

Privacy Policy

Last updated on Jul 14, 2022

FITCHIN Ltd ("FITCHIN," "we", "us", or "our") is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you how we collect, use, share and safeguard personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions. To use some of our products and services you need to have an account or to create an account and provide us certain information. We use that information to provide you with products and services and to keep FITCHIN more secure and relevant to you.

1. Types Of Data We Collect

"Personal Data" means data that allows someone to identify you individually, including, for example, your name, email address, as well as any other non-public information about you that is associated with or linked to any of the foregoing. "Anonymous Data" means data, including aggregated and de-identified data, that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data as described below.

1.1 Information You Provide Us.

- a. When you use our Service, update your account profile, or contact us, we may collect Personal Data from you, such as email address, first and last name, user name, date of birth, country, phone number and other information you provide. You may also choose to share in your public profile a profile picture, information about yourself, favorite game, and social media & gaming links.
- b. We also collect your blockchain address, which may become associated with Personal Data when you use our Service.
- c. Our Service lets you store preferences like how your content is displayed, notification settings, and favorites. We may associate these choices with your ID, browser, or mobile device.
- d. If you provide us with feedback or contact us, we will collect your name and contact information, as well as any other content included in the message.
- e. We may also collect Personal Data at other points in our Service where you voluntarily provide it or where we state that Personal Data is being collected.
- f. We also collect, use and share aggregated data, such as statistical or demographic data, for any purpose. Aggregated data may be derived from your personal data, but it is not considered personal data by law, as this data does not directly or indirectly reveal your identity. For example, we may add your Usage Data to calculate the percentage of users accessing a specific website and or FITCHIN function. However, if we combine or connect Aggregated Data with your personal data so that they can identify you directly or indirectly, we treat the combined data as personal data to be used in accordance with this privacy notice.
- g. We use information you share with us, or that we collect to conduct research, surveys, product testing, and troubleshooting to help us operate and improve our products and services.

1.2 Information Collected via Technology. As you navigate through and interact with our Service, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

a. Information Collected by Our Servers. To provide our Service and make it more useful to you we (or a third party service provider) collect information from you, including, but not limited to, your browser type, operating system, Internet Protocol (“IP”) address, mobile device ID, blockchain address, wallet type, website response time, download errors, duration of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to navigate off the page, and date/time stamps. You hereby accept that we collect that information.

b. Log Files. As is true of most websites and applications, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“ISP”), referring/exit pages, operating system, date/time stamps, and clickstream data. We use this information to analyze trends, administer the Service, track users’ movements around the Service, and better tailor our Services to our users’ needs. For example, some of the information may be collected so that when you visit the Service, it will recognize you and the information can be used to personalize your experience.

c. Cookies. Like many online services, we use cookies to collect information. Cookies are simple text files stored in your web browser to provide a means of distinguishing between users of this website. The use of cookies is a common practice among Internet websites. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to analyze how users interact with our Service, make improvements to our product quality, and provide users with a more personalized experience. To provide you with a better service, we occasionally use session cookies to improve or personalize your visit to this website. Session cookies can be automatically created on the device you use to access this website, but it does not contain personal information and does not compromise your privacy or security. We may use the cookie feature to store a randomly generated ID tag on the device you use to access FITCHIN. A session cookie is deleted during the operation of your browser or when your browser is closed.

If you wish, you can complete a registration and allow a persistent cookie. This persistent cookie will allow the FITCHIN / the website to recognize you when you visit it again and adapt the information presented to you according to your needs and interests. FITCHIN will use persistent cookies only with your permission. The software and hardware you use to FITCHIN access allows you to reject new cookies or delete existing cookies. Rejecting or deleting these cookies may limit your ability to take advantage of certain FITCHIN features. The information will be collected when you send an email to FITCHIN.

d. Pixel Tag. In addition, we use “Pixel Tags” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags allow us to analyze how users find our Service, make the Service more useful to you, and tailor your experience with us to meet your particular interests and needs.

e. How We Respond to Do Not Track Signals. Our systems do not currently recognize “do not track” signals or other mechanisms that might enable Users to opt out of tracking on our site.

f. Analytics Services. In addition to the tracking technologies we place like Cookies and Pixel Tags, other companies may set their own cookies or similar tools when you visit our Service. This includes third-party analytics services (“Analytics Services”) that we engage to help analyze how users use the Service. The information generated by the Cookies or other technologies about your use of our Service (the “Analytics Information”) is transmitted to the

Analytics Services. The Analytics Services use Analytics Information to compile reports on user activity, which we may receive on an individual or aggregate basis. We use the information we get from Analytics Services to improve our Service. The Analytics Services may also transfer information to third parties where required to do so by law, or where such third parties process Analytics Information on their behalf. Each Analytics Services' ability to use and share Analytics Information is restricted by such Analytics Services' terms of use and privacy policy. By using our Service, you consent to the processing of data about you by Analytics Services in the manner and for the purposes set out above.

1.3 Information Collected from Third-Party Companies. Third-party data is any information collected by an entity that does not have a direct relationship with the user the data is being collected on. We may receive Personal and/or Anonymous Data about you from companies that offer their products and/or services for use in conjunction with our Service or whose products and/or services may be linked from our Service. For example, third-party wallet providers provide us with your blockchain address and certain other information you choose to share with those wallets providers. We may add this to the data we have already collected from or about you through our Service. FITCHIN will not be liable for any claim due to third party disclosure of information.

1.4 Public Information Observed from Blockchains. We collect data from activity that is publicly visible and/or accessible on blockchains. This may include blockchain addresses and information regarding purchases, sales, or transfers of NFTs, which may then be associated with other data you have provided to us.

2. Use And Processing Of Information

We process your Personal Data to run our business, provide the Service, personalize your experience on the Service, and improve the Service. The information provided by the User is used for the following purposes:

- a. facilitate the creation of your profile;
- b. identify you as a user in our system;
- c. improve the administration of our Service and quality of experience when you interact with our Service, including, but not limited to, by analyzing how you and other users find and interact with the Service, how many times the users visit the Service and how often;
- d. take steps to keep the personal information collected protected from misuse and alteration.
In addition, we ask providers who process personal information on our behalf to adopt all security measures designed to help protect your personal information;
- e. provide customer support and respond to your requests and inquiries;
- f. investigate and address conduct that may violate our Terms of Service;
- g. analyze and monitor the use of our service and social interactions and moderate communications;
- h. establish new business relationships and to get registered for tournaments, events or other activities organized by FITCHIN or its partners;
- i. for the User to subscribe to newsletters;
- j. detect, warn, prevent, and address fraud, violations of our terms or policies, and/or other harmful or unlawful activity;
- k. send you a welcome email to verify ownership of the email address provided when your account was created;
- l. send you administrative notifications, such as security, support, and maintenance advisories;
- m. send you newsletters, promotional materials, updates and other notices related to our Services or third parties' goods and services;
- n. respond to your inquiries related to employment opportunities or other requests;

- o. comply with applicable laws, cooperate with investigations by law enforcement or other authorities of suspected violations of law, and/or to pursue or defend against legal threats and/or claims; and
- p. act in any other way we may describe when you provide the Personal Data.

We may create Anonymous Data records from Personal Data. We use this Anonymous Data to analyze request and usage patterns so that we may improve our Services and enhance Service navigation. We reserve the right to use Anonymous Data for any purpose and to disclose Anonymous Data to third parties without restriction.

3. Social media/ networks

You may interact with FITCHIN properties through social networking sites. When you interact with FITCHIN or FITCHIN properties, through social media, you acknowledge that we may access your information, including your public profile information, in accordance with your social media privacy settings.

We may use this information to:

- a. Link your social media account to your FITCHIN account
- b. Customize your online experience with us both on the website and to help promote the user on our other FITCHIN up properties
- c. Contact you for marketing purposes and to send you offers and news about FITCHIN limited

When you post personal information publicly through our website or other FITCHIN properties, this information is visible to our users. By posting publicly on social networking sites or chat rooms, that information will be visible to other users of these sites, and we cannot prevent the further use of personal information by third parties. We have no control over the information or data you have publicly posted on these social media platforms. Please refer to the terms and conditions and policies of your social networks or third-party platforms with respect to your information and security.

Chat rooms, message boards and forums. FITCHIN provides you with chat rooms or other community tools. We use the information from these community tools to help with research and development. When posting or writing to community tools, remember that this information is public and can be used by us and other parties.

4. Disclosure of Your Personal Data.

We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

4.1 Third Party Service Providers. We may share your Personal Data with third party service providers to: provide technical infrastructure services; conduct quality assurance testing; analyze how our Service is used; update FITCHIN service, prevent, detect, warn and respond to unauthorized activities; provide technical and customer support; and/or to provide other support to us and to the Service.

4.2 Affiliates. We may share some or all of your Personal Data with any subsidiaries, joint ventures, or other companies under our common control ("Affiliates"), in which case we will require our Affiliates to honor this Privacy Policy.

4.3 Corporate Restructuring. We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition, or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets,

that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

4.4 Legal Rights. We may disclose your information if we believe in good faith that such disclosure is necessary to comply with US state and/or federal law and/or other applicable laws of the relevant jurisdiction (e.g., in the User's country of residence), and/or respond to a court order, judicial request, subpoena, or other similar document. We also reserves the right to disclose information that believes in good faith is appropriate or necessary to protect FITCHIN of potential liability or fraudulent, abusive or illegal use; investigating and defending claims or complaints from third parties; protecting the safety or integrity of FITCHIN or protect rights as well as FITCHIN property.

We will disclose your information, when necessary, to exercise, establish or defend our legal rights. We will review your communications and other account information to investigate allegations of piracy or any other breach or alleged breach of the applicable Terms of Use or this Privacy Policy and will disclose your personal information, including communications to our legal advisers, consultants, lawyers and authorities or other government officials.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. In certain situations, you have the right to request that we correct your personal data or request that we delete your personal data. We may need to ask you for specific information to help us confirm your identity and guarantee your right to access your personal data (or exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to anyone who is not entitled to receive it.

We may also contact you to request more information regarding your request to expedite our response. We try to respond to all legitimate requests in duly time. Occasionally, we may take longer if your request is particularly complex or if you have made multiple requests (in each case when we are legally entitled to take longer to respond). In this case, we will notify you and keep you informed.

4.5 Other Disclosures. We may also disclose your Personal Data: to fulfill the purpose for which you provide it; for any other purpose disclosed by us when you provide it; or with your consent.

4.6 Third-Party Websites. Our Service may contain links to third-party websites. When you click on a link to any other website or location, you will leave our Service and go to another site, and another entity may collect Personal Data from you. We have no control over nor responsibility, we do not review, and cannot be liable for these third-party websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these third-party websites or their content, or to any collection of your Personal Data after you click on links to such third-party websites. We encourage you to read in detail the privacy policies of every website you visit. Any links to third-party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

4.7 Third-Party Wallets. To use our Service, you must use a third-party wallet which allows you to engage in transactions on public blockchains. Your interactions with any third-party wallet provider are governed by the applicable terms of service and privacy policy of that third party.

5. Your Choices

You have several choices regarding the use of information on our Services:

5.1 Data Access and Control. You can view, access, edit, or delete your Personal Data for certain aspects of the Service via your Settings page. You may also have certain additional rights:

a. If you are a user in the European Economic Area or United Kingdom, you have certain rights under the respective European and UK General Data Protection Regulations (“GDPR”). These include the right to (i) request access and obtain a copy of your personal data; (ii) request rectification or erasure; (iii) object to or restrict the processing of your personal data; and (iv) request portability of your personal data. Additionally, if we have collected and processed your personal data with your consent, you have the right to withdraw your consent at any time.

b. If you are a California resident, you have certain rights under the California Consumer Privacy Act (“CCPA”). These include the right to (i) request access to, details regarding, and a copy of the personal information we have collected about you and/or shared with third parties; (ii) request deletion of the personal information that we have collected about you; and (iii) the right to opt-out of sale of your personal information. As the terms are defined under the CCPA, we do not “sell” your “personal information.”

c. If you wish to exercise your rights under the GDPR, CCPA, or other applicable data protection or privacy laws, please contact us (info@fitchin.gg) specifying your request, and reference the applicable law. We may ask you to verify your identity, or ask for more information about your request. We will consider and act upon any above request in accordance with applicable law. We will not discriminate against you for exercising any of these rights.

5.2 Personal data use. You can use your personal data to:

- a. Request access to specific personal information about you;
- b. Avoid processing your personal data for direct marketing purposes;
- c. Update personal information that is outdated or incorrect;
- d. Delete certain personal data we might have obtained when you logged in

The fact that you do not provide certain personal data withdraws your consent for its processing and removing certain information about you could deliver FITCHIN inaccessible. In case you proceed to delete certain personal data, you may have no access to FITCHIN.

5.3 Data Retention. We may retain your Personal Data as long as you continue to use the Service, have an account with us, or for as long as is necessary to fulfill the purposes outlined in this Privacy Policy. We may continue to retain your Personal Data even after you deactivate your account and/or cease to use the Service if such retention is reasonably necessary to comply with our legal obligations, to resolve disputes, prevent fraud and abuse, enforce our Terms or other agreements, and/or protect our legitimate interests. Where your Personal Data is no longer required for these purposes, we will delete it without prior notice.

5.4 Email Communications. We may periodically send you newsletters and/or emails that directly promote the use of our Service or third parties’ goods and services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving these communications from us by following the unsubscribe instructions provided in the email you receive or through the Notifications preferences in your Settings page. Despite these preferences, we may send you occasional transactional service-related informational communications.

Notwithstanding the above, we cannot edit or delete any information that is stored on a blockchain as we do not have custody or control over any blockchains. The information stored

on the blockchain may include purchases, sales, and transfers related to your blockchain address and Tokens held at that address.

6. How We Protect Personal Information

We use a variety of administrative, technical and physical measures to protect the integrity and security of your personal data. These measures may vary depending on the sensitivity of such information. However, no precaution or safety system can be completely safe. FITCHIN cannot ensure or guarantee the security of any information that the user transmits to us; therefore, the User does so at its own risk. FITCHIN cannot guarantee that such information cannot be accessed, disclosed, altered or destroyed for breach of any of FITCHIN physical, technical or administrative security measures. In the event that any information under our custody and control is compromised as a result of a breach of security, we will take steps to investigate and remediate the situation and, in accordance with applicable laws and regulations, notify those individuals whose information may have been compromised.

You are responsible for the security of your digital wallet, and we urge you to take steps to ensure it is and remains secure. If you discover an issue related to your wallet, please contact your wallet provider.

7. Other Important Information

7.1 Cookies. If you decide at any time that you no longer wish to accept Cookies from our Service for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser's technical information. If you do not accept Cookies, however, you may not be able to use all portions of the Service or all functionality of the Service provided by FITCHIN.

7.2 Minors. We do not intentionally gather Personal Data from visitors who are under the age of 13*. Our Terms of Service require all users to be between 13 and 18 years old. Minors who are at least 13* years old but are under 18 years old may use a parent or guardian's FITCHIN account, but only with the involvement of the account holder. If a child under 13* submits Personal Data to FITCHIN and we learn that the Personal Data is the information of a child under 13*, we will attempt to delete the information as soon as possible. If you believe that we might have any Personal Data from a child under 13*, please contact us at the address indicated in Section "Contact Information" below.

** If you live in a country in the EU/EEA, you must be at least 16 years old to use our Services or such greater age required in your country to register for or use our Services. Please review "Message to Parents" in FITCHIN'S Terms and Conditions*

7.3 Users Outside of the United States. If you are a non-U.S. user of the Service, by visiting the Service and providing us with data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Data may be less stringent than the laws in your country. By providing your Personal Data, you consent to such transfer.

7.4 Changes to This Privacy Policy. This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy at <https://fitchin.gg/privacy-policy>. The date the Privacy Policy was last revised is identified at the beginning of this Privacy Policy. You are responsible for periodically visiting our Service and this Privacy Policy to check for any changes. By submitting to FITCHIN, you hereby accept all potential changes in Privacy Policy. We may also send you an email to notify you of any material changes to this Privacy Policy.

8. Newsletter and EMAIL communications

Without registration you might receive in your email address newsletters or other communications related to FITCHIN service, We reserve the right to send you regular offers on similar goods or services from our portfolio by email. You can opt out to this at any time without any costs for you.

9. Contact Information

If you have any questions, comments, or complaints concerning our privacy practices please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

info@fitchin.gg