

Privacy Policy

Last Modified: May 6, 2019

Please study this document carefully if you intend to use this Application. You can ask us any questions or submit any lawful requests regarding this Privacy Policy, just refer to the “Contact Us” section of this Privacy Policy for details.

1. General

The Company - Feofun Limited and its affiliates - is committed to protecting your privacy. This Privacy Policy applies to processing information from Snow Splash, PolyGame, Star Knives as an Ad Supported app and Commercial app (“Application”). This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. By using Application and accepting our cookies and/or terms & conditions and/or privacy policy or providing us data in any other way, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use the Application or provide us data in any manner.

The Company may, from time to time, revise the present Privacy Policy. If we make any revisions that will change the way of collecting or using your personal data, these changes will be published in present Privacy Policy and the effective date will be stated at the beginning of the Policy. Therefore, you should check it periodically so that you are aware of our latest policies and practices. If the Company substantially changed its practices regarding the collection or use of your personal data, you will be notified of such changes with an opportunity to opt out.

“Personal data” is defined in Article 4(1) of the GDPR as: “any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

This Privacy Policy should be read in conjunction with other agreements with the Company related to data processing, if any;

When providing the data to us you may be asked to specify certain privacy preferences which affect how the Company will process your personal data. By selecting the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the publication of your information.

The Company will ask you to consent to the Company's use of cookies in accordance with the terms of this policy when you first visit the Application. By continuing to use the Application and agreeing to this Privacy Policy, you consent to the Company's use of cookies in accordance with the terms of this Privacy Policy.

The Company is registered in Cyprus under company registration number HE 394929, and the Company's registered office is at Stavrou, 56, KARYATIS CENTRE, 1st floor, Flat/Office 104, Strovolos, 2035, Nicosia, Cyprus

2. Contact Us

Any requests to the Company, including any requests under this Privacy Policy or connected with your data usage, may be submitted via the following contacts:

E-mail: legal@feofun.com

Address: Stavrou, 56, KARYATIS CENTRE, 1st floor, Flat/Office 104, Strovolos, 2035, Nicosia, Cyprus

The Company and/or its data protection officer will make sure to provide a response or take requested action as soon as reasonably possible after studying your request.

3. Age Restrictions

Unless stipulated otherwise by the Application, we do not collect personal information of persons under 18-year olds and verify the age before accessing the Application. If some person less than 18 years old submits personal data and we find out that this personal data are of are data of a person less than 18 years old, we will delete the data as soon as possible.

4. Which Information We Collect

- billing information.
- username;
- age;
- mobile advertising identifiers;
- your interests and behavior;
- location data;
- log data.

Log Data

We want to inform you that whenever you use our Application, in a case of an error in the app we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol (“IP”) address, cookie identifiers, device name, operating system version, browser type, operating system, Internet service provider, pages that you visit before and after using the website or our application, the configuration of the app when utilizing our Application, the time and date of your use of the Application, and other statistics.

5. Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

The Application uses the following cookies:

- (a) tracking devices within Application;
- (b) saving unique identifier of the device that used to navigate through Application;
- (c) store session identifier;
- (d) store user last activity time.

The Application will notify you of its use of cookies, and you can use an active screen element to prove you agree with such cookies use. In case if the Application will contain advertisement the data on your interaction with such advertisement may be provided to such advertisers provided that you interacted with such advertisement.

Cookies are uniquely assigned to each visitor, and can only be read by a web server in the domain that issued the cookie to the visitor. Cookies cannot be used to run programs or deliver viruses to your device.

Persistent cookies remain on your device for a set period of time specified in the cookie. They are activated each time that the visitor visits the Application that created that particular cookie.

Session cookies are temporary. They allow Application operator to link the actions of a visitor during a browser session. A browser session starts when a visitor opens a browser window and finishes when they close it. Once you close the browser, all session cookies are deleted.

Strictly necessary cookies are essential to navigate around the Application and to use its features. Without them, visitors would not be able to use basic services like registration. These cookies do not gather information about visitors that could be used for marketing or remembering where a visitor has been on the internet.

Performance cookies collect anonymous data for statistical purposes on how visitors use the Application, they don't contain personal information, and are used to improve the visitor experience.

Functionality cookies allow visitors to customize how the Application looks for them: they can remember usernames, language preferences and regions.

These descriptions are provided for your general information only and in order for you to better understand the functionality of the Application and other applications and in no way imply that all of these kinds of cookies are used on the Application, however either or all of these kinds of cookies may be used.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (IE);
- (e) <https://support.apple.com/kb/PH21411> (Safari);
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites and applications. If you block cookies, you may not be able to use all the features on the Application.

6. Purposes of Processing

The Company processes personal data for the following purposes:

- Providing the Application and billing to you which is required for contract performance.
- Processing of your requests which is required for performance of legitimate rights and obligations or to enter a contract with a data subject.
- Ad targeting and analysis which requires your consent.
- Marketing communications which can be considered our legitimate interest.
- Analysis of technical performance which can be considered our legitimate interest.

7. How your personal data is used by the Company

The Company may process:

- (i) Usage data which may include browser type and version, operating system and date and time of your visit. The source of the usage data is our analytics tracking system as updated from time to time. This usage data may be processed for the purposes of analysing the use of the Application. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Subscription Services for illegal activities as well as improving the Application and other products.
- (ii) Profile data – the Company may process personal data included in your personal profile. Your profile data may include, as a minimum, phone number, and country of residence. Profile data may be processed for the purposes of enabling and monitoring your use of the Application and other products as well as ad targeting. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely

monitoring usage of Subscription Services for illegal activities as well as improving the Application and other products.

- (iii) Account data – the Company may process your account data, which will include your name and email address, as well as your registered address and photo identification details. The source of the account data is the data which you enter when signing up for an account. The account data may be processed for the purposes of operating the Application, providing the Application, ensuring the security of Application, monitoring any illicit or suspicious transactions undertaken using the Application and also communicating with you. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Application for illegal activities as well as improving the Application and other products.
- (iv) Service data – the Company may process personal data that you provide in the course of the use of Subscription Services and other products. The service data may include ATM data, transaction amounts and merchant information, if applicable and requested at the Application. The source of the service data is your use of the Application, including, without limitation, the transactions you undertake. The service data may be processed for the purposes of operating Application, providing the Application services, ensuring the security of Application, maintaining back-ups of the Company's databases and communicating with you. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of Application for illegal activities as well as improving the Application and other products.
- (v) Transaction data – the Company may process information relating to transactions that you enter into with us and/or through the Application or other products. The transaction data may include your phone number and specific data concerning each transaction you enter into, merchant and pricing information. The transaction data may be processed for the purpose of monitoring the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and the Company and/or taking steps, at your request, to enter into such a contract, as well as the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, namely monitoring usage of the Application for illegal activities as well as improving the Application and other products.
- (vi) Enquiry data – the Company may process information contained in any enquiry or request you submit to us. The enquiry data may be processed for the purposes of offering, marketing and selling other relevant the Company products and/or services to you. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis.
- (vii) Correspondence data – the Company may process information contained in or relating to any communication that you send to us. The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis, proper administration of the Company's business and communications with the Company's users.
- (viii) Notification data – the Company may process information that you provide to us for the purpose of subscribing to the Company's email notifications and/or

newsletters. The notification data may be processed for the purposes of sending you relevant notifications and/or newsletters. The legal basis for this processing is the Company's legitimate interests and the legal requirements to which it is subject to on an ongoing basis for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

- (ix) Data on specifications and location of your device used for ad targeting which we receive directly or indirectly. The legal basis for such processing is your consent. ((i) to (x) being "Relevant Data")

The Company may also process any of your personal data identified in the other provisions of this policy where absolutely necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

In addition to the specific purposes for which the Company may process your personal data, the Company may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which the Company is subject, or in order to protect your vital interests or the vital interests of another natural person.

Please do not supply any other person's personal data to us, unless the Company request in writing or from a Company email address that you do so.

8. Providing your personal data to others

The Company may disclose any or all of Relevant Data to:

- (a) any member of the Company's group of companies (this means the Company's subsidiaries, ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy; and
- (b) to the Company's insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- (c) subcontractors, insofar as reasonably necessary for the purposes of those subcontractors performing their obligations to the Company to allow the Company to provide the Application services.
- (d) the Company's partners, including but not limited to each relevant payment processor, advertiser or ad network.

Financial transactions relating to the Subscription Services are handled by the Company's payment services providers. The Company will share transaction data with the Company's payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Application;
- To provide the Application on our behalf;
- To receive payment for the Application;
- To place advertisements;
- To perform the Application-related services; or
- To assist us in analyzing how our Application is used.

We want to inform users of this Application that these third parties have access to your Personal Information. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

9. International transfers of your personal data

In this section, the Company provides information about the circumstances in which your personal data may be transferred to our third party partners as data processors, who are located in any country provided that such recipient ensured the adequate level of personal data protection or received the data based on your consent. The Company will transfer data internationally only if absolutely necessary for the purposes stated in this Privacy Policy. You can always contact the Company to know the exact subjects of such data processing, and such information will be provided to you, if stipulated by the applicable legislation.

10. Consent

The Application will enable you to provide consent to data processing and opt out of such processing. Opt out may result in unavailability of the Application functions to you. The consent interface will provide you with the all information required to make an informed and voluntary consent.

11. Third Party Websites

The Application may contain links or advertisements related to third party websites which are not controlled by the Company. The Company is not responsible for the practices of such third party websites.

12. Additional Provisions on the Data Use

We use the data only for the purposes mentioned above. Such use includes maintaining your user account, interaction with your mobile operator and billing providers, and sending you messages with important updates. No other use will be conducted unless you provided your consent or unless there is a legitimate ground for such use. The data will be stored for the period of providing the Application services to you and for a year after termination of such services.

13. Data Protection

The Company uses reasonable administrative and technical measures to protect your information against loss, theft and unauthorized use, disclosure or modification. Such measures include processing personal data in secure environment and training our personnel for proper handling of personal data.

The Company use implement appropriate technical and organizational measures, including:

- (a) the pseudonymization and encryption of personal data;
- (b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- (c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- (d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing.

Personal data is processed for as long as the relevant legal basis for processing exists.

14. Your Rights

Besides your rights stipulated above you have the following rights:

- to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing;

- to lodge a complaint with a supervisory authority if you consider violation of your rights;
- to correct your inaccurate data;
- to erase your data;
- to restrict processing of your data;
- to demand provision of your data to you in readable form.

Please be aware that your rights might be subject to wider interpretation and derogations provided by applicable law. You may contact us any time using the information in the “Contact Us” section of this Privacy Policy for further guidance.