

Privacy Policy

As used in this Privacy Policy, “Brainiac Games”, “We”, “Us” or “Our”, refers to Brainiac Games LTD, with its registered address at 2nd Floor 2 Woodberry Grove, North Finchley, London, United Kingdom, N12 0DR.

This Privacy Policy is part of and incorporated by reference into the Terms of Service (the “Terms”) governing the use of all “Brainiac Games” branded software applications (the “Application/s”, or “App/s”), which may operate on any type of computing device (including without limitation, a mobile device), and applies to your use of the Applications and/or www.chess-universe.net, and/or URL which may replace it or which may be added to the list of websites published by us and linking to this Privacy Policy (the “Website/s”).

We take the privacy of our users and data security very seriously and believe in the right of our users to know which data is collected and for what purpose. We therefore strive to make our actions transparent and allow our users to control the collected data and remove it if they so wish, and we take all reasonable precautions to prevent unauthorized access to this data.

When accessing to our website and/or using any of our Apps you consent to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy. Irrespective of which country you are based in, you authorize Brainiac Games to use your information in, and as a result to transfer it to and store it in Slovenia and any other country where Brainiac Games, or any third party service providers acting on its behalf, operates. Privacy and data protection laws in some of these countries may vary from the laws in the country where you are based, but we will always take appropriate steps to safeguard the privacy of your personal information.

By using our Apps you specifically consent to collection, transfer, manipulation, storage, disclosure and other uses of your information (including personal information) as described in this Privacy Policy.. We may receive and/or you may be asked to provide your information (including personal information) any time you are in contact with us or use the Applications. As described in greater detail below, we may share this information (including personal information) with our affiliates and with third party partners (as defined below) and use it in ways consistent with this Privacy Policy. We may also use your information (including personal information) together with other information to provide and improve products, services, content, and advertising. Irrespective of which country you are based in, you authorize Brainiac Games to use your information in, and as a result to transfer it to and store it in Slovenia and any other country where Brainiac Games, or any third party service providers acting on its behalf, operates. Privacy and data protection laws in some of these countries may vary from the laws in the country where you are based, but we will always take appropriate steps to safeguard the privacy of your personal information.

For general information please feel free to contact us via info@chess-universe.net.

Please read this Privacy Policy in order to learn more about the data we collect, what do we use it for and how we protect your privacy.

Interest-based ads

We promote our Apps and services in ours and other publisher’s apps and we also allow our partners to promote and advertise their goods and services in our Apps. We may share information we collect from you to our advertising partners and they can reuse such data for

targeted advertising. We or our advertising partners may display interest-based, or retargeted, ads ("IBA"), but only for the device IDs that have not opted out of IBA. By using our Apps and not choosing one of the opt-out options, you give us consent to transfer your data as stated below.

We may pass information we collect from you such as technical information, advertising and application usage information (for example if a device has clicked on a sports ad within our Apps, for more information please see Information And Data We Collect From You Section of this Privacy Policy) as well as age or gender information to our advertising partners and they can reuse such data for targeted advertising. We allow our partners to serve targeted third party advertisements or other content. They may attach the information gathered from our App to info gathered from other apps, websites, or via other services, and then build profiles and transfer the info to another provider. For example we pass advertising IDs to Facebook and they match it with your Facebook ID, aggregate it and delete the initial identifier. By doing so the other provider may receive or gather information about you and use the information for displaying targeted ads. Advertisers may choose their audience by location, demographics, likes, keywords, age & gender, interests, behaviors, connections and any other information Facebook receives or infers about users. We cooperate with several providers of IBA that are listed herein in subsection a) and in Opt-Out Section of this Privacy Policy ("Third Parties").

At all times You have an option to opt out from sharing your information and data for the purposes of interest-based advertising. When you opt out, you will not stop receiving ads, they just won't be based on topics you like, your interest, behavior, demographics, etc. You can opt out by choosing one of the following options (for more information please read the "Opt Out" Section of our Privacy Policy):

a) Via third party IBA provider:

- Google(AdMob) <https://support.google.com/admob/answer/7665968>; https://support.google.com/dfp_premium/answer/9012903;
https://support.google.com/admob/answer/2753860#Interest_based
- Facebook Audience Network https://www.facebook.com/about/privacy/update?ref=old_policy
- Facebook Ad Campaigns https://www.facebook.com/about/privacy/update?ref=old_policy
- AdMost <https://resources.admost.com/privacy-policy/>
- Unity Ads <https://unity3d.com/legal/privacy-policy>
- Inmobi <https://www.inmobi.com/privacy-policy/>
- Add4Game <https://ad4game.com/privacy/>
- Google Adx <https://policies.google.com/technologies/ads?hl=en-US>
- Applovin <https://www.applovin.com/privacy/>
- ironSource <https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/#step-2>
- adtrue <https://publishers.adtrue.com/terms-and-conditions>
- Mintegral <https://www.mintegral.com/ru/privacy/>
- Adcolony <https://www.adcolony.com/consumer-privacy/>
- Tapjoy <https://www.tapjoy.com/legal/general/privacy-policy/>
- Vungle <https://vungle.com/privacy/>
- Hyprmx <https://www.hyprmx.com/pp>
- My.com <https://legal.my.com/us/mytarget/privacy/>

If you choose to opt out you should stop receiving interest-based and targeted ads via the selected IBA provider, but you may continue to receive interest-based or targeted ads through other IBA providers. For opting out from receiving interest-based or targeted ads through all IBA providers, please see opt out options b) and c) below.

b) Via "Do Not Track Settings" in mobile phone:

Turn on “Limit Ad Tracking” on your iOS device or “Opt Out of Interest-Based Ads” on your Android device.

c) Via our Apps:

Choose “Opt Out of IBA” within the settings of our Apps (where available).

“Do Not Sell My Personal Information” Rights

If you are a California resident, California Consumer Privacy Act (CCPA) may permit you to “opt out” of the “sale” of your “personal information” to “third parties” (as those terms are defined in the CCPA). CCPA recognizes certain exceptions to the definition of “sale,” such that not all transfers of personal information are “sales.

You have an option to opt out of the sale of your personal information and data for the purposes of interest-based advertising at all times.

If you would like to opt out of the sale of your personal information, choose “Opt out of IBA” within the settings of our Apps (where available).

Information and data we collect from you

1. Technical Information And Data

We might collect technical data necessary for you to use our App and additional technical data that enables us to maintain and analyze the functioning of the App, to personalize the content of the App, and to display advertisements.

We may automatically obtain certain information about your computing device, including:

- IP address; Country code;
- IDFAs, IDFVs, Advertising IDs;
- Language;
- Time zone, session start/stop time,
- Network status (WiFi, etc.), browser plug-in types and versions;
- User agent string (UA), platform, SDK version, timestamp;
- Technical device information (e.g. device model and name, operating system name and version, CPU information, storage size, screen size, firmware, software, mobile phone carrier, Internet service provider, API key identifier for application, International Mobile Equipment Identity (IMEI) on Android, Android ID, Android Serial No);
- Push notifications token;
- Player identifier string (we collect player identifier string only upon your sign in to Google Play Games Services or Apple's Game Center).

In addition, for users of Android devices we create a unique user ID and for users of iOS devices we use IDFVs to track your use of our Apps.

Although some of this information may uniquely identify your device, this information does not identify you personally. Some legislation may treat information that uniquely identifies your device as personal information.

2. Advertising And Application Usage Information And Data

When you use our Apps, we may collect additional information by using device identifiers that permit identification of your device. Such information is used for advertising and analytics purposes.

The information collected includes:

- Which advertisements are shown;
- Length of time an advertisement is visible and the size of the advertisement;
- Advertisement response (if any), including clicks on ads;
- Application usage information, (how often you use the app, for how long you use the app, the events that occur within the app, in-app location, in-app purchases you make and their value, aggregated usage, performance data, life time value of user etc.).

3. Classical Personal Information

We do not collect any personal information about you through our Apps, with the sole exception of persistent identifiers (such as IDFA, IDFV, Advertising ID, IP address). Persistent identifiers are identifiers that do not identify you personally, but may uniquely identify your device. Some legislation (such as US) may treat such information that uniquely identifies your device as personal information.

We may ask you to submit and we may process other non-personally identifiable information that may be personal to you such as your age range, year of birth and gender, provided that year of birth and gender information is collected in our Apps. We will use such information for users who have not opted out from behavioral advertising we may use such information to display targeted ads. You can opt out from receiving targeted ads by choosing one of the options described in the "Opt Out" Section of our Privacy Policy.

When you voluntarily contact us directly, we may collect information about you that you provide us (such as your name and surname, email address). We will use such contact information only for the purpose for which you provided it to us. We will not share this information with third parties.

If you wish to delete your contact information that we received from you when you contacted us, please send an e-mail to info@chess-universe.net and your contact information will be deleted from our database.

We also collect the information about the name you give to yourself in the Application and your rating of the Application (if any). Please do not use your real name.

4. Creation of User Account and saved chess plays

We will save the plays You made in the App for the period of 14 days. Within that timeframe You and Your opponent will be able to see Your and Your opponents' moves made in the chess games. The plays will be deleted after 14 days.

You are able to create User Account within the App. By creating an User account You will be able to store Your item collection, rating and purchases and use Your profile on multiple devices.

You can create User Account by providing Us with email address and password. User Account is created once you click on the activation link in the email the We will send You. Only one device can use one User account at the time. You can use an email address that does not reveal your identity.

We will only use your email address for the purposes of the User Account, when given to Us in the App.

How we use your information

1. In General

We use the information we collect about you/your device to deliver services to you and to operate our business. Such use by us and by our Partners may include:

- 1.1. Delivering our services: developing, delivering and improving our products, services, and content, tailoring our products and services, providing software updates and product support, understanding and analyzing trends in connection with usage of the Apps and websites, administering the Apps, and customer communications.
- 1.2. Displaying advertisements: displaying third party advertisements in our Apps. Please see more in Advertising Section of this Privacy Policy.
- 1.3. Analytics and research: understanding and analyzing trends in connection with the usage of the Apps, gathering demographic information about our user base, data about where the App was downloaded from. We may also create reports and analysis for the purposes of research or business intelligence, for example to track potential problems or trends with our Apps and services, or to test our new game features and content. We use the data we receive from Third Party Social Network only for internal analytics. For opting out from analytics please visit Opt-Out Section of this Privacy Policy.

2. Push Notifications

We use push notifications to remind you about your activities within the App. You will receive push notifications only if you are subscribed to push notifications in the App. To unsubscribe, please use the instructions provided below:

For iOS: You will be asked to accept or refuse push notifications after an Application is downloaded. If you do not accept, you will not receive push notifications. Please note that if you accept, some mobile phones will allow you to disable push notifications later on by using the settings on your mobile phone. To manage push notifications on your mobile phone please follow these instructions: Open your Settings menu and tap "Notifications"; Find the App; Tap on the icon of App; Manage the "Notifications" option by sliding it OFF or ON.

For Android and Windows: After an App is downloaded, you will automatically receive push notifications. You can manage push notifications on your mobile phone by entering the "info screen" on the homepage of the App and choosing the "Settings" option. Here, push notifications can be disabled by unchecking the "Notification" option within the App.

We collect push notification tokens in order for us to be able to determine whether you are subscribed to push notifications. When you decide to unsubscribe from push notifications, such push notification tokens will be deleted from our database.

For the restriction on the usage of information please see 'Children's Privacy' Section of this Privacy Policy.

How we may share your information to third parties

Other players and users

Social feature and interaction are core components of the App. Other players may, for example, see your profile data, in-game activities and read the messages you have posted.

Partners working for us

We have partners who perform services on our behalf, such as data storage, technical or customer support and data analytics. Processors are contractually required or bound by law to protect your data and are only permitted to process such data in accordance with our agreements with them.

We entered into a Data Processing agreement with Kings of Games, razvoj mobilnih iger, d.o.o., Šmartinska cesta 152, 1000 Ljubljana, Slovenia as a data processor, in which we

agreed that Kings of Games process your information in accordance with this Privacy Policy and applicable regulation.

Other companies and public authorities.

Based on your consent or if so required by law we may supply or disclose your data, including personal information to third parties.

We cannot provide all services necessary for the successful operation of our products by ourselves. We must therefore share collected information with third parties (collectively referred to as “Partners”). We may share information that can be used to personally identify your device (e.g. persistent identifiers such as IDFA, IDFV, advertising ID and IP address) for the purposes of developing and delivering our services and conducting analysis and research and for measuring our and our Partners’ advertising campaign performance. We may share such information to:

- **Our analytics providers:** We use third party analytics for the purposes of delivering our services, conducting analysis and research.
- **Our cloud service providers:** We may store information we collect from you on servers provided by our third party cloud service providers.
- **Third party advertising partners:** We have contracted with certain third party advertising networks that assist us in delivering advertising to you that allows us to continue offering the Apps for free or at low cost. Please see more in Advertising Section of this Privacy Policy.
- **Advertising partner’s third party tracking provider:** For some Apps we may allow our advertising partners to track impressions, clicks, installs or other advertising campaign performance indicators through their tracking providers for the purposes of measuring their advertising campaign performance. Please see more in Tracking Section of this Privacy Policy.

We may contract with additional Partners or change existing Partners in the future to perform any services in connection with the Apps. These changes shall be updated twice a year or promptly in case of material changes in our data processing practices.

We reserve the right to disclose your information (including personally identifiable information) in response to law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations, users or user experience. Additionally, in the event of a reorganization, merger or sale we may transfer any and all information (including personally identifiable information) we collect to the relevant third party.

For any additional questions about third party information collection please refer to info@chess-universe.net.

How our partners may use your information

We strive to adhere to the generally accepted industry practices regarding the collection and the usage of information by our Partners and to limit their usage to the services they provide for us. They adhere to this Privacy Policy, but in some cases we must use their privacy policies.

We strive to commit our Partners to using the information solely for the purposes as stated in this Privacy Policy. Notwithstanding the above, we cannot guarantee that our Partners will adhere to the contractual obligations or acceptable business practices. While we strive to protect the

information provided to our Partners, we have no direct control over their use of the collected information and therefore you acknowledge that we are not liable for any third party privacy breach and that our liability for our Partner breaches is limited to the amount we are able to receive as indemnification from our Partners (legal costs exempted).

Advertising

When you use our Apps we may display contextual advertisements to you. In order to enable advertising we allow our advertising partners to collect persistent identifiers (such as device ID, IDFA, IDFV, advertising ID, IP address) that might be considered as personal information under some legislations, but they should use it solely for the purposes of contextual advertising (including frequency capping, fraud prevention and tracking for the attribution and billing purposes),. For any other purposes they should use the information solely on anonymized and aggregated basis.

For some territories, we may use and share with our advertising partners technical and advertising and application usage information we collect from you (please see Information and Data We Collect From You Section of this Privacy Policy) in order to enable our advertising partner to deliver, target and optimize third party advertising in our Apps, so that the advertisements you see are more relevant to you and are based on your app and device usage, online behavior and interests (this is commonly referred to as online behavioral or interest based advertising, i.e. IBA). In addition, we may use and share such information with our advertising partners in order to target and optimize our advertising and promotions in our and other publisher's apps.

We will always follow applicable legislation and accepted market practices, thus we will not use and share information for the purposes of behavioral advertising for users who did not pass the age gate in our Apps and for those who opted-out of IBA. For more information on behavioral advertising and our IBA providers please see Interest-Based Ads Section of this Privacy Policy. For opting out from sharing your information and data for the purposes of behavioral advertising please visit Opt-Out Section of this Privacy Policy.

Tracking

When you use the App, we or third parties operating the advertisement serving technology may use information logged from your device using SDKs, cookies, web beacons and other technologies to ensure that appropriate advertising is presented within the App and to calculate the number of unique and repeat views of advertising.

For some of our Apps we use third party tracking and data collection tools from our service providers for the purposes of tracking performance, ad visibility and privacy compliance of third party SDKs in our Apps.

We use third party tracking and data collection tools from our service providers for the purposes of measuring performance and optimizing our advertising campaigns, displaying advertisements, conducting analysis to improve our services and for fraud prevention purposes. Such tools may use cookies, APIs, and SDKs in our Apps to enable them to collect and analyze user and device related data and information, such as impressions, clicks, installs or other advertising campaign performance indicators and post-install in-app events.

In addition, our Partners may use their own tracking technologies (including and without limitation: SDKs, cookies, Web beacons, HTTP cache, local shared objects and other technologies) in order to track impressions, clicks, installs or other advertising campaign performance indicators for the purposes of measuring third party advertising campaign performance.

Third party terms and conditions

Please note that your access to and ability to use and interact with the Apps may be subject to certain third party terms and conditions and privacy policies, including but not limited to

application stores, mobile software platforms, online gaming platforms, social networking services, statistics services providers and payment providers. You recognize and agree that We are not liable for any such third party terms and conditions and their use of your personal information.

Our Apps may contain links to third party websites, products, or services. For example, the Apps may feature offers from third party advertisers or the ability to engage in transactions with such entities. Please note that while using such third party offerings, you are using sites, products, and services developed and administered by people or companies not affiliated with or controlled by us. We are not responsible for the actions of those people or companies, the content of their sites, products or services, the use of information you provide to them, or any products or services they may offer. Our link to such third parties does not constitute our sponsorship of, or affiliation with, those people or companies. Nor is such linking an endorsement of such third party's privacy or information security policies or practices or their compliance with laws. Information collected by third parties, which may include such things as location information or contact details, is governed by their privacy practices. These other websites or services may place their own cookies or other files on your computing device, collect information or solicit personal information from you. We encourage you to learn about the privacy practices of third parties with which you interact.

We are not responsible or liable for your interaction with such third parties, the information requests initiated by such third parties, or the subsequent use, treatment or dissemination of information you voluntarily choose to provide to them.

Children's privacy

We consider ourselves to be oriented towards general public. Our products and services are not directed to, and we do not knowingly collect personal information from children under 13, with the sole exception of persistent identifiers as described below. If we learn that we have collected personal information other than persistent identifier of a child under the age of 13, we will take all reasonable steps to delete the information as soon as possible. If you become aware that your child has provided us with personal information without your consent, please contact us at info@chess-universe.net.

The only personal information we collect from users for the purposes of offering our services are persistent identifiers as described herein.

We will send push notifications only to users who allow us to do so in order to reengage them in terms of using the App. You may unsubscribe at any time by following the instructions in section Push Notifications of this Privacy Policy. Push notifications are local, contextual and sent in app only and not from a server or in conjunction with other user information.

Opt-out

You are always free to opt out from the future collection of your personal information by Us in accordance with this Privacy Policy by uninstalling all the Apps from each of your computing devices.

If you are a California resident, You are, in accordance with California Consumer Privacy Act (CCPA) always free to opt out of the sale of your personal information and data for the purposes of interest-based advertising. You can opt out by choosing one the options described below:

Opting Out of IBA:

1. Via third party IBA providers

For Google (AdMob) please visit <https://www.google.com/ads/preferences/html/mobile-about.html>;

If you choose to opt out by following one of the third party IBA provider's opt out mechanisms, you should stop receiving ads based on your interest via the selected third party IBA provider, but you may continue to receive interest-based or targeted ads via other IBA providers. For opting out from receiving interest-based or targeted ads through all IBA providers, please see opt out options 2. and 3. below.

2. Via "Do Not Track Settings" in mobile phone

If you choose to opt out via "Do Not Track Settings" in your mobile phone all providers of advertising services are bound to comply with such "Do Not Track" setting, but we cannot provide any guarantees on their behalf. By choosing "Do not track" setting, you opt out of the sale of your personal information if you are California citizen. If you choose the opt-out option available via our Apps, we will not share your advertising ID with advertisers for the purposes of IBA. We provide no guarantees regarding the information provided prior to opting out. Some providers may have additional opt-out mechanisms implemented.

If you turn on "Limit Ad Tracking" on your iOS device or "Opt Out of Interest-Based Ads" on your Android device, you can restore interest-based ads by turning the settings off. When you opt out, you may still see the same number of ads on your mobile device; however, these ads may be less relevant because they won't be based on your interests. Our advertising partners may continue to serve you ads based on other non-personal information, such as ads related to the content of the application you are using.

Your iOS or Android mobile device may provide a "Limit Ad Tracking" or "Opt Out of Interest-Based Advertising" setting. When you have opted out using this setting on a device, our partners will not use information collected from that device to infer your interests, or to serve ads to that device that are targeted based on your inferred interests.

You can find the setting for your mobile device by following the directions below, or contact your device provider.

The reason for switching from device IDs to Advertising Identifier is that advertisers are able to use this identifier only for advertising and for no other purpose, while users can choose to opt out of tracking via the settings of mobile phone. Advertising Identifier is an anonymous identifier for advertising purposes which enables users to reset their identifier or opt out of interest-based ads. The parties participating in advertising are obligated to follow users' choice for opting out of tracking according to the app store guidelines.

IOS DEVICE

- iOS 7 or Higher

Go to your Settings > Select Privacy > Select Advertising > Enable the "Limit Ad Tracking" setting

- iOS 6

Go to your Settings > Select General > Select About > Select Advertising > Enable the "Limit Ads Tracking" setting

More information about the iOS setting can be found here: <https://support.apple.com/en-us/HT202074>

ANDROID DEVICE

For Android devices with OS 2.2 and up and Google Play Services version 4.0 and up:

Open your Google Settings app > Ads > Enable "Opt Out of Interest-Based Advertising"

3. Via our apps

We have created an opt-out option within some of our Apps. If you are You may choose it by visiting "Info Screen", "Settings" and ticking the "Disable Interest-Based Ads". Choosing this

option will mean that you will still be served ads, but they will not be tailored to your preferences. Should you decide to opt out of advertising altogether, you may make an in-app purchase to do so, or you can delete the App.

In-app purchases

Our Apps enable in-app purchases. We do not process payments for in-app purchases nor have access to your credit card information. Payment transactions for in-app purchases are completed through the app store via your app store account. Any post-purchase processes are controlled by the app store and are subject to specific terms of such app store.

For Terms of service more information on in-app purchases please see In-App Purchases Section of the available at <https://www.chess-universe.net/terms>.

Protection of personal information

We have implemented: reasonable security measures to protect the confidentiality, security and integrity of the collected information, and to prevent unauthorized access and the use of information contrary to this Privacy Policy. Although we use commercially reasonable efforts to assure that your information remains secure when maintained by us, please be aware that no security measures are perfect or impenetrable.

Integrity of personal information

We strive to enable you to keep your information accurate, complete and up to date. You can access, check and ensure the integrity of your information as described below.

Access to personal information

We make good faith efforts to provide you with access to the personal information you provide to us (information associated with your account). You can also request that we correct or delete information, provided that we are not required to retain such information by law or for legitimate business purposes.

We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Access, correction or deletion requests regarding your personal information may be submitted to info@chess-universe.net.

International transfer

We operate globally, thus we may for the purposes described in this Privacy Policy transfer your information to our affiliated entities and/or to other third party service providers across boarder and from your country or jurisdiction to other countries or jurisdictions around the world. Please note, that these countries and jurisdictions may not have the same data protection laws as your own jurisdiction, but wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information.

Storing of information

We store your information for as long as needed to provide you with our services. We may store information longer, but only in a way that it cannot be tracked back to you. We delete the information as soon as we do not need them for providing our services, unless a longer retention period is required or permitted by applicable legislation.

Storing might be different depending on the territory of collecting the information and the applicable legislation, but we always strive to store the information only as long as it is needed for the purposes of providing, improving or personalizing our services.

Deletion of information

When information is no longer needed, we shall delete it using reasonable measures to protect the information from unauthorized access or use.

Special provisions for citizens of California

Security

We have implemented appropriate technical and organizational measures to protect the confidentiality, security and integrity of the collected information, and to prevent unauthorized access and the use of information contrary to this Privacy Policy. Although we use commercially reasonable efforts to assure that your information remains secure when maintained by us, please be aware that no security measures are perfect or impenetrable.

Retention

We store your information for as long as needed to provide you with our services. We may store information longer, but only in a way that it cannot be tracked back to you. We delete the information as soon as we do not need it for the purposes as described in this Privacy Policy and in any event no later than five (5) years after your interaction with all of our Apps has ceased.

When required by law, we will retain your information for as long as we are legally obligated to do so. If you request us to delete your data we will delete your data as described above in "Your Rights" Section.

Your rights

You have certain rights in connection with your personal information and how we handle it, i.e. you have a right to access personal information we hold about you, to request the deletion of your personal information, to opt-out of the sale of your personal information, and right to portability of personal information. Some of these rights may be subject to some exceptions or limitations. You can exercise these rights at any time by sending your requests regarding your personal information to info@chess-universe.net

Your rights include:

- Right of access. You have a right to know what information we have collected about you and in some cases to have the information communicated to you. If you wish to exercise this right, please contact us by letting us know that you wish to exercise your right of access and what information in particular you would like to receive. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information. Please note that we may not be able to provide all the information you ask for. Where we are not able to provide you with information that you have asked for, we will explain to you why. We will try to respond to any request for a right of access as soon as possible, but we will always do so within 45 days of receipt of your request and verification of your identity. For Privacy enquiries you may contact us via info@chess-universe.net.
- Right to deletion. You have a right to request deletion of the personal information that we hold about you. Should you wish to do that, please contact us via info@chess-universe.net. We reserve the right to ask to provide us additional information to verify your identity before we can start processing your request. Once we receive all information, we need in order to be able to identify you, we will delete your personal information you requested us to delete as soon as possible, but we will always do so within 45 days of receipt of your request and verification of your identity. Please note that we may still retain some or all of that information, for example for complying with our

legal obligations and protecting or enforcing legal rights. We may also retain your information in an anonymized form.

- Right to opt-out of the sale of your personal information. In some cases, you may have the right to request a restriction of the processing of your personal information. You are always free to opt out from the future collection of your personal information by us and our Partners by choosing one of the options, described in “Do Not Sell My Personal Information” Rights section.
- Data Portability. In some circumstances, you have the right to request that we provide you with the personal information which you have provided to us, so you can transfer this information to another Business. Should you wish to do that, please contact us via info@chess-universe.net

We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

California’s “Shine the Light” law permits customers in California to request certain details about how certain types of their information are shared with third parties and, in some cases, affiliates, for those third parties’ and affiliates’ own direct marketing purposes. Under the law, we will provide California customers certain information upon request (“Right to access”) or permit California customers to opt out of, this type of sharing (“Right to opt-out of the sale of your personal information”).

If you are a California resident and wish to obtain information about our compliance with this law, please contact us via info@chess-universe.net. We may request information from you to verify your identity. Please note that We are not required to respond to requests made by means other than through the provided email address.

Changes to our privacy policy

We may amend this Privacy Policy from time to time. Any changes will be placed here and the amended version will supersede this version of our Privacy Policy. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected. We will take reasonable steps to draw your attention to any changes in our Privacy Policy. However, to be on the safe side, we suggest that you read this document each time you use the website to ensure that it still meets with your approval. The most current version of the Privacy Policy will govern our use of your information and will be available at <https://www.chess-universe.net/privacy>.

Should you request so by informing us on info@chess-universe.net, we will send you all the updates of this Privacy Policy or previous versions of this Privacy Policy to your e-mail. We will also inform you about any material updates of our Privacy Policy with an in-app banner and a link.

English language

By accepting this Privacy Policy you acknowledge that you are proficient in the English language, or have consulted with an advisor who is sufficiently proficient in English, so as to allow you to understand the terms of this Privacy Policy.

Privacy questions

If you have questions or concerns about Brainiac Games' Privacy Policy or information processing, please contact us through info@chess-universe.net.

Version 8.0.

Last revised in November 2021

Brainiac Games LTD

EEA Privacy Policy

As used in this Privacy Policy, “Brainiac Games”, “We”, “Us” or “Our”, refers to Brainiac Games LTD, with its registered address at 2nd Floor 2 Woodberry Grove, North Finchley, London, United Kingdom, N12 0DR.

This Privacy Policy is part of and incorporated by reference into the Terms of Service (the “Terms”) governing the use of all “Brainiac Games” branded software applications (the “Application/s”, or “ App/s”), which may operate on any type of computing device (including without limitation, a mobile device), and applies to your use of the Applications and/or www.chess-universe.net, and/or URL which may replace it or which may be added to the list of websites published by us and linking to this Privacy Policy (the “Website/s”).

By agreeing to the Terms and/or using the Websites or the Applications, you particularly agree to the collection, use and disclosure of your information (including personal information) in accordance with this Privacy Policy. We may collect and/or you may be asked to provide us with your information (including personal information) any time you are in contact with us or use the Applications or the Websites.

We take the privacy of our users and data security very seriously and believe in the right of our users to know which data is collected and for what purpose. We therefore strive to make our actions transparent and allow our users to control the collected data and remove it if they so wish, and we take all reasonable precautions to prevent unauthorized access to this data.

We value your privacy and will never sell your information to anyone without your knowledge and consent.

When accessing to our website and/or using any of our Apps you consent to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy. Irrespective of which country you are based in, you authorize Brainiac Games to use your information in, and as a result to transfer it to and store it in United Kingdom and any other country where Brainiac Games, or any third party service providers acting on its behalf, operates. Privacy and data protection laws in some of these countries may vary from the laws in the country where you are based, but we will always take appropriate steps to safeguard the privacy of your personal information.

Only when the transfer is based on one of the following safeguards, we will transfer your personal information:

1. If a country outside of EEA ensures an adequate level of protection in accordance with EEA data protection legislation.
2. If we have entered into standard contractual clauses with our contractual partner that are adopted by Commission of European Union in accordance with EEA data protection legislation and are deemed to offer sufficient safeguards with respect to the protection of the privacy rights.

Please read this Privacy Policy in order to learn more about the data we collect, what do we use it for and how we protect your privacy.

Collected information

We may collect any or all of the information that you give us together with data about your use of the website and applications, but we will primarily use the collected data to provide you with a satisfactory service and enhance your Brainiac Games experience. We use information for (i) delivering and improving our services and products, providing updates, technical troubleshooting, understanding and analyzing trends in connection with usage of the apps, and administering the apps; (ii) analytics and research in a way that we use your information for

understanding and analyzing trends in connection with usage of the apps, gathering demographic information about user base, data about where download of our app was performed, and we might use created reports and analysis for the purpose of business intelligence; (iii) security in a way to use your data for enhancing the safety and security of our products and services; (iv) providing customer support to you and to respond to your inquiries; and (v) our legal obligation when we are required to do so by law.

We use different SDKs from our business partners and they share collected information with us. For detailed information, see Analytics section below.

Collection of device and technical information

We might collect the data necessary for you to use our app and for us to maintain and analyze the functioning of the app and to personalize the content of the app.

We automatically obtain certain information about your computing device, including your Location for providing you with relevant Ads. We also obtain information about your account and game progress, such as (types of chess game played, name and/or types of opponents, chess match score sheet, users chess moves and strategy, time played, level progression, including level completed, level failed, level started other similar statistical or analytical data.; technical device information (e.g. device model and name, operating system name and version, unique device identifier (IMEI), advertising ID, MAC address). Although some of this information may uniquely identify your device, this information does not identify you personally. Some legislation may treat information that uniquely identifies your device as personal information.

Collection of classical personal information

We may also collect personally identifiable information about you (such as your name and surname, email address, birth year, player name and password), as well as non-personally identifiable information (such as age range and gender) that you provide us by contacting us directly. We might also collect the messages You sent to Us (such as chat logs and player support tickets).

We will only use the contact information you provide to us (for example, your name and email address) for the purpose for which you provided it to us. We will not share this data with third parties.

If you wish to delete your contact information that we received upon your specific email inquiry, please send an e-mail to info@chess-universe.net. and your e-mail will be deleted from our database.

Creation of User Account and saved chess plays

We will save the plays You made in the App for the period of 14 days. Within that timeframe You and Your opponent will be able to see Your and Your opponents' moves made in the chess games. The plays will be deleted after 14 days.

You are able to create User Account within the App. By creating an User account You will be able to store Your item collection, rating and purchases and use Your profile on multiple devices.

You can create User Account by providing Us with email address and password. User Account is created once you click on the activation link in the email the We will send You. Only one device can use one User account at the time. You can use an email address that does not reveal your identity.

We will only use your email address for the purposes of the User Account, when given to Us in the App.

What is collected data used for

Our use of information collected from you

We use the information collected from you for delivering and promoting our services, for advertising, internal analysis and research to improve the services. You hereby allow us to collect, process and store the data as stated in this Privacy Policy. We use the information we collect about you/your computing device to deliver services to you and to operate our business. Such use by us and by our Partners may include:

1. Delivering our services: developing, delivering and improving our products, services, and content, tailoring our products and services, providing software updates and product support, understanding and analyzing trends in connection with usage of the Applications and the Websites, administering the Applications and the Websites, and customer communications, develop and improve the App and player experience, manage our relationship with you, provide social features as part of the App, customize your App experience, respond to your comments and questions and provide player support, provide you our offers in the App as well as in other websites and services, and by email, send you related information, such as updates, security alerts, and support messages, enable you to communicate with other players, create accounts and allow you to play our games and use the App, to operate, maintain and provide all the features and services found on the App now and in the future, verify and confirm payments, send you App-related communications, to provide support and to help you solve any technical difficulties.
2. Analytics and research: Understanding and analyzing trends in connection with the usage of the Applications and the Website, auditing, learning about user behavior within the Applications and the Websites (how often you use the Application/Website, the events that occur within the Application/Website, aggregated usage, performance data etc.), gathering demographic information about our user base, data about where the Application was downloaded from. For information that can be treated as personal information in some legislation, we use only device identifiers. We use the data we receive from Third Party Social Network for internal analytics.
3. Advertising: We offer our Apps for free or at low cost and in order to do that we need to share information we collect from you with our third party advertising partners that assist us in delivering advertisements to you. When you use our apps we rely on our legitimate interest to show contextual advertisements to you. Before sharing any information with our advertising partners for the purposes of interest-based advertising, we will always ask for your consent. When you use our Apps we show contextual advertisements to you. In order to enable advertising we allow our advertising partners to collect advertising identifiers that are considered as personal information under some data protection legislations, but they should use it solely for the purposes of contextual advertising. For any other purposes they should use the information solely on anonymized and aggregated basis, this means in a way that cannot be tracked back to your device.

You have an option to withdraw or manage your consent to sharing your personal information for the purposes of personalized advertising at all times. You can withdraw your consent by going to the App settings and clicking the “personalized ads” button and manage your preferences. When you decide to withdraw your consent or if you do not provide your consent, you may still see the same number of ads on your mobile device; however, these ads may be less relevant because they won’t be based on topics you like, your interest, behavior, demographics, etc. Our advertising partners may continue to show you ads based on the content of the application you are using.

4. Push Notifications: We use push notifications to remind you about your activities within the App. You will receive push notifications only if you are subscribed to push notifications in the App. You can always unsubscribe from push notifications, please use the instructions provided below.
For iOS: You will be asked to accept or refuse push notifications after an Application is downloaded. If you do not accept, you will not receive push notifications. Please note that if you accept, some mobile phones will allow you to disable push notifications later on by using the settings on your mobile phone. To manage push notifications on your mobile phone please follow these instructions: Open your Settings menu and tap

“Notifications”; Find the App; Tap on the icon of App; Manage the “Notifications” option by sliding it OFF or ON.

For Android: After an App is downloaded, you will automatically receive push notifications. You can manage push notifications on your mobile phone by entering the “info screen” on the homepage of the App and choosing the “Settings” option. Here, push notifications can be disabled by unchecking the “Notification” option within the App.

When you decide to unsubscribe from push notifications, such push notification tokens will be deleted from our database.

5. In-App Purchases: Our Apps enable in-app purchases. We do not process payments for in-app purchases nor have access to your credit card information. Payment transactions for in-app purchases are completed through the app store via your app store account. Any post-purchase processes are controlled by the app store and are subject to specific terms of such app store. Please review privacy policy and terms of service of your app store. For more information on in-app purchases in Our Apps please see In-App Purchases Section of our Terms of Service.

WHO CAN SHOW PERSONALISED ADS TO ME?

Please see the following list of advertising providers that are allowed to show interest-based advertising and review their data processing practices, including the technologies they use for the purposes of interest-based advertising:

- Google(AdMob) <https://support.google.com/admob/answer/7665968>; https://support.google.com/dfp_premium/answer/9012903; https://support.google.com/admob/answer/2753860#Interest_based
- Facebook Audience Network https://www.facebook.com/about/privacy/update?ref=old_policy
- Facebook Ad Campaigns https://www.facebook.com/about/privacy/update?ref=old_policy
- AdMost <https://resources.admost.com/privacy-policy/>
- Unity Ads <https://unity3d.com/legal/privacy-policy>
- Inmobi <https://www.inmobi.com/privacy-policy/>
- Add4Game <https://ad4game.com/privacy/>
- Google Adx <https://policies.google.com/technologies/ads?hl=en-US>
- Applovin <https://www.applovin.com/privacy/>
- ironSource <https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/#step-2>
- adtrue <https://publishers.adtrue.com/terms-and-conditions>
- Mintegral <https://www.mintegral.com/ru/privacy/>
- Adcolony <https://www.adcolony.com/consumer-privacy/>
- Tapjoy <https://www.tapjoy.com/legal/general/privacy-policy/>
- Vungle <https://vungle.com/privacy/>
- Hyprmx <https://www.hyprmx.com/pp>
- My.com <https://legal.my.com/us/mytarget/privacy/>

You can withdraw your consent to sharing your personal information for the purposes of interest-based advertising at all times by going to the app settings and clicking the interest-based ads button where you can manage your preferences.

When you decide to withdraw your consent or if you do not provide your consent, you may still see the same number of ads on your mobile device; however, these ads may be less relevant because they won't be based on topics you like, your interest, behavior, demographics, etc. Our advertising partners may continue to show you ads based on the content of the application you are using.

Storing of information

We store your information for as long as needed to provide you with our services and for as long as we are legally obliged to do so. We may store information longer, but only in a way that it cannot be tracked back to you. We delete the information as soon as we do not need them for

providing our services and in any event no later than five (5) years after your interaction with our products has ceased.

We store personal information as long as it is needed for the provision of our services. Traffic information is erased or made anonymous when it is no longer needed for the purpose of the transmission or, in the case of payable services, up to the end of the period during which the bill may lawfully be challenged or payment pursued. Location information is stored to the extent and for the duration necessary for the provision of a value-added service. Direct marketing and provision of value-added services information (including traffic information used for these purposes) is stored as long as the same is necessary for the provision of these activities, or up to the time when a user opts out from such use in accordance with this Privacy Policy. Other information is stored for as long as we consider it to be necessary for the provision of our services. This section shall not prevent any technical storage or access to information for the sole purpose of carrying out the transmission of a communication or as strictly necessary in order for us to provide the service you requested.

Deletion of information

When information is no longer needed, we shall delete it using reasonable measures to protect the information from unauthorized access or use.

Protection of personal information

We have implemented: reasonable security measures to protect the confidentiality, security and integrity of the collected information, and to prevent unauthorized access and the use of information contrary to this Privacy Policy. Although we use commercially reasonable efforts to assure that your information remains secure when maintained by us, please be aware that no security measures are perfect or impenetrable.

Sharing your personal information

Other players and users

Social feature and interaction are core components of the App. Other players may, for example, see your profile data, in-game activities and read the messages you have posted.

Partners working for us

We have partners who perform services on our behalf, such as data storage, technical or customer support and data analytics. Processors are contractually required or bound by law to protect your data and are only permitted to process such data in accordance with our agreements with them.

We entered into a Data Processing agreement with Kings of Games, razvoj mobilnih iger, d.o.o., Šmartinska cesta 152, 1000 Ljubljana, Slovenia as a data processor, in which we agreed that Kings of Games process your information in accordance with this Privacy Policy and applicable regulation.

Other companies and public authorities.

Based on your consent or if so required by law we may supply or disclose your data, including personal information to third parties.

We cannot provide all services necessary for the successful operation of our products by ourselves. We must therefore share collected information with third parties (collectively referred to as "Partners"). The only personal information we collect from users for the purposes of offering our services are persistent identifiers (such as device ID, IDFA, IDFV, advertising ID, IP address). Such persistent identifiers are used and shared with third parties only to place contextual advertisement (including frequency capping, fraud prevention and tracking for the attribution and billing purposes), to authenticate users or personalize the content on Apps, to maintain or analyze the functioning of the Apps, personalize the content of the App (such as

sending push notifications), to perform network communications to protect the security or integrity of the user or the App, to ensure legal or regulatory compliance.

Integrity of personal information

We strive to enable you to keep your information accurate, complete and up to date. You can access, check and ensure the integrity of your information as described below.

Information collection relating to children

We consider ourselves to be oriented towards general public and even though our products and services are not directed to, and we do not knowingly collect personal information from, children under the age of digital consent according to EEA data protection legislation, with the sole exception persistent identifiers as described herein. If we learn that we have collected personal information of a child under the age of digital consent according to EEA data protection legislation, we will take all reasonable steps to delete the information as soon as possible. If you become aware that your child has provided us with personal information without your consent, please contact us at info@chess-universe.net.

Opt-out

You are always free to opt out from the future collection of your personal information by Brainiac Games in accordance with this Privacy Policy by uninstalling all the Applications from each of your computing devices and discontinuing use of the Websites.

Third Parties terms of service

We may provide links and/or connections to third-party websites or services from our website and our mobile applications. We are not responsible for the practices employed by websites or services linked to or from Brainiac Games website or applications, including the information or content contained therein.

Please remember that when you use a link to go from the Brainiac Games website www.chess-universe.net or applications to another website or service, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those linked on our website or in our applications, are subject to that third party's own rules and policies. We are not responsible for the privacy practices or content of these third-party sites.

Legal basis for processing personal information

Our legal basis for collecting and using the personal information will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where: (i) we have your consent to do so, (ii) where we need the personal information to perform a contract with you (e.g. to deliver a service you have requested), or (iii) where the processing is in our legitimate interests (and not overridden by your data protection interests or fundamental rights and freedoms). In some cases, we may also have a legal obligation to collect personal information from you, or may otherwise need the personal information to protect your vital interests or those of another person.

Support

If you have further questions or any concerns regarding privacy with Brainiac Games and have already signed up in Brainiac Games, the best way to get the answers is to contact our DPO, Duško Pavasović by sending an email to: info@chess-universe.net (subject "DPO"). Should you have any concerns or complaints our DPO is not able to solve, you have the right to lodge a complaint with a supervisory authority, Information Commissioner's Office, by telephone on 0303 123 1113 or contact us via live chat at <https://ico.org.uk/global/contact-us/> .

If you submit a support request, we may receive your email address and other information you provide related to your support request ("Support Information"). We use Support Information only to provide support to you. We don't rent, sell or share your email address unless we have your express consent and in the following circumstances:

1. We may share your Support Information with our support providers, but only for the purpose of providing support to you.
2. We may share your email address and Support Information to enforce compliance with our mobile application license agreements and user agreements, to respond to legal requirements, when legally required to do so, and at the request of governmental authorities.
3. We may share your email address and Support Information with a successor entity or in connection with a corporate merger, consolidation, sale of assets or other corporate reorganization provided that use of your email address is otherwise in compliance with this Privacy Policy.

Your data protection rights

You have the following data protection rights:

1. To **access, correct, update or request deletion** of your personal information. You may do so by contacting us at info@chess-universe.net
2. To **object to the processing** of your personal information ask us to **restrict processing** of your personal information or **request portability** of your personal information. You may do so by contacting us at info@chess-universe.net
3. If we are processing your personal information with your consent, you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted pursuant to lawful processing grounds other than consent. You may do so by contacting us using the details at info@chess-universe.net.
4. You have the **right to file a complaint with a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

You can control and limit the type of personal information we collect and process about you in a number of ways. For example, you can disconnect your social media account(s) from our games or control your social media privacy settings to limit the information shared with us. You can also reset your mobile advertising identifier or limit ad tracking altogether using the settings on your phone. You can also limit or disable the use of cookies (or similar technologies).

We will respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. Any changes will be placed here and the amended version will supersede this version of our Privacy Policy. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected. We will take

reasonable steps to draw your attention to any changes in our Privacy Policy. However, to be on the safe side, we suggest that you read this document each time you use the website to ensure that it still meets with your approval.

If we make changes in the way we use your email address, we will notify you in advance of posting by email. Such modifications will become effective on the date set forth in the email.

English language

By accepting this Privacy Policy you acknowledge that you are proficient in the English language, or have consulted with an advisor who is sufficiently proficient in English, so as to allow you to understand the terms of this Privacy Policy.

Privacy questions

For general information please feel free to contact us via contacts provided on www.chess-universe.net and for privacy question via info@chess-universe.net

Version 8.0.

Last revised in November 2021

Brainiac Games LTD