



GAMEWORX.IO

Privacy Policy

Updated: 01 July 2020

This Privacy Policy ("Policy") explains what you can expect from us and what we need from you in relation to your personal data. Kindly read this Policy carefully as this is legally binding when you use GAMEWORX Services, without regard to how you access or use them, including through mobile devices.

We reserve the right to revise, amend or update this Policy at any time by posting the updated version on this site including its effective date. Further, we shall announce material changes to this Policy by email.

Definitions

The following terms used in this Policy are defined as follows:

"Digital Asset" is a digital representation of value (also referred to as "cryptocurrency," "virtual currency," "digital currency," "crypto token," "cryptoasset," or "digital commodity"), such as bitcoin, ETH, or GWX, which is based on the cryptographic protocol of a computer network that may be (i) centralized or decentralized, (ii) closed or open-source, and (iii) used as a medium of exchange and/or store of value.

"GAMEWORX Account" means a user-accessible account offered via the GAMEWORX platform to enable access to various gaming services.

"GAMEWORX," "GAMEWORX," "We," and "Us" refers to GAMEWORX and its wholly owned subsidiaries (also referred to collectively as "we," or "us").

"Personal Information" or "Personal Data" refers to any information relating to you, as an identified or identifiable natural person, including your name, an identification number, location data, or an online identifier or to one or more factors specific to the physical, economic, cultural or social identity of you as a natural person.

Data controller

GAMEWORX provides various token-based gaming and entertainment services. GAMEWORX is your data controller, and is responsible for the collection, use, disclosure,



retention and protection of your personal information in accordance with our global privacy standards, this Privacy Policy, as well as any relevant local privacy laws and regulations.

GAMEWORX uses encryption to protect your information and store decryption keys in separate systems. Data controllers process and retain your personal information on our servers where our data centers are located.

Where we have a legal obligation to do so, we have appointed Data Protection Officers (DPOs) to be responsible for privacy program for the respective data controllers. If you have any questions about how we protect or use your Personal Information, you can contact our DPOs by email at compliance@gameworx.io.

Protecting personal information

We are serious about guarding the privacy of your Personal Information and work hard to protect GAMEWORX and you from unauthorized access to, or unauthorized alteration, disclosure, or destruction of Personal Information we collect and store. Measures we take include encryption with SSL; the availability of two-factor authentication (2FA) at your discretion, and periodic review of our Personal Information collection, storage, and processing practices.

We restrict access to your Personal Information only to GAMEWORX employees, affiliates, and subcontractors who have a legitimate business need for accessing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information. We maintain physical, electronic, and procedural safeguards that comply with the relevant laws and regulations to protect your Personal Information from unauthorized access.

Unfortunately, despite best practices and technical safeguards, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data during transmission, and any acts of transmission are at your own risk.

Information we may collect about you

When using the GAMEWORX Services, we may collect and use the following data about you as part of our Know-Your-Client (KYC) procedure:

1. Full legal name;



2. Residential address, including country of residence;
3. Email address;
4. Mobile phone number;
5. Date of birth;
6. Proof of identity (e.g., driver's license, passport, or government-issued identity card);
7. Identification number issued by a government;
8. Other Personal Information or commercial and/or identification information – Whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under various Anti-Money Laundering (AML) obligations, such as Financial Action Task Force Recommendations as, the European Union's 4th AML Directive and the U.S. Bank Secrecy Act (BSA).

Information we collect about you automatically

Account Information. Information that is generated by your GAMEWORX account activity including, but not limited to, instructions regarding funding and disbursement, orders, trades, and account balances;

Log Information. Information that is generated by your use of GAMEWORX Services that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to pages that you visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;

Location Information. Information that is automatically collected via analytics systems providers to determine your location, including your IP address and/or domain name and any external page that referred you to us, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform;

Correspondence. Information that you provide to us in written or oral correspondence, including opening a GAMEWORX account, and with respect to ongoing customer support; and logging of phone numbers used to contact us.

Information we receive about you from other sources.



We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties and may receive information about you from them. For example:

- a. The banks you use to transfer money to us will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;
- b. Business partners may provide us with your name and address, as well as financial information;
- c. Advertising networks, analytics providers and search information providers may provide us with anonymized or de-identified information about you, such as confirming how you found our website;
- d. Credit reference agencies do not provide us with any personal information about you, but may be used to corroborate the information you have provided us.

General Provisions

Personal Information you provide during the registration process may be retained, even if your registration is left incomplete or abandoned.

In providing the personal data of any individual (other than yourself) to us during your use of the GAMEWORX Services, you promise that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data for the purposes set out in this Privacy Policy.

Uses of Personal Data

Below we set forth in a table format, a description of all the ways we use your personal data as stated above, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at compliance@gameworx.io if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.



What we use your personal information for	Type of information	Our reasons	Our legitimate interests
<p>To provide the GAMEWORX Services:</p> <ul style="list-style-type: none"> To carry out our contractual obligations relating to you; including the operation of your GAMEWORX account and the provision of our support services. 	Submitted Information	<p>Fulfilling contracts</p> <p>Our legitimate interests</p> <p>Our legal obligation</p>	<p>Being efficient about how we fulfill our legal and contractual duties.</p> <p>Our commercial interest in providing you with a good service.</p> <p>Complying with regulations that apply to us.</p>
<ul style="list-style-type: none"> To comply with legal and/or regulatory requirements; including, but not limited to anti-money laundering requirements. 	Submitted Information Device Information Third Party Information	<p>Our legitimate interests</p> <p>Our legal obligation</p>	Complying with regulations that apply to us.
<p>To combat against fraud:</p> <ul style="list-style-type: none"> To verify your identity to protect against fraud, comply with financial crime laws, and to confirm your eligibility to use our products and services; and To help us make better decisions about how we manage your GAMEWORX Account. 	Submitted Information Device Information Third Party Information	<p>Fulfilling contracts</p> <p>Our legitimate interests</p> <p>Our legal obligation</p>	As part of GAMEWORX's efforts to keep our Services safe and secure.
To help GAMEWORX to market and provide services that interest you:	Submitted Information	Our legitimate interests	Developing products and services for existing customers and any



<ul style="list-style-type: none"> ▪ To provide you with information about new functionality, features, or services we offer related to, or similar to, GAMEWORX Services; ▪ To provide you with information about new functionality, features or services we feel may interest you; ▪ To make suggestions and recommendations to you and other users of GAMEWORX; ▪ To process applications for GAMEWORX services, including making decisions about whether to agree to approve any applications. 	<p>Device Information</p> <p>Third Party Information</p>	<p>applicable fees in relation to them.</p> <p>Defining types of customers for new products or services.</p> <p>Being efficient about how we fulfil our legal and contractual duties.</p> <p>Seeking your consent when we need it to contact you.</p>
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To keep the GAMEWORX Services available and properly functioning;

To administer internal operations necessary to GAMEWORX Services, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;

To notify you about changes to our service, changes to our terms and policies, and as part of our efforts to keep the GAMEWORX Services, safe and secure.

Submitted Information

Device Information

Fulfilling contracts

Our legitimate interests

Our legal obligation

Being efficient about how we fulfill our legal and contractual duties.

Complying with regulations that apply to us.

Disclosure of your personal information

We may share your personal information with selected third parties including:

- a. Affiliates, operational and business partners, suppliers and subcontractors for the performance and execution of any contract we enter into with them or you;
- b. Analytics and search engine providers that assist us in the improvement and optimization of our site; and
- c. Our group entities or subsidiaries.

We may disclose your personal information to third parties when:



- a. We sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets in order to continue the services for which you have contracted;
- b. We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the GAMEWORX Terms of Service and other applicable agreements; or to protect the rights, property, or safety of GAMEWORX, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- c. We conduct or cooperate in investigations of fraud or other illegal activity whenever we believe it is reasonable and appropriate to do so;
- d. We seek to prevent and detect fraud and crime;
- e. We receive a lawful subpoena, warrant, court order, or as otherwise required by law;
- f. We seek to protect GAMEWORX from financial and insurance risks;
- g. We seek to recover debt or in relation to your insolvency; and

We seek information necessary to maintain or develop customer relationships, services and systems.

We do not maintain a published list of all of the third parties with whom we share your personal information with, as this would be heavily dependent on your specific use of our Services. However, if you would like further information about who we have shared your personal information with, or to be provided with a list specific to you, you can request this by writing to support@gameworx.io.

Where we store your personal data

Our operations are supported by a network of computers, servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and process your personal data in the European Union, Japan, Singapore, the United States of America, and elsewhere in the world.

Profiling and automated decision making

We may in some instances use your personal data, such as your country of residence and transactions and player history, to better address your needs. For example, if you frequently play a specific game, we may use this information to inform you of new product updates or features that may be useful for you. When we do this, we take all



necessary measures to ensure that your privacy and security are protected, and we only use anonymous or de-identified data.

We may use Automated Decision Making (ADM) to improve your experience or help fight financial crime. For example, so that we can provide you with a fast and efficient service, we may use ADM to verify your identity documents, or to confirm the accuracy of the information you have provided to us. None of our ADM processes have legal effects on you. In any event, no decision with legal effects on you shall be made solely on the basis of automated processing without your informed and express consent.

Privacy when using digital assets and blockchains

Funding your account or GWX Wallet may be recorded on a public blockchain, such as EOSIO. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because public blockchains are decentralized or third-party networks that are not controlled or operated by GAMEWORX or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

Data Retention

As GAMEWORX is subject to various legal, compliance and reporting obligations, we are required by law to store some of your personal and transactional data beyond the closure of your account with us. Your data is only accessed internally on a need-to-know basis, and it will only be accessed or processed if absolutely necessary. We will delete data that is no longer required by any relevant law or jurisdiction in which we operate.

Cookies

When you use GAMEWORX Services, we observe standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit GAMEWORX Services. We use Cookies to (i) help us recognize you as a customer, collect information about your use of GAMEWORX Services to better customize our services and content for you, and to collect information about your computer or other access devices as part to ensure our compliance with our Anti-Money Laundering and Combating of Terrorist Financing



obligations and (ii) ensure that your account security has not been compromised by detecting irregular or suspicious account activities.

We use both session and persistent Cookies. Session Cookies expire when you log out of your account or close your browser. Persistent Cookies remain on your computer or mobile device until deleted or otherwise expire. Most web browsers are set to accept Cookies by default. You are free to decline most of our session Cookies if your browser or browser add-on permits but choosing to remove or disable our Cookies may interfere with your use and functionality of the GAMEWORX Services.

Email Communications

Subject to applicable laws and regulations, we may from time to time send communications promoting services, products, facilities, or activities to you using information collected from you. When you create a GAMEWORX Account you are agreeing to opt-in to all communications from us. We will provide you with an opportunity to opt-out of newsletter communications. We will never provide your Personal Information to third parties for direct marketing or other unrelated purposes without your written consent. Unfortunately, we are unable to allow you to opt-out of the emails we send you for certain legal or administrative purposes.

Cookies

You may decline session cookies if your browser or browser add-on permits but choosing to remove or disable our cookies may interfere with your use and functionality of the GAMEWORX Services.

Right of Rectification

You have the right to correct any personal information We hold on you that is inaccurate, incorrect, or out of date.

Right of Erasure

You have the right to ask us to delete your data when it is no longer necessary, or no longer subject to a legal obligation to which GAMEWORX is subject to.

Portability

You may have the right to transfer certain personal data between data controllers, for example, to move your account details from one online platform to another.



Location Information

You may be able to stop the collection of location information through your device settings or by following the standard uninstall process to remove our applications from your device; however, because such data is used by us to meet legal requirements, as well as for ongoing fraud and risk monitoring purposes, choosing to remove or disable location services may interfere with your use and functionality of the GAMEWORX Services.

Access to information

Subject to applicable laws, you may have the right to access information we hold about you. Your right of access can be exercised in accordance with the relevant data protection legislation. For further information, please contact support@gameworx.io.

Changes to this Privacy Policy

Any changes we may make to our Privacy Policy will be posted on GAMEWORX' Site and applications and, where appropriate, notified to you by email. Kindly monitor periodically the Site to see any updates or changes to our Privacy Policy.

Contact

We welcome any questions, comments and requests regarding this Privacy Policy and should be addressed to support@gameworx.io.

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