

Privacy Policy

We, Vira Games Inc., are committed to protecting and respecting your privacy. This Privacy Policy relates to our website at viragames.com and any of our other online or mobile products, content and services (collectively, the “Service”).

This Privacy Policy explains how we use any personal information that we may collect about you when you use the Service. By using the Service, you consent to the collection, storage and use of your personal information as described below. If you do not agree to this Privacy Policy, please do not use the Service and (if relevant) please uninstall the related application.

Data protection compliance

The Service is controlled by us from our offices in the Delaware (“DE”). If you choose to use the Service from outside the DE, you do so at your own risk, with the understanding that personal information collected from the Service may be collected, stored and used in a country whose privacy laws may be different and less protective than those of your home country.

The information we collect from you

When you use the Service (such as when registering as a member and/or using our paid-for services), you may be asked to provide personal information that identifies you personally (including “personal data”). This may include your name, postal address, email address, telephone number, gender, date of birth, country, preferred language, user name, password, credit card information, as well as any other information that may be used to identify you. From time to time, you may be asked to submit personal information in order to receive or use parts of the Service or for the purposes further described in this Privacy Policy. By entering your details in the fields requested, you enable us to provide you with the products, content or services you select. If you do not provide us with all or part of the personal information requested, some parts of the Service may not be available to you.

Whenever you provide such personal information (whether to us direct or to others collecting it on our behalf) or we receive it with your permission from third parties (such as social network operators), we will treat that information in accordance with this Privacy Policy.

You may decide to make certain information available for other users of the Service to see (for example, in the course of playing an online game). In this context, you should only provide information that you are entirely comfortable with providing, and we highly recommend that you do not provide any details that could be used to make personal contact with you.

We may also collect certain usage data, such as pages visited and services used within the Service, as well as information about your location. This information is generally not personally identifiable information, and generally is not aggregated with your other personal information. If it is personally identifiable, or aggregated with personal information in a way that makes you personally identifiable, we will treat the aggregated

information as personal information under this Privacy Policy. We generally use usage data to improve our services to you and to customize and enhance your experience of the Service.

An important note to parents or guardians

We encourage parents or guardians to take an active interest in their children's use of online platforms, including the Service. Their involvement is essential to help ensure a safe and rewarding experience for their children. Parents or guardians should be aware that there are software tools available that screen objectionable content and allow you to prevent children from disclosing their personal information without your permission.

We will not intentionally collect any personal information from children under the age of 14. Children under the age of 14 can participate in all activities on the Service that do not require submission of personal information. They may view, but may not under any circumstances participate in activities that require submission of personal information, such as message boards, contests or sweepstakes.

In addition, we take particular care when processing the personal information of children aged 14 or older to ensure that such information is processed in accordance with the Law.

How we use personal information

We may use personal information collected from the Service to enable your efficient use of the Service, as well as for marketing, promotions, research, analysis, product service and development. Where permitted, we may occasionally use your personal information to contact you by telephone, email, SMS or otherwise in writing to inform you about our products.

We will not use your personal information for marketing or promotional purposes without having first obtained your consent to do so. In any further marketing or promotional communications, we send to you, we will give you the opportunity to withdraw your consent to receiving such communications in the future. If you have opted in to allow us to share your personal information with third-party providers of products, content or services that we believe may be of interest to you, you can opt out of further direct communications from any such third party by contacting that third party direct.

We may also use your personal information for the purposes of:

- processing and administering your registration as a member and/or use of paid-for products, content or services;
- performing, monitoring and enforcing any contracts concluded between you and us (including our Terms of Use and any relevant end-user licence agreement), including providing you with the part(s) of the Service that you have requested, along with any support services and any related information and communications;
- running competitions and other promotional events;
- conducting surveys as to the quality of the Service or of parts of it;
- miscellaneous customer service correspondence (such as notifying you of changes to our products, content or services);

- processing details of your personal interests and preferences submitted to us via the Service;
- processing details of your use of the Service (including traffic data, location data and other communication data) and your online or wireless activity on the Service (including information on your game usage, such as your scores and rankings);
- serving advertising to you on our website or applications based on your use of the Services and/or on third-party sites and applications; and
- any other general or special use that you may permit under any particular request for permission that we may make from to time.

We reserve the right to monitor your account and records to check any complaint or allegation of abuse, infringement of third-party rights or any other unauthorized use of the Service.

Disclosure of your personal information

We may disclose your personal information to other third parties where:

- they provide products, content or services to us in connection with your use of the Service;
- we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets;
- our company all of our assets are to be acquired by a third party, in which case we may disclose your personal information to the prospective acquirer and personal data held by us about users of the Service will be one of the transferred assets; and/or
- we reasonably believe that we need to disclose your personal information to other person(s) (a) by order of any court or governmental or regulatory body of competent authority, (b) to comply with any legal obligation, (c) to enforce or apply our Terms of Use or other contracts and/or (d) to protect our, our customers' or any other third parties' rights, property or safety (including exchanging information with other companies and organization's for the purposes of fraud protection and credit risk reduction).

We may also process your personal information to anonymize and aggregate it with other data and to disclose such anonymous and aggregate data to our affiliates and/or business partners.

Certain parts of the Service may allow you to post personal information alongside content generated by you (such as on message boards or through game play). In doing so, you accept that such personal information will be disclosed to other users of the part of the Service concerned, and we are not responsible for information or content that you choose to post in this way. Please think carefully before deciding what information to share in this way, and you are highly advised not to share any data that would personally identify you (or your address or location).

Except as required or allowed by law or as set out in this Privacy Policy, we will not disclose or dispose of your personal information to any third party without your permission.

Tracking, Ad Technology and Serving, IP addresses and other Data

We may collect and process, and our third-party partners and advertisers may directly collect and process, certain information about your device(s) and your use of the Service for system administration, to provide certain parts of the Service, and/to share with third party ad partners (as described below) including (where available) your IP address, geolocation information, mobile network information, hardware information, device serial number, unique device identifier, device 'Advertiser ID', operating system and browser type, Internet connection information, as well as details of how and when you access and use the Service including the pages visited, services used within the Service, any visits to any in-Service stores, and your interactions with advertisements.

We may also link IP addresses and other unique identifiers to personal data (such as a user's country or a user ID) and/or non-personal data (such as a user's access location or usage record) in order to provide certain parts of the Service, to enforce our Terms of Use or other user contracts and/to share with third party ad partners (as described below), and we may block certain IP addresses from accessing all or any part of the Service in the event of a user abuse.

If we collect this information and data we may share it with third party ad partners in order that they can use it to assist them with the management and/or placing of ads and offers that you may see served within the Service, or ads served on other third-party services that you may use. For example, we may share your email address with Facebook so that you can receive targeted ads from us when you use Facebook, and so that other users of Facebook who share similar interests to you can also receive targeted ads from us. In some cases, other third parties may also collect some or all of the above information and data using their own technology(ies) (including cookies) and use it for the same or similar purposes – where they do so, their collection, use and protection of that data is governed by those third parties' privacy policies and practices, and not this Privacy Policy. We may also share this information and data with third party analytics and tracking companies in order that they can use it to assist them in providing services to us or to our third-party ad partners. Your device and/or browser settings may allow you to manage aspects of the placement of ads that you see within the Service. To learn how to do this we recommend that you consult your device manual, or the the "Help" function of your browser.

Certain parts of the Service may also give you the option to manage location tracking (such as turning it on or off, except for the essential location purposes noted above). If you wish to terminate our tracking, please uninstall or cease using the relevant parts of the Service.

Cookie technology

A "cookie" is a small bit of record-keeping information that websites often store on a user's computer. Our cookies are typically used to quickly identify a user's computer, browser,

or device and to "remember" things about prior visits (such as the user's use of various features on the service). You can disable cookies or set your browser to alert you when cookies are being sent to your computer; however, disabling cookies may affect your ability to use certain Online Services. On your mobile device, you may adjust your privacy and advertising settings to control whether you want to receive more relevant advertising.

Where we store your personal information

All information you provide to us is stored on secure servers hosted by us or third parties providing hosting, payment or other services for us.

The information we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), including any destination where the privacy laws of the country concerned may be different and less protective than those of EEA countries. It may also be processed by personnel operating outside the EEA who work for us or for one of our suppliers. Such personnel may be engaged in, among other things, the processing of your payment details (where applicable) and the provision of support services.

By submitting your personal information, you agree to this transfer, storing and processing.

Information security

We take every reasonable precaution to protect against the loss, misuse or alteration of your personal information and to ensure that it will be processed in accordance with this Privacy Policy. Where we have given you (or you have chosen) an account password that enables you to access certain parts of the Service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet, mobile networks or wireless technology is not completely secure, nor is any method of electronic storage. You acknowledge and accept that others may intercept or otherwise access the personal information you provide to us, and that any such transmission or storage is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorized access.

One easy and important way to protect your personal information is to keep your account password confidential and to close your browser when you are away from your device.

You can check and edit the personal information we hold about you at any time via the Service or by contacting us by email or post (details below).

Other services

The Service may interact with other online or mobile products, content or services (such as websites, social networks or mobile applications), including via (a) links from or to the Service, (b) Service log-ins hosted by third-party sites or applications and (c) Service content hosted on third-party sites or applications (such as social media plug-ins).

We may provide some of your personal information to (or receive it from) the operators of such third-party sites or applications, where required for the effective provision of such interactive features (including in the context of in-game or in-site advertising or co-branded offerings provided by us in association with third parties). We are not responsible and accept no liability for their content or their operators' privacy practices (including any tracking technologies that they may use). Before providing any personal information to them, please refer to their relevant privacy and cookies policies as any information you share with them will be subject to those policies.

Opting out

If, at any time, you wish us to stop using your personal information, to stop receiving direct marketing from us, or to correct any factual inaccuracies, just contact us by email or post (details below). Be sure to state "opt-out" in the subject line, and to include your full name, registered user ID (if any) and email address in the message. We will try to make the requested changes in our active databases as soon as reasonably practical. Please note that residual data may be retained on back-up media or for other technical or administrative reasons.

Access to your information

We will retain your information for as long as necessary for the uses set out in this Privacy Policy. If requested, we will use reasonable efforts to supply, correct or (as appropriate) delete information about you on our files. Please note that we may not always be able to delete information we hold about you due to technical, legal, regulatory and/or contractual restraints. For example, we would need to retain your name and contact details for suppression purposes if you do not wish to receive direct marketing from us.

How to contact us

If you have any questions on this Privacy Policy or our use of your personal information, you can email us at pr@viragames.com.

Changes to this Privacy Policy

We keep our Privacy Policy under regular review, and we may at any time update or otherwise modify this Privacy Policy. We will notify you of any changes to our Privacy Policy by posting the modified Privacy Policy on the Service. By then continuing to use the Service, you will be bound by the modified Privacy Policy. You are encouraged to check the terms of our Privacy Policy whenever you access the Service.

Compiled: April 12, 2018