

# Privacy Policy

Effective date: 01/01/2021

## 1. Introduction

Welcome! Gold inc (the “Game”) and <https://www.sapphirerc.com/> (the “Website”) (collectively hereafter the “Services”) are provided to you by Sapphire Studios LLC, (hereafter referred to as “Sapphire Studios”, “we” or “us” as the context may require).

The mechanism behind the Game is to let Sapphire Studios take you on a journey as you become a modern day gold miner while earning cryptocurrency.

Your privacy is of the utmost importance to us. We will never share your personal information with any third party, but because we may gather certain types of information about our users, we feel you should fully understand our policy and the terms and conditions surrounding the capture and use of that information. This Privacy Policy discloses what information we gather and how we use it.

By personal data, we refer to data that relates to you as an identified or identifiable person. The term "Personal Data" may include your name, your address, your telephone number, your email 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.

We respect your right to privacy and will only process Personal Data and other information you provide to us or we collect about you in accordance with applicable privacy and personal data protection laws.

Please read this Policy carefully. If you wish to use our Services, you will need to accept our End User License Agreement, Terms of Use and this Privacy Policy. By accepting this Privacy Policy, you signify your consent to the collection and other processing of your personal data in accordance with and for the purposes set out in this Policy Policy.

## 2. Who we are

Sapphire Studios is a controller in the sense of the General Data Protection Regulation (GDPR), other data protection or data privacy laws and other guidelines with a data protection nature regarding its Services.

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.

### **3. Legal basis for processing personal information**

Our legal basis for collecting and using your personal information as described above will depend on the specific context in which we collect it. Sapphire Studios will always make sure that we have a legal basis to collect and use your personal information, and that legal basis may change depending on the type of personal information and the context in which we collect it. Sapphire Studios relies on our Terms of Use, End User License Agreement and legitimate interests for collecting and using your personal information.

Our main reason for collecting and using your personal information is so we could perform the obligations set out in our Terms of Use and End User License Agreement (i.e. to ensure you have full access to our Services). We may process your Personal Data for the following purposes:

- to be able to enter in a contract with you;
- to process payments for the Service performed;
- to comply with the law.

If we ask you to provide certain personal information to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not. Before processing your personal data, we ask for your permission to do so.

### **4. Personal data collected directly**

For registration and communication purposes, we collect your email address. As a general rule, Sapphire Studios and/or the Game do not collect other types of personal data about you when you visit/use our Website or the Game, unless you choose to provide such information to us. Submitting to use other types of your personal data is voluntary. By doing so, you are giving Sapphire Studios your permission to use the information for the stated purpose. However, not providing certain information may result in Sapphire Studios inability to provide you with the Services.

If you request a conversion of in-game gold into GoldBar, we may ask you to provide to us a following personal data:

- “Identifying information” (i.e. name, date and place of birth, gender, age);
- “Contact information” (i.e. mobile phone numbers, email addresses);
- Wallet information for GoldBar transaction.

You have the right not to provide the foregoing information. However, not providing certain information may result in the inability to provide you with the Services or to complete the transaction of converting in-game gold into GoldBar.

## **5. Information we collect indirectly**

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

*Tracking Data.* 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. We collect and possess the following Tracking Data

- Information relating to your use of our Services including, but not limited to, information about when and how you use the Services and data traffic and recordings of the parts of the screen you click on while using our Services (so called "clickstreams").
- Log files and statistics in relation to actions taken on our Sites and in the Game.
- Technical information about any device and operational system that you use when you visit the Sites or use a Games, including your Media Access Control (MAC), Unique Device Identifier (UDID) or equivalent device identifier, your IP address and the browser you are using.

For the collection and processing of Tracking Data on the Sites we use cookies.

*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. If

you have refused to use cookies, we only store one permanent 'compliance' cookie which tells us that you want to opt out of use of any other cookies. However, please note that if you do this, you may not be able to access the full functionality of our Website. For more information about cookies, we recommend that you visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

*Game-Related Information.* In order to provide you with efficient services, we need to collect, store and use various information about your activity in our Game. "Game-Related Information" includes your in-game identifier, as well as what is usually referred to as "game statistics". By game statistics we mean information about your Games preferences, progress in the Game, 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.

*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. 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.

*Third Party SDK.* Additionally, we may implement third-party advertising companies' SDKs in our Games to serve ads on our behalf in our Game. Third-party targeted advertising SDKs collect information about your activity across multiple websites and online services and applications in order to provide you with relevant advertisements in the Game. These companies may use SDKs to measure advertising effectiveness and allow more effective targeted advertising. Ad networks may share this information with the advertisers using their network. The information collected using these third-party SDKs does not disclose your identity, but will be used to identify you across multiple web sites and applications.

## **6. How we use your information**

We need to process your Personal Data in order to fulfill the contract with you. We will use your Personal Data, unless otherwise prohibited by law, for the following purposes:

- to provide you with the Services;
- to communicate with you about your account or transactions with us;

- to provide support including, but not limited to, product updates, product patches and fixes, and other similar communications;
- to arrange your receipt of in-game rewards to which you may be entitled as a result of playing our Game.

Sapphire Studios and/or the Game does not sell, rent or lease your Personal Data to third parties.

Sapphire Studios and/or the Game may share data between/with Third Parties to help perform statistical analysis, send you email and/or provide customer support. All such Third Parties are prohibited from using your personal information except to provide the services to Sapphire Studios and/or the Game and they are required to maintain the confidentiality of your information.

Sapphire Studios and/or the Game may keep track of the Game and users visit within the Game, in order to determine the popularity of the Game. The data is used to deliver customized content and advertising within the Game to players whose behavior indicates they are interested in a particular subject area.

We use the information required for our detection, investigation and prevention of cheating in the Game and EULA violations only for the purposes of 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 defence of legal claims.

## **7. How we share your information**

The personal information you provide to us whether voluntarily or automatically as the foregoing paragraphs describes, may be used and disclosed without limitations, to our employees, staffs, insurers, professionals, agents, suppliers, subcontractors and/or other parties we deem fit for the purpose and in the manner reasonably necessary for the carrying out of the Game and for purposes set out in this Privacy Policy.

Personal information may be disclosed to the third parties. When personal information is disclosed all terms and conditions contained herein shall have effect for the purpose of protecting your personal information.

Compliance with legal requirements for the enforcement of law, regulations, court orders, subpoena, warrant during the course of a legal proceedings or otherwise may render our need to disclose personal information. Personal information may also be used to protect and safeguard the copyright, trademarks, legal rights, intellectual property rights or safety of Sapphire Studios and/or the Game.

## **8. Security of your personal information**

Sapphire Studios and/or the Game secure your personal information from unauthorized access, use or disclosure.

Sapphire Studios and/or the Game implements the use of protection of Sapphire Studios's server by firewalls, SSL connections and encryption of sensitive data.

## **9. Children under 13 (16 in EU)**

Sapphire Studios and/or the Game do not knowingly collect personal information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this Game. If you are a parent or guardian and you are aware that your child has provided us with personal information without your permission, you should contact us so we could take steps to delete such information.

## **10. Data retention**

Sapphire Studios will store your personal information for no longer than is necessary to fulfil the purposes described in this Privacy Policy (and the retention period depends on the type of personal information Sapphire Studios collects, regulatory requirements, and how Sapphire Studios use the personal information). The retention period of Sapphire Studios is based on criteria that include legally mandated retention periods, pending or potential litigation, intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving.

Sapphire Studios will destroy or permanently anonymise your personal information at the point that Sapphire Studios no longer needs to process it for our ongoing legitimate business needs or for any legal reason. If this is not possible (for example, because your personal information has been stored in backup archives), then Sapphire Studios will securely store it and isolate it from any further processing until deletion is possible.

## **11. Data transfers**

Sapphire Studios may transfer your personal information to countries other than the country in which you reside. Sapphire Studios implements appropriate safeguards to protect your personal information when transferring data. Some of the safeguards Sapphire Studios rely on include, where appropriate, using the European Commission's approved standard contractual clauses with sub-processors.

Your consent to this Privacy Policy and following submission of such information to us represents your agreement to that transfer.

Transfer of your Personal Data will take place to an organization or a country only if there are adequate security controls in place.

## **12. Your data protection rights under the California Privacy Protection Act (CalOPPA)**

CalOPPA requires commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivable the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this Privacy Policy.

According to CalOPPA we agree to the following:

- users can visit our site anonymously;
- our Privacy Policy link includes the word "Privacy", and can easily be found on the page specified above on the home page of our website;
- users will be notified of any privacy policy changes on our Privacy Policy Page;
- users are able to change their personal information by emailing us.

We honor Do Not Track signals and do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **13. Your Data Protection Rights under the California Consumer Privacy Act (CCPA)**

If you are a California resident, you are entitled to learn what data we collect about you, ask to delete your data and not to sell (share) it. To exercise your data protection rights, you can make certain requests and ask us:

- what personal information we have about you. If you make this request, we will return to you: (i) the categories of personal information we have collected about you; (ii) the categories of sources from which we collect your personal information; (iii) the business or commercial purpose for collecting or selling your personal information; (iv) the categories of third parties with whom we share personal information; (v) the specific pieces of personal information we have collected about you; (vi) a list of categories of personal information that we have sold, along with the category of any other company we sold it to. If we have not sold your personal information, we will inform you of that fact; (vii) A list of categories of personal information that we have disclosed for a business purpose, along with the category of any other company we shared it with.

Please note, you are entitled to ask us to provide you with this information up to two times in a rolling twelve-month period. When you make this request, the information provided may be limited to the personal information we collected about you in the previous 12 months.

- to delete your personal information. If you make this request, we will delete the personal information we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be accomplished through de-identification of the information. If you choose to delete your personal information, you may not be able to use certain functions that require your personal information to operate;
- to stop selling your personal information. We don't sell or rent your personal information to any third parties for any purpose. You are the only owner of your Personal Data and can request disclosure or deletion at any time.

Please note, if you ask us to delete or stop selling your data, it may impact your experience with us, and you may not be able to participate in certain programs or membership services which require the usage of your personal information to function. But in no circumstances, we will discriminate against you for exercising your rights.

To exercise your California data protection rights described above, please send your request(s) by email.

Your data protection rights, described above, are covered by the CCPA, short for the California Consumer Privacy Act. To find out more, visit the official California Legislative Information website.

## **14. Your rights under General Data Protection Regulation (GDPR)**

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights, covered by GDPR. For example, you have rights to correct, amend, delete, or limit the use of your personal information.

In order to get information on what Personal Data we hold or to remove it from our systems, you can contact us any time.

Your data protection rights include the following:

- the right to access, update or to delete the information we have on you;
- the right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete;
- the right to object. You have the right to object to our processing of your Personal Data;
- the right of restriction. You have the right to request that we restrict the processing of your personal information;



- the right to data portability. You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format;
- the right to withdraw consent. You also have the right to withdraw your consent at any time where we rely on your consent to process your personal information;

Before responding to your requests related to exercising your rights under GDPR, you may be asked to verify your identity.

Also, you are entitled to file a complaint to your local data protection authority in regards to our collection and use of your personal information. Please note that you can contact your local data protection authority and get more detailed information about the rights you are entitled to.

## **15. Disclaimer**

All information contained, posted and/or displayed in the Game is for information and entertainment purposes only.

Sapphire Studios is not and will not be liable, either expressly or in an implied manner, and is not responsible for any physical and/or emotional problems that may and/or could occur from any of the information in the Game.

Sapphire Studios, its affiliates, agents, and licensors make no warranty regarding any goods or services referred to, advertised on, or obtained through the Game, other than those express warranties the Game itself specifically makes.

## **16. Changes**

We may change this Privacy 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. No notice will be given to you prior to such changes and/or modifications; you are therefore advised to review our Privacy Policy from time to time.

## **17. Contacts**

Sapphire Studios and/or the Game welcomes your questions or comments regarding the foregoing terms. Please send your questions or comments to our email: [support@sapphirerc.com](mailto:support@sapphirerc.com)