

L&L Technology – PRIVACY POLICY

SUMMARY

What information do we collect about you?

We collect information when you set up your account for the Game and the Community Forum. If you set up a Community Forum account we collect your nickname, email address and password. If you choose to set up your Game profile using a social media account, we will collect your social media name and profile picture in order to set up your account. If you choose, you can provide your gender to personalize the gaming experience.

How will we use the information about you?

We use your information to provide the Game to you and allow you to access the Community Forum. We use your information to create and verify your account, allow you to manage your account and to support and improve the Game and the Community Forum.

Who do we share your information with?

We use third parties for support services, such as game servers and support ticketing. We use these third parties services solely to process or store your information for the purposes described in this policy. We also share your information with our related group companies and as required by law.

Where do we process your information?

Our engineering and other teams are located in our offices in Australia.

How long do we keep hold of your information?

We generally retain your information for the Game and Community Forum for the period during which you maintain an account. We delete certain information earlier at your request, and in accordance with local law.

How can I exercise my rights over my information?

You may have rights to access, receive copy of, or delete, your data or restrict or object to our processing of, your data.

Dispute Resolution

If you have any concerns or complaints, please contact us at contact@lnltechnology.com

How will we notify you of changes?

If there are any significant changes to this privacy policy, we will notify you within the Game.

Contact Information

contact@lnltechnology.com

INTRODUCTION

This privacy policy informs you of your choices and our practices regarding any personal information you provide to us. Your use of the games developed by L&L Technology (“**Game**”) and community forum and website for the Game (“**Community Forum**”) involves the collection and use of your personal information. It is important for you to understand how this happens and how you may control it. When you contract to use the Game and the Community Forum (the “**Game Services**”), you accept our rules and

policies regarding your personal information and you expressly consent to us collecting, processing, using and storing your personal information, as described in this policy. **You acknowledge that you have read and understood this privacy policy. If you do not agree with this privacy policy, you must not use the Game Services. If you change your mind in the future, you may withdraw your consent to use of your personal information in accordance with this policy.**

L&L technology is a company registered in Australia. If you have any comments, questions or complaints regarding the processing of your personal information, you can contact us at: contact@lnltechnology.com

SECTION 1: WHERE WE ARE A DATA CONTROLLER

The Types of Personal Information We Use

This section describes the different types of personal information we collect and how we collect it. We will collect and use the following information about you:

- **Information you give us.** You give us information about you:
 - when you register for the Game and/or the Community Forum (including your nominated nickname, and certain information we import from your connected social media account (Facebook, Google Play or iOS Game Centre) in order to set up your profile, including your name as it appears on your social media profile and your profile picture);
 - when you set up your profile for the Game and/or Community Forum (including information you voluntarily elect to provide in order to customise gameplay, such as gender); and
 - when you log-in as a “guest” in order to use the Game and/or Community Forum (your nickname).
- **Information we collect about you.** We automatically collect certain data from you when you use the Game and/or the Community Forum, including your IP address and device information (such as application version, network type, OS) and information regarding your use of the Game and/or the Community Forum, such as date and time stamps of actions. We also collect and store your data each time you interact with us, for example, when you use in-app support to communicate with us.
- **Information you generate and display in the course of using the Game Services.** You may provide additional information as part of your profile (such as gender). You may also provide or generate information when you communicate with other users in the Game or on the Community Forum (e.g., chat log data, chat content).

Cookies

We use cookies and other similar technologies (e.g. web beacons, log files, scripts and eTags) (“**Cookies**”) to enhance your experience using the Game Services. Cookies are small files which, when placed on your device, enable us to provide certain features and functionality. You have the option to permit installation of such Cookies or subsequently disable them. You may accept all cookies, or instruct the device (in the case of the

Game) or web browser (in the case of the Community Forum) to provide notice at the time of installation of cookies, or refuse to accept all cookies by adjusting the relevant cookie retention function in your device. However, in the event of your refusal to install cookies, the Game Services may be unable to operate as designed.

Children

Our Service is not intended for children. Children must not use the Service for any purpose.

Persons under the age of 18 are: (a) required to obtain parental/guardian consent prior to using the Game; and (b) not permitted to sign up for the Community Forum.

How We Use Your Personal Information

We will use the information in the following ways and in accordance with the following legal bases:

Personal Information	Use	Legal Basis for Processing
Game		
Nickname	We use this information to create your account for the Game in accordance with your request.	Necessary to perform our contract with you to provide the Game.
Social Connect Information: <ul style="list-style-type: none"> • <i>Facebook</i>: Name, Facebook ID, Profile Picture, Email Address (optional) • <i>Google Play</i>: Google ID, Display Name • <i>iOS Game Centre</i>: User ID, Nickname, Profile Picture 	We use this information to create your account for the Game in accordance with your request.	Necessary to perform our contract with you to provide the Game.
Gender (if you elect to provide this information)	We only receive this information if you voluntarily provide it. It is used in order to customise gameplay.	Necessary to perform our contract with you to provide the Game with customised gender-specific features.
Region Location (manually selected by you)	We use this information to: <ul style="list-style-type: none"> • set up your gameplay on a regional server; • provide you with your geographic ranking; 	Necessary to perform our contract with you to provide the Game.

	<ul style="list-style-type: none"> improve gameplay. 	
Player ID	We use this information to store your Game data (including level and progress) with your profile.	Necessary to perform our contract with you to provide the Game.
Game Play Statistics (Level, Heroes, Score/s)	We use this information to provide you with feedback and information about your gameplay and progress.	Necessary to perform our contract with you to provide the Game.
Chat Data (Free Chat – meaning users can communicate using their own, custom messages) (for users located in the EEA or Switzerland, this chat function is only available to users over the age of 16)	We facilitate the posting of your communications with other users.	Necessary to perform our contract with you to provide the Game where you seek to use chat services.
Chat Data (Quick Chat – meaning users can communicate using only pre-determined messages set in a drop down menu in the Game)	We facilitate the posting of your communications with other users.	Necessary to perform our contract with you to provide the Game where you seek to use chat services.
IP Address, Device ID, Device Information (Android: Device ID (IMEI), Series ID, Android ID, MAC address, device fingerprint, device host, device hardware, RadioVersion, Google advertising ID; iOS: IDFV, Model, OS Version, Network, Wifi, MAC)	<p>We use this information:</p> <ul style="list-style-type: none"> to improve our services, including the functionality of the Game; for security and verification purposes; identify and address bugs and assess game function for optimisation. 	It is in our legitimate interest to ensure the security of our services, manage registrations and improve our services.
GPS	We use this information to allow you to connect with users nearby your location. Your GPS information is not shared with other users.	We use this information with your consent.
Friends List (Facebook)	If you choose to log-in using Facebook, we import the Facebook ID and name of the	Necessary to perform our contract with you if you

	friends from your Facebook Profile so that you can connect with your friends.	request that we connect you with your friends.
Friends List (Manual)	If you choose to add a user as a friend, we will store that information so that you can connect with that user.	Necessary to perform our contract with you if you request that we connect you with your friends.
Advertising ID	We store the Advertising ID for your profile so that we can better make you aware of the Game Services.	It is in our legitimate interests to use this information to monitor the success of our advertising and marketing programs.
Log Data (purchasing actions, game results (e.g., win or lose), in-game performance)	<p>We use this information to:</p> <ul style="list-style-type: none"> • maintain a record of log-in and actions of your account; • improve our services, including the functionality of the Game; • for security and verification purposes. 	Necessary to perform our contract with you to provide the Game and retain your record of progress.
Transaction Records: payments on I&I technology, Google Play or iOS App Store (Player ID, cost, product purchased, IP Address, device details, email (if web-based transaction))	We use this information to maintain a record of your transaction history.	Necessary to perform our contract with you to provide the Game, information about your in-game purchase history and to restore purchases of in-game items.
Security-Related Information (list of hack or cheating software, device operation system settings, device information including mobile phone brand, model, CPU structure, CPU model, kernel version, resolution)	<p>We use this information:</p> <ul style="list-style-type: none"> • To provide a fair Game environment; 	It is in our legitimate interests to use this information to protect the integrity of the Game and improve its operation.

	<ul style="list-style-type: none"> To solve game crash and optimize compatibility. 	
Customer Support Ticket ID & User Communications with Support (Name, Player ID, device ID, email address (if you choose to disclose your email), details of ticket and error)	<p>We use this information to:</p> <ul style="list-style-type: none"> improve our services; provide troubleshooting, such as addressing and remediating technical issues and bugs. 	Necessary to perform our contract with you to provide and support the Game.
Survey Information: In-Game Surveys (Player ID, IP address, age (optional), email address (optional), mobile number (optional), name (optional), address (optional), other information that you provide in your response to the survey)	If you agree to participate in a survey run by us, we use this information to improve our services.	We collect this information with your consent.
Community Forum		
Username, Password, Email Address	We use this information to create your account for the Community Forum in accordance with your request and to facilitate retrieval of forgotten password.	Necessary to perform our contract with you to provide the Community Forum.
Forum Post Content	We display this information on the Community Forum in accordance with your instructions.	Necessary to perform our contract with you to provide the Community Forum.
Customer Support Ticket ID & User Communications with Support (Name, Player ID, device ID, email address (if you choose to disclose your email), details of ticket and error)	<p>We use this information to:</p> <ul style="list-style-type: none"> improve our services; provide troubleshooting, such as addressing and remediating technical issues and bugs. 	Necessary to perform our contract with you to provide and support the Community Forum.
Survey Information: surveys placed on third party platforms including social media (IP address, age (optional), email	If you agree to participate in these surveys, we use this information to improve our services.	We collect this information with your consent.

address (optional), mobile number (optional), name (optional), address (optional), other information that you provide in your response to the survey)		
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How We Store and Share Your Personal Information

In order to perform our contract with you, your personal information will be accessible from and will be processed on us. We are located in:

- USA

We share your personal information with selected third parties in and outside your country, including

- **third parties** that provide services in support of the Game and the Community Forum, including:
 - for the purpose of processing support ticket ID and support communications for the purpose of providing customer support;
 - providers of cloud services that processes information identified in this policy on their servers for the purpose of providing the Game Services;
 - for the purpose of processing gameplay and game rendering data to provide game analytics to improve game play.
- **related group companies** with whom we share your personal information to operate the Game Services.
- **law enforcement agencies, public authorities or other judicial bodies and organisations.**

We disclose information if we are legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- comply with a legal obligation, process or request;
- enforce our terms of service and other agreements, policies, and standards, including investigation of any potential violation thereof;
- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (including exchanging information with other companies and organisations for the purposes of fraud protection); and
- **a third party that acquires all or substantially all of us or our business.** We will disclose information to a third party in the event that we sell or buy any business or undergo a merger, in which case we will disclose your data to the prospective buyer of such business. We will also disclose information to a third party if we sell, buy, merge or partner with other companies or businesses, or sell some or all of our assets. In such transactions, user information may be among the transferred assets.

The Security of Your Personal Information

- We are committed to maintaining the privacy and integrity of your personal information no matter where it is stored. Our group companies have information security and access policies that limit access to our systems and technology. We also protect data through the use of technological protection measures such as encryption. Your personal information will remain subject to our technical and organisational controls and our policies and procedures (including this Privacy Policy).
- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of the information transmitted to our services; any transmission of your information is at your own risk.

Data Retention

We will retain your personal information as described below (except if otherwise required to be retained by applicable law).

Personal Information	Retention Policy
Game	
Nickname Social Connect Information: <ul style="list-style-type: none"> • Facebook: Name, Facebook ID, Profile Picture, Email Address (optional) • Google Play: Google ID, Display Name • iOS Game Centre: User ID, Nickname, Profile Picture Gender Region Location (manually selected by you) Player ID Game Play Statistics (Level, Heroes, Score/s)	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.
IP Address, Device ID, Device Information	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.
GPS	Deleted after you log out.
Friends List (Facebook) Friends List (Manual)	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.

Advertising ID	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.
Log Data	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.
Chat Data (Free Chat)	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.
Chat Data (Quick Chat)	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.
Transaction Records (Player ID, cost, product purchased, IP Address, device details)	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for the duration of any retention periods for which such data must be retained in order to comply with our legal obligations.
Transaction Records (email if web-based transaction)	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request) and then for 30 days.
Security-Related Information	Stored for the lifetime of your use of the Game, until account deletion in accordance with your request, upon which it will be deleted within 30 days.
Customer Support Ticket ID & User Communications with Support	Support data is deleted within 30 days of a lawful request from you for the erasure of such data (see the Erasure section of this privacy policy).
Survey Information (In-Game Surveys)	Stored for two years following receipt of the data. The data is deleted upon the expiry of such period or within 30 days of a lawful request from you for the erasure of such data (see the Erasure section of this privacy policy) (whichever is sooner).
Community Forum	
Username, Password, Email Address	Stored for the lifetime of your use of the Community Forum (i.e. until account deletion in accordance with your request) and then for 15 days.
Forum Post Content	Stored for the lifetime of your use of the Community Forum (i.e. until account deletion in accordance with your request) and then for 15 days.
Customer Support Ticket ID & User Communications with Support	Support data is deleted within 30 days of a lawful request from you for the erasure of such data (see the Erasure section of this privacy policy).

Survey Information: surveys placed on third party platforms including social media	Stored for two years following receipt of the data. The data is deleted upon the expiry of such period or within 30 days of a lawful request from you for the erasure of such data (see the Erasure section of this privacy policy) (whichever is sooner).
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Personal Information is kept until the end of its life cycle (as set out in the retention policy above). When destroying personal information, measures will be taken to make the personal information irrecoverable or irreproducible, and electronic files which contain personal information will be deleted permanently using a technical method which makes the files irreproducible.

In the event that the processing and retention period have terminated, but personal information is required to be retained continuously for other reasons including for the purposes as prescribed under applicable laws, the relevant personal information will be stored and maintained separately from other types of personal information. If you require us to destroy your personal information before the end of its life cycle (as set out in the retention policy above), we will destroy your personal information in accordance with local laws.

Your Rights

This section (“Your Rights”) applies to users that are located in the European Economic Area only.

You have certain rights in relation to the personal information we hold about you. Some of these only apply in certain circumstances (as set out in more detail below). We must respond to a request by you to exercise those rights without undue delay and at least within one month (though this may be extended by a further two months in certain circumstances). To exercise any of your rights, please contact us at contact@lnltechnology.com.

Access

You have the right to access personal information we hold about you, how we use it, and who we share it with. You can access the personal information you have made available as part of your account by logging into your Game account and/or the Community Forum (as applicable). If you believe we hold any other personal information about you, please contact us at contact@lnltechnology.com.

Portability

You have the right to receive a copy of certain personal information we process about you. This comprises any personal information we process on the basis of your consent (e.g., forum post content) or pursuant to our contract with you (e.g., game play statistics), as described in the section “***How We Use Your Personal Information***”. You have the right to receive this information in a structured, commonly used and machine-readable format. You also have the right to request that we transfer that personal information to another party.

If you wish for us to transfer such personal information to a third party, please ensure you detail that party in your request. Note that we can only do so where it is technically feasible. Please note that we may not be able to provide you with personal information if providing it would interfere with another’s rights (e.g., where providing the personal

information we hold about you would reveal information about another person or our trade secrets or intellectual property).

Correction

You have the right to correct any personal information held about you that is inaccurate. You can access the personal information you have made available as part of your account by logging into your Game account and/or the Community Forum (as applicable). If you believe we hold any other personal information about you and that information is inaccurate, please contact us at contact@Inltechnology.com.

Erasure

You can delete your account, or remove certain personal information, by logging into your Game account and/or the Community Forum (as applicable). If there is any other personal information you believe we process that you would like us to erase, please contact us at contact@Inltechnology.com.

You may request that we erase the personal information we hold about you in the following circumstances:

- you believe that it is no longer necessary for us to hold such personal information; or
- you believe the personal information we hold about you is being unlawfully processed by us.

You can also exercise your right to restrict our processing of your personal information (as described below) whilst we consider your request.

We may need to retain personal information if there are valid grounds under data protection laws for us to do so (e.g., for the defence of legal claims or freedom of expression) but we will let you know if that is the case. Where you have requested that we erase personal information that has been made available publicly on the Game Services and there are grounds for erasure, we will use reasonable steps to try to tell others that are displaying the personal information or providing links to the personal information to erase it too.

Restriction of Processing to Storage Only

You have a right to require us to stop processing the personal information we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection laws for us to do so (e.g., for the defence of legal claims or for another's protection). As above, where we agree to stop processing the personal information, we will try to tell any third party to whom we have disclosed the relevant personal information so that they can stop processing it too.

You may request we stop processing and just store the personal information we hold about you where:

- you believe the personal information is not accurate for the period it takes for us to verify whether it is accurate;

- you wish to erase the personal information as the processing we are doing is unlawful but you want us to retain the personal information but just store it instead; or
- you wish to erase the personal information as it is no longer necessary for our purposes but you require it to be stored for the establishment, exercise or defence of legal claims.

Objection

You have the right to object to our processing of personal information about you. We will consider your request in other circumstances as detailed below by contacting us at contact@Inltechnology.com. To the extent provided by applicable laws and regulations, you may withdraw any consent you previously provided to us for certain processing activities by contacting us at contact@Inltechnology.com.

Announcements

We may from time to time send you announcements when we consider it necessary to do so (such as when we temporarily suspend Game access for maintenance, or security, privacy or administrative-related communications). You may not opt-out of these service-related announcements, which are not promotional in nature.

Contact & Complaints

Questions, comments and requests regarding this policy are welcomed and should be addressed to contact@Inltechnology.com.

In the event that you wish to make a complaint about how we process your personal information, please contact us in the first instance at contact@Inltechnology.com and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the data protection authority in the country in which you live or work where you think we have infringed data protection laws.

Changes

If we make any material changes to this policy, we will post the updated policy here and notify our users within the Game. Please check this page frequently to see any updates or changes to this policy.