

FRICHINQO PRIVACY POLICY

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1.	<u>GENERAL INFORMATION</u>	1
2.	<u>WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES?</u>	2
3.	<u>WHAT NON-PERSONAL DATA DO WE COLLECT?</u>	4
4.	<u>WHAT NOTICES DO WE SEND?</u>	4
5.	<u>FOR HOW LONG DO WE STORE YOUR PERSONAL DATA?</u>	5
6.	<u>HOW DO WE DISCLOSE YOUR DATA?</u>	5
7.	<u>ADVERTISING</u>	6
8.	<u>SECURITY</u>	7
9.	<u>CHILDREN POLICY</u>	7
10.	<u>YOUR RIGHTS REGARDING PERSONAL DATA</u>	7
11.	<u>AMENDMENTS</u>	8
12.	<u>CONTACT</u>	8

1. GENERAL INFORMATION

1.1. **Applicability of the Privacy Policy.** This Frichinqo privacy policy (the “Privacy Policy”) governs the processing of personal data collected from individual users (“you” and “your”) through the mobile application “Frichinqo” and the website available at <https://frichinqo.com> (collectively, “FRICHINQO”). This Privacy Policy does not apply to any third-party products, businesses or services.

1.2. **Responsible entity (data controller).** The entity that is responsible for the processing of your personal data through FRICHINQO is Frichinqo Games (“we”, “us”, and “our”).

1.3. **About FRICHINQO.** FRICHINQO is a mobile social gaming application that allows you to play games and, from time to time, win cash and non-cash prizes. FRICHINQO and the games provided through it are offered free of charge. FRICHINQO is intended solely for entertainment purposes and does not constitute gambling. FRICHINQO does not offer real money gaming and does not imply any future success. It is intended for adult audience only.

1.4. **Cookies.** We do not use cookies on FRICHINQO.

1.5. **Term and termination.** This Privacy Policy enters into force on the effective date indicated at the top of the Privacy Policy and remains valid until terminated or updated by us.

1.6. **Your consent to the Privacy Policy.** Your use of FRICHINQO is subject to this Privacy Policy. Before you register your user account, we will ask you to review this

Privacy Policy. We also encourage you to review the Privacy Policy before submitting any personal data through FRICHINQO. We may seek to obtain your consent for the processing of your personal data if (i) we are required by law to do so, (ii) we significantly amend this Privacy Policy, or (iii) we would like to use your personal data for purposes that are not mentioned in this Privacy Policy.

- 1.7. **Third-party links.** FRICHINQO may contain links to websites owned and operated by third parties (e.g., social media providers). This Privacy Policy does not apply to such third-party websites and we are not responsible in any manner for the data protection and security practices of such websites. Please read carefully the privacy policies of the respective third-party websites before submitting any personal data to them and take reasonable security measures before using any third-party services.

2. WHAT PERSONAL DATA DO WE COLLECT AND FOR WHAT PURPOSES?

- 2.1. We comply with data minimization principles and collect only a minimal amount of personal data that is necessary for ensuring your proper use of FRICHINQO. We use your personal data only for the purposes of enabling you to use FRICHINQO, maintaining and improving FRICHINQO, conducting research about our business activities, and replying to your enquiries. The detailed description of the purposes of your personal data and the legal bases on which we rely is provided below.

- When you register your user account, we collect your (i) email address, (ii) name, and (iii) password. We will use such data to register, verify, and maintain your user account and contact you if necessary. The lawful basis on which we rely is performing a contract with you.
- When you register your user account by using your social media profile, we collect any personal data that you make available through the settings of your profile (e.g., your full name, photo, and location). We will use such data to register, verify, and maintain your user account and contact you if necessary. The lawful basis on which we rely is ‘performing a contract with you’.
- When we transfer you a cash prize, we will ask you to provide the details of your financial account (e.g., bank account number or PayPal account). We will use such data to transfer you the cash prize that you have won and to maintain our accountancy records. The lawful bases on which we rely are ‘performing a contract with you’ and ‘pursuing our legitimate business interests (i.e., to administer our business)’.
- When we need to send you a non-cash prize, we may ask you to provide your shipping address. We will use such data to send you the non-cash prize that you have won. The lawful basis on which we rely is ‘performing a contract with you’.
- When you contact us by email, we collect your (i) name, (ii) email address, and (iii) any information or personal data that you decide to provide us in your message. We will use such data for replying to your request. The lawful basis on which we rely is ‘performing a contract with you’.

- When you use FRICHINQO, we may have access to your IP address. We will use your IP address as a part of our business analytics that allows us examine how FRICHINQO is used and how we could improve our business activities. The legal basis on which we rely is ‘pursuing our legitimate business interests (i.e., to analyze and improve our business)’.

2.2. **Additional data.** We may receive certain additional data when submitted through FRICHINQO if you participate in a focus group, contest, activity or event, request support, interact with our social media accounts, submit your feedback and reviews or otherwise communicate with us. Please note that the provision of such data is optional and you may choose what personal data you would like to share with us. We will use such personal data to reply to you, provide you with the requested services, or for pursuing our legitimate business interests (i.e., to analyze and improve our business).

2.3. **Personal data obtained from third parties.** When using FRICHINQO, you can choose to permit or restrict services, functionalities, and integrations provided by third parties, including, but not limited to, social media providers Facebook and Google (collectively, the “Third-Party Services”). Once enabled, the providers of the Third-Party Services may share certain information with us, subject to the privacy policy of the Third-Party Services. You are strongly encouraged to check carefully the privacy settings and notices of the Third-Party Services to understand what information may be disclosed to us.

2.4. **Sensitive data.** We do not collect any special categories of personal data (sensitive data) from you, such as your health information, opinion about your religious and political beliefs, racial origins, membership of a professional or trade association, or information about your sexual orientation.

2.5. **Failure to provide personal data.** If you fail to provide us with the personal data when requested, we may not be able to perform the requested operation and you may not be able to use the full functionality of FRICHINQO or get our response.

3. WHAT NON-PERSONAL DATA DO WE COLLECT?

- 3.1. **Types of non-personal data.** When you use FRICHINQO, we may automatically collect certain technical non-personal data about your use of FRICHINQO and your device for analytics purposes. Such non-personal data does not allow us to identify you in any manner and includes information about: (i) the type of your device; (ii) operating systems and browsers used by you; (iii) your browsing patterns; and (iv) your other online behavior data.
- 3.2. **Your feedback.** If you contact us, we may keep records of any questions, complaints or compliments made by you and the response, if any. Where possible, we will de-identify your personal data. Please note that de-identified personal data is also considered to be non-personal data.
- 3.3. **Purposes of non-personal data.** We will use non-personal data in furtherance of our legitimate interests in operating FRICHINQO, conducting our business activities, and developing new products and services. More specifically, we collect the non-personal data for the following purposes:
- To analyze what kind of users visit and use FRICHINQO;
 - To identify the channels through which FRICHINQO is accessed and used;
 - To examine the relevance, popularity, and engagement rate of the content available on FRICHINQO;
 - To investigate and help prevent security issues and abuse;
 - To develop and provide search, learning, and productivity tools and additional features to FRICHINQO; and
 - To personalize FRICHINQO for your specific needs.
- 3.4. **Aggregated data.** In case your non-personal data is combined with certain elements of your personal data in a way that allows us to identify you, we will handle such aggregated data as personal data. If your personal data is aggregated or de-identified in a way that it can no longer be associated with an identified or identifiable natural person, it will not be considered personal data and we may use it for any business purpose.

4. WHAT NOTICES DO WE SEND?

- 4.1. **Marketing messages.** We do not send marketing messages to you. However, if we decide to send you any marketing-related communication, we will make sure that:
- We receive your express (“opt-in”) consent to receive marketing messages; or
 - We decide to send you marketing messages about our new services that are closely related to the services already used by you.
- 4.2. **Opting-out.** You can opt-out from receiving marketing messages at any time free of charge by clicking on the “unsubscribe” link contained in any of the messages sent to you or contacting us directly.
- 4.3. **Informational notices.** From time to time (if we have your email address), we may send you informational notices, such as service-related, technical or administrative

emails, information about FRICHINQO and your user account, your privacy and security, and other important matters. Please note that we will send such notices on an “if-needed” basis and they do not fall within the scope of direct marketing communication that requires your prior consent.

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

- 5.1. **Storage of personal data.** We store your personal data in our systems only for as long as such personal data is required for the purposes described in this Privacy Policy, we are obliged by law to store such data for certain period of time (for example, if we need to keep our accountancy records), you request us to delete your personal data, or until you stop using FRICHINQO and deactivate your user account - whichever comes first. After your personal data is no longer necessary for its purposes and there is no other legal basis for storing it (e.g., we are not obliged by law to store your personal data), we will immediately delete your personal data from our systems.
- 5.2. **Storage of non-personal data.** We may retain non-personal data pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping non-personal data after you have deactivated your user account for the period of time needed for us to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.
- 5.3. **Storage as required by law.** Please note that, in some cases, we may be obliged by law to store your personal data for a certain period of time. In such cases, we will store your personal data for the time period stipulated by the applicable law and delete the personal data as soon as the required retention period expires.

6. HOW DO WE DISCLOSE YOUR DATA?

- 6.1. **Do we share your personal data?** If necessary, we may disclose your personal data to the service providers with whom we cooperate (our data processors). For example, we may share your personal and non-personal data with entities that provide certain technical support services to us, such as web analytics, advertising, email distribution, and developing services.
- 6.2. **When do we share your personal data?** The disclosure of your personal data is limited to the situations when such data is required for the following purposes:
 - Ensuring the operation of FRICHINQO;
 - Ensuring the delivery of the services requested by you;
 - Providing you with the requested information;
 - Processing payments;
 - Pursuing our legitimate business interests;
 - Enforcing our rights, preventing fraud, and security purposes;
 - Carrying out our contractual obligations;
 - Law enforcement purposes; or

- If you provide your prior consent to such a disclosure.
- 6.3. **List of data processors.** We will share your personal data only with the third parties that agree to ensure an adequate level of protection of personal data that is consistent with this Privacy Policy and the applicable data protection laws. The third parties (data processors) that may have access to your personal data include:
- Our hosting and cloud computing service provider Amazon Web Services located in the United States (more information: <https://aws.amazon.com>);
 - Our business analytics service provider Google Analytics located in the United States (more information: <https://analytics.google.com>);
 - Our advertising service provider Unity Ads located in the United States (more information: <https://unity.com/solutions/unity-ads>);
 - Our email service provider Tutanota located in Germany (more information: <https://tutanota.com>); and
 - Our payment service provider PayPal located in the United States (more information: <https://www.paypal.com>).
- 6.4. **Sharing of non-personal data.** We may disclose non-personal data and de-identified data for any purpose. For example, we may share it with prospects or partners for business or research purposes, for improving FRICHINQO, responding to lawful requests from public authorities or developing new products and services.
- 6.5. **Legal requests.** If necessary, we will to disclose information about the users of FRICHINQO to the extent necessary for pursuing a public interest objective, such as national security or law enforcement.
- 6.6. **Successors.** In case our business is sold partly or fully, we will provide your personal data to a purchaser or successor entity and request the successor to handle your personal data in line with this Privacy Policy.
- 6.7. **Transfer of personal data outside the EEA.** We and some of our data processors listed in Section 6 of this Privacy Policy are located outside the European Economic Area (EEA) and, if you reside in the EEA, we may need to transfer your personal data to jurisdictions outside the EEA. In case it is necessary to make such a transfer, we will make sure that the jurisdiction in which the recipient third party is located guarantees an adequate level of protection for your personal data (e.g., the country in which the recipient is located is white-listed by the European Commission or the recipient is a Privacy-Shield certified entity) or we conclude an agreement with the respective third party that ensures such protection (e.g., a data processing agreement based on the Standard Contractual Clauses provided by the European Commission).

7. ADVERTISING

- 7.1. To increase your engagement, we place integrated and interest-based advertisements on FRICHINQO as a part of the advertising network Unity Ads. Such advertisements are generated on the basis of your use of FRICHINQO, your interests, and the advertising identifiers of your device.
- 7.2. You can control how such advertisements are shown or opt-out from some targeted advertising by consulting the guides powered by the Digital Advertising Alliance

available at <https://youradchoices.com> and the Network Advertising Initiative available at <https://www.networkadvertising.org/understanding-online-advertising/what-are-my-options>.

8. SECURITY

- 8.1. **Our security measures.** We implement organizational and technical information security measures to protect your personal data from loss, misuse, unauthorized access, and disclosure. The security measures taken by us include strong passwords, secured networks, limited access to your personal data by our staff, and anonymization of personal data (when possible). In order to ensure the security of your personal data, we kindly ask you to use FRICHINQO through a secure network only.
- 8.2. **Handling security breaches.** Although we put our best efforts to protect your personal data, given the nature of communications and information processing technology and the Internet, we cannot be liable for any unlawful destruction, loss, use, copying, modification, leakage, and falsification of your personal data caused by circumstances that are beyond our reasonable control. In case a personal data breach occurs, we will immediately take reasonable measures to mitigate the breach, as required by the applicable law. Our liability for any security breach will be limited to the highest extent permitted by the applicable law.

9. CHILDREN POLICY

- 9.1. We do not allow anyone younger than 18 years old to use FRICHINQO. Thus, we do not knowingly collect personal data of persons below the age of 18. If you learn that anyone younger than 18 has unlawfully provided us with personal data and you are a parent or legal guardian of that person, please contact us and we will take immediate steps to delete such personal data, if required by the applicable law.

10. YOUR RIGHTS REGARDING PERSONAL DATA

- 10.1. **What rights do you have?** Subject to any exemptions provided by law, you may ask us to:
- Get a copy of your personal data that we store;
 - Get a list of purposes for which your personal data is processed;
 - Correct inaccurate personal data;
 - Move your personal data to another processor;
 - Delete your personal data from our systems;
 - Object and restrict processing of your personal data;
 - Withdraw your consent (if you have provided one); or
 - Process your complaint regarding your personal data.
- 10.2. **How to exercise your rights?** If you would like to exercise your rights listed above, please contact us by email at frichinqo@tuta.io and explain in detail your request. In order to verify the legitimacy of your request, we may ask you to

provide us with an identifying piece of information, so that we would be able to identify you in our system. We will answer your request within a reasonable timeframe but no later than 2 weeks.

- 10.3. **How to launch a complaint?** If you would like to launch a complaint about the way in which we handle your personal data, we kindly ask you to contact us first and express your concerns. After you contact us, we will investigate your complaint and provide you with our response as soon as possible. If you are not satisfied with the outcome of your complaint, you have the right to lodge a complaint with your local data protection authority.

11. AMENDMENTS

- 11.2. This Privacy Policy may be changed from time to time to address the changes in laws, regulations, and industry standards.
- 11.3. The amended version of the Privacy Policy will be posted on this page with a new effective date and, if we have your email address, we will send you a notice about all the changes implemented by us. We encourage you to review our Privacy Policy to stay informed.
- 11.4. For significant material changes in the Privacy Policy or, where required by the applicable law, we may seek your consent. If you disagree with the changes to the Privacy Policy, you should cease using FRICHINQO.

12. CONTACT

- 12.1. Please feel free to contact us if you have any questions about the Privacy Policy, our privacy and security practices, or would like to exercise your rights listed in Section 10 of the Privacy Policy. You may contact us by sending an email to Frichinqo Games | frichinqo@tuta.io .
