

PRIVACY AND DATA POLICY
ISSUED BY DIGIMENTAL STUDIO LTD.

Last updated: 18/1/2022

1. INTRODUCTION AND GENERAL TERMS

These terms apply to the use of the Digimental Studio Ltd. ("**Digimental**" / "**we**" / "**us**") services and as further detailed below. Our registered office is at Digimental Studio, 3rd Floor 86-90 Paul Street London EC2A 4NE. We are a company registered in the United Kingdom, with company number 08267892 and VAT number GB 207220357.

This privacy and data policy ("**Privacy Policy**") applies and has effect in respect of our website and related content and our related services, activities and features (the "**Services**", each a "**Service**").

If you have any questions or comments about this Privacy Policy, or if you want to exercise your right to object to the processing of your personal data, you can contact us at contact@hapebeast.com

We are committed to protecting and respecting your privacy. This Privacy Policy explains the basis on which personal data we collect from you will be processed by us or on our behalf. Where we decide the purpose and means for which personal data you supply through this Service is processed, we are the "controller" for the purposes of the General Data Protection Regulation 2016/679 ("**EU GDPR**"), the GDPR as it forms part of the laws of England, Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 ("**UK GDPR**" and together with the EU GDPR, the "**GDPR**") and the UK Data Protection Act 2018 ("**UKDPA**"). We will comply with all applicable data protection laws, including the GDPR, UKDPA and the California Consumer Privacy Act 2018 ("**CCPA**").

Please read this Privacy Policy carefully as it contains important information about the following:

- What information we may collect about you;
- How we will use information we collect about you;
- Whether we will disclose your details to anyone else; and
- Your choices and rights regarding the personal data we hold about you.

This Privacy Policy should be read in conjunction with our Terms of Use as may be applicable in respect of the Service. Where Terms of Use are applicable, they will be made available via the Service.

The Service may contain hyperlinks to services owned and operated by third parties. These third party services may have their own privacy policies and we recommend that you review them. They will govern the use of personal data that you submit or which is collected by cookies and other tracking technologies whilst using these services. We do not accept any responsibility or liability for the privacy practices of such third party services and your use of these is at your own risk. For information about our cookie practices, please see paragraph 4 and our Cookie Policy.

We may make changes to this Privacy Policy in the future, which will be made available here. You should check here from time to time to ensure you are aware of any changes. Where appropriate, we may notify you of changes by email or through the Service.

2. INFORMATION WE MAY COLLECT ABOUT YOU

We may collect and process the following personal data from you when you use our Services (for example, our website) (the "**Services Information**"):

**Information that may be provided by you when creating a Service account
("Submitted Information")**

- Your Ethereum (ETH) Wallet Address; and
- Technical Information relating to the wallet interface.

**Information that may be provided by you when you contact us for support
("Support Information")**

- Your full name;
- Your email address; and
- Your telephone number (if you choose to provide this).

**Information about your activities
("Technical and Usage Data")**

We may collect technical and usage information about your use of our Service through tracking technologies and analytics collection in our Services. Personal data we may collect in this way includes:

- IP address;
- Geolocation information (i.e. longitude and latitude);
- Service user ID (a unique ID that we generate which identifies Service users);
- Device information (such as your device ID, operating system and version, device brand, device family, model and manufacturer);
- Mobile network carrier (if applicable);
- Country, market and region information;
- Language;
- Error and crash data (identifying a Service crash event);
- Advertising identifier numbers (such as IDFA (iOS devices) and ADID (Android devices)); and
- Events related to your Service usage, such as achievement of a milestone and the occurrence of other events during your Service usage (such as virtual currency balance, session durations and your choices and progression for and in different parts of the Service).

**Analytics and profile information
("Analytics and Behavioural Data")**

We may collect, or create by analysis of other Services Information, analytical information in connection with your Service usage including without limitation:

- When you first launched / began using the Service;
- Whether you use our free Services, or whether you use paid-for Services and how much you spend;
- Whether you discovered our Service organically, or whether you discovered the Service through an advertising campaign;
- What your Service usage habits are (for example, whether you use the Service in a particular way or only use a part of the Service and how often you use it); and
- We may associate your account with a user segment group which we think have

shared characteristics, such as perceived interest in a particular type of gameplay or particular parts of our Services.

3. WHY WE COLLECT INFORMATION ABOUT YOU

To provide the Service to you to attribute your ETH wallet to the correct account

We will process Submitted Information about you to provide our Service to you under the Terms of Use agreed between us.

The processing of information in this way is necessary, for us attribute your ETH wallet address to the correct account and to ensure the Service delivers the features promised and functions properly. For these purposes, we rely upon the legal basis of performance of a contract (being performance of the Terms of Use agreed between us).

To prevent money-laundering and other illegal activity

We process your Submitted Information for the purpose of ensuring that the funds held in the ETH wallet do not present a risk of money-laundering. We conduct verification checks through the transaction history associated with the ETH address, as publicly viewable on the ethereum blockchain. We do this for our legitimate interests of ensuring that your use of our Services is lawful and in compliance with our agreement (being the Terms of Use agreed between us), to prevent disruption to our Service, to enforce our rights, to protect any individual or otherwise to ensure our compliance with our legal obligations.

To respond to your enquiries and requests for support

We may process certain of your Services Information (including your Support Information and certain other Services Information which might be relevant) so that we are able to properly respond to your enquiries and support requests, in accordance with the Terms of Use agreed between us.

For the above purposes, we rely upon the legal basis of performance of a contract (being our Terms of Use with you for the Service).

4. COOKIES

A cookie is a text file placed onto your device when you access our Services. We use cookies and other similar or equivalent online tracking devices such as web beacons, standard development kits (for mobile) and flash object storage to deliver, improve and monitor our websites, applications and games, including in the following ways:

Authentication To log you into our Service and keep you logged in.

Service delivery To deliver our Services and third-party services which may be embedded into our own Services (such as social media network connectivity).

Preferences To remember information about your preferences such as your preferred language and configuration.

Analytics	To help us understand how you use our Services, such as how often, so we can improve Services and deliver a better experience and also for us to carry out research and statistical analysis to help us develop new products and services.
Advertising	To help us deliver in-Service advertising to you (which may be served by, or facilitated by, third parties). These are also used to help us and our partners measure the effectiveness of advertising and whether it was actually served to you.

The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your advertiser ID, IP address, your browser and/or other internet log information, this will not usually identify you personally.

Please note that if you choose to disable cookies, or similar technologies, on your device you may be unable to make full use of our Services or may not have the same quality of experience.

We may work with third parties who may also set cookies and equivalent technologies on our Services, for example: Google Analytics, Google AdWords, YouTube, Facebook, Twitter and LinkedIn, which we use to display video content, enable social networking functionality and sharing, and to monitor how visitors use our Services.

For more information, please refer to our cookie policy [here](#).

5. DATA SHARING

We will share your information with third parties only in the ways that are described in this Privacy Policy

Group members, personnel, suppliers or subcontractors from time to time: We keep your information confidential but may disclose it to any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006), our personnel, our advertising and analytics service providers and our other suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Privacy Policy. However, this is on the basis that they do not make independent use of the information and have agreed to safeguard it.

Payment providers: Where you instigate a payment with us, your payment related information will be processed by our payment providers.

Merger or acquisition: If we are involved in a merger, acquisition, transfer or sale of all or a portion of our assets, you will be notified via email, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

Required by law: We may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

Third party suppliers: we will share your Submitted Information with third-party suppliers based in the UK, for the purposes of running checks to seek to prevent money-laundering and other illegal activities.

6. AUTOMATED DECISION MAKING

We may use automated decision-making methods which do not involve human involvement to process your information and shall do so only in the ways that are described in this Privacy Policy.

7. MARKETING INFORMATION

In the event we wish to process your personal data for marketing purposes and where not otherwise detailed in this Privacy Policy, we will obtain your prior consent to process your personal data before doing that where we are required to do so by law. In each relevant instance, if you prefer that we do not process your personal data in that way, you can let us know by simply using the relevant consent options, buttons or similar choices we provide to you at the relevant time. You can also withdraw your consent (or, if applicable, 'opt-out') at any time by letting us know by email to contact@hapebeast.com.

8. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

You have the following rights over the way we process personal data relating to you, as set out in the table below. We aim to comply with requests without undue delay and within one month at the latest.

Ask for a copy of personal data we are processing about you and have inaccuracies corrected or request erasure

You have the right to request a copy of the personal data we hold about you and to have any inaccuracies corrected. You can request a copy by emailing contact@hapebeast.com.

We will use reasonable efforts, to the extent required by law, to comply with requests to supply, correct or delete personal data held about you on our files (and request that any third parties to whom it has been disclosed to do the same).

Object to us processing personal data about you

You can ask us to restrict, stop processing or delete your personal data if:

- you consented to our processing the personal data and have withdrawn that consent;
- we no longer need to process that personal data for the reason it was collected;
- we are processing that personal data because it is in the public interest or it is in order to pursue our legitimate interest or the legitimate interest of a third party, you don't agree with that processing and there is no overriding legitimate interest for us to continue processing it;
- the personal data was unlawfully processed;
- you need the personal data to be deleted in order to comply with legal obligations; and/or
- the personal data is processed in relation to the offer of a service to a child.

You can request account deletion by sending an email to contact@hapebeast.com.

Obtain a machine-readable copy of your personal data, which you can use with another service provider

- If (i) we are processing personal data in order to perform our obligations to you or because you consented and (ii) that processing is carried out by automated means, we will help you to move, copy or transfer your personal data to other IT systems.
- If you request, we will supply you with the relevant personal data in CSV format. Where it is technically feasible, you can ask us to send this information directly to another IT system provider if you prefer.

Make a complaint to a Supervisory Authority

- If you are unhappy with the way we are processing your personal data, please let us know by contacting us via the support services.
- If you do not agree with the way we have processed your data or responded to your concerns, an alternative is to submit a complaint to a Data Protection Supervisory Authority. Contact information for the Information Commissioner's Office, the UK's independent authority setup to uphold information rights, is available here: <https://ico.org.uk/>.

9. DATA RETENTION

In accordance with data protection laws and good commercial practice, we do not retain data in a form that permits identification of the person(s) to whom it relates for any longer than is necessary.

10. CHILDREN

We take the protection of the personal data of children very seriously. In the event that we learn that we have collected personal data from a child other than as intended in accordance with this Privacy Policy, we will delete that information as quickly as possible.

11. SECURITY

We will take commercially reasonable, appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of our Service, taking into account the likelihood and severity those risks might pose to your rights and freedoms.

In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal data transmitted, stored or otherwise processed by us.

Please be aware that, while we make the security of our Service and your personal data a high priority, no security system can prevent all security breaches.

Unfortunately, the transmission of information via the internet is not completely secure. We do our best to protect your personal data, but we cannot always guarantee the complete security of your data transmitted through our Service; subject to applicable law, the sharing of your personal data with us and any transmission of the data is at your own risk.

12. INTERNATIONAL DATA TRANSFERS

The data we collect from you may be transferred to, and stored at, a destination outside the UK and/or European Economic Area ("EEA"). It may also be processed by staff that operate outside the UK and/or EEA and work for us or our suppliers. These staff may be engaged in the fulfilment of your orders, the processing of your payment details, the maintenance of the Service, and the provision of support services. We will take all steps

reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Where your personal data is transferred outside of the UK and/or EEA to a territory not subject to an adequacy decision by the UK Government and/or European Commission, we have agreements in place with the relevant parties which include either (i) standard data protection clauses adopted by the relevant data protection regulator (including in the UK) and approved by the European Commission or (ii) standard data protection clauses adopted by the European Commission and/or the UK Government, to ensure that appropriate safeguards are used to protect your personal data, together with other appropriate safeguards to protect your personal data. If you require more information about these safeguards, you can contact us at contact@hapebeast.com.

13. CALIFORNIA RESIDENTS & CCPA

If you are a California (USA) resident, as defined in Section 17014 of Title 18 of the California Code of Regulations, you have certain rights in respect of the personal information we hold about you.

If you have questions or concerns about our privacy policies and practices, please contact us using the details set out at the end of this Privacy Policy.

Please see above for:

- the date on which this Privacy Policy was last updated (at the top of this Privacy Policy);
- categories of personal information collected about you in the last 12 months (see paragraph 2);
- categories of sources from which the personal information was collected (see paragraphs 2 and 3);
- purposes for collecting personal information (see paragraph 3);
- categories of third parties with whom we share personal information (see paragraph 5);
- categories of personal information we have disclosed within the last 12 months (see paragraphs 2 and 5); and
- specific pieces of personal information we hold on you (see paragraph 2).

For the purposes of the CCPA, please be aware that (per the details above) we have disclosed for business purposes, but we have not sold, your personal information to third parties within the last 12 months.

You can designate an authorised agent to make a request under the CCPA on your behalf. The authorized agent must submit proof that they have been authorized by you to act on your behalf and provide proof of their own identity.

Where the CCPA applies, you have the right to:

- request access to your personal information;
- request deletion of your personal information; and
- not be discriminated against for exercising any of your rights under the California Consumer Privacy Act of 2018 (CCPA).

To make a verifiable consumer request, please contact us by email at contact@hapebeast.com.

We may verify your request by asking for proof of identity, such as your device ID and/or user ID.

14. CONTACT INFORMATION

All questions, comments or enquiries should be directed to us at contact@hapebeast.com. We will endeavor to respond to any query or questions within a reasonable amount of time.