

Last revised and effective: December 09, 2022

This Privacy Policy (“**Policy**”) describes how Limited Liability Company “EXBO” (“**EXBO**”, “**We**”) processes Your personal data. By expressing Your consent in the forms presented on our Website, You or Your representative (“**User**”, “**You**”) accept the Policy.

Acceptance of the Policy with respect to minors

To accept the Policy, You must reach the age of sufficient legal capacity under applicable legislation (the laws of the country of Your residence).

If You are under the age of legal capacity, please ask Your parents or other legal representatives for assistance before using our Game. By continuing to use our Game, You certify that You have either reached the age of legal capacity to accept the Policy, or that Your parent/legal representative has reviewed and agreed to the terms of the Policy on Your behalf.

If You, as a parent or other legal representative, find out that Your child has accepted the Policy without Your consent, please contact Us (for example, via our support platform (<https://support.exbo.net/>) or other means indicated on the Website). We will promptly erase the corresponding data and inform our partners about it.

Applicable legislation

EXBO treats collection and use of Your data responsibly. Considering the international nature of distribution of the Game, the Policy was developed in such a manner as to comply with the requirements of General Data Protection Regulation (European Union) 2016/679 (hereinafter “**GDPR**”), as well as with the requirements of the State of California (USA), including California Consumer Privacy Act 2018 (hereafter “**CCPA**”) and the US federal laws, as those setting a high standard for protection and responsible processing of personal data. In the Policy We also take into account Privacy Shield framework agreements, to which Switzerland and the European Union are parties.

We confirm that our internal processes are aligned with the Policy.

Amendment to the Policy

Over time, EXBO may unilaterally amend the Policy, including to comply with the latest changes in the applicable law. All changes come into force from the moment they are published here, unless a different period is indicated in the text of the amendments. EXBO will make every effort to organize additional ways to notify Users of amendments to the Policy, but We ask You to regularly check for the latest version.

1. DEFINITIONS:

- **Device** means any personal computer (PC) as well as other devices which support the Platform, which allows the use of the Game according to its functional purpose.
- **The Game** means “Stalcraft”, a computer software developed and published by EXBO intended for installation and use on Devices.
- **Terms of Use** means an agreement between Us and a User, on the basis of which User is granted access to our Game. User enters into a Terms of Use with Us by accepting the terms

before the first launch of the Game. The Terms are posted here: https://exbo.net/legal/terms_of_use.pdf.

- **Personal data** means any information relating to an identified or identifiable natural person.
- **Platform** means “EXBO launcher”, provided by Us and available at Our Website.
- **Website** means our website <https://stalcraft.net>.

ABOUT US

Exbo East Limited Liability Company

Registration number: 221140035112

Legal address: Dinmukhamed Qonayev St 12/1 Astana 020000, Kazakhstan

E-mail: legal@exbo.net

2. WHAT TYPES OF INFORMATION DO WE COLLECT AND FOR WHAT PURPOSES?

2.1. In order to implement the Terms of Use between You and EXBO, We need to support the Game, as well as its functionality, including user support, restoring progress in the Game when switching Devices, analyzing statistics of our Game to improve Your user experience, correcting errors in the Game, determining the need for changes in our commercial decisions regarding the Game.

2.2. To achieve these objectives, and in compliance with applicable laws, We will collect, store, aggregate, organize, extract, compare, use, and supplement Your data (hereinafter “**processing**”). We will also receive and pass this data on to our partners as set out in the table below.

2.3. We set out in more detail the information We collect when You use our Game, why We collect and process it and the legal bases below:

Personal Data	Legal Basis for Collection	Purpose(s)
For You to Play the Game		
Device Information	Our legitimate interest in improving the Game	In order to prevent technical issues that may occur when You use the Game, and to improve its usability for You, We collect, store and use information about the device on which You use the Game, including information about the type of device, hardware and operating system, settings, unique device identifiers, and error information (if available). The type of device and its settings often determine whether all or part of the information is collected.
Location Data	Your Consent, which You provide by accepting the Privacy Policy	In order to improve the Game’s usability, We may also collect Your precise location data from

		Your Device. Your device's MAC address and IP addresses may be used to determine Your approximate location.
User ID, User Name, User Avatar	Performance of a Contract (i.e. Terms of Use) which You accept by using the Game. User's Name and User's Avatar are processed only if You decide to provide them voluntarily.	Identification and personalization of Your account
User IP Address, Your Device's unique ID and User statistics	Performance of a Contract (Terms of Use)	Prevention and investigation of Fraudulent behaviour and behaviour related to a breach of Terms of Use
User Statistics (behaviour)	Legitimate interests, which, inter alia, include the processing of data manifestly made public by You, where it is accessible by other users of the Game	We use this information in order to manage and administer the Game including providing our Game to You. We may also use this data in order to tailor and improve the adverts that are presented to You and to measure the effectiveness of these advertisements.
Information that is created by You while using the Game (including information that You post in any Game chats). This information may be available to some or all other users of our Game.	Legitimate interests, which inter alia, include the processing of data manifestly made public by You	We use this information in order to manage and administer the Game, including providing our Game to You.
Information that is received about You as the result of other users' actions in the Game (in particular, information posted in chat by other users).	Legitimate interest	We use this information in order to manage and administer the Game including providing our Game to You.
Data obtained via third parties, including Your social network ids, social network nickname, avatar, email and friends list, when You connect Your social account (e.g.	Legitimate interest	We use this information in order to manage and administer the Game provided to You.

Facebook, Steam) to our Website.		
Email	Your Consent	For sending marketing and advertising materials (including targeting ads) to Your personal email
For You to Use Customer Support		
Name	Performance of a Contract (Terms of Use)	We may need some of Your personal data in order to be able to contact You and provide the requested help. You have the option to contact our customer support team by using our social networks and email. When You do, We will collect and use this information to respond to Your requests and/or comments.
Email address		
Device Information		
User ID		
User Name		
User Avatar		
Location Information	Your Consent	

2.4. Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body or agency or in the defense or exercise of legal claims. We will not delete personal information if it is relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved and/or during the term that is required and/or permissible under applicable/relevant law.

2.5. Please note that We do not process any sensitive and special categories of data about You (including data relating to Your health, racial or ethnic origin, political opinion, religious or philosophical beliefs, sex life, and Your sexual orientation).

2.6. If We intend to further process Your data for any other purposes besides those set out in this Privacy Policy, We shall provide You with details of these purposes before We commence data processing in the respective update of this Privacy Policy.

3. IS PERSONAL DATA TRANSFERRED TO THIRD PARTIES?

3.1. We may transfer Your data to third parties indicated in this Policy within the designated purposes.

3.2. Your username and other information that You provide or post while using the Game can be available to all users of the Game. We take technical and organizational measures to ensure that Your data is safe. Please note, that by posting Your personal information in publicly accessible areas (resources accessible by other users of the Game), You manifestly make this information public, and it may become available to other users of the Game and be copied and/ or disseminated by such users. Please keep in mind that once other users have gained access to or copied Your data, neither You nor We are able to delete or remove such data from possession of those other users.

3.3. The transmission of personal data with the recipients (whatever their legal status, subcontractor, processing manager or just recipient) is carried out in a secure manner and in application of an agreement between Us and each recipient as may be necessary under applicable

law. We undertake to ensure that each recipient knows the directive principles of personal data protection and submits them in application of the law and/or of a particular contract.

3.4. In case We share Your data with selected third parties, including our third-party contractors, We always ensure that these third parties undertake confidentiality obligations regarding Your personal data collected while You use the services or applications they offer.

3.5. We share Your data with the following categories of partners:

(1) Payment Processors

In order for Us to enable You to successfully complete Your purchases We provide Your data necessary for such transactions to the following services (including emails, User ID):

a. **Xsolla Inc.:** please read privacy information here: <https://xsolla.com/privacypolicy#section1>

b. **Unitpay:** please read privacy information here: <https://unitpay.money/en/policy>

(2) Software Providers

In order for Us to properly provide the Game, We need to use third-party software solutions, for example, to conduct in-game text chats, for this purpose We use:

a. **Unity Technologies (Vivox):** please read privacy information here: <https://unity.com/legal/game-player-and-app-user-privacy-policy>

(3) Other Providers

In order for Us to properly provide the Game and Our services, We need to use third-party services:

a. **Cloudflare, Inc.:** please read privacy information here: <https://www.cloudflare.com/privacypolicy/>

b. **Mailgun Technologies, Inc:** please read privacy information here: <https://www.mailgun.com/legal/privacy-policy/>

c. **Functional Software, Inc (Sentry):** please read privacy information here: <https://sentry.io/privacy/>

d. **Yandex LLC:** please read privacy information here: https://yandex.com/legal/metrika_eea_termsfuse/.

(4) Storage Services

Some of the data We collect is stored on the servers of third party storage services of the following server provider:

- a. **OVH:** please read privacy information here:
<https://www.ovhcloud.com/en-ie/personal-data-protection/gdpr/>
- b. **DataPacket:** please read privacy information here
<https://www.datapacket.com/privacy-policy>

3.6. We may also share Your data with our affiliates and keep some of Your personal information in our business records for accounting and compliance purposes. As such, We may also disclose Your personal information to a third party if We decide to transfer a business to that third party, so You can continue to receive service and information in connection with that business with as little disruption as possible. Similarly, in the event of a merger, acquisition, reorganization, bankruptcy, or other similar event, Your personal information may be transferred to our successor or assignee.

3.7. We reserve the right to disclose Your personal information as required by law, by court order or in special cases when We have reason to believe that disclosing such information is necessary to identify, contact, or bring legal action if You or third parties are violating the Terms, any other terms of services provided by Us or our affiliates or any applicable law, for the purpose of defense of our rights and interests. We also reserve the right to disclose Your personal information if We have a good faith belief that it is necessary to prevent fraud or other illegal activities.

4. ARE THERE ANY INTERNATIONAL TRANSFERS?

4.1. We may transfer and maintain on our servers or databases some of Your personal information between the European Economic Area (EEA), the United States of America and the Russian Federation.

4.2. The countries to which We transfer Your data may not have the same data protection laws as Your jurisdiction. We take reasonable cyber security measures and/or put in place the Standard Contractual Clauses (e.g. Model Clauses, Data Processing Agreement/Addendum) to ensure Your data is adequately protected.

5. HOW AND HOW LONG DO WE STORE YOUR DATA FOR?

5.1. We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that Your personal data are protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.

5.2. We will retain Your personal information for as long as required to perform the purposes for which the data was collected depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that We retain Your personal information during the term that is required and/or permissible under applicable/relevant law.

5.3. You may delete Your personal data by deleting the data from Your Account;

5.4. You may directly request Us to delete Your data from the Game by contacting Us via the support services (<https://support.exbo.net/>).

6. WHAT ARE THE RIGHTS REGARDING YOUR PERSONAL DATA?

6.1. You have the following rights, in certain circumstances, in relation to Your personal information:

- Right to access Your personal information;
- Right to rectify Your personal information: You can request that We update, block or delete Your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing;
- Right to restrict the use of Your personal information;
- Right to request that Your personal information is erased if:
 - it is no longer required in relation to the purposes for which it was gathered or processed in another way;
 - You withdraw Your consent concerning processing subject to consent;
 - You are justifiably opposed to the processing;
 - it has been subject to illicit processing; or
 - it is imposed by law.
- Right to object to processing of Your personal information;
- Right to data portability (in certain specific circumstances);
- Right not to be subject to an automated decision;
- Right to lodge a complaint with a supervisory authority;
- For processing based upon Your consent, the right withdraw that consent at any time;
- You may have other rights under Your legislation of Your country of residence, including the right to define the instructions relative to the outcome of Your personal data after Your death.

6.2. If You would like to exercise these rights, please contact Us on our support platform (<https://support.exbo.net/>) or send Your request to us, by writing to legal@exbo.net. We will aim to respond to You within 30 days from the date of receipt of Your request.

7. INFORMATION FOR EU RESIDENTS

7.1. You can exercise all the rights provided for in section “What are the rights regarding Your personal data?” in accordance with GDPR.

7.2. We may transfer personal data relating to You outside of the EEA, since We may transfer it to third-party services located outside of the EEA. In order to ensure Your rights regarding the collection, storage and processing of personal data, You have a right to file a complaint with the authority at Your place of residence. The list of responsible authorities can be found at: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

7.3. In accordance with the section “Are there international data transfers?” Your data may be transferred to our partners in the following countries:

Partner	Country of Registration	Adequacy of protection decided by the Commission	Safeguards

Xsolla Inc.	The United States	Absent	Standard contractual clauses adopted by the EU Commission with provision of the assessment of the level protection regarding Personal Data.
Unitpay	Russia	Absent	Standard Contractual Clauses.
Unity Technologies	The United States	Absent	Standard Contractual Clauses.
Cloudflare, Inc.			
Functional Software, Inc.			
Mailgun Technologies, Inc			
DATA PACKET	UK	Present	Data transfer to this country is expressly permitted by The European Commission.

7.4. We undertake to store Your personal data only in those jurisdictions that use the necessary security mechanisms to protect Your personal data, including various data encryption methods. With each of the partners where it is mentioned above, We accept obligations under the standard contractual clauses adopted by the EU Commission, which give Us a legal basis for such a transfer.

7.5. By agreeing to the processing of Your personal data in accordance with this Privacy Policy, You give Us explicit consent to transfer Your personal data to jurisdictions outside the EEA, despite all possible risks of such a transfer.

8. INFORMATION FOR CALIFORNIA RESIDENTS (USA)

8.1. The California Consumer Privacy Act (hereinafter “CCPA”) applies to processing of personal data in relation to customers who are residents of California.

8.2. We take measures to collect, use and disclose such data solely for the purpose of providing the Game to You, or for other purposes provided for by the CCPA.

8.3. We guarantee that We **do not sell Users' personal data** directly for a monetary reward.

8.4. At the same time, We understand that CCPA has a very broad understanding of the term “data sale”. Apart from this, We do not monetize the transfer of personal data to third parties.

8.5. Under the CCPA You may exercise the following rights among others:

- Right to know: You can request to disclose what Personal data do We have and why;
- Right to delete: You can request to delete Your Personal data;
- Right to opt-out: as We mentioned earlier, We do not sell Your Personal data. Regardless, You can still request a confirmation from Us or ask to stop selling Your data if You feel to do so;
- Right to non-discrimination: We encourage You to feel free in exercising Your rights under the CCPA.

To exercise any of Your rights, please contact Our support team via <https://support.exbo.net/>.

9. CONTACT US

9.1. If You have any questions, please send Your inquiries to support platform (<https://support.exbo.net/>) or in writing to legal@exbo.net. So We can deal with Your inquiry effectively, please quote this Privacy Policy. We will aim to respond to You within 30 days from receipt of your request.

9.2. All correspondence received by Us from You (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without Your written consent. Personal data and other information about You may not be used without Your consent for any purpose other than for response to the inquiry, except as expressly provided by law.