

**GOLDEN POPPY INC.,
PRIVACY POLICY
HOW WE COLLECT, USE AND DISCLOSE INFORMATION FROM OUR USERS**

Last Update: September 9, 2019

Your privacy is important to us, and we take our responsibility of caring for it seriously. This policy describes what information Golden Poppy Inc., (GP) collects when you use the mobile, online and downloadable products and services offered by GP and/or attend live events hosted by or in connection with GP products.

Purpose of Data Collection

GP processes personal data from customers for certain purposes depending on the product and/or service the customer is accessing. These purposes include to develop and operate the product and/or service requested; enable sales and/or other transactions; enable and adhere to player requests and preferences; serve and measure the effectiveness of technical and customer support; deliver dynamic content and important information about players' accounts, products, purchases, subscriptions; provide software updates; enforce GP's terms and conditions; comply with the law; assess opinions through surveys or questionnaires; analyze data to improve products and/or services; tailor and personalize customers' experiences; and/or to otherwise maintain marketing relationships. GP does not disclose personal information that directly identifies players (such as name, email, or postal address) with independent third parties without the players' consent, unless such sharing is required by law or is reasonably necessary to enforce GP's rights, property or operations, or to protect GP's players or third parties. GP is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, GP may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. GP otherwise discloses personal information to agents acting on its behalf with appropriate contractual safeguards in place.

1.0 Information We Collect

The information we collect depends on what products you use and how you use them. Please see below for more details.

- A. Information you give us directly including:
 - Name, email, phone, mobile operating system
 - Security questions and answer
 - Details in response to surveys about our products
 - Details of issues you experience
 - Billing and payment account details

- B. Information we collect when you use our products provided by Third Party Providers including:
 - a. Mobile device or IP identifiers
 - b. GP products you have downloaded or viewed
 - c. Device event information, including crash reports, whether you encountered an error playing our game or lost internet access during download

Mobile Platforms. If you play or purchase our games on your mobile device we receive information about your experience from the app store (Apple) and play store (Android). This information includes your username and/or device ID and the fact that you had requested access, downloaded, played or made a purchase, for instance, but does not include any sensitive or financial information. Some of our mobile platforms also may send information to us that you authorize them to provide. Our mobile products also may request additional personal information from you, such as push notifications for updates or new releases that may require

your precise location, and we will collect this information only if you give us your explicit consent. Our mobile products may request access to your device's camera to provide augmented reality support. Spatial awareness is required to put virtual objects into space; face tracking is required to place virtual objects onto a player's face. We will only collect this information during game play if you give us your explicit consent. Our mobile products do not store or share this data with third parties.

Other Third Parties. We may receive information from third parties, like YouTube when you use these services in connection with our products. We use information from these companies primarily to help us deliver relevant content to you. We also may use information from third parties like Stripe, for instance, to help us understand your approximate geolocation via your IP address for tax purposes, or to customize certain services to your location, and for fraud and/or abuse prevention purposes.

2. How We Collect Information

We collect some information from you when you provide it to us directly, such as via an online form or when you talk with our customer experience team. We and third parties also use certain technologies described below to collect information to deliver excellent experiences.

Cookies

Cookies are small text files stored on your Internet browser. We use cookies and similar technologies to help us understand things like what web content you view and what features you use on our web site. This information helps us measure the effectiveness of our customer care and otherwise help enhance your user experience. You can disable cookies, limit the types of cookies you allow, or set your browser to alert you when cookies are being sent.

Analytics Technology

We use third party analytic technologies to collect information about how you use our products, your computer or device and the health of our products i.e., information about your content usage, gameplay and usage statistics.

3. How We Use Information

We use your information to operate our business and to enhance and personalize your game experience including:

- Operate, improve, and develop our games and services;
- Provide you with personalized recommendations for GP products and/or features;
- Measure the health of our services;
- Set up and maintain accounts you register for;
- Provide game experiences that you may like;
- Set up loyalty programs;
- Facilitate your gameplay on multiple devices when available;
- Identify, fix, and troubleshoot bugs and service errors;
- Provide software updates;
- Activate or authenticate your games and save game progress and stats;
- Run events and contests;
- Adhere to your preferences to deliver dynamic content; and
- Help keep our services safe and fair, resolve disputes, investigate and help curb fraud and illegal behavior, comply with the law, and to enforce our agreements and policies.

To provide you support, including to:

- Help identify and troubleshoot problems with your account or games;

- Survey your opinions through surveys or questionnaires;
- Communicate with you and respond to your specific requests or questions; and
- Manage and send you confirmations and important information about your purchases, products and events.

To personalize our communications with you, including to:

- Present offers and/or information relating to content you might like;
- Make recommendations to you; and
- Personalize customer service for you and deliver targeted marketing, service updates and promotional offers.

We retain the information we collect for as long as necessary to provide our products and services, and we may retain that information beyond that period if necessary for legal, operational or other legitimate reasons.

4. Information We Share with Third Parties

We do not share personal information that directly identifies you (such as your name, e-mail or postal address) with third parties for their own use without your consent, unless it is either required by law or we determine that disclosure is reasonably necessary to enforce our rights, property or operations or to protect our players or third parties. We may share anonymous or aggregated information, or other data that does not directly identify you, with third parties, for instance to show trends about use of our products.

We employ third parties to collect or process personal information on our behalf for various reasons, such as conducting market surveys, facilitating credit card processing, or sending emails. When our third party agents or service providers collect or receive personal information, we require that they use the data only on our behalf and for purposes consistent with this policy.

We do not knowingly disclose personal information about children under 18 years of age to independent third parties even with consent.

We do not control information sent from your browser to third parties, such as advertising networks and analytics companies that receive information in the normal course of your Internet activity. When third party technologies or social tools are integrated into our products, those third parties may collect information when you use our products. An example is the YouTube "Like" button.

5. Where We Hold Your Information

Personal information we collect may be stored and processed for the purposes set out in this Privacy Policy. By using our products, you acknowledge that your personal information may be transferred to recipients in the United States and other countries that may not offer the same level of privacy protection as the laws in your country of residence or citizenship.

6. How We Protect Your Personal Information

Security of our players' information is a priority at GP, and we take a range of measures to help protect it. Even so, no security measure is 100% perfect. This means we cannot guarantee the security of your information and do not assume any responsibility for the unauthorized use or access to your information under our control.

7. Children

Protecting children's privacy online is extremely important to GP. Our online and mobile products and services are intended for general audiences and do not knowingly collect any personal information from children. When users identify themselves as being children we will: (1) not provide a path for them to input personal information, (2) collect certain information for limited purposes only, (3) block or restrict the child from accessing relevant services, such as chat functionality; and/or (4) obtain consent from parents for the use of their children's personal information, all according to applicable law. When we say children, we mean under the age of 13 or the minimum age in the relevant territory if that age is older than 13. Through our mobile applications your child may be able to receive local in-app notifications, which do not collect any personal information.

Information collected is secured in a manner consistent with this Privacy Policy. If we make material changes to how we use, collect, or share your child's personal information, we will notify parents by email or by in-game notice in order to obtain verifiable parental consent for the new uses of your child's personal information.

We encourage you to talk with your children about communicating with strangers and disclosing personal information online. To facilitate this conversation you and your child should review our Online Safety web page at <https://www.goldenpoppy.net/>

8. Your Choices and Controls

We give you meaningful choices when it comes to important uses and collection of information. For example, you can update your account information and preferences, choose to opt in or out of GP marketing emails and choose whether to share your information with select GP partners. If you would like to opt out at any time after providing your consent, you can review and change most of your preferences through your platform or GP account settings. If you no longer wish to receive marketing emails from GP, you may also click the unsubscribe link included in the footer of every marketing email we send. Where we rely on consent to collect and use information about you, you can withdraw your consent at any time.

You may deactivate your GP Account or delete the personal information associated with your account. If you do so, you will no longer have access to the GP content or services associated with your account. Note that GP may retain information needed to resolve disputes, enforce our user agreements, protect our legal rights, and comply with technical and legal requirements and constraints related to the security, integrity and operation of our products. Otherwise, we will retain your personal information for as long as reasonably necessary to provide you services, create and improve our products, comply with the law, and to run our business.

You may have additional rights under local law, including the right to request erasure or portability of personal information and the right to object to or restrict processing of information. Where applicable, you can exercise these rights by contacting support@goldenpoppy.net/

9. Third Party Services

Our websites and products may contain advertising or third party services (such as the YouTube Like button or links to third-party websites). If you click on those links, including an advertisement, you will leave the GP website and go to the site you selected. If you visit a third party website or use a third party service, you should consult that site's or service's privacy policy.

10. Changes to Our Policy

We may update this policy from time to time, so please review it frequently. We reserve the right to make changes to the policy by posting the new version with a new effective date. Your continued use indicates your agreement to these changes. You can see when this policy was last updated by checking the "last updated" date displayed at the top of this policy.

11. Contact Us

If you would like to access the personal information we hold about you or you have a complaint or question about this policy, please send an email to support@goldenpoppy.net. Before we process any request, we may ask you for certain personal information to verify your identity.

The controller of the personal information processed under this policy is Golden Poppy Inc., 171 Main Street #612, Los Altos, CA 94022.

12. Right to Contact a Data Protection Authority

You may have additional rights under local law, including the right to request erasure or portability of personal information and the right to object to or restrict processing of information. Where applicable, you can exercise these rights by contacting support@goldenpoppy.net. You also have the right to contact your local Data Protection Authority if you prefer.

13. Further Information

Previous Privacy Policy:

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