

## Privacy Policy

BlackSleeve Media Inc (or, "BlackSleeve Media") issues this Privacy Policy to inform you of our procedures and policies regarding the collection, disclosure, and use of personal information BlackSleeve Media receives or collects from users of our applications and/or website. The term "Services", as used in this Privacy Policy, references both the BlackSleeve Media website (the "Site") and all BlackSleeve Media applications, games, and any other products or services offered by BlackSleeve Media (the "Application(s)"). This Privacy Policy applies to information that you provide to us (or permit third party sites to provide us) or that we collect through the Services. This Privacy Policy will be updated at dates in the future to be determined by BlackSleeve Media Inc. We will notify you of any material changes by posting the new Privacy Policy on the Services. BlackSleeve Media recommends that you consult this policy periodically for any changes. By using our Services, you are consenting to our Processing of your information as described in this Privacy Policy now and as revised in the future by BlackSleeve Media Inc. "Processing" means using cookies on a computer or using, reviewing, or otherwise interacting with information in any way, including, but not limited to, storing, deleting, collecting, using, combining, and disclosing information and transferring it to US and other governments. If you do not agree to the terms of this Privacy Policy, please do not use the Services.

## What This Policy Contains

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### I. Information Collection and Use: Personally Identifiable Information Information That You Provide

As you use the Services, you may provide us with personally identifiable information. This refers to information about you that can be used to identify, track, or contact you ("Personal Information"). Personal Information includes data such as your name and email address but is not limited to this information. When you contact our customer support services, this may include a record of communication correspondence and associated contact information.

Where applicable, you may sign up to use the Services directly via the Site or Application or via certain third-party social networking sites (each, a "Social Networking Site"). If you decide to create an account to use the Services via a Social Networking Site, we may extract the personal information you have provided to such Social Networking Site (such as your "real" name, email address and other information you make available via the Social Networking Site) from the account you have with such Social Networking Site and use that information to create your BlackSleeve Media account, or an account for a BlackSleeve Media application, website, or property; the information we extract may depend on the privacy settings you have with the Social Networking Site.

If you choose to purchase any virtual goods as part of your use of the Services, to the extent available, we or our third-party service providers may collect Personal Information from you to facilitate your payment for such virtual goods.

We also collect other information that you provide in connection with your registration and/or use of the Services (e.g., without limitation, birthday, gender, zip code (on its own), individual preferences and certain information about your computer or mobile device, such as operating system, software version and unique advertising identifier) ("Non-Identifying Information").

Certain Non-Identifying Information would be considered a part of your Personal Information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other non-identifying information (for example, your viewing preferences).

With your permission, we access information from your device, such as your general location, contact lists, photo library, and calendar. If you choose to give us access, you may also link your use of the Services with your cloud storage accounts.

### Information We Collect Automatically

- Our products may require additional information or permissions from your device in order to function effectively.
- Log Data. When you use the Services, whether as a registered user or a non-registered user, for

example in accessing our Services through a Social Networking Site, (any of these, a "BlackSleeve Media User"), our servers automatically record information that your browser sends whenever you visit a website or application ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type or the website or application you were visiting before you came to the Service, pages of the websites or applications involved in the Service that you visit, the time spent on those pages, information you search for, access times and dates, operating system, software version, unique advertising identifier, and other statistics. We use this information to monitor and analyze use of the Services and for the Service's technical administration, to increase the functionality and user-friendliness of our Services, and to better tailor the Services to our visitors' needs. For example, some of this information is collected so that when you use our Services again, it will recognize you and serve advertisements and other information appropriate to your interests, as described in more detail below. We also use this information to verify that visitors to the Service meet the criteria required to process their requests. We do not treat Log Data as Personal Information or use it in association with other Personal Information, though we may aggregate, analyze, and evaluate such information for the same purposes as stated above regarding other Non-Identifying Information.

**Cookies.** Like many websites and applications, our Service uses "cookies" and mobile advertising identifiers to collect information. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes. We do not link the information we store in cookies to any Personal Information you submit while using our Services. An advertising identifier is an anonymous, resettable ID associated with your mobile device that can be managed in your device settings.

**How We Use Your Personal Information:**

We may use your Personal Information to provide products and services and to support our business functions. For example, we may use this information for the following purposes:

- Provide, Improve, and Develop the Services
- Provide the Services to you
- Recognize you when you return to our Services, keep your game progress, save your registration ID and login password for future logins, and store information about your use of the Services
- Display your achievements on leader boards within the relevant Application (which will include your basic social media profile information if you choose to link your social media accounts with the Services)
- Provide customer service
- Operate, protect, improve, and optimize the Services and the user experience, such as by performing analytics and conducting research
- Communicate with you and to send you information by email, postal mail, telephone, text message, or other means about our products, services, contests, support messages, updates, security alerts, and account notifications. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications or update your "user preferences" information. (See "Your Rights," below.)
- Make your user experience easier, more personalized, more enjoyable, and more efficient
- Address problems with and improve our products, brands, services, and technologies, as well as to develop new products and services
- Enable certain features of the Services in order to better understand how you interact with the Services and to monitor aggregate usage
- Facilitate your ability to share information to social media
- Administer and fulfill our contests and other promotions
- Help us learn more about your product preferences
- Send you push notifications with app-related information when you give us permission
- Fulfill your purchase requests and process refunds
- Fulfill a contract we have with you
- Operate, protect, improve, and optimize the Services and experience, and personalize and customize your experience. We conduct profiling based on your interactions with the Services
- We process this information given our legitimate interest in improving the Services and our users' experience, and where it is necessary, for the adequate performance of the contract with you
- Create and Maintain a Trusted and Safe Environment
- Prevent, detect, mitigate, and investigate fraud, security breaches and activities that are or potentially may be prohibited or illegal
- Conduct security investigations and risk assessments
- Verify or authenticate information

- As we believe to be required or appropriate to protect the rights, property, safety, and security of BlackSleeve Media and our employees, customers, and others
- As we believe to be required or appropriate under applicable law, to respond to requests from government authorities and to comply with legal process, investigations, regulatory or governmental inquiries or for other legal or regulatory purposes
- Comply with our legal obligations
- Resolve any disputes with any of our users or shoppers and enforce our agreements with third parties
- Enforce our Terms of Service or other policies
- We process this information given our legitimate interest in protecting the Services, to measure the adequate performance of our contract with you, and to comply with applicable laws
- Provide, Personalize, Measure, and Improve our Advertising and Marketing.
- Send you promotional messages we believe may be of interest to you, including marketing, advertising, and other information that may be of interest to you based on your preferences (including information about BlackSleeve Media or partner campaigns and services)<sup>(SEP)</sup> Personalize, measure, and improve our advertising.
- Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by BlackSleeve Media or its third-party partners
- Conduct profiling on your characteristics and preferences (based on the information you provide to us, your interactions with the Services, information obtained from third parties, and your search and booking history) to send you promotional messages, marketing, advertising, and other information that we think may be of interest to you
- We will process your Personal Information for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest
- Other Purposes
- When it is necessary to protect your vital interests or that of another person
- When it is necessary to carry out your instructions
- When it is necessary for the performance of a task carried out in the public interest
- If there is a sale of the assets of BlackSleeve Media or corporate restructuring, or as a result of a change of control of BlackSleeve Media or one of its group companies, or in preparation of any of these events. Any third party to which BlackSleeve Media transfers or sells BlackSleeve Media's assets will have the right to continue to use the personal and other information that you provide to us in the manner set out in this Privacy Policy.
- When it is in our legitimate interests. Legitimate interests are our business or commercial reasons for using your data, such as (i) keeping our records up to date (ii) providing the Services to you; (iii) maintaining or administering the Services (iv) performing business analyses or for other internal purposes to improve the quality of our business and the Services we offer; (v) prevention of fraud and financial crime to protect the public; (vi) communicating with you concerning programs or services consistent with our obligations to provide those services or otherwise; and (vii) participating in litigation, investigations, regulatory or governmental enquiries or for other legal or regulatory purposes involving our customers who use or have used our Services or other third parties. We will not unfairly place our legitimate interests above what is best for you.

## II. Legal Bases for Use of Your Personal Information

Other than as described above, the legal bases for using your personal information as set out in this Privacy Policy are as follows:

- Our use of your personal information is necessary to perform our obligations under any contract with you (for example, to comply with the Terms of Service);
  - Or you have provided us with your consent to do so, including with respect to the advertising and marketing materials delivered via our Services that are tailored to you and your preferences.
- Where 1 or 2 does not apply, our use of your personal information is necessary for our legitimate interests or the legitimate interests of others. Our legitimate interests are to:
- Develop and improve our business, including funding our business by use of advertising revenues;
  - Operate, maintain, and improve the Services and our marketing optimization efforts;
  - Understand the way in which the Services are used; and

- For internal administrative purposes.

### III. Information Sharing and Disclosure

**BlackSleeve Media Registered Users.** If you register through the Services on the Site and submit your Personal Information to create a profile, for BlackSleeve Media or for any BlackSleeve Media applications, websites, or services, other registered users will see your "User Name" ("Subscriber Identifier").

**Third-Party Advertisers:**

**Aggregate Information and Non-Identifying Information; Advertisers.** We may share aggregated information that does not include Personal Information and we may otherwise disclose Non-Identifying Information and Log Data with third parties for industry analysis, demographic profiling, and other purposes.

In particular, we share Non-Identifying Information (including the advertising identifier currently associated with your device) and Log Data and other aggregated information with third party advertising and technology companies. The data we share with them includes data about your device, location, and use of our Applications, including IP address, device identifiers and information, Application usage data, and purchase data as well as information you provide to us when using our Applications such as game progress and certain technical information. Such information may be used to send you targeted advertisements for products and services that are relevant to your interests. In some cases, these third parties will also use the data that they collect for their own purposes, such as aggregating your data with other data they hold in order to inform advertising related services provided to other clients. These third parties may place a cookie on your browser, or use a web beacon, to collect information about your use of our website so that they can provide advertising about products and services tailored to your interest. That advertising may appear across the Services, or on other websites, apps, and services. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. On mobile you can reset your settings by taking the following steps (for iOS: <https://support.apple.com/en-us/HT202074> and for Android: <https://support.google.com/ads/answer/2662922?hl=en>). If you do not accept cookies, however, you may not be able to use all portions of the website or all functionality of our Services, and advertising will no longer be targeted to your interests.

For example, we may collect and share the advertising identifier associated with your device (such as the Apple IDFA and Android Advertising ID) with advertisers. An advertising identifier is an alphanumeric string that can be used to identify your device so that advertisers can serve relevant ads to you. We use the Apple IDFA only as permitted by Apple, and we use the Android Advertising ID only as permitted by Google. An advertising identifier is assigned, and ad tracking is turned on, by default on your mobile device. You may limit the use of or reset your advertising device ID using the privacy settings on your mobile device; in some instances, you may need to reset the operating system to reset the advertising device ID. We do not associate any of your personal information with your advertising device ID without your consent (which may be given by you in our terms of use for an Application).

This list may be updated at any time. Please check this Privacy Policy for the most current information.

**Service Providers:**

We may employ third party companies and individuals to facilitate our services, to provide our services on our behalf, to perform services related to our Services (e.g., without limitation, analytics and reporting services, database & hosting services, distribution platforms, and other web or app service providers) or to assist us in analyzing how our Services are used. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Service providers with whom we share your personal information include:

- Web, App and Game Distribution, Payments and Operating System platforms, including, but not limited, to Apple Inc., Google LLC, Amazon.com, Inc. Facebook, Inc., Bemobi International AS, and Microsoft Corporation;
- Analytics Service Providers, including, but not limited, to Flurry, Inc., Periscope, Inc., Appfigures, Inc., Google LLC (operating as Fabric, Firebase, Google Analytics), and Game Analytics;<sup>SEP</sup> Web, App or Game Software, Hosting and Database Service Providers, including, but not limited, to OneSignal, Inc., Amazon.com, LLC (Amazon Web Services), Globotech Communications, and GOTOANDPLAY S.N.C.; and
- Customer Support Platforms, including, but not limited, to Zendesk, Inc., Helpshift, Inc., and Salesforce, Inc. (Operating as Desk.com).
- Social Networking Sites.

We may share the information in your BlackSleeve Media account profiles and the account profiles of

BlackSleeve Media Applications and websites (including your Personal Information) with the Social Networking Sites you have linked to your BlackSleeve Media accounts and other social media and similar platforms, as well as our advertising partners, to provide you with enhanced services, including relevant advertising. These third parties have access to your Personal Information only for this purpose (unless they have received your Personal Information independently of the BlackSleeve Media service) and are obligated not to disclose or use it for any other purpose.

#### Group Companies.

We may share your personal information with our group companies where it is in our legitimate interests to do so to enable them to provide customer support to you or for internal administrative and management purposes (for example, for corporate strategy, compliance, auditing and monitoring, research and development, and quality assurance).

#### Compliance with Laws and Law Enforcement.

BlackSleeve Media cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of BlackSleeve Media or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, any illegal, unethical or legally actionable activity.

#### Business Transfers.

BlackSleeve Media may sell, transfer, or otherwise share some or all of its assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

#### Other Disclosures.

We may share your Personal Information with our legal, regulatory, audit, and other professional advisors. Those companies may use your Personal Information to assist us in our operations consistent with our legitimate business interests. We also may share information about you as described at the point of collection or otherwise pursuant to your consent or where BlackSleeve Media has a legitimate interest in doing so.

### IV. How Long We Store Your Information

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise, or defend our legal rights.

### V. Your Rights

In accordance with BlackSleeve Media's policies and procedures, all registered users of BlackSleeve Media Services have the right to review, verify, correct, and request erasure of the Personal Information that we hold about you under certain circumstances. If you completely delete all such information, then your account may become deactivated. You also have the right to limit, restrict, or object to the processing of your Personal Information under certain circumstances. You may also have the right to request that we transfer your Personal Information to another party to the extent provided for under applicable data privacy laws. If you want to review, verify, correct, or request erasure of your Personal Information; limit, restrict, or object to the processing of your Personal Information; or request a transfer of your Personal Information to another party, please contact us at [admin@blacksleeve.com](mailto:admin@blacksleeve.com) or write to us at 5317 Windypine Dr, Nashville, TN 37211-7413. To protect your privacy and security, we also will take reasonable steps to verify your identity before granting access, making corrections, or following such a request to correct or delete your data.

When you contact us, we will respond as soon as possible and where possible within one month. If your request is more complicated, it may take longer to respond to you, but we will respond within two months of your request. There is no charge for most requests, but if you ask us to provide a significant amount of data, for example, we may ask you to pay a reasonable administrative fee.

#### Your California Privacy Rights

California Civil Code Section 1798.83 permits customers of BlackSleeve Media who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please write to us at the following address:

BlackSleeve Media Inc. <sup>SEP</sup>Attn: California Privacy Rights <sup>SEP</sup>5317 Windypine Dr, Nashville, TN 37211-7413

California Do Not Track Disclosure: Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Do Not Track browser settings or signals. For information about Do Not Track, please visit: [www.allaboutdnt.org](http://www.allaboutdnt.org).

## VI. Security

BlackSleeve Media is concerned with safeguarding your information. We employ reasonable administrative, physical, and electronic measures designed to help protect your information from unauthorized access. No security, however, can eliminate the possibility that your information may be accessed by an unauthorized third party and we cannot guarantee that your information will remain secure in all situations.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to you via email, mail, telephone, or conspicuous posting on our website in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system. We reserve the right to choose which method we use to contact you about such an event.

## VII. International Transfer

You are giving us the following particular express, voluntary, and informed consent to a few activities relating to your Personal Information that is disclosed in providing goods and services to you, or for a purpose directly related to such purpose:

**Consent to International Transfer and Disclosure of Personal Information:** BlackSleeve Media is located in the United States ("U.S.") and is subject to the applicable laws of the United States (where data privacy laws are less stringent than in the European Union and certain other jurisdictions). We will store and process information we receive about you, as described in this Privacy Policy, in the U.S.

We may be involved in business activities in a variety of countries. You agree that BlackSleeve Media and those with whom we share your Personal Information ("Recipients") may disclose, transfer, process, and store your Personal Information outside of your country of origin to our affiliates, sponsors and partners, and any other third-party service providers for the purposes described in this Privacy Policy.

Some of the recipients of Personal Information as specified above may be located in countries that do not provide a level of data protection equivalent to that set forth by the European Union and some other jurisdictions. If you submit any Personal Information or choose to access or use the Services offered by BlackSleeve Media, such as our website, you consent to such disclosure, transfer, process, and storage of information in accordance with this Privacy Notice and subject to such applicable laws which may include access by law enforcement and other government entities including courts and tribunals.

If we do transfer Personal Information outside the U.S., we will make sure that it is protected in the same way as if it were being used in the U.S. We will use one of the following safeguards to ensure your information is protected:

- Transfer the data to a non-EEA country that has privacy laws at least as protective as those within the EEA, or
- Put in place a contract with the recipient of the data, which means the recipient must protect the data to the same standards as required within the EEA, or
- Transfer it to organizations that are part of the Privacy Shield. The Privacy Shield is a framework that sets out the standards for data to be sent between the United States and European countries. The Privacy Shield ensures that data are protected to the same standards as used within the EEA.
- **Consent to Electronic Notice If There is a Security Breach:** We will safeguard your Personal Information and prevent such information from unauthorized access, disclosure, or use. If we or a Recipient is required to provide notice of unauthorized access to or other invasion of certain security systems, you agree that we (or they) may do so when required (or voluntarily) by posting notice on our website or sending notice to any email address we have for you, in our (or their) good faith discretion. You agree that notice to you will count as notice to others for whom you are acting and agree to pass the notice on to them.

## VIII. Our Policy Toward Children

These Services are not directed to children under 13. We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at

admin@blacksleeve.com. If we become aware that a child under 13 has provided us with Personal Information, we will delete such information from our files.

#### IX. Phishing

Identity theft and the practice currently known as “phishing” are of great concern to BlackSleeve Media. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, your account ID, login password, or national identification numbers in a non-secure or unsolicited e-mail or telephone communication. For more information about phishing, visit the Federal Trade Commission’s website.

#### X. Links to Other Sites

Our Services may provide links to other websites and applications. If you choose to visit an advertiser by “clicking on” a banner ad or other type of advertisement, or click on another third-party link, you will be directed to that third party’s website. The fact that we link to a website or present a banner ad or other type of advertisement is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

#### XI. Complaints

If you have any complaints concerning BlackSleeve Media’s processing of your Personal Information, please email us at admin@blacksleeve.com or write to us at 5317 Windypine Dr, Nashville, TN 37211-7413. Please note that if you are an EU Resident, you may have the right to lodge a complaint with a European Union supervisory authority that is responsible for the protection of Personal Information in the country where you live or work, or in which you think a breach of data protection laws might have taken place. You can learn more about these rights at [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en).

Customers in the United Kingdom can contact the Information Commissioner’s Office by telephone on 0303 123 1113, or by using the live chat service that is available through the Information Commissioner’s website [www.ico.org.uk](http://www.ico.org.uk)

#### XII. Contacting Us

If you have any questions about this Privacy Policy or if you would like us to delete your personal information, please contact us at admin@blacksleeve.com

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