

## **PRIVACY POLICY**

This Personal Data Processing and Protection Policy (the “Policy”) has been developed in accordance with the laws of the People’s Republic of China (PRC) and the European Union Regulation 2016/679 of April 27, 2016 (the “GDPR”).

The Site Operator treats privacy, security and protection of users’ rights with care and diligence, respects the User’s personal data and strives to protect it in accordance with the terms of this Policy.

This Policy applies to the relations between individuals - users of the website [www.ageofmars.io](http://www.ageofmars.io) (hereinafter - the “Site”) and the Site Operator, arising when the User performs transactions using the Site.

This Policy defines the goals, procedures and conditions for processing of the User’s personal data and other individuals whose personal data are processed by the Site Operator to ensure protection of the citizen’s rights and freedoms in the course of processing of their personal data.

This Policy applies to all processes of collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer (provision, access), anonymization, blocking, deletion, destruction of personal data, carried out with or without the use of automated means.

This Policy applies only to the Site and applies to all information that the Site Operator may receive about the User during their use of the Site.

The Policy does not apply to third-party web-sites, whose information collection, storage and use rules may differ from the present Policy. In case the User goes to the web-sites of the third parties the User shall get acquainted with privacy policy of such third parties. The Site Operator has no control over information transferred to or collected by the third parties.

Using the Site’s services means the User’s unconditional consent to this Policy and the terms of processing his personal data specified in it; in case of disagreement with these terms, the User must refrain from using the services.

### **1. GENERAL**

1.1. Within the framework of this Policy, personal data of the User shall refer to:

1.1.1. Personal data, which the User provides about himself/herself upon registration (account creation) or while using the Site, including the User’s personal data.

1.1.2. Data, which is automatically transmitted to the Site services in the course of their use with the software installed on the User’s device, including IP-address, cookie file data, information about the User’s browser (or other software through which the User accesses the services), hardware and software specifications used by the User, date and time of access to the services, requested page addresses and other similar information.

1.1.3. Other information about the User, processing of which is stipulated by the User Agreement, posted on the Site.

### **2. PURPOSE OF PROCESSING OF USERS’ PERSONAL DATA**

2.1.1. The Site only collects and stores personal data that is necessary to provide services or perform agreements with the User, unless the law provides for mandatory storage of personal data for a period specified by law.

2.2. The Site processes the User’s personal data for the following purposes:

2.2.1. Identification of the User registered on the Site;

2.2.2. Providing the User with access to game processes and resources of the Site;

2.2.3. Establishing of feedback with the User, including sending of notices, requests regarding the use of the Site, provision of services, processing of requests and applications, using the e-mail specified by the User when registering an account, from the User;

2.2.4. Establishing the User’s location to ensure security of User’s account and data, fraud prevention;

2.2.5. Confirming the accuracy and completeness of the personal data provided by the User;

Notifying the User of the Site;

Providing the User with effective customer and technical support if any problems arise related to the use of the Site.

### **3. CATEGORIES OF DATA BEING COLLECTED BY THE SITE OPERATOR**

3.1. Information being collected by the Site Operator:

3.1.1. Personal data, which the User provides about himself/herself during registration of the User’s account on the Site or while using the Site;

3.1.2. Data, which are automatically transmitted to the Site Operator while using the Site with the help of the software installed on the User's device, including but not limited to: technical information, including IP-address, used for computer or other device connection to the Internet and other information about the device, which provides the access, information from cookies files, information about the User's browser (browser type and version, time zone setting, types and versions of browser plug-ins), geo-referenced data.

3.1.3. Additional information, combined with personal data, so that it makes possible to identify the identity of an individual, such as combinations of the following data: name, city, country and zip code, e-mail address, date of birth, phone number, payment information (bank card number), billing information, information about transactions through the Site.

3.2. With the exception of cases of identification of the User on the grounds and according to the procedure stipulated by the User Agreement posted on the Site, the Site Operator doesn't check reliability of the information provided by the User, thus the Site Operator assumes that the User provides reliable and exhaustive information and keeps this information up to date. If it will be established, that the User has given the information which doesn't correspond to reality, the Site Operator has the right to suspend or stop access of the User to the Site at any moment. The User agrees that if they provide false information about themselves, the User's claims to the Site Operator will be invalid.

3.3. The Site Operator doesn't collect the information related to the User's account, including passwords, keys, pass phrases and other security tools

#### **4. COOKIES USED BY THE SITE OPERATOR AND OTHER MEANS**

4.1. A cookie is a small text file containing a unique identification number that identifies the User's browser each time it visits the Site. The use of cookies is standard industry practice, and many major browsers are initially set up to use them. The User has the right to configure their browser so that the browser either refuses to accept all cookies or notifies the User about the receipt of cookies.

4.2. Cookies are used by the Site Operator for the purpose of:

- authorization on the Site as a registered User;
- identify and eliminate errors on the Site;
- ensure functioning, increasing performance and improving quality of the Site;
- elimination of risks of possible fraud prevention, ensuring security of the Site;
- storage of personal preferences and settings of the User;
- providing targeted information about the products and services of the Site Operator and its partners;
- improvement of products and (or) services, and for development of new products and (or) sites;
- conducting analytics of the Site.

4.3. When the User visits the Site, the following data is collected automatically, including: device specifications, IP-address, information about the browser and language used, date and time of access to the Site, addresses of requested pages of the Site and other similar information.

4.4. The Site Operator may use "cookies" and other automated and non-automated methods of processing the User's data, as well as the Site Operator may transfer them to the third parties for conducting research, performing works or providing services.

4.5. The User has the right to manage "cookies" independently. The used browser and (or) device can allow blocking, deleting or otherwise restricting the use of "cookies". To learn how to manage cookies with your browser or device, please, refer to the instructions provided by the browser developer or the manufacturer of your device.

If you delete or restrict the use of cookies, you may not be able to use certain features of the Site.

4.6. The processed cookies shall be destroyed or depersonalized upon achievement of the above mentioned purposes of processing or if it is no longer necessary to achieve these purposes.

4.7. The Site Operator can use software technology from the category of web beacons/web bugs, which provides the best management of the Site and are graphs with a unique identifier, similar in function to "cookies", embedded in the Site and used to track online movement of Users. The Site Operator does not combine the information collected by the above software technologies with the User's personal data.

The Site Operator can release the traffic data and information, collected by means of "cookies" and the specified software technologies in aggregate, by publishing the report on the Site usage trends or other similar documents.

#### **5. TERMS OF PROCESSING OF PERSONAL DATA OF THE USERS AND ITS TRANSFER TO THIRD PARTIES**

5.1. The Site stores Users' personal data in accordance with the Site Operator's internal regulations.

5.2. The User's personal data is kept confidential, except when the User voluntarily provides information about himself for public access to an unlimited number of people. When using particular services, the User agrees that certain portions of their personal data will become publicly available.

5.3. The Site has the right to transfer the User's personal data to third parties in the following cases:

5.3.1. The User has expressed consent to such actions.

5.3.2. The transfer is necessary for the User to use a particular service, or for the performance of a particular agreement with the User.

5.3.3. The transfer is required by applicable law under the procedure established by law.

5.3.4. In the case of sale of the Site, all obligations to comply with the terms of this Policy in relation to the personal data obtained by it are transferred to the transferee.

5.4. Processing of the User's personal data shall be carried out without limitation of time by any lawful means, including personal data information systems with or without the use of automation tools.

In case of loss or disclosure of personal data, the Site Operator shall inform the User, using the email indicated by the User when registering an account, about the loss or disclosure of personal data.

5.5. The Site Operator takes necessary organizational and technical measures for protection of personal data of the User against illegal or casual access, destruction, change, blocking, copying, distribution, and also from other illegal actions of the third parties.

5.6. The Site Operator together with the User takes all necessary measures to prevent losses or other negative consequences caused by loss or disclosure of the User's personal data.

## **6. RIGHTS OF THE USER**

6.1. The User has the right to receive information regarding the processing of his/her personal data, including containing:

- confirmation of the fact of processing of his personal data by the Site Operator;
- legal grounds and purposes of personal data processing;
- The goals and methods of personal data processing used by the Site Operator;
- name and location of the Site Operator, information about persons who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Site Operator;
- processed personal data relating to the relevant User, the source of their receipt;
- terms of processing of personal data, including the terms of their storage;
- the procedure for the exercise of the User's rights;
- information about the implemented or suspected cross-border transfer of data;
- the name or surname, name and address of the person processing personal data by order of the Site Operator, if the processing has been or will be assigned to such a person.

6.2. The User has the right to receive information concerning the processing of his/her personal data by sending a request to the Site Operator, indicating the number of the main identity document, information about the date of issue of the specified document and the body that issued it. The request may be sent in the form of an electronic document.

6.3. The User's right of access to their personal data may be restricted, including if the User's access to their personal data violates the rights and legitimate interests of third parties.

6.4. The User has the right to demand from the Site Operator to clarify his/her personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, and has the right to take statutory measures to protect his/her rights.

6.5. Information regarding processing of the User's personal data is provided to the User by the Site Operator in an accessible form, and does not contain personal data related to other Users, unless there are legal grounds for disclosure of such personal data.

In case information, concerning processing of the User's personal data, as well as if the processed personal data was not provided to the User for familiarization upon his/her request, the User has the right to address repeatedly to the Site Operator or send repeated request not earlier than in 30 (thirty) days after the initial addressing or sending of the initial request, if shorter term is not established by the Site Operator.

6.6. The User shall have the right to contact the Site Operator again or send a repeated request to receive the information concerning his/her personal data processing, as well as to review the processed personal data within 30 (thirty) days after the initial request, if such information and (or) processed personal data were not made available to him/her in full upon review of the initial request. A repeated request, along with information regarding the processing of the User's personal data, must contain a justification for sending a repeated request.

6.7. The User has the right to withdraw their consent to the processing of personal data.

6.8. The User located in the territory of the European Union has the right to request the personal data processed by the Site Operator in a structured, machine-readable format and transfer this data to another personal data operator under the GDPR requirements.

6.9. The User shall provide information about personal data necessary for using the Site.

6.10. The User shall update, supplement the provided information about personal data in case of changes in this information.

## **7. OBLIGATIONS OF THE SITE OPERATOR**

7.1 In accordance with GDPR requirements and regulations adopted in accordance with them, the Site Operator shall:

- Use the received information solely for the purposes specified in this Privacy Policy;
- Ensure that confidential information is kept confidential, not to disclose without the User's prior consent, and not sell, exchange, publish or disclose in any other possible ways the User's personal data transmitted, except as provided in this Privacy Policy;
- take precautionary measures to protect confidentiality of personal data of the User in accordance with the procedure generally used for the protection of such information in the existing business turnover;
- block any personal data concerning the respective User from the moment of their appeal or request, or their legal representative or an authorized body for the protection of the rights of subjects of personal data for the period of verification in case of unreliable personal data or unlawful acts
- provide, upon User's or its representative's request, information related to the processing of its personal data, or provide a reasoned refusal to provide such information in the form, cases and within the time period prescribed by the GDPR
- notify the User about the processing of personal data in case the personal data was not received from the User (except as previously agreed);
- explain to the User the legal consequences of the refusal to provide his/her personal data;
- upon the User's request to clarify the processed personal data, block or delete, if the personal data is incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing
- make necessary changes to personal data, destroy it, notify the User or its representative of the changes made and the measures taken, and take reasonable measures to notify third parties to whom the personal data of this User has been transferred, within the time period and in the cases provided by the GDPR;
- in case the purpose of personal data processing is achieved, immediately cease processing of personal data and destroy the relevant personal data within a period not exceeding 30 (thirty) days from the date the purpose of personal data processing is achieved;
- in case of revocation by the User of their consent to processing of their personal data to stop processing of personal data and to destroy the personal data within a period not exceeding 30 (thirty) days from the date of receipt of said revocation, unless otherwise provided by the agreement between the Site Operator and the User. The Site Operator shall notify the User about the destruction of personal data;
- in case of the User's demand regarding the termination of personal data processing in order to promote goods, works, services in the marketplace, to stop processing of personal data immediately;
- notify the User and the authorized body for the protection of personal data subjects' rights about incidents involving compromise of personal data of personal data subjects located in the territory of the European Union within 72 hours from the moment the incident is detected.

## **8. MEASURES USED TO PROTECT PERSONAL DATA OF THE USERS**

8.1. When processing personal data, the Site Operator shall take the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data.

8.2. Transmission of information via the Internet is not completely secure. The Site Operator takes all necessary measures for protection of the personal data and other personal data of the User, but the Site Operator does not guarantee safety of personal data of the User, transferred to the Site Operator by e-mail or through the Site. From the moment the Site Operator receives the User's personal data, the Site Operator undertakes to use strict procedures and security measures to protect the User's personal data.

8.3. Ensuring security of personal data is achieved, in particular by:

- defining the threats to the security of personal data during its processing in the information systems of the Site Operator;

- determining the levels of security of personal data during their processing within the IT system of the Site Operator;
  - organizational and technical measures taken to ensure security of personal data during their processing within information systems of the Site Operator, required for the compliance with the requirements to personal data protection;
  - assessment of efficiency of personal data security measures prior to the launch of the Site Operator's information system
  - accounting of personal data using machine carriers;
  - detection of the facts of unauthorized access to personal data and taking measures for elimination of detected violations;
  - restoration of personal data, modified or destroyed as a result of unauthorized access to it;
  - establishment of access rules to personal data, processed in the information system of the Site Operator, as well as registration and accounting of all actions, performed with personal data in the information system of the Site Operator;
  - control over measures taken to ensure security of personal data and the level of protection of personal data during its processing in the information system of the Site Operator;
  - appointment of a person in charge of organization of personal data processing;
  - appointment of a person in charge of organization of security of personal data;
  - issuance of local acts related to processing and protection of personal data, as well as local acts establishing procedures, aimed at prevention and detection of violations, elimination of consequences of such violations
  - exercising internal control over compliance of personal data processing with GDPR requirements, and regulations adopted in accordance therewith, this Policy, local acts of the Site Operator;
  - assessment of harm that may be caused to the User in case of violation of the requirements of personal data legislation, the ratio of the said harm and the measures taken by the Site Operator to ensure compliance with the obligations and regulations adopted in accordance therewith.
- 8.4. The Site Operator transmits information using secure communication (SSL), which creates secure and encrypted HTTPS addresses for the Site pages.

## **9. CONSENT TO THE COLLECTION, PROCESSING AND TRANSFER OF PERSONAL DATA**

By this consent the User provides his personal data to the Site Operator and gives consent to their processing, namely to perform the following actions: collection, recording, systematization, accumulation, storage, clarification (updating, change), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction, in order to enter into contracts with the Site Operator, execution of contracts, identity verification, as well as to meet the requirements of regulations on combating terrorism. The specified actions can be performed using automation tools.

The User hereby consents to the processing of the following personal data:

- surname, first name;
- date, month and year of birth;
- place of birth;
- sex;
- citizenship, country;
- identity document details;
- information about the place of registration and/or place of stay;
- contact details (including phone number and email);
- information about the transactions made by the User using the site;
- cookies;
- IP address.
- any other information provided by the User to the Site Operator, including bank card details (card number, cardholder's name, card expiration date), names of bank cards (arbitrarily assigned by the User).

User also gives consent to the processing of the following personal data - full name and contact information (including phone number and email address) for the purpose of conducting surveys, including through direct contact with the User by means of communication.

The User gives their consent to the transfer of their personal data to the Site Operator to third parties for the purposes of their processing, provided that the Site Operator has duly executed contracts with such third parties and that the Site Operator remains liable for non-disclosure of the User's personal data by such third parties.

This Consent becomes effective once it is signed and is valid till achievement of the personal data processing purpose, or till the moment of revocation by the User of the consent to transfer of personal data.

This consent may be withdrawn at any time with the mandatory submission of an application to the Site Operator for withdrawal of consent in electronic form, indicating the number of the main identity document, information about the date of issue of the specified document and the issuing authority.

If the User's personal data is processed, it shall be destroyed within a period not exceeding thirty days from the date the purpose of personal data processing is achieved, except for the data necessary for processing in accordance with the applicable legislation and performance of the User Agreement and use of the Site.

## **10. ADDITIONAL CONDITIONS**

10.1. The Site Operator may update this Policy at any time by posting changes on the Site. The Site Operator has the right to make changes to this Privacy Policy without the User's consent.

10.2. In case the terms of use of the User's personal data change, the Site Operator shall notify the User about it by e-mail, or by placing a prominent visual notice on the Site. The new edition of the Policy becomes effective once it is posted on the Site, unless otherwise provided by the new edition of the Policy. The effective version of the Policy is always available on the Site.

10.3. The new Privacy Policy shall come into force from the moment of its posting on the Site, unless otherwise stipulated by the new version of the Privacy Policy.

10.4. This Privacy Policy is available at [www.ageofmars.io](http://www.ageofmars.io).

10.5. This Privacy Policy is an integral part of the User Agreement, posted on the page at: [www.ageofmars.io](http://www.ageofmars.io).