

PRIVACY POLICY

Last Updated: 01.04.2024

General

This privacy policy ("Policy") informs you of your choices and our practices in relation to your Personal Information (as defined below).

As this Policy constitutes an integral part of the Terms of Use, capitalised terms used in this Policy have the same meanings as those defined in Terms of Use.

Play2fun is the data controller regarding the personal data processed within the framework of this Policy.

Play2fun is committed to protecting and respecting the privacy of its users and ensures their security when accessing the Platform and using the Services. This Policy is intended to help you to understand what data and for which purposes we collect, how collected data is processed and protected.

Play2fun consistently upholds Policy and other documents updated and undergoes regular modifications to ensure their relevance and compliance with laws, regulations and app stores requirements. Play2fun may amend this Policy anytime. The amended Policy will be published on this website and in some cases will also be notified via electronic means of communication, such as pop-up, in-game etc.

All the changes to this Policy are effective as of the "Last updated" date. If you continue to access the Platform and use the Service after the Last updated date is deemed to accept the changes made to it.

By registering on the Platform, the user consents to the processing of personal data by Play2fun in accordance with the provisions set below.

Data collected

Our Platform functions seamlessly and offers an optimal user experience through the utilization of various types of information about you. Here's a comprehensive breakdown of the data we collect and its utilization.

User-provided information. When engaging with our Platform, you may furnish us with full name, mailing address, phone number, email address, photo, date of birth, place of living, registration information, social media and messaging platform, optional biographic and demographic information, information for Wallets you connect, and any other information that you provide. This information is collected and used for the purpose of Platform functioning and provision of Services, performance of contractual duties under the Terms of Use and compliance with our legal obligations.

Upon accessing our Platform, certain data is automatically gathered or generated, including Identifiers such as IP address, device and app ID, unique ID, location data, and device specifications (e.g., model, brand, operating system) and cookies. We employ such data to ensure Platform functionality, enhance user experience, and personalize content.

Interaction data encompasses event timestamps, page views, referral URLs, ad metrics, transaction history, and web log data. Integration of third-party analytic software allows us to gain insights into user activity and enhance Platform features. This data helps us to improve our Platform and Services and enhance your user experience.

Legal grounds for processing

Play2fun collects, process and uses personal data of the Users based on the following grounds:

- when such processing is performed in order to fulfil the contract between Play2fun and user;
- processing necessary for compliance with legal obligations;
- based on legitimate interest of Play2fun;
- upon explicit prior consent from the User.

Duration of the data retention

Play2fun retains the user's personal data for the period of time necessary to carry out relevant activities, specified in this Policy and as permitted by applicable law. personal data, that the user has communicated to the Platform upon registration and subsequently through the use of the Services, will be retained as long as the user remains the user of the Platform and Services.

If a user withdraws consent for the processing of personal data, and Play2fun has no other legal basis for retaining it, Play2fun will promptly delete this data. Termination of use of the Platform and Services by deleting Account is equivalent to withdrawal of consent for the processing of personal data. To protect the safety and security of the users Play2fun implements a safety retention window of 30 days following the user's Account deletion.

Play2fun reserves the right to store the user's personal data for a longer period of time than provided in this section when it is performed in order to fulfill the legal obligations of Play2fun (including law enforcement requests, dispute resolution), ensure compliance with applicable law (taxation and accounting) or when the relevant personal data is stored on the basis of Play2fun's legitimate interests (including security reasons, prevention of illegal activities).

Sharing of personal data

Play2fun may share your data with specific third parties, as outlined below:

- Service providers, business partners, suppliers, and subcontractors, to fulfill any contracts entered into with them or user.
- Advertisers and advertising networks, for the purpose of selecting and serving relevant advertisements to users and others.
- Analytics and search engine providers, assisting us in enhancing and optimizing the Platform.
- Additionally, we may disclose your personal data to third parties in the event of buying or selling any business or assets, where data may be disclosed to prospective sellers or buyers.
- If legally obligated, or to enforce Terms of Use and other agreements, to protect the rights, property, or safety of Play2fun, users or others. This includes sharing

information with companies and organizations for fraud protection and credit risk reduction.

- To cooperate in investigations of fraud or illegal activities where deemed reasonable and appropriate.
- To prevent and detect fraud or crime.
- In response to legal requirements such as a subpoena, warrant, or court order.
- To assess financial and insurance risks.
- In debt recovery or insolvency situations.
- To develop customer relationships, services, and systems.

User's rights

Every user is a data subject and thus has ultimate rights over his/her personal data.

The right to access. The user has the right to know whether their personal data is being processed, the right to receive information regarding the processing of personal data, and the right to request a copy of the personal data being processed. The user also has the right to information about public and private entities with which data has been shared.

The right of rectification. The user has the right to have their information rectified if it is inaccurate or incomplete.

The right to object. The user has the right to object to our processing of their personal data.

The right of restriction. The user has the right to request that we restrict the processing of their personal data.

The right to data portability. The user has the right to be provided with a copy of their personal data in a structured, machine-readable, and commonly used format.

The right to withdraw consent. The user has the right to withdraw their consent at any time where we rely on their consent to process their personal data.

The right to erasure. The user has the right to request deletion of their personal data from our database so that Play2fun is not able to continue processing and storing such data, with exceptions provided in applicable law.

Please note that we may ask the user to verify their identity before responding to such requests. Additionally, we may not be able to provide the Services without some necessary data. The abovementioned rights are not absolute. In order to exercise some of the rights, in some cases You should meet certain conditions and requirements, specified by the law.

Protection measures

Play2fun works hard to protect users from unauthorized access to or alteration, disclosure or destruction of their personal data. Yet, as any other technology companies, although Play2fun takes steps to secure users' information, it could not be promised or guaranteed, that unauthorised access, hacking, data loss, or other breaches will never occur.

Play2fun reserves the right to suspend the user's Account without notice if there is a reasonable suspicion of breach of security or unauthorised access to such an account. If a user believes that his/her account or information is no longer secure, the user should notify Play2fun immediately.

The user should take reasonable steps in order to keep his/her personal data (including the Account's password) safe.

Cookies

In order to guarantee an optimal level of usability and performance and to ensure relevance of promoted Service, Play2fun uses cookies and similar technologies in order to track the interaction of users with the Platform. This section explains the different types of cookies that may be set when the user uses the Platform, helping to understand and manage them as he/she wishes.

A cookie is a small file that is stored locally at the user's technical device as soon as the Platform is being used and/or being visited. Cookies function by saving particular sets of data, such as, for example, the user's language selection, version of browser, the type of operating system used, device characteristics and the IP address of the connected device used. Should the user visit the Platform again later, a cookie will transmit this data back to the Platform. The cookies don't store personal data like the user's name or address

Play2fun uses different types of cookies:

- Session cookies only last only while the User is visiting the Platform and help the Platform to learn more about User's behavior during a single session and to help the user to use the Platform more efficiently.
- Persistent cookies have a longer lifespan and aren't automatically deleted when the user leaves the Platform. These cookies are primarily used to help the user to sign-in again quickly, for security and analytical purposes. The Platform does not use any information whilst the user is logged off.
- Play2fun uses first-party cookies that is when the cookies are placed on the user's device directly. For example, first-party cookies are used to adapt the Platform to the language preferences and analyze user experience of the user.
- Third-party cookies are placed on the user's device by partners and service providers.
- Necessary cookies. These cookies are strictly necessary to provide the user with the Services.
- Authentication cookies. These persistent cookies help the Platform to identify the users so that the user can log in automatically.
- Analytics cookies. These cookies help Play2fun to understand how the Platform is being used, and help to customize and improve the service.
- Advertising cookies. These cookies are used to make advertising messages more relevant to the user. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, selecting advertisements that are based on the user's interests and measuring the number of ads displayed and their performance, such as how many people clicked on a given ad.
- Social networking cookies. These cookies are used to enable the user to connect the user's account to third party social networks.

Users can at any time reset device identifiers by activating the appropriate setting on his/her device. The procedure for managing device identifiers is slightly different for each device.

Cross-border Data Transfer

The processing of personal data may sometimes involve cross-border transfers of data, such as to the United States of America and other jurisdictions. In the case of user data from the EEA, the Company uses standard contractual clauses approved by the European Commission or other suitable safeguards for secure transfers of data from the EEA to countries for which there are no adequacy decisions. Standard contractual clauses are commitments between companies transferring personal data, obliging them to protect the privacy and security of users' personal data.

PRIVACY NOTICE FOR BRAZIL RESIDENTS

The terms of this Privacy Notice apply to residents of Brazil under the Lei Geral de Proteção de Dados (Lei nº 13.709, de 14 de agosto de 2018) and its implementing regulations, as amended or superseded from time to time (“LGPD”). For the purposes of this Privacy Notice, Personal Information has the meaning as defined in the LGPD.

The categories of your Personal Information are collected and processed, ways and grounds we process and use Personal Information are described in the main portion of the Privacy Policy.

Your rights under the LGPD

In addition to rights provided in Privacy Policy, the LGPD provides residents of Brazil with certain legal rights. To exercise these rights, please email us. These rights are not absolute and are subject to exemptions. In particular, you have the right to:

- Ask whether we hold personal information about you and request copies of such personal information and information about how it is processed.
- Restrict the processing of your personal information that is not being processed in compliance with the LGPD.
- Obtain information on the possibility of refusing consent and the consequences of doing so.
- Obtain information about the third parties with whom we share your personal information.
- Obtain the deletion of your personal information being processed if the processing was based upon your consent, unless one or more exceptions provided for in Art. 16 of the LGPD apply.
- Revoke your consent at any time.
- Oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law.

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

This Privacy Notice for California Residents (this “Privacy Notice”) supplements the information contained in Privacy Policy (“Site Privacy Policy”) and applies solely to all visitors, users and others who reside in the State of California (“consumers”, “you” or “your”). We adopt this Privacy Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Privacy Notice. All capitalized terms not herein defined will have the meaning set forth in Privacy Policy. In case on any inconsistencies with Privacy Policy, this Privacy Notice shall prevail.

1. INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”).

1.1. In particular, we have collected the following categories of personal information from our consumers within the last twelve (12) months:

A. Identifiers.

Examples: A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name or other similar identifiers.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, physical characteristics or description, address, telephone number. Some personal information included in this category may overlap with other categories.

C. Protected classification characteristics under California or federal law.

Examples: Age, citizenship, marital status, sex (including gender, gender identity).

D. Commercial information.

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

F. Internet or other similar network activity.

Examples: Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.

G. Geolocation data.

Examples: Physical location or movements.

H. Sensory data.

Examples: Audio, electronic, visual, or similar information.

K. Inferences drawn from other personal information.

Examples: Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

1.2. Personal information does not include:

- (i) Publicly available information from government records,
- (ii) De-identified or aggregated consumer information,
- (iii) Information excluded from the CCPA's scope, like:

- i. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- ii. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

1.3. We obtain the categories of personal information listed above from the following categories of sources:

- (i) Directly from our Users or their agents. For example, from information our Users provide to us related to the Services for which they engage us.
- (ii) Directly from you when you provide it to us. For example, if you share your name and contact information to ask a question about our site or app.
- (iii) Indirectly from you. For example, from observing your actions on our Site.
- (iv) From third parties, for example, our service providers.

2. USE OF PERSONAL INFORMATION

We may use or disclose the personal information we collect for one or more of the following purposes:

- (i) To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our site, app or product we will use that personal information to respond to your inquiry.
- (ii) To provide, support, personalize and develop our site, apps and products.
- (iii) To process your requests and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- (iv) To notify you about changes to our site, app or any products or services we offer or provide through it.
- (v) To notify you about changes to our policies and/or user agreements.
- (vi) To maintain a record of our dealings with you.
- (vii) To understand and analyze the usage trends and preferences of our users, to improve the site, the app and other products and to develop new features, and functionality.
- (viii) To contact you for administrative and information purposes - this may include providing customer service or sending communications, including changes to our terms of use.
- (ix) To engage features of third party social networks.

- (x) For testing, research, analysis and product development.
- (xi) To help maintain the safety, security, and integrity of our site and app, and our databases, other technology assets and business.
- (xii) To diagnose or fix technological problems in relation to our site, app and products.
- (xiii) To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- (xiv) To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.
- (xv) To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- (xvi) As described to you when collecting your personal information or as otherwise set forth in the CCPA.

3. SHARING PERSONAL INFORMATION

3.1. We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

3.2. In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: Personal information categories listed in the California Customer Records statute

Category F: Internet or other similar network activity

Category G: Geolocation data.

Category K: Inferences drawn from other personal information.

3.3. We disclose your personal information for a business purpose to the following categories of third parties:

- (i) Our affiliates.
- (ii) Service providers.
- (iii) Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
- (iv) Law enforcement bodies and courts.

3.4. We share your personal information for the following general purposes:

- (i) **Service Providers:** We may disclose personal information to third-party service providers that assist us with our operations. For example, analytics, log management, payment processing and data storage and processing services.
- (ii) **Protecting our Rights:** We may disclose personal information to third parties if we believe that doing so is legally required or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others.
- (iii) **Corporate Transaction:** Personal information may be disclosed as part of a corporate transaction, such as a merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which personal information could be transferred to third parties as one of our business assets.

In the preceding twelve (12) months, we have not sold any personal information.

4. YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

4.1. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights Section), we will disclose to you:

- (i) The categories of personal information we collected about you.
- (ii) The categories of sources for the personal information we collected about you.
- (iii) Our business or commercial purpose for collecting and selling that personal information.
- (iv) The categories of third parties with whom we share that personal information.
- (v) The specific pieces of personal information we collected about you (also called a data portability request).
- (vi) If we disclosed your personal information for a business purpose, a list with disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

4.2. Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion

Rights Section), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- (i) Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you or otherwise perform our contract with you.
- (ii) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- (iii) Debug products to identify and repair errors that impair existing intended functionality.
- (iv) Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- (v) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- (vi) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- (vii) Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- (viii) Comply with a legal obligation.
- (ix) Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

4.3. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability and deletion rights described above, please submit a verifiable consumer request to us by emailing us.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- (i) Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- (ii) Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

4.3.1. Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

4.4. Personal Information Sales Opt-Out and Opt-In Rights

If you are a California resident and 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a variable notice to our email.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales.

5. NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- (i) Deny you goods or services.
- (ii) Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- (iii) Provide you a different level or quality of goods or services.
- (iv) Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Contact us

If you have any questions or comments about this Privacy Policy or wish to exercise your rights, please do not hesitate to contact us by the following email: info@universesatoshi.com