

# Privacy Policy

This policy (the “Privacy Policy”) describes what information we collect, how it is used and shared. You will also learn about how to manage your privacy controls and your rights within our websites and the related mobile applications and services (collectively, the “Services”).

## What kinds of information do we collect?

To provide the Services, we must process information about you. The type of information that we collect depends on how you use our Services.

### Things that you and others do and provide

- **Information and content you provide.** We collect the content, communications and other information you provide when you use our Services, including when you sign up for an account, create or share content and message or communicate with others. This may include information in or about the content that you provide (e.g. metadata), such as the location of a photo or the date a file was created. It can also include what you see through features that we provide, such as our camera, so we can provide better services and recommendation. Our systems automatically process content and communications that you and others provide to analyse context and what's in them for the purposes described below.
- **Networks and connections.** We collect information about the people, accounts, tagging, and groups that you are connected to and how you interact with them across our Services, such as people you communicate with the most or groups that you are part of. We also collect contact information if you choose to upload, sync or import), which we use for things such as helping you and others find people you may know and for the other purposes listed below
- **Your usage.** We collect information about how you use our Services, such as the types of content that you view or engage with, the features you use, the actions you take, the people or accounts you interact with and the time, frequency and duration of your activities. For example, we log when you're using and have last used our Services, and what posts, videos and other content you view on our Services. We also collect information about how you use features such as our camera.
- **Information about transactions made on our Services.** If you use our Services for purchases or other financial transactions (such as when you make a purchase for merchandises or token purchase), we collect information about the purchase or transaction. This includes payment information, such as your wallet address and other information that is obtained from the wallet, other account and authentication information, and billing, delivery and contact details.
- **Things others do and information they provide about you.** We also receive and analyse content, communications and information that other people provide when they use our Services. This can include information about you, such as when others share or comment on a photo of you, send a message to you or upload, sync or import your contact information.

## How do we use this information?

We use the information that we have (subject to choices you make) as described below and to provide and support the Services.

### Provide, personalise and improve our Services

We use the information that we have to deliver our Services, including to personalise features and content (including feed and ads) and make suggestions for you (such as topics that you may want to follow, friends that you may know). To create personalised Services that are unique and relevant to you, we use your connections, preferences, interests and activities based on the data that we collect and learn from you and others; how you use and interact with our Services.

- Information across Services: We connect information about your activities on different Services to provide a more tailored and consistent experience that you use, wherever you use them. We can also make your experience more seamless, for example, by automatically filling in your registration information (such as your country) from one Service when you sign up for an account on a different Service.
- Product research and development: We use the information we have to develop, test and improve our Products, including by conducting surveys and research, and testing and troubleshooting new products and features.

### Promoting safety, integrity and security

We use the information that we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Services, and promote safety and security. For example, we use data that we have to investigate suspicious activity or violations of our Terms or Policies.

### Communicate with you

We use the information that we have to send you marketing communications, communicate with you about our Services and let you know about our Policies and Terms. We also use your information to respond to you when you contact us.

## How is this information shared?

Your information is shared with others in the following ways:

### Sharing on Services

#### People and accounts that you share and communicate with

Public information be seen by anyone, including if they do not have an account. This includes any information you choose to share with a public audience, and content you share on a social pages (is PathPlay). You, other people using PathPlay and we can provide access to or send public information to anyone, including in other Services, in search results or through tools and APIs. Public information can also be seen, accessed, reshared or downloaded through third-party services such as search engines, APIs and offline media such as TV, and by apps, websites and other services that integrate with our Products.

## Content that others share or reshare about you

People who can see your activity on our Services can choose to share it with others on and off our Services, including people and businesses outside the audience that you shared with. For example, when you share a post or send a message to specific friends or accounts, they can download, screenshot or reshare that content to others across or off our Products, in person or in virtual reality experiences. Also, when you comment on someone else's post or react to their content, your comment or reaction will be visible to anyone who can see the other person's content, and that person will be able to change the audience later.

People can also use our Services to create and share content about you with the audience they choose. For example, people can share a photo of you in a story, mention or tag you at a location in a post, or share information about you in their posts or messages. If you are uncomfortable with what others have shared about you on our Service, you can report the content.

## Information about your active status or presence on our Service

People in your networks can see signals telling them whether you are active on our Services, including whether you are currently active PathPlay, or when you last used our Services.

## Apps, websites and third-party integrations on or using our Services

When you choose to use third-party apps, websites or other services that use, or are integrated with, our Services, they can receive information about what you post or share. For example, when you login to our Financial Services platform using PathPlay Account, the website can receive information about your account. Apps and websites that you use may receive your list of PathPlay friends if you choose to share it with them. But apps and websites that you use will not be able to receive any other information about your PathPlay friends from you, or information about any of your PathPlay followers (although your friends and followers may, of course, choose to share this information themselves). Information collected by these third-party services is subject to their own terms and policies, not this one.

## New owner

If the ownership or control of all or part of our Services or their assets changes, we may transfer your information to the new owner.

## Sharing with third-party partners

We work with third-party partners who help us provide and improve our Services. We don't sell any of your information to anyone and we never will. We also impose strict restrictions on how our partners can use and disclose the data we provide. Here are the types of third parties that we share information with:

### Partners who use our analytics services

We provide aggregated statistics and insights that help people and businesses understand how people are engaging with their posts, videos and other content on our Services.

### Advertisers

We provide advertisers with reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us permission. For example, we provide general demographic and interest information for advertisers (for example, that an ad was seen by a woman

between the ages of 25 and 34 who lives in Madrid and likes software engineering) to help them better understand their audience. We also confirm which ads led you to make a purchase or take an action with an advertiser.

#### Measurement partners

We share information about you with companies that aggregate it to provide analytics and measurement reports to our partners.

#### Partners offering goods and services in our Services

When you subscribe to receive premium content, or buy something from a seller in our Services, the content creator or seller can receive your public information and other information that you share with them, as well as the information needed to complete the transaction, including shipping and contact details.

#### Vendors and service providers

We provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analysing how our Products are used, providing customer service, facilitating payments or conducting surveys.

#### Researchers and academics

We also provide information and content to research partners and academics to conduct research that advances scholarship and innovation that supports our business or mission and enhances discovery and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

#### Law enforcement or legal requests

We share information with law enforcement or in response to legal requests.

## How can I manage or delete information about me?

We provide you with the ability to access and change your privacy settings.

We store data until it is no longer necessary to provide our Services, or until your account is deleted – whichever comes first. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs. If you submit a copy of your government-issued ID for account verification purposes, we delete that copy 30 days after review, unless otherwise stated.

When you delete your account, we delete things you have posted, such as your photos and status updates, and you won't be able to recover this information later. Information that others have shared about you isn't part of your account and won't be deleted. If you don't want to delete your account but want to temporarily stop using the Services, you can deactivate your account instead. To delete your account at any time, please submit a request at <https://PathPlay.io/contact-us/>

## How do we respond to legal requests or prevent harm?

We access, preserve and share your information with regulators, law enforcement or others:

- In response to a legal request (e.g. a search warrant, court order or subpoena) if we have a good-faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of the Singapore when we have a good-faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction and is consistent with internationally recognised standards.
- When we have a good-faith belief that it is necessary to: detect, prevent and address fraud, unauthorised use of the Products, breaches of our Terms or Policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or Services), you or others, including as part of investigations or regulatory enquiries; or to prevent death or imminent bodily harm.

Information that we receive about you (including financial transaction data related to purchases made on our Services) can be accessed and preserved for an extended period when it is the subject of a legal request or obligation, governmental investigation or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for term breaches for at least a year to prevent repeat abuse or other term breaches.

## How do we operate and transfer data as part of our global services?

We share information globally, both internally within the PathPlay entities, and externally with our partners and with those you connect and share with around the world in accordance with this policy. Your information may, for example, be transferred or transmitted to, or stored and processed in the Singapore or other countries outside of where you live for the purposes as described in this Policy. These data transfers are necessary to provide our Services to you. We utilise standard contract clauses, rely on the European Commission's adequacy decisions about certain countries, as applicable, and obtain your consent for these data transfers to the Singapore and other countries.

## How will we notify you of changes to this Policy?

We'll notify you before we make changes to this Policy and give you the opportunity to review the revised Policy before you choose to continue using our Services.

## How to contact us with questions

Should you have any feedback or enquiries about this Privacy Policy, you may submit them via our contact us form at <https://PathPlay.io/contact-us/>