

PRIVACY POLICY

Red Pill Studio (“**Red Pill Studio**”, “**we**”, “**us**” or “**our**”) is committed to respecting your privacy and protecting your personal data. This Privacy Policy (“**Policy**”) describes how we treat information that you provide to us or that we collect about you.

By “**Personal Data**”, we refer to data that relates to you as an identified or identifiable natural person. The term “**Personal Data**” may include your name, your address, your telephone number, your e-mail address, your age, your gender, your game preferences, for instance. Anonymous information, which we are not in a position to relate to you, does not qualify as “**Personal Data**”.

1. CONTROLLER’S NAME AND CONTACT DETAILS

Controller in the sense of the General Data Protection Regulation (GDPR) and other data protection or data privacy laws in the Member States of the European Union and other guidelines with a data protection nature regarding our online and mobile games is:

Name: Red Pill Studio

Email: support@traincraft.game

The term “**Services**” refers to the act of providing you with the opportunity to use the named games (“**Games**”), websites (“**Sites**”), **Red Pill Studio** account (“**Account**”), any of our other products and services (including support services, forums) related to the Games (“**Ancillary Services**”).

2. GENERAL INFORMATION IN BRIEF

We process personal data only when necessary for the performance of a contract with you. Processing is necessary for compliance with a legal obligation to which we are subject, or based on our legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms for which require the protection of your Personal Data.

Our legitimate interests are to provide our Services in an effective, safe and harmless manner. We want to provide everyone with a fair and balanced experience when using our Services.

2.1. INFORMATION SECURITY

We and our employees understand the need for user privacy, and we maintain reasonable and appropriate security procedures to protect your information from loss, misuse and unauthorised access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the Personal Data.

2.2. PROCESSING INFORMATION BY THIRD PARTIES

We may share Personal Data with our affiliates, subsidiaries, vendors or agents working on our behalf for the purposes described in this Policy. For example, we may hire companies to assist with protecting and securing our systems or services. Any vendor or agent that we retain must comply with our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose. Those companies may be located outside of the European Economic Area. Read more in Section 5 “How we share your information”.

2.3. CHILDREN

We recognise that we have a special obligation to protect personal information obtained from children. We will not knowingly collect Personal Data from any child, or process such information, without parental consent. For the purpose of this Policy, a child means any individual who is under the age of 18 (or the minimum legal age to consent to the collection and processing of Personal Data where this is different under applicable law).

2.4. DATA RETENTION

We keep most of your Personal Data gathered and processed for the purposes described in this Policy for as long as you continue to use our Services, e.g. you have an activated Account in one of our Games. We will delete your Personal Data after you request your Account deletion and the grace period of 45 (forty-five) calendar days, during which we can restore your Account, expires. The process of erasing your Personal Data can take up to one month from expiry of the grace period and, considering the complexity and number of requests, may be extended by a further two months. Read more in Section 6.3 “Right to erasure”.

3. INFORMATION WE COLLECT

In relation to your use of our Services, we gather information either directly from you (when you provide information to us) or indirectly (e.g. through our Site's technology).

3.1. INFORMATION WE COLLECT DIRECTLY

We collect Personal Data and other information that you voluntarily provide. It is entirely your decision to provide the requested information. However, your use of certain Services is possible only if you provide required information, e.g. while creating an Account.

Account Data

When setting up an Account, you may be asked to provide Personal Data including, but not limited to, your name, email address and telephone number.

Content Data

We may obtain your Personal Data when you register for and use our other Services, e.g. game forums, chats, or when you provide feedback about our Services. This data includes:

- Information that you post, comment or like in any of the Games Forums and Sites;
- Information sent through the "game-chat" functionality in the Games;
- Information you provide when you request information or support from us or purchase a product or service from us, including information necessary to process your orders with the relevant payment merchant, which may include the amount of any transaction, but will not include your financial information, which will only be submitted directly to the payment merchant under secure protocols;
- Information other than the Account Data you provide to us when participating in competitions, contests and tournaments, responding to surveys, e.g. your contact details;
- Information relating to your profiles on social networking sites in order to allow integration with such social networking sites.

3.2. INFORMATION WE COLLECT INDIRECTLY

We indirectly collect a variety of information through your interaction with and use of our websites. This information may include, but is not limited to, browser and device information, data collected through automated electronic interactions, application usage data,

demographic information, geographic, geo-location information, statistical and aggregated information (“**Other Information**”). Statistical or aggregated information does not directly identify a specific person, but it may be derived from Personal Data. For example, we may aggregate Personal Data to calculate the percentage of users in a particular country. If we combine Other Information with Personal Data, we will treat the combined information as Personal Data.

3.2.1. Tracking Data and Cookies

We and our partners, such as marketing partners and analytics providers, use “**Cookies**”, which are text files placed on your computer, to help us analyse how users use our Services, and similar technologies (e.g. web beacons, pixels, ad tags and device identifiers) to recognise you and/or your device(s) on, off and across different devices and our Services, as well as to improve the Services we are offering, to improve marketing, analytics or website functionality. The use of Cookies is standard on the internet. Although most web browsers automatically accept cookies, the decision of whether to accept or not is yours. You may adjust your browser settings to prevent the reception of cookies, or to provide notification whenever a cookie is sent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to access the full functionality of our Sites.

Website traffic volume and patterns, such as the number of visitors to a given website or page on a daily basis is typically referred to as “**Tracking Data**”. This type of indirectly collected information is gathered through various means, such as an IP address, which is a number that is automatically assigned to your computer whenever you are surfing the web. Web servers, the computers that “serve up” web pages, automatically identify your computer by its IP address. When you visit any of our Sites, our servers log your computer’s IP address.

Analytics Cookies. We use third-party analytics providers, including, but not limited to, Google Analytics, Google Optimize, Doubleclick and Yandex.Metrica (collectively “**Third Party Analytics Providers**”). These Third-Party Analytics Providers use Cookies on our Sites. The information generated by the Cookies about your use of our Sites, including your Red Pill Studio ID, may be transmitted to and stored by Third-Party Analytics Providers’ servers, which also may be located outside of the European Economic Area. On our behalf,

the Third-Party Analytics Providers will use this information for the purpose of evaluating your use of our Sites, compiling reports on website activity, and providing other services relating to website activity.

We use the following Google Analytics cookies:

_ga (also known as _rollupGa). The cookie is used to collect information and report website usage statistics. It expires after 2 years.

_gid (also known as _rollupGa_gid). The cookie is used to distinguish users. It expires after 24 hours.

_gat. The cookie is used to throttle request rate. It expires after 1 minute.

gac. This cookie contains campaign related information for the user. AdWords website conversion tags will read this cookie in an anonymous form. It expires after 90 days.

_dc_gtm_. This cookie is used to throttle request rate in an anonymous form. It expires after 1 minute.

We use the following Google Optimize cookies, which are used to determine your inclusion in an experiment (e.g. an A/B test on button colours our users prefer, which we use for UX improvement of our interfaces) and the expiry of experiments a user has been included in.

__utmx. It expires after 18 months.

__utmxx. It expires after 18 months.

_gaexp. It typically expires after 90 days.

We use the following Doubleclick cookies:

IDE and DSIS. This cookie enables features in Google Analytics that are not available through standard implementations. Advertising features include: remarketing with Google Analytics, Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting integrated services that require Google Analytics to collect data for advertising purposes, including the collection of data via advertising cookies and identifiers. The cookies expire after 2 years.

You can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout>. Further information can be found under <http://www.google.com/analytics/terms/gb.html> (Google Analytics Terms of Service & Privacy). Please note that on our Sites, Google Analytics, Google Optimize and Doubleclick code is supplemented by "gat._anonymizelp();" to ensure an anonymised collection of IP addresses (so called IP-masking). Also, you can prevent Google Analytics, Google Optimize and Doubleclick to collect such data on behalf of Red Pill Studio by clicking on the following link: <https://tools.google.com/dlpage/gaoptout>.

We use the following Yandex.Metrica cookies:

_ym_isad. This cookie helps to check if Adblock is enabled in user browser. It expires after 24 hours.

_ym_uid. This cookie is used to collect information and report website usage statistics. We use these cookies to improve user experience. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. It expires after 2 years.

_ym_visorc. This cookie enables session replays. These cookie is used for Webvisor feature in Yandex.Metrica reports, which enables "Sessions replays" (<https://yandex.com/support/metrica/general/counter-webvisor.html>). Yandex ensures that all collected information is depersonalised. The cookie expires after less than 1 day.

We also use some additional Yandex.Metrica cookies with the following expiry terms:

sync_cookie_csrf expires after 1 day, *i* expires after 10 years, *yandexuid* expires after 10 years, *yp* expires after 10 years, *sync_cookie_ok* expires after 2 days.

While you can disable Yandex.Metrica cookies through your browser settings, you can also block collection of any data related to you using this add-on:

<https://yandex.com/support/metrica/general/opt-out.html>.

Third-Party Cookies. Additionally, we may use third-party advertising companies, including Facebook, Holimetrics, Auditorius, Adform, Criteo, Bing, AdRoll, Reddit, Accelerize Inc., MyTarget services, to serve ads on our behalf. These companies may use cookies and action tags to measure advertising effectiveness and allow more effective targeted

advertising. You may adjust your browser settings to prevent the receipt of third-party cookies, or to provide notification whenever such third-party cookies are sent to you.

3.2.2. Game-Related Information, Device Information, Geo-Location

In order to provide you with efficient services, we need to collect, store and use various information about your activity in our Games. “**Game-Related Information**” includes your in-game identifier, which for most of our Games is known as “Red Pill Studio ID”, as well as what is usually referred to as “game statistics”. By game statistics we mean information about your Games preferences, progress in the Games, participation in clans, frequency of playing, as well as information about the device you are using the Services on, including what type of device it is, what operating system you are using, device settings, unique device identifiers, and crash data. Whether we collect some or all of this information often depends on what type of device you are using and its settings. Precise GPS location from mobile devices is collected only with your permission. Wi-Fi and IP addresses received from your browser or device may be used to determine approximate location.

3.2.3. Information required for fraud and violations detection

We may also collect certain data (like IP address, username, etc.) that is required for our detection, investigation and prevention of cheating in the Game and EULA violations. This data is used only for the purposes of detection, investigation and prevention of cheating in the Game, and is deleted six months after its collection, unless the data can be used to prove that cheating has occurred. If the data can be used to prove that cheating or another fraud or EULA violation has occurred, we will further store the data for the establishment, exercise or defence of legal claims during the applicable statute of limitations. Please note that the specific data stored for this purpose may not be disclosed to you or any third parties, since the disclosure will compromise the mechanism through which we detect, investigate and prevent cheating in the Game, as well as other EULA violations.

3.2.4. Information from publicly available online resources

We may use the information made publicly available, e.g. through YouTube, vk.com, Facebook, Instagram and Twitter, in order to find out your opinion about Games and Services, so that we could take them into account while improving our Services.

3.2.5. Information from our partners

In order to fulfil our obligation under the EULA and when processing is required in order to comply with a legal obligation to which we are subject, we may also obtain information about you from our partners, e.g. from our payment and advertising partners. We only use the data controlled by our partners in accordance with their instructions and applicable laws. When you purchase virtual items, virtual currency (so-called “gold”) or time-limited premium memberships with your credit card, we may receive from our payment partners and process a part of your credit card number, information about your credit card issuer, as well as your full address for billing purposes.

4. HOW WE USE YOUR INFORMATION

We need to process your Personal Data in order to fulfil the contract with you according to Article 6(1)(b) of the GDPR. As a user, we will use your Personal Data, unless otherwise prohibited by law, for the following purposes:

- to provide you with the Services you request;
- to communicate with you about your Account or transactions with us and send you information about features on our Sites or changes to our policies;
- to provide support including, but not limited to, product updates, product patches and fixes and other similar communications;
- to arrange your travel, receipt of gifts and awards, to which you may be entitled as a result of winning an offline competition, etc.

4.1. COMMUNICATION PURPOSES

We will use your Personal Data for our legitimate interests according to Article 6(1)(f) of the GDPR to notify you and provide you with information about features on our Sites, new product releases and service developments and to advertise our products and services in accordance with this Policy. Namely, once you have created an Account we may use your email address, nickname, IP address, mobile phone number, in order to send you emails, messages and targeted in-game and web offers about Games. Also, if you opt-in, we will send you emails, messages and targeted in-game and web offers about Red Pill Studio offline events, co-projects of Red Pill Studio and its partners, as well as about Red Pill Studio games, not using Red Pill Studio ID.

4.2. SERVICES IMPROVEMENT PURPOSES

We analyse the Tracking Data, Content Data and Game-Related Information to identify how to improve the Services and our operations to make them more interesting for our players in general. You are not obligated to respond to polls or surveys and you have choices about the information you provide.

4.3. TARGETED IN-GAME OFFERS

We may also use the Game-Related Information to send you certain in-game offers that we believe are the most useful to you. To make the offer we first collect Game-Related Information from various players, identify patterns in their behaviour, and create algorithms that identify whether you follow the pattern, if we apply the algorithm and it says that you do actually follow the pattern – we send the in-game offer to you. We make sure that such offers never have any significant impact on you or our other players. You can unsubscribe from in-Game offers through our Account Management tool.

4.4. FRAUD AND EULA VIOLATIONS DETECTION

We use the information required for our detection, investigation and prevention of cheating in the Game and violations of EULA and Game rules and policies only for the purposes of such detection, investigation and prevention of cheating in the Game. If the data can be used to prove that cheating or another fraud or EULA violation has occurred, we will further store the data for the establishment, exercise or defense of legal claims during the applicable statute of limitations.

5. HOW WE SHARE YOUR INFORMATION

For the performance of a contract with you, compliance with a legal obligation to which we are subject, and based on our legitimate interests, we may share your personal data with the following categories of third parties:

1. Payment partners: we may share your device IDs, IP address, information about in-game purchases requested by you at Red Pill Studio's web-sites, and other information you provide to us for the purpose of fulfilling your purchase requests with such companies as Adyen BV, PW Inc., PayPal (Europe) Sarl & Cie, "Yandex.Money", NBCO LLC;

2. Advertising and advertising measurement partners: we share your device ID, nickname, IP address and other information you provide to us in order to facilitate targeting, delivery, and measurement of online advertising on third-party services, or otherwise facilitate transmittal of information that may be useful, relevant, or of interest to you, with such companies as Emarsys UK Ltd, Unity Technologies APS;

3. Data storage partners: we store some of your information using third-party data storage services, e.g. we store most of your responses to our in-game questionnaires using the services of Widgix, LLC dba Survey Gizmo, while some of your game statistics is stored using the services of Amazon Web Services, Inc.;

4. Research partners: we may provide access to some of your data, such as your Game statistics, to provide marketing-related and other research. We share anonymous data with our partners unless your personal data is necessary for the requested services or research;

5. Customer support partners: for some territories and products we engage third parties to provide you with appropriate customer support services. Such companies may get access to your personal data, including personal data that you may provide in your customer support requests. Such partners include Zendesk Inc, iOpex Technologies Inc.;

6. Developers of applications based on the Game: we make your nickname and some of your Game statistics available to other players and our partners through Public API. The data can be used for developing and support of the applications created by the Game community, mobile applications, e.g. Casual Billionaire: Free slots games Assistant. Public API enables us to improve your gaming experience, fulfil potential of our community, and put use of our players' statistics under our control by creating rules and requirements for their use by other players and community;

7. Publicly available information: our Sites may also have message boards, forums and/or chat areas, where users can exchange ideas and communicate with each other. When posting a message to a board, forum or chat area, please be aware that the information is being made publicly available on-line; therefore, you are doing so at your own risk. If your personal information is posted on one of our community forums, please use our Account Management tool to request its removal. If we may not be able to remove your personal information promptly, we will let you know about the reasons.

8. External moderators and testers: some limited data about you (such as your nickname, content of customer support ticket) may become available to third party volunteering moderators and testers who contribute to providing you with better Services, e.g. to quickly respond to your questions about the Games.

9. Anti-cheat and anti-fraud companies: we may share the information required for our detection, investigation and prevention of cheating in the Games and EULA violations only for the purposes of detection, investigation and prevention of cheating in the Game.

10. Red Pill Studio subsidiaries and affiliates: as a global company, we collect information that may be processed in our offices worldwide. Your information may also be processed outside of the European Economic Area, e.g. in the United States, or any other country in which we, our affiliates or subsidiaries maintain presence.

11. Change of control: we may share your data as part of our company's sale, merger or change in control, or in preparation for any of these events. Any entity which buys us, or part of our business will have the right to continue using your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

When your personal data is shared with Red Pill Studio affiliates and subsidiaries, as well as third parties outside the European Union or the European Economic Area, Red Pill Studio guarantees an adequate level of personal data protection, including but not limited to, by entering into standard data protection clauses adopted by the European Commission with Red Pill Studio affiliates and subsidiaries, as well as such third parties. We will provide you with a copy of the standard data protection clauses upon your request.

Sharing anonymous information. We also may share anonymous information, i.e. information which does not directly or indirectly disclose your identity, and aggregated information (meaning information about groups and categories of users, including game statistics and behaviour, but which does not identify and that cannot reasonably be used to identify any individual user) with our advertising partners. We may also allow our advertisers to collect anonymous information and aggregated information within the Services and they may then share that information with us. Our advertisers may collect this information through the use of tracking technologies like cookies and web beacons. This enables our advertisers to develop and deliver targeted advertising in the Services and on the websites of third parties, so that they can try to serve you with advertisements for products and services that are most

likely to be of interest to you. Advertisers will also use this information to monitor, improve or modify their operations.

6. YOUR RIGHTS

With regard to the Games that do not use the Account, you can exercise your rights by filing a request to that effect to Customer Support or as otherwise indicated in the respective Game.

6.1. OPT-OUT OF DIRECT MARKETING AND RIGHT TO OBJECT

You can opt-out of interest-based advertising on mobile applications, including our mobile Games, by checking the privacy settings of your Android or iOS device and selecting “limit ad tracking” (Apple iOS) or “opt-out of interest-based ads” (Android).

Where processing of your Personal Data is based on legitimate interests according to Article 6(1)(f) of the GDPR, you can use your right to object at any time. If you object we will no longer process your Personal Data unless there are compelling and prevailing legitimate grounds for the processing or the data is necessary for the establishment, exercise or defense of legal claims.

6.2. RIGHT OF ACCESS

You have the right to access your Personal Data that we hold about you, i.e. the right to require free of charge (i) information whether your Personal Data is retained, (ii) access to and/or (iii) duplicates of the Personal Data retained. Normally, we provide the duplicate of the Personal Data retained within 30 (thirty) days upon your request. Once the archive with the Personal Data we retain is ready, you will be able to download it from our resources. If the request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee (taking into account the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request. We also will not be able to provide you with some Personal Data that you may post or provide using our Services regardless of our request not to provide the Personal Data in this particular field, website, etc.

6.3. RIGHT TO RECTIFICATION

You control which nickname, phone number, country, social networks accounts, trusted sites and payment methods we associate with your Account. If they change, please modify the data in the Personal Account directly. Please inform us if any of the Personal Data we retain about you is inaccurate.

6.4. RIGHT TO ERASURE

You have the right to obtain deletion by us of Personal Data concerning you by deleting your Account via our “Account Deletion” tool available in the Game. As a result of deleting your Account, you will lose access to most Services, including the Account and Game-Related Information linked to the Account, subscriptions to Red Pill Studio forums and the possibility to access other services you are using the Account for.

Grace period. We allow you to restore your Account during a grace period of 45 (forty-five) days from the moment you request deletion of your Account. This functionality allows you not to lose various Game-Related Information and other important information and options by mistake. During the suspension period, we will be able to finalise financial and other activities that you may have initiated before sending the Account deletion request.

Complicated Account deletion. In some cases, deletion of your Account, and therefore Personal Data deletion, is complicated. Namely, if you are a clan commander in the Games, it is highly likely that you will only be able to delete your Account after you have transferred the clan and placed it under the command of another user or dissolve the clan. In some cases, considering the complexity and number of the requests, the period for Personal Data erasure may be extended, but for no longer than two further months.

Earlier Personal Data deletion. We store most Personal Data we retain about you until you request deletion of your Account. However, certain Personal Data is deleted even while you have a valid Account. For example, we will delete:

- your Contact Data, clothes sizes, colour preferences, etc., you have provided for customisation, or for us to send you an award or arrange travel to one of our events, within 30 (thirty) days of us sending the award to your address;
- the data about you that we have collected in the course of alpha-tests, super tests, UX tests, surveys, analysis of publicly available sentiments in social networks such as YouTube,

Facebook, vk.com for the period when we are generating the reports for our Services improvement and for 30 (thirty) days after that;

technical logs such as records of communication between Services, access logs, errors logs: normally within 30 (thirty) days from their creation.

Information we retain. Upon expiry of the suspension period we will delete all Personal Data about you, except for the data that are required for our compliance with the requirements of applicable laws (e.g. tax and accounting requirements) or for our detection, investigation and prevention of cheating in the Game and EULA violations. We will retain anonymous information after your Account has been closed. Information you have shared with others (e.g. through in-Games chats, updates or group posts) will remain visible after you closed your account or deleted the information from your own profile or mailbox, and we do not control data that other Members copied out of our Services. Groups content associated with closed accounts will show an unknown user as the source. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache.

You also have the right to lodge a complaint at a supervisory authority.

7. WE CAN CHANGE THIS POLICY

We may change this Policy from time to time for various reasons, such as legal and regulatory changes, changes in industry practices and technological developments that need to be reflected.