

PRIVACY NOTICE

Last update: March 01, 2022

We respect your privacy and therefore appreciate your trust and confidence in us.

This Privacy Notice explains how XTEN LIMITED (“**we**”, “**our**” or “**us**”) collects and processes your personal data provided by you and/or received by us (“**personal data**” or “**personal information**”) when you use the software program - mobile game “Chess Royale” (“the Game”) and related products and/or services (collectively the “**Services**”).

Please read it carefully, because it is important for you to understand what we do with your personal information, the rights you are entitled to and how you can control it.

What information do we collect?

We generally collect information that you voluntarily provide us with, such as by creating an account, signing up for mailouts, information from your use of the Services, such as cookies or similar automated technologies and software, and information that we might collect from third parties, such as partner platforms. Information received by us from third parties shall be treated in accordance with the terms of this Privacy Notice.

When collecting and processing your personal information, we are striving to be as transparent as possible, thus consider checking the list of personal information that we collect and process. Please note that the list is not comprehensive and might be extended by us at our sole discretion, provided that the extension and our use of personal information does not violate applicable legislation, therefore consider checking this Privacy Notice from time to time.

Information you provide	We collect the information that you directly provide to us while using the Services or include it in an email or other messages that you send to us. Such kind of information collection would happen during usual business processes. This information may include: <ul style="list-style-type: none">- information you provide to us when addressing our help&support team or communicate with us through our official communities in social networks;- any information provided by you when contacting us, addressing the following email: support@whitesharx.com
Information we collect automatically	We may automatically collect information when you use the Services. Such information may include: <ul style="list-style-type: none">- Device Data. We automatically collect device-specific and device event information from the devices you use to in order to get access to the Services. Such information may include your IP address, the version of the Game you use, advertising identifier, operating system version, device brand, device model, your network operator, language settings;- Location Data. We collect information about your location (Country/City) basing on your IP address;- Game Data. We automatically collect information from the devices you use in order to get access to the Game. Such information may include your device ID (identification number) and game identification number

	(ID). Those IDs are assigned to you automatically when installing and starting the Game and is a randomly specified set of characters that alone cannot identify you. Also we may collect information regarding the Game, including information about your in-game achievements and events, your in-game purchases, completed game levels and actions, crashes, reports and other information that might be generated by the Game.
Information we receive from third parties	<p>We may receive information from third party sources and combine it with the information we receive directly from you. This information may include:</p> <ul style="list-style-type: none"> - Third parties' data. We can receive your personal data from the third parties if you have given your consent to such third parties to provide us with your personal data or if you make these data public on your own. We will handle this information in accordance with this Privacy Policy.

How we process personal information?

We strictly abide by all data protection regulations and strives to render the best level of information security and protection. We are transparent about our privacy practices and follow the principles of data minimization, and purpose limitation, accuracy, and accountability.

How we protect your data?

We maintain appropriate administrative, technical and physical security measures to protect your personal information from accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use and other unlawful forms of processing.

For what purposes do we process your personal data?

Generally, we process your personal data to provide you access to the Services, to ensure proper and secure functioning thereof, to comply with applicable laws and regulations, and to enhance your experience while using the Services. We also use your personal data to contact you when necessary.

We do not and will not process your personal data in order to sell it.

In addition, we may process your personal data in case when we are obliged to do so by applicable laws. We may also process your personal data in case when we are entitled to do so by the applicable data protection laws without obtaining your consent.

What data do we process?	On what legal basis do we process your personal data?	For what purposes do we process your personal data?
Any information provided by you when contacting us, addressing the following email: support@whitesharx.com	performance of contractual obligations	We process such data in order to response your submissions and provide you with feedbacks
Device Data	performance of contractual obligations	We may use your device data to fix Game errors, to improve your gaming experience, to ensure the security of your account
	our legitimate interest	We may collect statistics on the equipment used for the Services functioning,

		to analyze the performance thereof. Also such data may be used for analytics purpose (for more information, please check “Analytics” section)
	on the basis of your consent to such processing	Such data may also be used for advertising purposes (for more information, please, check “Advertising” section)
Location Data	performance of contractual obligations	We process your approximate location data in order to adjust the language and currency of payments when you use the Services. The Game does not have geographic location tracking, we do not monitor your movement
	our legitimate interest	Such data may be used for analytics purposes such as to monitor the success of our marketing/ads programs (for more information, please check “Analytics” section)
	on the basis of your consent to such processing	Such data may be used for advertising purpose (for more information, please, check “Advertising” section);
Game Data	performance of contractual obligations	We use your Game ID to isolate your data from the data of other users. Data regarding the Game, as well as other information you provide, is used to provide you with the most comfortable mechanism for interacting with the Game

When processing your personal information based on your consent to do so, you therefore are entitled to withdraw your consent at any time (please see the description below), provided, however, processing preceding such a withdrawal shall remain valid and lawful.

Please also note that we may exercise further processing of your data (the processing of personal data for purposes other than those for which the personal data were initially collected). This processing may be exercised only where this further processing is compatible with the purposes for which the personal data were initially collected and only after conducting a compatibility assessment that demonstrates the compatibility of such further processing with the initial purpose. In such a case, no legal basis separate from that which allowed the collection of the personal data is required.

You also have the right not to be subject to a decision based solely on automated processing of your Personal Information, including profiling, which produces legal or similarly significant effects on you, and thus we avoid any automated decision making, including profiling that can produce any legal or similarly significant effects for our Service recipients.

Do we collect your payment information?

We do not and will not collect or process any information related to your payment instruments, such as your credit card number, its expiration date or your name as written on your card.

Do we provide third parties with your personal data?

We may provide third parties with your data on our behalf since their respective technical solutions may form an integral part of the Services. However, we do not own these technical solutions and we do not affect their functionality. We may transfer your personal data to our partners on the basis of a written contract.

We may use third-party services to collect analytical data and advertisement display. You can learn about our partners' terms and conditions of personal data use in the "Analytics" and "Advertising" section of this Privacy Notice.

We may also transfer your personal data to third parties (e.g. Independent Data Controllers) in case we are obliged or entitled to do so by applicable laws. In such cases we transfer data according to applicable personal data protection laws, including, but not limited to, General Data Protection Regulation 2016/679.

International transfers of Personal Information

We may transfer your Personal Information in and outside the EEA, EU, UK, Switzerland or the U.S. in the course of the Services provision. We apply the Standard Contractual Clauses approved by the European Commission or other appropriate means as legal mechanisms for any such transfer, and make sure that such transfers occur only if there are adequate safeguards in place.

By using our Services or providing us with any information through them, you acknowledge such transfer, processing, and storage of your Personal and other information in countries in which privacy regulations may be not as comprehensive as those in the country of your residence.

How long do we process your personal data?

We store all the data we collect for as long as you use the Services and 30 months after your last use thereof. After the expiry of this time limit, we erase your personal data from our database or anonymize it, as well as request same erasure from any third parties whom your data may have been transferred to. We can also delete or anonymize your personal data as soon as we do not need it anymore. Anonymization is the process of removing personal identifiers, both direct and indirect, that may lead to an individual being identified. The result of this process is anonymous data that cannot be associated with any individual.

Do we process any personal data of children?

We do not allow access to the Services to anyone under the age of 16. We do not knowingly collect any personal data of those individuals.

If you are aware that we unintentionally process personal data of an individual under 16 years old, please contact us and we will make all reasonable efforts to stop processing such data and erase it as soon as possible.

What rights do you have with regard to your personal data?

You are entitled to all rights granted in accordance with the applicable domestic laws and cross-border legislation. In particular, under General Data Protection Regulation 2016/679 you are entitled to the following rights:

- Right to access your data;
- Right to correct your data;
- Right to have your data deleted;
- Right to transmit your data;
- Right to object to processing of your personal data;
- Right to restrict processing of your personal data;
- Right to withdraw your consent for personal data processing.

Right to access your data. You have the right to access your personal data, which we process. If you want to exercise the right, please contact us by sending us a message describing your request through our help&support service within the Game.

Right to rectify (correct) your data. You have the right to ask us to update any inaccurate data about you. If you think that the data we process are incomplete for the purpose of processing as stated in this Privacy Notice, you may ask us to complete your personal data accordingly. If you want to exercise the right, please contact us by sending us a message describing your request through our help&support service within the Game.

Right to have your data erased (deleted). You have the right to ask us to delete your personal data completely. If you want to exercise the right, please contact us by sending us a message describing your request through our help&support service within the Game. Please, be informed that we will not erase your Game ID, as we need to keep it for our internal records. However, we will erase all data that may help us identify you; therefore, your Game ID will not be considered personal data anymore.

ATTENTION

Please, be aware that if you ask us to delete your personal data, all your profile data may be irrevocably lost. Deletion of personal data is irreversible. You will not be able to restore your personal data.

We emphasize that processing your personal data is absolutely necessary to allow you to access the Game.

Right to object to processing of your personal data. You have the right to object to processing your personal data for the purpose of direct marketing. If you want to exercise the right, please contact us by sending us a message describing your request through our help&support service within the Game.

Right to withdraw your consent for personal data processing. You have the right to withdraw your consent for personal data processing. Any withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. If you want to exercise the right, please

contact us by sending us a message describing your request through our help&support service within the Game.

Right to restrict processing of your personal data. Please, be informed that this right may be exercised only in a situation set forth in Article 18 of General Data Protection Regulation 2016/679. If you want to exercise the right, please contact us by sending us a message describing your request through our help&support service within the Game.

Right to transmit your data. You have the right to ask us to receive your personal data which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. If you want to exercise the right, please contact us by sending us a message describing your request through our help&support service within the Game.

California Residents rights

If you are a resident of California state, United States of America, you are entitled to the following rights: the right to know what personal information is being collected about you; the right to know whether your personal information is sold or disclosed and to whom; the right to say no to the sale of personal information; the right to access your personal information; the right of equal service and price, even if you exercise your privacy rights.

Also, being a California resident, you have the following rights:

- to request deletion any personal information about you;
- to request disclosure of the categories and specific pieces of personal information that we have collected about you;
- to request disclosure to you the following: the categories of personal information we have collected about you; the categories of sources from which the personal information have been collected; the business or commercial purpose for collecting or selling personal information; the categories of third parties with whom we share personal information; the specific pieces of personal information we have collected about you; the categories of personal information that we sold about you and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each category of third parties to whom the personal information was sold.

We shall not discriminate against you because you exercised any of the California resident rights, including, but not limited to, by: denying goods or services to the resident; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level or quality of goods or services to the resident; suggesting that the resident will receive a different price or rate for goods or services or a different level or quality of goods or services.

Analytics

We collect and process certain data on how you interact with the Services in order to analyze various aspects of its functionality. Such information may include your location and device data. We use our own technology solutions to collect and process analytical data as well as third-party technology solutions provided by our analytics partners to collect analytical data. We adopt such technologies and our partners process your data on our behalf in order to provide us with analytical data.

You can learn about our partners' terms and conditions of personal data use at the following links:

Apps Flyer: <https://www.appsflyer.com/legal/privacy-policy/>

Google BigQuery: <https://policies.google.com/privacy?hl=en>

FB Analytics: <https://www.facebook.com/about/privacy/previous>

Firebase Analytics: <https://firebase.google.com/support/privacy>

Unity Analytics: <https://unity3d.com/legal/privacy-policy>

Data processing for analytical purposes is based on our legitimate interest, i.e. to analyze the data of the Services' users for commercial purposes. We rely on analytics to provide our users with high quality services, to update and develop the Services. We can use analytical data to fix functionality errors.

Advertising

We may show advertisements in our Game with the help of third-party advertising partners. We integrate their technologies into our Game, which are then used by our partners to select the advertisements that meet your interests in the best way.

You can learn about our partners' terms and conditions of personal data use at the following links:

AdColony, Inc.: <https://www.adcolony.com/privacy-policy/https://www.adcolony.com/privacy-policy/>

AdMob: <https://policies.google.com/privacy?hl=en>

AppLovin: <https://www.applovin.com/privacy/>

Chartboost: <https://answers.chartboost.com/en-us/articles/200780269>

Facebook: <https://www.facebook.com/privacy/explanation>

Fyber: <https://www.fyber.com/privacy-policy/>

HyprMX: <https://www.hyprmx.com/pp>

InMobi: <https://www.inmobi.com/privacy-policy/>

IronSource: <https://developers.is.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>

Mintegral: <https://www.mintegral.com/en/privacy/>

MyTarget: <https://legal.my.com/us/mytarget/privacy/>

Pangle: <https://www.pangleglobal.com/privacy>

Tapjoy: <https://www.tapjoy.com/legal/#>

Unity: <https://unity3d.com/legal/privacy-policy>

Vungle: <http://vungle.com/privacy/>

Contact Us

In case you have any questions with regard to this Privacy Notice, please, contact us via email at support@whitesharx.com or via regular post at the address stated below, and we will get back to you as soon as practically possible. Please note that for the exercise of some of your data subject rights, we might be requested by law to verify your identity.

The controller of your personal data is XTEN LIMITED, a company duly incorporated in the Republic of Cyprus at the address: Leoforos Archiepiskopou Makariou III, 169, Office 303, 3027, Limassol, Cyprus.