

PRIVACY POLICY

SECTION 1 - PRIVACY POLICY

The following document governs and details the Privacy Policy of Higher-Order Games, a project of HIGHER ORDER GAMES SRL. Higher-Order Games is our web-based digital marketplace for video games through which we are offering our digital products (including video games) and services. On our website, the privacy of all of our users, customers, and other members is protected and respected. This privacy statement is drafted in order to declare our website's data protection and data collection practices by explaining specifically how we protect users' data, and what measures have been taken in order to be in compliance with different local and global privacy laws. This policy is written for all the users, gamers, members and (herein collectively will be called "users") to understand how our website ("we", "our", "Higher-Order Games") uses, collects, shares, and protects users' information and data. We request our users to read this privacy policy statement before using our website and services. The users of our website's services will be assumed to be in agreement with our privacy statement after we have published this Privacy Policy on/through our website.

SECTION 2 - COLLECTION OF DATA

Our website collects information that is necessary for the purpose of delivering our products and services. Personal information includes (but is not limited to) the full name and e-mail, age along with other data (processed automatically) of the user. The information which will be collected in this process will be used to provide services to the user as well as in order to communicate with that user through e-mail and/or newsletters. Some information on our website will be gathered automatically through different tools and plugins.

2.1. Users Information Collection.

There will be a collection of information from all of our users on our website and game if they will use any of our given services. The information that will be provided to us includes but is not limited to:

- a** Username
- b** In-Game ID/Address
- c** Email address
- d** Discord Username
- e** Users' Third-Party Related Information
- f** NFTs and Tezos Related to Our Company's Games (including Reckless).
- g** Gameplay information and statistics

- h** Any additional information relating to the users that they provide us directly through our website or indirectly through our platform or online presence such as 'cookies'.

2.2. Automatic Information Collection

We also collect information that is collected by general websites and relative tools/plugins for the purpose of rendering normal services. This type of information includes (but is not limited to) the usage of our services by users, referring nodes, device OS and its type, language and its preference, and data and time of users' browsing history. We may release such information in aggregate form for the purpose of making our services better. Please note that in aggregate form none of the individual users can be identified. Our website may also collect information that is considered personal identifiable information such as IP addresses and other information collected through cookies. We may share this information with third parties in order to be compliant legally.

2.3. Disclaimer Regarding Discord Information Collection

We do not collect any information related to users on our Discord "Reckless". Nor do we share or use any personal data of any user or member and hence we are not responsible for any stealing, hack, theft, or otherwise unlawful use of any of the members' or users' data that is provided on or through Discord. All the information on Discord is collected in accordance with the official privacy policy of the website of discord.com which is owned and operated by Discord Inc. If you want to find out how Discord Inc. is collecting, processing, and using your data, you can do so by reading their official privacy policy at <https://discord.com/privacy>.

SECTION 3 - USE OF COOKIES

Our website uses, collects, and stores cookies on users' devices. This cookie policy is written according to the privacy rights and user rights policies and we are letting our customers know that their data may be collected and they can contact us if they want to have their data removed. A cookie is a log file that collects certain information and is stored on the user's or visitor's device or personal computer. This information will be provided back to the device if such a user or visitor makes a return visit. The most common types of cookies are session cookies and permanent cookies. Session cookies are temporary cookies that are deleted once the user exits the browser while permanent cookies remain in the user's or visitor's browser until the cookie log files are either deleted by the user or expired on their own. Mainly we use cookies in order to (i) understand how visitors are arriving at our website; (ii) in order to monitor the usage of our website visitors and traffic; (iii) remember when a user last visited our website and if the cookie persists continuing that user's usage from the last time; (iv) in order to keep track for analysis we may store analytical cookies; (v) track for the purpose of marketing; (vi) for error reporting; (vii) for

customer services; (viii) to conduct research and development by gathering user data in aggregated form. A functional cookie is a type of permanent cookie that is necessary for the purpose of some services.

Please note that the cookie does not contain any personal identifying information. Users can also change their browser settings to ensure that the collection of cookies is disabled. However, doing so will make many of our services ineffectual.

SECTION 4 - THIRD-PARTY LINKS

We rely on third-party platforms in order to render our services. For the purpose of storing and hosting our data we primarily use hosting services. Please note that all of these services are changeable and we may use other alternatives in case we find new, better, and improved third-party platforms. Apart from sharing some of our data with our third-party platform partners, we will not share, lease, or sell any personal user information to a third party (unless specifically required by legal authorities for lawful purposes). There might also be a presence of third-party tracking and analytical services links on our website that may also include the services of Google Analytics which may help us track users' session activity, bounce rate, time of stay, and general traffic analytics. Most of these links will only be there in order to help us provide our services. Please note that any links that are on or through our website are there either for marketing purposes or for other services as a requirement for the working of our website. These links may or may not be associated or affiliated with us in any way.

We do not collect any information collected by these third-party services. Nor do we share or use any personal data of any user or member and hence we are not responsible for any stealing, hack, theft, or otherwise unlawful use of any of the member's or user's data which is provided for any of the services rendered by third-party platforms. All the information on these platforms is collected in accordance with the official privacy policy of these relevant platforms.

SECTION 5 - PROTECTION AND SHARING OF CONSUMERS AND USERS' DATA

We are committed to protecting the personal data of consumers and users to the best of our ability. Data security is necessary and therefore in compliance with the global data privacy laws we have implemented measures in order to make sure that all data belonging to the users, buyers and sellers and visitors of our website is well protected. We have made sure that all the transactions on and through our website are going through well-protected payment platforms. Our website neither collects any payment-related information nor do we control it.

We May Share Users' Information In Following Instances:

- a When we are required by a court of law or legal authority to do so.
- b When our business is transferred or sold to a new company or owner and in that transaction, the data stored by us will also be transferred to the new owner.
- c We may store and transfer the personal data of the users out of the European Union regions in order to better provide our services. This step will be taken in order to make our services better. Users of our services from the EU zone hereby acknowledge that their data can be stored on hosting servers that are outside the jurisdiction of the EU zone.
- d We will share the users' data with our service providers (such as web-hosting providers, payment partners, etc.), affiliates, marketing partners, business partners, and others who have legal rights to access users' data.

SECTION 6 - PRIVACY AND GDPR USER RIGHTS

In compliance with the GDPR and other user privacy rights, this statement has been provided for all the users of our website who are using any or all of our services. All users have the right to access their personal information and they have the right to know how their data is being stored on our website. Users can also have their data removed or transferred from our website.

Our website would like to make sure all users are fully aware of all of their data protection rights. Every user is entitled to the following:

- a.a The Right To Access** - Users have the right to request our website for copies of their personal data.
- a.b The Right To Rectification** - Users have the right to request that our website correct (or complete) any information they believe is inaccurate (or incomplete) about them.
- a.c The Right To Erasure** - Users have the right to request that our website erases their data, under certain conditions.
- a.d The Right To Restrict Processing** - Users have the right to request that we restrict the processing of their data, under certain conditions.
- a.e The Right To Object To Processing** - Users have the right to object to our website's processing of their data, under certain conditions.
- a.f The Right To Data Portability** - Users have the right to request that we transfer the data that we have collected to another organization, or directly to them, under certain conditions.

If any user makes a request, we have one month to respond to the user. If anyone would like to exercise any of these rights, please contact us at this email:

reckless@higher-order-games.net.

SECTION 7 - CCPA COMPLIANCE

The California Consumer Privacy Act (CCPA) is an act enacted for the residents of the USA and specifically for the residents of the state of California. This law provides additional protections and rights for the protection of personal information for California residents. Our website does not sell personal information for monetary consideration; however, we do work with and share personal information with certain partners and third parties unless otherwise stated in this Privacy Policy. Under CCPA, users hold certain rights that apply to the collection, storing, and sharing of their personal information. Users can contact us to exercise their rights under CCPA by emailing us at the address below.

Under CCPA users have the following rights.

- a** Users have the right to know what personal information our website collects.
- b** Users have the right to know who we share their data with.
- c** Users have the right to deletion of their data.
- d** Users have the right to receive Non-Discrimination services.

Email: reckless@higher-order-games.net.

SECTION 8 - NOTICE FOR RESIDENTS IN THE EUROPEAN ECONOMIC AREA REGARDING STORAGE OF DATA

All information users provide to us is stored securely and treated with care and respect. The data that we collect from users may be transferred to and stored at, a destination outside the European Economic Area ("EEA") such as the United States or Canada. It may also be processed by persons operating outside the EEA. If we do send users' data outside the EEA, we will take reasonable steps to ensure that the recipient implements appropriate measures to protect users' information.

SECTION 9 - AGE LIMIT (COPPA NOTICE)

In compliance with the COPPA act, we are making this notice available that anyone under the age of 13 should not provide us with any data, specifically personal identifiable information in any way. Any such information unknowingly collected by our website will be deleted as soon as we have become aware of it. If a parent or guardian is aware that a minor has provided us with personal identifiable information without their consent, they should reach us at reckless@higher-order-games.net.

SECTION 10 - OPT-OUT RIGHT FROM THE E-MAIL LIST

All users have the right to opt-out of our e-mail list by removing themselves from our e-mail list. Users can either e-mail us at reckless@higher-order-games.net if they wish to stop receiving our e-mails or they can also follow the “unsubscribe link” provided at the end of every email

SECTION 11 - MODIFICATIONS AND AMENDMENTS IN PRIVACY POLICY

Any amendments or modifications in this Privacy Policy will be made based on the requirements and necessities of our website. All updated information will be publicly displayed on this page.

SECTION 12 - CONTACT

Any questions, remarks, queries, and feedback regarding any of the above-mentioned terms of our Privacy Policy can be directed at reckless@higher-order-games.net.