

Privacy Policy

Effective as of February 18, 2022

We are «IZX VERSE (" IZX"). We provide real-world augmented reality platforms IZX, designed to enable you to interact in shared worlds, seamlessly blended with the real world. To do that, we need information about you. Protecting your privacy is really important to us. We only use your information where we have a legal basis to do so. This Privacy Policy will help you understand what information we collect, how we use it and what choices you have when you play our game and use our website (the " **Services**").

By using the services, you also agree to our Terms of Service. Please make sure that you read and agree with our Terms of Service if you want to use IZX.

1. Who decides how your information is used?

«IZX VERSE, is the data controller responsible for making decisions about how we use your personal information.

If you have:

- Any questions or comments on this policy, you can mail us at info@izx.io.
- On issues related to abuse of rights, please, mail us at abuse@izx.io.

2. The information we collect about you and how we use it

This Privacy Policy covers our use of any information that can or could be used to identify you (" **Personal Data**"). It does not cover information which cannot be used to identify you ("**Anonymous Data**").

We need to collect and use certain Personal Data to provide the Services to you and fulfil the promises we make to you in the Terms of Service:

- When you sign up for our Services you give us Personal Data voluntarily by providing it to us, for example when you sign up for an account. We collect and use that information in order to authenticate you when you register an account and use the Services, to make sure you are eligible and able to receive the Services, and so that you receive the correct version of the Services. That information includes the in-game @username you choose to use on our Services, and internal account IDs that we assign to your account, and phone number which you put in during an account creation.
- We collect and use your device location information as you use our Services, including how you move around and events that occur during gameplay. Our Services include location, based games whose core feature is to provide a gameplay experience tied to your real world location, so we need to know where you are to operate this game for you, and to plan the location of in-game resources. We identify your location using a variety of technologies, including GPS, the WiFi points you are accessing the Service through and mobile/cell tower triangulation.
- We also collect and use your in-game actions and achievements, as well as certain information about your mobile device (including device identifiers, device OS,

model, configuration, settings, to operate the Services for you and to personalize your gameplay and user experience.

- We also use the information above to show in-game sponsored locations that are in your vicinity as part of the gameplay experience.
- We further use the information above in order to provide technical and customer support to you.
- You also give us Personal Data when you subscribe to our publications, participate a live events, enter a competition, promotion or communicate with us. Depending on which of these Services you use, that may include your name, phone number, country of residency, language, date of birth (as needed to verify eligibility), BTC wallet address, gender, your photo and email address. We use that information to fulfil those Services to you and to provide related customer support to you.

In addition, we have and rely on a legitimate interest in using your Personal Data as follows:

- Using your IP address, browser type, operating system, the web page you were visiting before accessing our Services, the pages of our Services which you browsed or the features you used, and the time spent on those pages or features, the links on our Services that you click on, device and advertising identifiers, as well as actions you take during gameplay, your in-game user settings and preferences to understand who is using our Services and how.
- Using your contact information, namely your email address in order to communicate with you to provide technical and customer support.
- Using your email address and device information in order to share updates and news with you either within the games or by email. You can unsubscribe from these at any time in your device settings or in-app settings.
- Analyze your in-game actions and achievements to show you rewards, promotions, or other offers about our Services that are tailored to your personal user experience. You can choose to opt out of this and certain other processing of your Personal Data by following the steps described in Section 7 below.
- To provide social features within our games so you can interact and play with other players, including storing your communications with those players, find your friends and be found by them, and share your gameplay experience, your internal user ID and nickname, geotags and achievements with your friends.
- To provide AR experiences. In order to do this, IZX needs to locally derive AR geospatial data from your device camera. This geospatial data is then ingested by IZX servers to allow you and other players to view and interact with the same virtual objects at the same time in a shared physical space.
- To offer new or additional features for our Services.
- To organize and run live events based on or featuring our games. Note that when you participate in live events your in-game actions and achievements, in-game username and your avatar, team, and other components of your in-game profile will be visible to other event participants and to the public (for example on leaderboards displayed at the event and online).
- Using your in-game actions and achievements, as well as certain information about your mobile device (including device identifiers, device OS, model, configuration, settings and information about third party applications or software installed on your device), to carry out anti-fraud and anti-cheating measures against behaviors prohibited under our Terms of Service, to ensure that we provide a fair gaming experience to all players.
- To make legal or regulatory disclosures and to establish, exercise, or defend legal claims.

We will only use your Personal Data to do the following if we have your consent:

- Send you marketing materials by email or via in-app notifications. You can unsubscribe from these at any time in your device settings or in-app settings.

We also rely on your consent where we use cookies or similar technologies. Please see our **Cookie Policy** for more information about how we use them. Insofar as cookies collect Personal Data, we will process it only based on your explicit consent, in an anonymized form, or under a pseudonym. While you may disable the usage of cookies through your browser settings.

3. Legal basis for the processing

We collect and process your personal data for or on the basis of one or more following legal bases:

- a) Conclusion and performance of a contract. By using our services, you have contracted with us through the **Terms of Service**, and therefore we have to process certain personal data to execute the contract and comply with it. Please note, that the provision of your data is a necessary requirement to enter into and execute the **Terms of Service** and therefore - enjoy our services. If you fail to provide us with such the data, you won't be able to use our services.
- b) Legitimate Interests. We may process your personal data for our legitimate interests, in particular protecting our, our users' rights, safety and property; detecting and resolving any security concerns or fraud; complying with any applicable law, act, regulation, other regulatory legal act, any inquiry or remedy; enforcing the **Terms of Service**.
- c) Your explicit consent to the processing. You may choose to give your explicit consent to processing of your personal data by us or a third party for the abovesaid **purposes of the processing**.
- d) Compliance with other obligations set out by applicable law, governmental or other competent bodies' requests.

4. Who we share information with

We will not share any Personal Data that we have collected from or regarding you except as described below:

Information Shared with Our Service Providers. We engage external service providers to work with us to administer and provide the Services. As part of that they will process your Personal Data on our behalf. These external service providers have access to your Personal Data only for the purpose of performing services on our behalf, in compliance with this Privacy Policy, and we make sure each one is contractually obliged not to disclose or use your Personal Data for any other purpose. The service providers we use help us to:

- run, operate and maintain our Services through third party platform and software tools;
- perform content moderation and crash analytics;
- run email and mobile messaging campaigns;
- perform game and marketing analytics;
- to provide measurement services and target ads (you can opt out of these services at Notification center in the App);
- administer live events, community chats, including registering players, managing check-in and attendance and verifying eligibility;
- provide payment attribution;

- provide technical and customer support.

Some external service providers may also collect information directly from you (for example, a payment processor may request your billing and financial information) as a Third Party Service in accordance with their own privacy policy. Such external service provider does not share your financial information, like credit card number, with us, but it may share limited information with us related to your purchase, like your zip or postal code. We don't keep your financial information, it goes straight to our payment service provider.

****Information Shared with Other Players. **** When you use the Services, and in particular when you play our games, use social features within those games (including cross-game features), or take part in live events, we will share certain Personal Data with other players. This Personal Data includes your in-game profile (such as your username, your avatar, your online status, and your team), your in-game actions and achievements, the real-world location of gameplay resources you interacted with when playing the game, and your public in-game messages. Additionally, our game link to third-party sharing features on your device that you can use to disclose Personal Data to others outside the Services; IZX does not control and is not responsible for the practices of these third-party sharing features.

Information Shared with Third Parties. We share Anonymous Data with third parties for industry and market analysis. We may share Personal Data with our third-party publishing partners for their direct marketing purposes only if we have your express permission. We do not share Personal Data with any other third parties for their direct marketing purposes.

Information Disclosed for Our Protection and the Protection of Others. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We only share information about you to government or law enforcement officials or private parties when we reasonably believe necessary or appropriate: (a) to respond to claims, legal process (including subpoenas and warrants); (b) to protect our property, rights, and safety and the property, rights, and safety of a third party or the public in general; and (c) to investigate and stop any activity that we consider illegal, unethical, or legally actionable.

Information Disclosed in Connection with Business Transactions. Information that we collect from our users, including Personal Data, is a business asset. If we are acquired by a third party as a result of a transaction such as a merger, acquisition, or asset sale or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your Personal Data, will be disclosed or transferred to a third party acquirer in connection with the transaction.

5. How we store your personal data

The term of storing and processing your personal data shall depend on the purpose of its processing, as well as on the applicable technology (this applies to cookies). For instance, IZX will keep and process your personal data related to the provision of our services to you, including based on the **Terms of Service**, within the period of service provision and/or contract validity.

We will store and process your personal data for marketing (advertising) purposes for providing you with discounts on our services and products as well as for communication

purposes until user`s account removal and in the period in _____ months after in order to ensure user`s security on and off our Service.

The servers with your data are hosted by our service providers Amazon Web Services, Inc and Mongo DB. This service providers are located in the United States and its affiliated companies - throughout the world. From there, your data may be stored in or accessed from multiple countries, including the United States.

Please note, that we don't define the terms of keeping and processing your personal data by third parties, as it completely depends on their approved rules.

6. How your Personal Data is transferred

«U» LTD operates its Services across the globe. Your Personal Data will very likely be transferred and stored in a country outside of your home country, including in the USA, for the purposes outlined in this Privacy Policy. The data protection laws in these countries may not be the same as in your home country.

If we transfer your Personal Data from the EEA to other countries, including the USA, we ensure that a similar degree of protection is provided to your Personal Data as within the EEA by ensuring that at least one of the following safeguards is implemented:

- The country that your Personal Data is transferred to is a country that the European Commission has deemed to provide an adequate level of protection for Personal Data as the EEA.
- We use specific contracts approved by the European Commission which give Personal Data the same protection as it has in Europe when we engage with service providers.
- Where we engage with service providers in the USA, they are part of the EU-US Privacy Shield, which requires them to provide the same protection of your Personal Data as it has in the EEA.

7. How we keep your Personal Data safe

We have appropriate security measures in place to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, improperly altered or disclosed. We also limit access to your Personal Data to employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. How long we will keep your Personal Data

We keep your Personal Data for as long as we need to provide the Services to you and fulfil the purposes set out in this Privacy Policy. This is also the case for anyone that we share your information with and who carry out services on our behalf.

When we no longer need to use your Personal Data and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or anonymize it so that it can no longer be associated with you. When removing Personal Data, we will take commercially reasonable and technically feasible measures to make said Personal Data irrecoverable or irreproducible.

9. Your rights regarding your Personal Data

We collect and process your personal data exclusively pursuant to the applicable law. You may exercise your rights provided for by applicable law at any time. You may have, in particular, the following rights.

a) Your rights under General Data Protection Regulation

If you are on the territory of the European Union or on the territory of such countries as: Iceland, Liechtenstein, Norway, Switzerland, then you have the right to:

- withdraw your consent where you have given it
- request an access to and rectification or erasure (right to be forgotten) of your personal data
- in certain circumstances restrict the processing of your personal data or object to processing it
- request data portability
- receive information on the retention term of your personal data or the criteria by which such a term can be determined
- receive information about the source from which your personal data originates, and if applicable, whether it came from publicly accessible sources (if personal data was not received from you)
- lodge a complaint with a competent supervisory authority on the territory you're located in
- not be subject to a decision based solely on automated processing, including profiling, unless it's necessary for entering into or performance of the Terms of Service to which you're subject

To get more details about your rights, please make aware of the official text of the [General Data Protection Regulation](#).

b) Your rights under California Consumer Privacy Act ("CCPA")

If you are on the territory of the state of California, then you have the right to:

- know what categories and specific pieces of personal information we have collected
- request to delete any personal data about you that we've collected
- not be discriminated such as: denying goods and services; accrual of various prices including the use of deductions; securement a low level of services.
- submit a request for information about your personal data that we have collected: by submitting your CCPA request by Access My PD Form or by calling us.

To get more details about your rights, please make aware of the official text of the [California Consumer Privacy Act](#).

c) Your rights under Virginia Consumer Data Protection Act:

If you are on the territory of the state of Virginia, then you have the right:

- know is IZX processing your personal data or not;
- to file a request to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of your personal data;
- to file a request to delete personal data provided by or obtained about you like a user;
- opt-out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning to you like a user.

We offer you choices regarding the collection, use, and sharing of your Personal Data and we'll respect the choices you make. Please note that if you decide not to provide us with the Personal Data that we request, you may not be able to access all of the features of the Services.

After you contact us, you may receive an email in order to verify your request. We aim to provide the information or complete the outcome you request within 30 days.

10. Children

Unless stated otherwise for a particular Service, children are not allowed to use the Services, and we do not collect Personal Data from them. We define "children" as follows:

- Residents of the EEA: anyone under 16 years old, or the age needed to consent to the processing of personal data in your country of residence.
- Residents of the Republic of Korea, anyone under 14 years old.
- Residents of other regions: anyone under 13 years old

We are scrupulous in taking measures to protect children as defined in this Privacy Policy and Children's Online Privacy Protection Rule («COPPA»). Please help us protect your children's privacy by training them never to provide personal data without approval.

Protecting children's online privacy

- We do not collect personal data from children at IZX Services directed to children without the approval of a parent or guardian, except in limited circumstances authorized by law
- We may collect some data (name and username, age, sex, email address, mobile phone number) automatically and use technology like cookies to provide functionality and support our partners
- We are trying to prevent children from posting or publicly disclosing personal information
- We use filtering and monitoring system in an effort to discourage children from posting personal data without parental approval at IZX Services directed to children

Parents can access to update or delete their children`s information by using the [COPPA Form](#).

If we learn that we have collected Personal Data of a Child, and we do not have parental consent, we will take steps to delete such information from our files as soon as possible.

If you have questions about privacy of your children` data, please contact us at support@izx.io or IZX VERSE.

11. Changes to this Privacy Policy

Any Personal Data that we collect is covered by the Privacy Policy in effect at the time such information is collected. We may make changes to this Privacy Policy from time to time. You will be given reasonable notice of any material change.

12. Third Parties

In using our Services you may access links to websites and services that are owned or operated by third parties (each, a " **Third Party Service**"). Any information that you provide on or to a Third Party Service or that is collected by a Third Party Service is provided directly to the owner or operator of the Third Party Service and is subject to the owner's or operator's privacy policy. We're not responsible for the content, privacy, or security practices and policies of any Third Party Service. To protect your information we recommend that you carefully review the privacy policies of all Third Party Service that you access.

13. Disclosures Specific to California Residents

California law requires that we make certain disclosures about your data. We do not sell your Personal Data. The information listed in Section 2 falls under the following California Consumer Privacy Act (CCPA) categories: identifiers, commercial information, Internet or other electronic network activity information, geolocation data, and visual information.

14. Game Specific Disclosures

Additional Privacy Information for IZX

Accounts with Children. We comply with parental consent requirements as mandated by the U.S. Children's Online Privacy Protection Act (COPPA) and European data protection laws (including, without limitation, the General Data Protection Regulation) through a user verification.

Parents have the right to refuse further collection, use, and/or disclosure of their Child's Personal Data by notifying us. As a Parent, you understand that IZX VERSE has a legitimate interest in providing your Child's information collected via the Services to third party providers for the sole purpose of administering or providing the Services, as described in Paragraph 3 of this Privacy Policy.