

META PUBLISHING

PRIVACY POLICY

This Privacy Policy (“**Policy**”) sets forth how Postmeta Games Ltd. is a company established and existing under the laws of the Republic of Cyprus, reg. number HE 395082 (“**we**”, “**us**”, “**our**”), processes personal data of

- customers of video games (“**Games**”) published by us,
- our clients' customers,
- website visitors, newsletter subscribers,
- journalists and other media representatives, influencers,
- our counterparties' employees and other representatives,
- complainants and claimants.

This Policy is posted and is constantly available at <https://metapublishing.io/privacy-policy>. The Policy may be updated time to time, and you may access any version (see at the end the available versions). In the event of any major changes (new purposes, new controller, etc.) we will alert you in advance by email or pop-up window at our websites.

Some technical terms used in this Policy are given without explanation. If you do not know a term, please contact us (see contact details in Section 6).

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1. WHAT DATA WE COLLECT AND FOR WHAT PURPOSES



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, and 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.

When you delete and/or amend your data, we reserve the right to store the data necessary to comply with the applicable laws, ensuring the websites' safety and effectiveness.

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 trying to enter with you. Should this be the case we will notify you at the time.

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 use our Games ▼

What are the purposes	What data we collect	What is the legal basis	For how long we store data
To ensure quality assurance, improve player experience, address widespread bugs and other in-game problems, maintain security, and prevent fraud	<ul style="list-style-type: none"> • Game information (game progress, game settings, inventory in-game items list, bug description, gameplay log, in-game events, etc.) • System information (operating system details, including version, peripherals, processor details, device type, screen parameters, memory size, video memory size etc.) 	Consent you give before you start to play the Games	For 1 year after your last use of the Games

When you subscribe to the newsletter ▼

What are the purposes	What data we collect	What is the legal basis	For how long we store data
To send news and promotions to you	<ul style="list-style-type: none"> Email Newsletter details (content, time of sending, status of receipt) Consent details (whether you gave your consent to receiving the newsletter or withdrew it) 	Consent that you give by subscribing to our newsletter	During 3 years after the last email

When you wish to collaborate with us as an influencer ▼

What are the purposes	What data we collect	What is the legal basis	For how long we store data
To engage in paid collaborations with influencers, including content production, voiceovers, localisation, etc.	<u>Data we receive from PR and marketing agencies:</u> <ul style="list-style-type: none"> Full name, contact details (email, phone number, Discord nickname) Channels details (region, number of subscribers, average views, links), language, Place of residence, banking account details (if a contract is concluded) 	<p>Our legitimate interest to promote our business by searching for, reviewing and engaging influencers managed by digital agencies.</p> <p>Performance of our contract with you (if we conclude a direct contract with you during our partnership).</p>	During the term of the contract with an agency or you and up for 6 years after for tax / compliance purposes

When you are a media representative or a journalist ▼

What are the purposes	What data we collect	What is the legal basis	For how long we store
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		basis	data
To arrange our PR releases and announcements	<u>Data we receive from media outlets or publicly accessible sources such as media outlets websites, etc:</u> <ul style="list-style-type: none"> • Full name, contact details (email, phone number) • Title, company • Region, language 	Our legitimate interest to promote our Services, raise the media coverage and maintain PR	During 5 years and later if no objection received upon review

When you are an employee or other representative of our counterparties, incl. clients for publishing contracts ▼

What are the purposes	What data we collect	What is the legal basis	For how long we store data
To negotiate, enter and perform contracts with counterparties, incl. clients for publishing contracts	<ul style="list-style-type: none"> • Full name, contact details (email, phone number) • Title, company • Power of attorney details 	Our legitimate interest to freely conduct business by engaging service providers and other counterparties	During the term of the contract with a counterparty and for 6 years after its termination for tax/accounting compliance purposes
To conduct due diligence procedures prior to entering a publishing contract	<ul style="list-style-type: none"> • Full name • Title, company • Salary • Power of attorney details • Corporate ownership, certificates details 	Our legitimate interest to freely conduct business by assessing potential risks from collaborating and investment	During the term of the contract with a game studio.

When you wish to send a complaint or any other request to us ▼

What are the purposes	What data we collect	What is the legal basis	For how long we store data
To handle complaints, claims, and requests	<u>Data we receive directly from you:</u> <ul style="list-style-type: none"> • Full name, contact details (email) • Any other additional information that you wish to include in your inquiry 	Our legitimate interest to amicably resolve issues with persons concerned, process inquiries	During 3 years after the settlement of the claim, request, if no longer needed for legal claims

Processing data on behalf of our clients



We also process personal data as data processor on behalf of our clients under publishing contracts (for example, when we conduct crowdfunding and marketing campaigns, administer websites, give out rewards, etc.). In this case, the purposes and means of data processing, including what data is processed and for how long, are generally determined by our clients. In the event of any questions relating to the data processing we advise you to firstly contact the game developer (our client).

When you visit our websites, we also process your data with cookies and similar web analytics tools. For more information on how we use cookies and other web analytics tools see our Cookies policy available at <https://metapublishing.io/cookie/>.

2. 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 employ to process your data,
- our clients if we process your data to fulfil our obligations to them under our publishing contracts (for example, we can arrange the reward distribution),
- new business owner if we ever sell our business,
- governmental agencies, courts if required by any law order,
- professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.

Our Services may contain links to sites operated by third parties. We are not responsible for your data when you access these links or engage with third party services, and you should ensure you review the relevant third party's privacy statement which will govern your data privacy rights.

3. HOW WE TRANSFER DATA OUTSIDE OF THE EEA ▼

We do our best to keep your data inside the EEA area. With that, some processes require use of foreign service providers to be efficient.

The countries to which we transfer your data not always have the same data protection laws as your jurisdiction. We take reasonable measures to ensure your data is adequately protected when outside of the EEA, for example, we sign Standard Contractual Clauses (SCC) adopted by the European Commission with our providers and other recipients in third countries, assess the risks of the international data transfers to adopt additional security measures, etc.

You may also obtain a copy of relevant SCCs by contacting us, as specified in Section 6 (Contacts).

4. WHAT ARE YOUR RIGHTS ▼

Under the GDPR you have certain legal rights, which are briefly summarised below, in relation to any personal data about you which we hold:

Accessing data

You have the right to ask us to provide information on how we process your data. As well you can request copies of your personal data we hold about you.

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 ask us to rectify information 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 or remove your data in certain circumstances. For instance, if you withdraw consent and believe that is no good reason for us continuing to process it. In some cases, we may be required to continue storing data for regulatory purposes even though you require 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 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 6 (Contacts) below.

Complaints

If you believe we have violated your rights you may lodge a complaint with the Office of the Commissioner for Personal Data Protection (Cyprus) via their [website](#). Nevertheless, we kindly ask to contact us first to see if we can resolve your issue amicably.

If you would like to exercise the rights above, please contact us, as specified in Section 6 (Contacts). We will aim to respond to you within 1 month. In some cases, we may need to ask for additional information before we are able to disclose any data to you.

5. THE SAFETY AND SECURITY OF DATA ▼

No IT system or online communication 100% safe. But we do our best to ensure security of your personal data. We take technical, organisational, and legal measures, including, where suitable, encryption, to ensure that your personal data are protected from unauthorised or accidental access, deletion, modification, blocking, copying and dissemination.

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

6.CONTACTS ▼

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

- by email: team@metapublishing.io, or
- by mail: Cyprus, Aigaiuo 83/104, Lakatamia 2302, Nicosia (POSTMETA GAMES LTD).

Please, specify your name and other information necessary for full and complete consideration of your request.

Last update: April 4, 2024