 13 and 14 GDPR.
- **Access to personal data:** You have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain related information, all pursuant to Article 15 GDPR.
- **Rectification or erasure of personal data:** You have the right to request from us the rectification of inaccurate personal data concerning you without undue delay, and to complete any incomplete personal data (Article 16 GDPR). You may also have the right to request from us the erasure of personal data concerning you without undue delay (Article 17 GDPR).
- **Restriction on processing of personal data:** You may have the right to request from us the restriction of processing of personal data, all pursuant to Article 18 GDPR.
- **Object to processing of personal data:** You may have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, all pursuant to Article 21 GDPR.
- **Data portability of personal data:** You may have the right to receive your personal data in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without our hindrance, all pursuant to Article 20 GDPR.
- **Not to be subject to automated decision-making:** You may have the right not to be subject to automated decision-making (including profiling) based on the processing of your personal data, insofar as this produces legal or similar effects on you, all pursuant to Article 22 GDPR.

If you intend to exercise your rights you may at any time contact us as provided in Section 10 of this Privacy Policy.

7. CHILDREN

We do not collect and process information from children under sixteen (16) years of age without the consent or authorisation by the holder of parental responsibility over the child.

8. LINKS TO OTHER WEBSITES

We may propose hypertext links from the Company's website to third-party websites or internet sources. We do not control third parties' privacy practices and content and hereby disclaim any liability. Please read the privacy policies of the third parties carefully to find out how they collect and process your personal data and take appropriate steps.

9. UPDATES TO OUR PRIVACY POLICY

This Privacy Policy applies to all personal data processed from May 25, 2018. We may revise or update this Privacy Policy from time to time and inform you in accordance with the applicable data protection laws.

10. CONTACT

If you have any questions about this Privacy Policy and the Company's data processing activities or if you want to exercise any of your rights under GDPR, please contact:

support_sif2_en@bushiroad.com

You can also contact the Company's Information Management Supervisor: Shunichi Taira

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