

**PRIVACY POLICY** 

Effective Date: 1st day of May 2023

PLEASE READ THE FOLLOWING CAREFULLY

THIS STATEMENT PROVIDES GENERAL INFORMATION ABOUT THE PRIVACY STATEMENT OF THIS WEBSITE. IF YOU ARE UNDER 18 YEARS OF AGE, PLEASE BE SURE TO READ THIS PRIVACY STATEMENT WITH YOUR PARENTS OR GUARDIAN AND ASK THEM QUESTIONS ABOUT WHAT YOU DO

**NOT UNDERSTAND.** 

YOUR USE OF THIS SERVICE CONSTITUTES ACCEPTANCE BY YOU OF THIS PRIVACY STATEMENT.

Pocket Gaming (collectively, "Pocket Gaming", "we", "our" and "us".) has created this privacy statement ("Statement") in order to demonstrate its firm commitment to the privacy of the details that you provide to us when using https://www.pocket-gaming.io (collectively, the 'website or site') as the data controller for the purposes of the Micronesia Data Protection Law and the EU General Data Protection Regulation (GDPR).

At Pocket Gaming, we are committed to maintaining the trust and confidence of all visitors to our website. In particular, we want you to know that the website is not in the business of selling, renting or trading email lists with other companies and businesses for marketing purposes.

We believe your business is no one else's. Your Privacy is important to you and to us. So, we'll protect the information you share with us. To protect your privacy, Pocket Gaming follows different principles in accordance with worldwide practices for customer privacy and data protection.

- We won't sell or give away your name, mail address, phone number, email address or any other information

to anyone.

- We 'll use state - of - the - art security measures to protect your information from unauthorized users.

Therefore, to provide you with our services we need (and sometimes are obliged by the law) to collect your personal data. This Privacy Policy (the "Policy") informs Users (a "User", "You") of our policies regarding the processing of Personal Information we receive from Users of the site.

In this Privacy Policy, we've provided detailed information on when and why we collect personal information, how

we use it, the limited conditions under which we may disclose it to others, and how we keep it secure.

We take your privacy seriously and take measures to provide all visitors and users of the website with a safe and

secure environment.

The Personal Information on the Site, is collected, controlled and processed by the following entities:

Pocket Gaming.

VB Center, Suite 2E 14 Pohn Umpomp,

Place Nett, Pohnpei FSM 96941

# **THIS POLICY**

This Policy explains our processing of your personal data and your rights according to MALAYSIAN DATA

PROTECTION LAW and the EU GDPR. Pocket Gaming reserves the right to modify this Statement at any time without notice by posting the changes on this webpage.

#### **DEFINITIONS**

"Personal Data" means any information which relates to a living, identifiable person. It can include names,

addresses, telephone numbers, email addresses etc but it is wider than that and includes any other information

relating to that person or a combination of information which, if put together, means that the person can be

identified.

"Special Category data" means personal date about a person's race, ethnic origin, politics, religion, trade union

membership, genetics, biometrics (where used for ID purposes), health, sex life or sexual orientation.

"Processing" covers all activities relating to the use of personal date by an organization, from its collection through to its storage and disposal and everything in between.

"Data subject" means the person whose personal data is being processed.

"Consent" any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

"Controller" the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

"Data handling" any set of operations or operations performed in an automated or not automated manner on personal data or files, thus collection, capture, systematization, distribution, storage, transformation or alteration, query, introspection, use, communication, forwarding, distribution or by any other means of making data available, coordination or interconnection, restriction, deletion or destruction;

"Data controller" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

"Addressee" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not;

"Third party" means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

"Profiling" any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements and;

"Privacy data breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

#### **INFORMATION WE COLLECT**

As part of the process of using the site and the Services, we require you to give us certain Personal Information which we need to provide our products and Services to you. Without this information we may not be able to fulfill our obligations with you. This information includes:

While providing our services we may collect the "Personal Information" which is defined as any information that

identifies or can be used to identify, contact, or locate the person to whom such information pertains.

Namely, we

may collect:

Identity information: name, facial image, ID number, documents proving your identity and any other information

they may contain;

Residential information: IP address, residence address, documents proving your residency and any other

information they may contain;

Contact information: email address, mailing address, phone number;

Security information: alias, passwords;

Financial and billing information: identifiers in payment systems or other means of payment,

information on your

balance accounts, your trade history, incoming and outgoing wallet addresses;

Cookies: to know more about cookies please acquaint yourself with Our Cookie Policy below

You can correct or remove this information by accessing your account settings.

#### **HOW WE USE INFORMATION**

We, our authorized partners and our representatives store and use Your Personal Information only for providing and improving the website. In particular, we use Users' Personal Information for the following purposes:

To improve our services to you and to provide you with the Services requested: We run the following processes to

fulfil our obligations with you:

- Enabling you to access the Site and create an account
- Enabling you receive updates from Pocket Gaming about your account
- Enabling payments
- Providing support to you when you use the Site

To comply with our legal obligations: In many jurisdictions we are obliged to collect certain information about our

Users to be authorized to act:

a. It is necessary for the performance of a contract to which you are a party, or to take steps prior to entering

into a contract with you, for us to provide you with our products and services. Where we require information from

you for these purposes, we have set out above which information it is necessary for us to process, without which we will be unable to provide you with our services.

b. It is necessary for the purposes of our legitimate interests, such as fraud prevention, child protection,

maintaining quality of service, error detection and cyber security, except where our interests are overridden by the

interests, rights or freedoms of affected individuals (such as you). To determine this, we shall consider a number of factors, such as what you were told at the time you provided your data, what your expectations are about the processing of the data, the nature of the data, and the impact of the processing on you. In order to protect children

from harassment and abuse, we video record and store tutoring sessions.

- c. Where we need to comply with a legal obligation; or in rare circumstances:
- d. Where we need to protect your interests (or someone else's interests); and/or
- e Where it is needed in the public interest or for official purposes

To improve customer service: information provided by Users helps us respond to customer service requests and

support needs more efficiently;

To support our legitimate interests in developing the Site and the Services: These processes include:

- To aid the technical administration of the Site;
- To better understand how the Site is functioning for Users to inform our product development;
- To draw conclusions upon demographic information and;
- Preventing fraud, spam and abusive or inappropriate behavior and;
- Marketing activities to promote our services to registered users. These communications may be personalized to you and your interactions with the Site and can be delivered by email, social media advertising and other digital marketing channels
- Notifying you about upcoming promotions, Referral Discount Codes, services or customer surveys
- Undertaking impact reporting to understand the efficacy of our Services
- Undertaking research to better understand our customers interests
- Analysing your interactions to improve the efficiency of our marketing activity

To personalize User experience: We may use information in a general manner to understand how Our Users as a

group use the services and resources provided on our website;

To send periodic emails: We may use the email address to send information and updates pertaining to your use of

the transaction request;

To resolve disputes and enforce our agreements to the extent necessary and sufficient for protecting your interests

or interests of other Users.

To deliver the products & services: We may use your information to contact you about Pocket Gaming's updates, to provide informational & service-related communications, including important security updates.

Information you share in public areas of the Site may be accessed, used, and collected by others around the world.

We try to provide a secure environment by endeavouring to limit access to our database to legitimate users, but we

cannot ensure that unauthorized parties will not obtain access. We also cannot control how approved users store or transfer the information you give to us, so you should not post sensitive information to the Site.

For Payments. We accept payments via PayPal, Credit/Debit Cards and Cryptocurrencies. When processing

payments, some of your data will be passed to these parties, including information required to process or supports

the payment, such as the purchase total and billing information.

Please see PayPal, and the relevant Credit cards Privacy policy for more details.

When you purchase from us, we will ask you to provide information including your name, billing address, shipping

address, email address, phone number, credit card/payment details and optional account information like username and password.

- We will use this information for purposes, such as, to:
- · Send you information about your account and order
- Respond to your requests, including refunds and complaints
- Process payments and prevent fraud
- Set up your account for our store
- Comply with any legal obligations we have, such as calculating taxes
- Improve our store offerings
- Send you marketing messages, if you choose to receive them
- If you create an account, we will store your name, address, email and phone number, which will be used to

populate the checkout for future orders.

We generally store information about you for as long as we need the information for the purposes for which we

collect and use it, and we are not legally required to continue to keep it. For example, we will store order information for tax and accounting purposes. This includes your name, email address and billing and shipping addresses.

We will also store comments or reviews if you choose to leave them.

# LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR)

If you are from the European Economic Area (EEA), Pocket Gaming legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Pocket Gaming may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so
- The processing is in our legitimate interests and it is not overridden by your rights
- For payment processing purposes
- To comply with the GDPR law

## **HOW LONG WE RETAIN YOUR DATA**

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can

recognize and

approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website, we also store the personal information they provide in their user profile. All

users can see, edit, or delete their personal information at any time (except they cannot change their username).

Website administrators can also see and edit that information.

We will retain your information for as long as your account is active, your information is needed to provide you

services, or as required to fulfill our legal obligations.

By contacting us at privacy@exgame.io at any time to obtain the confirmation whether or not the personal data concerning you is being processed.

We may retain records where necessary to fulfil our regulatory or statutory duties.

#### WHAT ARE YOUR RIGHTS TO YOUR DATA?

All Your Personal Information we collect will always belong to you. However, we are a collector and a processor of Your Personal Information. That implies on us obligations to respect your rights to Personal Information and facilitate the exercise of your rights thereto. In order to use any of your rights at any time please contact us and we will facilitate the exercise of your rights free of charge. We will inform you on the actions taken by us under your request as soon as practically possible, but in any case, not later than in 30 (thirty) calendar days.

In accordance with effective regulations you have a significant number of rights related to your Personal Information, such as e.g.:

**Right to access.** You may obtain from us the confirmation as to whether or not personal data concerning you is being processed and get an access to such personal data. You are entitled to view, amend, or delete the personal

information that we hold. Email your request to our data protection office at privacy@exgame.io and we will work

with you to remove any of your personal data we may have.

**Right to rectify** your inaccurate Personal Information and to have incomplete personal data completed, including by means of providing a supplementary statement

**Right to erase** your Personal Information. Please note that a request to erase your Personal Information will also

terminate your account on the Site. We will automatically and without undue delay erase your Personal Information when it is no longer necessary in relation to the purposes for which it was collected or otherwise processed; To erase your account, please submit a request to us from our contact form.

Right to restrict processing of your Personal Information;

**Right to data portability.** You may obtain from us the personal data concerning you and which you have provided

to us and transmit it to another Personal Information Controller;

Right to object to processing of Your Personal Information,

Right to withdraw your consent to the usage of your Personal Information at any time

Right to lodge a complaint. We take privacy concerns seriously. If you believe that we have not complied with this Privacy Policy with respect to your Personal Information, you may contact our respective Data Protection Office. We will investigate your complaint promptly and will reply you within 30 (thirty) calendar days.

#### **COOKIES**

The site may set cookies on your computer. Cookies are used to provide our system with the basic information to

provide the services you are requesting. Cookies can be cleared at any time from your internet browser settings.

If you leave a comment on our site you may opt-in to save your name, email address and website in cookies. These

are for your convenience so that you do not have to fill in your details again when you leave another comment.

These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices.

Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

### **ANALYTICS**

When someone visits the website, we use analytics to collect standard internet log information and details of visitor behaviour patterns. We do this to track things such as the number of visitors to the various parts of the site and

interactions with the site. This information is processed in a way which does not identify anyone. We do not make

and do not allow Google to make, any attempt to find out the identities of visitors to our website.

#### **SECURING PRIVACY**

To transfer data between our websites, our applications and backends, communication is encrypted using the SSL (Secure Socket Layer) encryption. We protect the systems and processing by a series of technical and organizational measures. These include data encryption, pseudonymization and anonymization, logical and physical access restriction and control, firewalls and recovery systems, and integrity testing. Our employees are regularly trained in the sensitive handling of personal data and are obliged to observe data secrecy in accordance with legal requirements.

#### **MINORS**

We do not knowingly gather or otherwise process personal data of minors under the age of 16. If we notice that one of our users/visitors is a minor we'll immediately take steps to remove their information. If you believe we have processed or still hold information on minors, please send us an email at privacy@exgame.io and we'll remove it A.S.A.P

#### **CHANGES IN THE PRIVACY STATEMENT**

The effective date at the bottom of this page indicates when this Privacy Statement was last revised. We will notify you before any material change takes effect so that you have time to review the changes. Any change is effective when we post the revised Privacy Statement. Your use of the Services following these changes means that you accept the revised Privacy Statement.