

PP Technology and Software Ltd.

Privacy Policy of <https://playpad.app>

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Introduction

This Privacy Policy explains how PP Technology and Software Ltd. ("PlayPad," "We," "Our," and "Us") collects, uses, processes, discloses, shares, transfers, and secures the information You supply on <https://playpad.app/>. ("Website"). This Privacy Policy is included into the Website's Terms and Conditions ("T&Cs"). With the exception of those defined in the T&Cs, the words used in this Privacy Policy will have the same definition as those defined in the T&Cs.

We appreciate your privacy and the integrity of the information You have submitted and/or authorized Us to gather. As a result, whether You use Our Services or use PlayPad Platform, We strive to adhere to industry standards to protect the security and confidentiality of your Personal Information.

You should carefully read, recognize, understand, and accept all conditions mentioned in this Privacy Policy before accessing, connecting, using, clicking on, or engaging in any Services provided on the PlayPad Platform. We will not use your information for any purpose not stated in this Privacy Policy or the T&Cs without first notifying you or gaining your consent.

Several aspects from the General Data Protection Regulation ("GDPR") have been integrated into this Privacy Policy, especially the Personal Information Processing regulations inside the European Economic Area ("EEA").

This Privacy Policy will inform You about the following matters among several others:

- Acceptance of the Privacy Policy
- Our Relationship with You
- Personal Information that We collect
- How We collect Personal Information
- How We use Personal Information
- How We protect Personal Information
- How long We retain Personal Information
- Cookies
- Sharing your Personal Information
- Third-Party Collection of Personal Information
- Designated Countries and Your Legal Rights
- Rights of the residents of the EEA
- Cross-Border Transfer of Personal Information
- Limitations
- Updates or amendments to the Privacy Policy
- How to contact PlayPad
- Acceptance of the Privacy Policy

You indicate and acknowledge that You have accepted and agreed to the terms of this Privacy Policy by accessing, connecting, clicking on, using, or interacting in Our Services. We will not use your Personal Information for any other purpose not included in this Privacy Policy or the T&Cs without first informing you or gaining your consent.

If You do not agree to this Privacy Policy in part or in whole, You must immediately stop using, connecting to, or interacting in Our Services and PlayPad Platform. Other companies' or service providers' services, as well as other websites connected from Our Platform, are not covered by this Privacy Policy.

Our Relationship with You

PlayPad has the following connection with persons who use its services:

A "User" is a person who gives Us personal information through Our website, Medium pages, social media accounts, or other ways. User can, for example, participate in and complete extra PlayPad social media engagement chores in order to be included to the whitelist for each IDO fundraising event or communicate with Us on Our social media accounts.

In the following sections of this Privacy Policy, we may refer to the User as "You."

Minors

Our Services are not intended for those under the age of 18 or those who are not of legal age to consent under the laws of the country or jurisdiction in which You use Our Services or Platform. You will not disclose any Personal Information to Us or use Our services if you are under the age of 18 or the legal age in your country. We have the right to examine and verify any Personal Information you provide to us. If We discover that You are under the age of 18 or have previously shared your Personal Information with Us, We will delete such information and immediately disable your access to the PlayPad Platform.

Personal Information that We collect

Personal Information is defined as information that may be used to identify, characterize, relate, or associate with a specific individual for the purposes of this Privacy Policy. When you use Our services, we collect, store, and handle the following types of information:

- **Information provided by You when connecting with PlayPad and for KYC purpose**
You must provide Us with your full name, birthday date, nationality, home address, location, government identification number (Identification Card/Passport Number and Date of Issuance of Identification Card/Passport), telegram username, digital wallet address, email address, IP address, documentation for proof of address, and other information as We require in order to connect or participate in PlayPad Platform to use Our Services. Additionally, when connecting into Our Services via Metamask, You will employ single sign-on (also known as "OAuth"). These services will verify your identification and allow You to exchange information with Us such as your username and email address.

Furthermore, when connecting with PlayPad for the first time, you will be required to upload facial image data, namely photo images of your face, as well as provide additional information, such as linking to your Facebook account, Telegram, LinkedIn, GitHub, Google, or Twitter, or other social media accounts, and more. We may use social media features that allow us to share information with Your social networks and interact with us on various social media sites.

- **Information collected by Us as You use Our services**
 - o **Usage Information**
We will track your IP address, phone number, the type of device you use to access Our Platform, device information, which websites you visited before accessing Our

Services or Platform, browser type, information about your browser, Date and Time you visit Our Platform, Volume of data transmitted, and network operator when you engage or use Our Services. PlayPad will collect this information either directly or through third-party service providers. If You use any of Our Platform's open source software, We may collect bandwidth upload and download speeds, the amount of free and used storage space on Your device and other statistics about Your device.

This information is collected to guarantee that Our interface and/or Platform are accessible to all users throughout the world, except users in the prohibited jurisdictions.

o Communication Information

You hereby agree that We have the right to collect, use, and process the Personal Information You have provided on Our Platform or generated through your use of PlayPad Services in order to communicate with You via messages, requests, emails, live chats, file attachments in connection with your PlayPad transactions, or any other information related to your contact with PlayPad. If You contact Us, We shall maintain a record of the information you disclose with us throughout the conversation.

o Financial Information

You hereby agree that when You use Our services, We have the right to collect and use the information included in or connected to your financial information for the reasons specified in this Privacy Policy. This contains, for example, your transaction history, such as the amount of your original coin or token, the amount of your PlayPad Token, your staking instructions, and your BEP-20 wallet address.

We gather this financial information to monitor suspected financial activity in order to protect You against fraud, as well as for any other reasons described in this Privacy Policy.

Elements of the PlayPad Services are public, including any information shared on Our social media accounts, and You accept that these parts of the PlayPad Services may be "crawled," searched, and utilized by third parties or other Users and Customers of the Services. Please don't submit any information that you don't want the world to know about.

How We collect Personal Information

- Information automatically collected by Us

In the following circumstances, we shall automatically collect and handle Personal Information given by You:

- when You visit and/or firstly connect with the Website;
- when You voluntarily complete any user survey or provide feedback to Us via emails or any other electronic channels including on Our social media accounts;
- when You use browser cookies or any other relevant software upon visiting the Website;
- or
- other situations where We may automatically collect your information as described in this Privacy Policy, Our T&Cs, or other relevant agreements with You.

- Information collected by the third-party

To the extent authorized by relevant legislation, we shall obtain your Personal Information from third parties as necessary or permitted by law. Public databases, ID verification partners, KYC Verification partners, blockchain data, marketing partners and resellers, advertising partners, and analytics providers are just some of the third-party sources of information.

- **Anonymized and Aggregated Data**

We will also gather information in the form of anonymized and aggregate data, in which all data will be pooled and personally identifiable information will be deleted, rendering it worthless for identifying specific persons. Although aggregated data may be obtained from your personal information, it is not considered personal information under relevant regulations. We may, for example, combine your usage data to determine the percentage of users who utilize various PlayPad Services features. However, if We combine or connect aggregated data with your personal data in such a way that it may be used to directly or indirectly identify You, You agree that the combined data will be treated as personal data, which will be used in accordance with this Privacy Policy.

We may use anonymized or aggregated information about users for any of the reasons outlined in this Privacy Policy, including better understanding users' needs and activities, performing business intelligence and marketing campaigns, and identifying security concerns. In this context, we retain the right to adopt novel technology for strategic planning and operational procedures when they become available.

How We use Personal Information

PlayPad, Our Affiliate, Our Partners, and/or Our group of companies will have access to your Personal Information on a need-to-know basis. This includes, but is not limited to, PlayPad employees and/or any other individuals or third parties who are in charge of utilizing and safeguarding your Personal Information.

Your Personal Information is used and processed for the following purposes or in the following ways:

- **To provide Our Services**

We adhere to data protection standards and only use personal information for the specific, explicit, and legitimate purposes for which it was submitted. We primarily utilize your Personal information, whether gathered or transmitted, to enable your use of PlayPad Services (such as processing transactions), to enhance the operation of the Services, the process to participate in the IDO fundraising project event, and to authenticate your identification.

- **To protect users**

We utilize the data we gather to safeguard Our Platforms, Users' data, and archives. IP addresses and cookies are also used to detect unusual activity and guard against automated misuse, such as spam, phishing, and Distributed Denial of Service ("DDoS") attacks, as well as other security threats.

- **To comply with regulations and compliance**

We will use the information in accordance with Our legal requirements, worldwide and local industry standards, and AML/KYC/CTF processes for Our legitimate purposes. We may use and use your Personal Information without your consent if it is strictly required (for example, to safeguard the vital interests of users or other natural people, to avoid or mitigate fraud, to fulfill a public purpose, or to pursue Our justifiable interests). You

expressly authorize PlayPad to provide any and all information about You in its control to any law enforcement or government officials who make a lawful request.

- **For measurement, research and development purposes**

We actively track and analyze your data in order to better understand how You use and interact with Our Services and Platform, and to offer You with a tailored experience. We allow You to use social networking plugins on Our Services (e.g., Telegram, Twitter, etc.) and we keep track of your preferences such display name, time zone, and so on. Our operations teams do this evaluation on a regular basis in order to optimize the performance of Our Platforms and handle concerns with User experience.

We also use this data to track trends and enhance Our Services, Our administration, the content and structure of the Website, and to create new services.

- **For communication purposes**

We utilize your Personal Information, which we gather or deduce from your communication devices or email address, to engage with You directly, offer you with essential assistance, and/or keep you up - date on wallets linked, transactions, staking instructions, security information, and other elements. All direct communications will be stored appropriately at PlayPad, or the service providers selected by PlayPad, to be examined for correctness, preserved as evidence, or used to fulfill any legislative duties or responsibilities as specified in this Privacy Policy and the T&Cs.

- **To enforce Our T&Cs, and other relevant agreements**

Personal information is also used to enforce Our T&Cs and other agreements connected to the PlayPad Platform Services in a consistent and active manner. Reviewing, processing, verifying, investigating, mitigating, and preventing any potentially prohibited or illegal activities that may violate the preceding provisions, or disclosing relevant information to third parties in accordance with the preceding provisions, are examples of activities in this regard. As a result, PlayPad reserves the right to suspend, cancel, or remove accounts or other User activity on the Website as needed for any User discovered to be engaging in actions that violate Our T&Cs and other relevant agreements.

- **For marketing and advertising**

We shall share your Personal Information with Our marketing partners for the purposes of marketing and advertising, as well as targeting, modeling, and/or identifying analytics. We may send You marketing emails to notify You about new Services, but You have the option to opt-out at any time.

- **For other purposes**

If we need to handle or use your Personal Information for a reason not specified in this Privacy Policy, we will tell you or ask for your approval before doing so. We will not use your Personal Information for purposes other than those specified in this Privacy Policy without your prior consent, unless it is necessary for our legitimate interests (or the legitimate interests of Our Affiliates, Partners, and/or Our group of companies) and your interests and fundamental rights do not override those interests.

How We protect Personal Information

PlayPad takes reasonable precautions to safeguard the security of the PlayPad as well as your Personal Information against loss, misuse, disclosure, modification, and destruction. We take reasonable precautions to preserve the security and integrity of your Personal Information by

maintaining physical, technological, and administrative safeguards. Firewalls and data encryption are among the measures, as are physical access restrictions to Our premise and files, and restricting access to Personal Information to just those employees, agents, or third parties who require it to process it for Us.

We also take reasonable security precautions to safeguard your Personal Information from unauthorized access, and these precautions are in accordance with the security standards and procedures set forth by the applicable legislation.

However, you accept and recognize that applying the above-mentioned safeguards and procedures may not completely ensure the security of your Personal Information. It is not an absolute guarantee that your Personal Information will be protected when you use the Services.

You accept that We are not liable for the actions of individuals who obtain unauthorized access to or abuse your personal information or services. Furthermore, We will not be held liable for any actions taken by third-party service providers that are legally obligated to maintain adequate security measures to secure your Personal Information. As a result, You should be aware of your responsibilities and take independent steps to secure your Personal Information, particularly your credential information such as your BEP-20 wallet address. You agree that We are not liable for any information leakage or other harm or loss that is not caused by Our purpose or gross negligence, such as hacker attacks, power outages, or unavoidable technological faults. Therefore You agree to not hold us and our respective past, present and future employees, officers, directors, contractors, consultants, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through Website.

How long We retain Personal Information

You understand that your Personal Information will be stored and retained by Us or a third-party processor engaged by Us for KYC Verification while You use or access the PlayPad Platform and the Services, and for a reasonable period of time following your use of the Services, as required by applicable law.

In addition, applicable laws and regulatory requirements may require Us to keep certain information after You stop using or participating in PlayPad, such as your Personal Information, identification verification materials, information related to AML/KYC/CTF procedures, staking instructions, account agreements, and other agreements between Us and third-parties, account statements, and other records.

Cookies

We shall collect, store, and analyze some information connected to your access to and activity through the Services, including when You visit the Website, using cookies and other technologies or techniques of web and analytic tools.

While you are browsing a website, a "cookie" is a little bit of information that a website allocates to your device. Cookies are useful and can be utilized for a variety of reasons. These goals include making it simpler for You to navigate between sites, enabling automatic activation of certain features, remembering your choices, and making your interactions with the Services faster, easier, and smoother. The following types of cookies will be used on our website:

- **Strictly Necessary Cookies**
These cookies are required to log in, navigate a website, and utilize its features, or to offer a service that you have requested. We won't need to ask for your permission to use these cookies.

- **Functionality Cookies**
These cookies allow the website to remember your preferences (such as your username, language, or location) and deliver improved, more personalized services. These cookies do not monitor your browsing activities on other websites, and the information they collect is anonymous.

- **Performance cookies**
These cookies gather information on how you use a website, such as which pages you visit most frequently, how much time you spend on each page, and any errors you may encounter while using the site. Because the data gathered by these cookies is aggregated, it is anonymous. It is simply used to improve the website's efficiency.

- **Targeting Cookies or Advertising Cookies**
These cookies are used to offer adverts that are specially customized to you and your interests. They can also be used to limit the number of times you view an advertisement and to assist assess the campaign's performance. These cookies keep track of the websites you've visited, and this information is shared with third parties such as marketers. Targeting or advertising cookies are frequently tied to the sites' functionality offered by third parties.

These cookies can be deleted by following the instructions in your device's options. If You disable cookies, however, some PlayPad Services services may stop working or become unavailable, and your online experience may be reduced. Please see our Cookies Policy for more information.

Sharing your Personal Information

We will not rent, sell, or disclose your Personal Information to any third parties, except to those who need access to it to complete their jobs and obligations under the contractual agreements we have in place with them, and to share it with third parties who have a legitimate reason for obtaining it.

For the purposes stated below, we may share, transfer, disclose, or give access to your Personal Information to the following third parties:

We may disclose Personal Information to third parties in order to administer or process a transaction, or services You have authorized or requested, or in the context of facilitating the execution of a transaction, or We may disclose Personal Information to third parties that provide supporting services, or analytical information for the purpose of improving the Service, but only if we have a lawful basis to do so or under an agreement or legal requirements.

We will be required to validate your identities under applicable laws and regulatory requirements, and we will rely on third-party services to do so. Personal information that You give to Us during the initial sign-up process is forwarded to these providers for the duration of the KYC Verification process and beyond.

We may reveal or transfer a portion of your Personal Information that we collect if We are involved in a corporate transition or any merger and/or acquisition (M&A) efforts. In the event of a merger or

acquisition, your Personal Information may be among the assets transferred, but it will be maintained and secure in accordance with this Privacy Policy.

When we are obliged to do so by a subpoena, a court order, or to avoid financial loss, report suspected unlawful activity, or investigate violations of any of Our T&Cs or other applicable rules, We may disclose your Personal Information with law enforcement and government officials.

We may share your Personal Information with third-party processors working on behalf of PlayPad or for PlayPad, Our Affiliate, and/or Our Partners.

The privacy rules of all Affiliates and Third Parties with whom We share your Personal Information also exist. However, they will be expected to protect this information in a manner that aligns with the provisions described in this Privacy Policy.

Third-Party Collection of Personal Information

This Privacy Policy solely covers how we use and disclose the personal data we gather from you. Different regulations regarding Privacy Policies may apply to their use or disclosure of the Personal Information You give to them if You disclose your information to other parties through the use of Our Services, such as by clicking on a link to any other website of our partner networks.

You agree that We are not responsible for the products, services, or descriptions of products or services that You obtain from third-party websites, as well as the content or privacy policies of such websites. Furthermore, this Privacy Policy will not apply to any third-party products or services that You access through the PlayPad Platform. You consciously and freely assume all risks associated with purchasing items or services from third-party websites, and you agree that We will have no liability for such third-party websites or your use of them.

Your interactions with these third parties, as well as their services and tools, are separate from your interactions with Us. These third parties may provide You the option of allowing or restricting the information collected. Individually restricting or enabling such data gathering may be in your best interests.

Designated Countries Privacy Right and Your Legal Rights

This clause applies to Users of the Services who are based in the European Economic Area, the United Kingdom, and/or Switzerland at the time Data or Personal Information is collected (hereinafter referred to as "Designated Countries"). When You use Our Services or Platform, we may ask for information about your nationality, location, and the country You are in, or we may depend on your IP address. We are unable to enforce this provision against Users who do not supply location information or who obfuscate location information in order to avoid seeming to be situated in the Designated Countries.

We use and treat your Personal Information in accordance with the GDPR and any other applicable rules (collectively referred as "Data Protection Laws"). In your permission, (ii) fulfillment of a contract, (iii) a legitimate interest, (iv) compliance with legal duties, (v) protection of your vital interests, and (vi) public duty are all legal bases for processing your Personal Information.

If any term in this section conflicts with other provisions in this Privacy Policy, the term in this provision shall govern and control Users in the Designated Countries.

When You Use Our Services, You Have Rights Under Data Protection Laws in Relation to Your Personal Information in Certain Circumstances. The following are some of these rights:

- **Right to rectify**
You have the right to ask Us to update, rectify, or complete any Personal Information you feel is outdated, incorrect, or incomplete. You can change your mind at any time by contacting us using our contact methods.
- **Right to be informed**
You have the right to know how your Personal Information is collected, used, and processed.
- **Right of access**
You have the right to seek a copy of the Personal Details We have on you, as well as particular information about how We treat this data.
- **Right to data portability**
You have the right to request that your Personal Information be transferred to you or a third-party of your choice in a machine-readable format. We shall provide your Personal Information in a machine-readable manner to You or a third party. This right only applies to Personal Information about you that you have given us permission to use.
- **Right to Erasure ("Right to be Forgotten")**
You have the right to have your Personal Information deleted from Our records if (i) it is no longer necessary to use for the Services or on the Platform, (ii) it was collected in relation to processing that You previously consented to but later revoked, or (iii) it was collected in relation to processing activities to which You object, and there are no overriding legitimate grounds for Us to keep it.

Please be aware that the above-mentioned Right to be Forgotten is not an absolute right. We are obligated to comply with your request only if the keeping of your Personal Information would violate the GDPR or any other relevant legislation to which We are subject. We will make reasonable efforts to have your Personal Information destroyed to the extent required by the GDPR or relevant legislation, including notifying Our recipients of your Personal Information of the erasure, unless this proves impossible or disproportionately difficult.

- **Right to object**
You have the right to object to Our processing of your Personal Information based on Our legitimate interests if it affects your rights. You can also refuse to have your Personal Information used for direct marketing reasons by contacting Us.
- **Right to restrict processing**
You may request Us to restrict or suppress the processing of your Personal Information under certain circumstances as follows:
 - o to contest the accuracy of the Personal Information;
 - o when the processing is considered unlawful, but You do not want your Personal Information erased;
 - o where We no longer need to process your Personal Information, but the information must be retained for the establishment, exercise, or defense of legal claims; and
 - o where You have objected to Our processing of your Personal Information, but We need to determine whether Our legitimate interests override your objection

- **Right to withdraw consent ("Opt-out")**

Where We depend on your consent to process your Personal Information, you have the right to withdraw it at any time. The lawfulness of Our processing of your Personal Information previous to your withdrawal is unaffected by your withdrawal of consent.

Please notify and contact Us via Our Platform, including the Website, or make a request to support@playpad.app if You desire to exercise these rights.

Please keep in mind that if you want to exercise any of these individual rights, there are certain restrictions. In the following circumstances, we may limit your specific rights:

- (i) Where denial of access is required by law;
- (ii) When allowing access would jeopardize the privacy of others;
- (iii) To safeguard Our rights and properties;
- (iv) Where the request is excessive.

Cross Border Transfer of Personal Information

We may store, process, analyze, and transfer your Personal Information in locations around the world, including countries other than your home jurisdiction and/or locations outside the Designated Countries, where data protections may be less stringent than the EU GDPR or equivalent data protection laws, as part of your use of and to ensure better and seamless delivery of the Services to You.

If your Personal Information is sensitive, it is not recommended that you use our Service or Platform because it contains the communication of your Personal Information to, transfer to, or process it outside of the country where you are situated or outside the Designated Countries.

If You continue to use Our Services outside of the Designated Countries and your home locations, We will ensure that We only transfer your Personal Information to countries that have the required contractual provisions in place with the third parties to whom your Information is transferred, or to countries that have been approved by EU authorities. You fully consent to this transfer in this manner, and you accept that We are not responsible for any extra terms and conditions, policies, or other guidelines adopted by any company receiving the information.

Limitation

We cannot guarantee that your Personal Information will not be lost, misused, accessed without authorization, or altered. You acknowledge and accept that you are responsible for safeguarding your personal information, including your credentials.

Updates or amendments to the Privacy Policy

We reserve the right to alter and update this Privacy Policy at any time, and the most recent version will be posted on the Website or PlayPad Platform (as reflected in the "Last Revised" heading).

In the case of a major change that may impact your use of Our Services and Platform, We will notify You in advance of the change taking effect by means of a conspicuous notice. A conspicuous notice may be sent to you by email or other communication channels you supply to Us, or you may get an in-app notice, such as a banner or pop-up, alerting You to a change on the Website. We highly advise you to go through our Privacy Policy carefully. If You do not agree with the updated Privacy Policy in part or in whole, You should stop using or accessing Our Services. Your continued access to and use of Our Services following any changes to this Privacy Policy indicates that you agree to the changes and will continue to use the Services.

We may also give You with "just-in-time" disclosures or other information regarding Our data collecting procedure, processing aims, or other information relating to the collection of your personal information. The purpose of the just-in-time notification is to supplement or clarify Our privacy practice or provide You with additional choices about how We process your personal information.

How to contact PlayPad

Please send your requests to support@playpad.app and visit Our Website at <https://playpad.app/> if you have any concerns about this Privacy Policy, your Personal Information collected or processed by Us, or if you want to exercise one of your legal privacy rights.