

## Privacy Policy

This privacy policy (Privacy Policy) adopted by Juego Studio Private Limited and Its subsidiary GamesTurf Private Limited (hereinafter referred to as “GamesTurf”, “We”, “Us” or “Our”) governs the collection, use, and transfer of information capable of identifying a person (Personal Information) accessed or shared with Us by virtue of use or access of our mobile applications or websites (Platform). By agreeing to this Privacy Policy, or by accessing, or by using the Services (defined below) through the Platform, you consent to the collection, transfer, adaptation, alteration, storage, disclosure, and other uses of your Personal Information as described in this Privacy Policy. If you have any concerns about providing data, or having it used in any manner permitted in this Privacy Policy, you should not use the GamesTurf Services. Unless specified otherwise, this Privacy Policy applies only to the Platform and services, features, software, and functionalities offered by Us, via the Platform.

For the purposes of this Privacy Policy, “Sensitive Personal Data or Information” or “Sensitive Information” means Personal Information, that consists of the (i) Password, (ii) Financial information, such as bank account, debit or credit card details, (iii) Physical, psychological and mental health condition, (iv) Sexual orientation, (v) Medical records and history, (vi) Biometric information, (vii) Any detail relating to the above as provided to the body corporate for providing a service, and (viii) Any of the information received under each of the aforesaid heads by the body corporate for processing, or to be stored or processed under a lawful contract or otherwise.

This Privacy Policy incorporates the requirements under the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011.

### Our Business & Policy Applicability

GamesTurf develops and operates software & technology products/ platforms and associated services for enabling, conducting, and offering online cash-based skill games i.e. Games where there is a preponderance of skill over chance, whether through the deployment of physical or mental skill (Services). By accessing our Platform, users and players (hereinafter referred to as “Users/”You”/”Your”) can access our Services, which include the provision of access to various games available on the Platform.

As set out in the terms and conditions relating to the Services (the “Terms”), you must be at least at a legal age (minimum age of 18 years) to access and/or use the Services. The Services are not directed to persons under the legal age of majority or any such persons residing outside India. We do not knowingly collect any Personal Information from children under legal age. If We become aware that a child under legal age has provided Personal Information, steps will be taken

to remove such information and terminate such an account. If you become aware that any Personal Information of a child/minor is provided, please contact our Grievance Officer (defined below).

For the purposes of this Privacy Policy, unless defined hereunder, all capitalized terms shall have the meaning ascribed to them under the Terms.

THIS PRIVACY POLICY DOES NOT APPLY TO MOBILE APPLICATIONS OR WEBSITES WHICH ARE NOT OWNED OR CONTROLLED BY GAMESTURF, INCLUDING THIRD PARTY LINKS AND APPLICATIONS WITH WHICH YOU MAY INTERACT WHILE USING THE PLATFORM. WE WILL NOT ASSUME ANY LIABILITY FOR ANY HARM CAUSED TO YOU BY ACCESSING ANY THIRD PARTY WEBSITES OR LINKS ADVERTISED ON THE PLATFORM. YOUR ACCESS AND USAGE OF ANY THIRD-PARTY WEBSITES OR APPS IS ENTIRELY AT YOUR OWN RISK. THE COMPANY SHALL NOT BE A PARTY TO ANY TRANSACTION BETWEEN YOU AND A THIRD-PARTY SERVICE.

## Collection & Use of Information

- **Personal Information**

We obtain and you hereby consent to provide your Personal Information at the time of registration or from third-party service providers you interact with or engaged by us. Such Personal Information includes :

- **Registration** – Apple /phone number/Google.
- Using wallet, payment functions – Bank account details, Payment method, Name, KYC proof documents. Please note that we are collecting Aadhaar information.
- **Customer support correspondence:** When you ask for assistance from Our customer support, the contact information you provide will be collected, as well as information about your gameplay or activity on the Service, your user ID number, your financial and payment information, and the correspondence. If available through the Services, you may provide Us with certain profile information which you consent to make public, such as a short biography, location, website, cell phone, a picture, information to customize your account, etc. Such contact information may be used to send you information about the Services or related information.

- **Non-Personal / Aggregated Data**

Additionally, GamesTurf may use data management services to access device information; metadata of incoming and outgoing calls and messages; device storage, device identifiers, call related information and records, application history, etc. These permissions are collected to better understand how users access and use our Services, both on an aggregated and individualized basis, in order to improve our Platform, analyze player traffic and activity, respond to user desires and preferences, and for other research and analytical purposes. This includes:

- **Location Services:** We and/or third parties may use and store information about your location to provide special features, to deliver ads that relate to your interests and/or to improve and customize the Services and to ensure that you are not accessing the Platform from restricted states in India or outside the territorial limits of the Republic of India.
- **Links:** We may keep track of how you interact with links across the Services, including email notifications, third-party services, and client applications, by redirecting clicks or through other means.
- **Log Data Services:** Our backend servers automatically record information created by your use of the Services. This data may include information such as your IP address, browser type, operating system, the referring web page, pages visited, location, your mobile carrier, device and application IDs, search terms, and cookie information. Log data is received when you interact with the Services. This data is used to provide the Services and to measure, customize, and improve them.
- **Third-party services:** We use a variety of third-party services to help the provision of the Services, such as hosting and other services. These third-party service providers may collect information sent by your browser as part of a web page request, such as cookies or your IP address, location and devices' unique identifiers. Also, third-party ad partners may share information to measure ad quality and tailor ads, for example, to display ads about things you may have already shown interest in.
- **Device Management Services:** The Device Management Services access device information; data, metadata of incoming and outgoing calls and messages; device storage, device identifiers, call related information and records, application history, etc. These permissions are collected to better understand how users access and use our Services, both on an aggregated and individualized basis, in order to improve our Services, analyze player traffic and activity, respond to user desires and preferences, and for other research and analytical purposes.

### **Sensitive Personal Data or Information Collected:**

Please note that We shall always take your express consent before collecting any Sensitive Personal Data or Information.

We are committed to keeping all such Sensitive Personal Data or Information safe at all times and ensure that such data/information is only transacted provided the highest possible degree of care available under the technology presently in use. GamesTurf will not use Your Sensitive Personal Data or Information for any purpose other than for such specific purposes as you have expressly consented to its use.

If you opt for the paid functions on the Platform, GamesTurf may collect the billing and financial information necessary to process the charges, including bank account details; and/or do so on behalf of the relevant payment service providers. Purchases of third-party services are subject to the policies applicable to such providers. Any payment data may need to be retained only within India to comply with directives of the Reserve Bank of India that apply to the payment service providers we engage to provide the services.

Where we permit any third parties to collect and use your Sensitive Personal Information, we, to the best of our knowledge, (i) Ensure that such third parties maintain the same security standards that are adhered to by us and prescribed under applicable data protection laws for the protection of your Sensitive Personal Information, and (ii) Take reasonable measures to ensure that the third parties do not disclose the Sensitive Personal Information unless such disclosure has been expressly consented to by you.

**Disbursal Information Services:** If you make a purchase in the Services, we may collect the billing, payments, and financial information necessary to process the charges/payments; and/or do so on behalf of the relevant payment service providers. Purchases of third-party services are subject to the policies applicable to such providers.

## Information sharing and disclosure

We may disclose your Personal Information in the circumstances set out below and you hereby consent to the same to be shared with:

- **Provision of Services:** Any third-party service provider to whom disclosure is necessary to enable Us to provide You with the services which You wish to access on or through the Platform, for example, to process a disbursal instruction your Information has to be provided to the payment processors. Such companies shall be granted access to the Personal Information needed to perform their functions and include:

Third-Party Data Recipient Entity Name	Service/Function
Cashfree   Payment gateways and payment aggregators	For making transactions and depositing and withdrawing money with us
Twilio   SMS Providers	For sending OTP through SMS
Ipapi   IP Reverse Geolocation Providers	To ascertain and act against Users from restricted jurisdictions
CleverTap and AppsFlyer Analytical and data management service providers	To obtain services for smooth functioning of the Platform and customizing the Platform for the needs of the Users, sharing such data with data analytics services and tools which are run on

- Law Enforcement:** (i) Any person/entity to whom disclosure is necessary in accordance with applicable law; (ii) Any government or statutory authority or court of law or judicial forum to whom disclosure is necessary in accordance with applicable law; (iii) In circumstances We believe necessary or appropriate to respond to valid claims and legal process, to protect the property and rights of GamesTurf, to protect the safety of the public or any person or User, or to prevent or stop any illegal, unethical or legally actionable activity; and (iv) Any person/entity to whom disclosure is necessary to enable Us to enforce Our rights.
- Affiliates:** To Our associate companies, business partners, agents or third parties for the purposes of the services or any other marketing and promotional activity is undertaken by or on behalf of the Company.
- Change in Control:** Any entity that legally acquires the Company or its Platform. In the event that GamesTurf is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your Personal Information may be sold or transferred as part of that transaction. The undertakings in this Privacy Policy shall apply to the Personal Information as transferred to the new entity.

Through interaction with social networks and/or platforms you may allow the Services to interact with any third-party social network and/or platforms, such as Facebook, Twitter, WhatsApp and any other networks/platforms which will provide data about you to Us, and vice versa. Since any other applications or websites other than the Services are owned by a third party, you must ensure that you read their terms of service and privacy policy or similar documents. You understand that when you allow the Services to interact with any third-party social network and/or platform, We may share data about you with your contacts and other users of the Services

and vice versa. This Data may include your name, profile picture, activity status, and information related to your use of the Services.

## Your Rights

We do not keep Your data for longer than is necessary unless we are required to do so under applicable law. We will use Your Personal Information only for so long as is necessary:

- To achieve the purposes that have been specifically identified in this Privacy Policy or such purposes as having been identified in any agreement entered into with you.
- As required by applicable laws and regulations, or as may be required for evidentiary purposes.
- As deemed necessary for tax, fraud control, or mitigation, and to conduct a defense in relation to any disputes or claims whether potential or actual (taking into account statute of limitations under applicable laws).

You can review, modify, and delete the information You have provided to us at any time and/or withdraw Your consent from allowing us to collect, process or transfer Your information by contacting Our Grievance Officer (See Section VIII below). Please note that if You withdraw Your consent, we may be constrained to withdraw those features, functionalities, services etc. which cannot be provided, without the information You seek to withdraw consent for, or delete from our records. Please note that your requests with respect to your data shall not be complied with if it adversely affects another user, or prejudices such user's rights.

Your right to withdraw consent relates to any further collection or processing, of your Sensitive Personal Information, however such withdrawal of consent shall not: (i) Be retrospective or require the deletion of records required for statutory purposes; or (ii) Operate where required for the discharge of ongoing contractual obligations unless the contract under which the Sensitive Personal Information is required to be collected is also terminated with the request for withdrawal of consent to collect such Sensitive Data.

Your data will be erased/deleted when it has served the purpose for which it was being collected and is no longer necessary, where consent has been withdrawn, or where retention of such data is contrary to or prohibited by applicable law.

You have the right to data portability, i.e., you have the right to receive a copy of your Personal Information in a commonly used and structured, machine-readable format and have it transferred to another service provider or third party after paying us a fee which shall be communicated upon your request.

GamesTurf maintains appropriate technical and physical safeguards to protect Information against accidental or unlawful destruction or loss, alteration, unauthorized disclosures or access, and any other unlawful forms of processing of the data in its possession (Security Practices). All information provided by You is stored and retained on a secure server located in India.

Such Security Practices include, but are not limited to encryption, firewalls, password protection, limitation of access to specified personnel on a need to know basis, de-identification and encryption and other physical security measures to guard against unauthorized access to the server and systems and information residing on such server and systems. GamesTurf Security Practices are commensurate with the information assets being protected and with the nature of the business. By using the Platform, you accept that the Security Practice and procedures mentioned above, which are designed to protect the information provided by You, are reasonable.

Information including Sensitive Personal Data or Information (other than such data that is subject to data localization due to statutory or regulatory obligations) may be transferred to third parties located and/or may be stored at worldwide destinations, outside India or the location from which your information has been collected which ensure a similar level of protection and security adhered to by us under applicable Indian laws. However, we do not guarantee that Personal Information cannot be accessed, disclosed, altered or destroyed by breach of any of the abovementioned safeguards. We take all steps reasonably necessary, including providing notice of breach to users, where required under applicable law, to ensure that Personal Information is treated securely and in accordance with this Privacy Policy.

Irrespective of which country you reside in or supply information from, you authorize us to store and/or use the Information according to this Privacy Policy in any country where we may operate.

PLEASE UNDERSTAND THAT, WHILE WE STRIVE TO PROTECT YOUR PERSONAL INFORMATION AGAINST POTENTIAL RISKS AND EXPOSURES, THERE IS NO ABSOLUTE SECURITY IN THE ONLINE/ INTERNET SPHERE. THEREFORE, YOU MUST NOT DISCLOSE ANY INFORMATION ON THE PLATFORM THAT IS SENSITIVE PERSONAL DATA OR INFORMATION WHICH IS NOT REQUIRED FOR YOU TO USE OUR SERVICES. YOU UNDERSTAND THAT THE TRANSMISSION OF INFORMATION OVER THE INTERNET IS NOT COMPLETELY SECURE AND THERE ARE RISKS ASSOCIATED WITH IT. ALTHOUGH WE STRIVE TO PROTECT YOUR PERSONAL INFORMATION, WE CANNOT GUARANTEE THE SECURITY OF THE SAME WHILE IT IS BEING TRANSMITTED TO OUR PLATFORM AND ANY TRANSMISSION IS AT YOUR OWN RISK.

## **Term**

We may retain the Information for as long as is necessary to fulfill the purposes for which it was collected or as needed to provide the Services, even after you have discontinued or deleted any account, or after the end of the provision of the Services, if retention of such Personal Information is reasonably necessary to comply with legal obligations, meet regulatory requirements, resolve disputes between users, prevent fraud, or any other use. Subsequent to such a term, we will delete or anonymize your Personal Information once the purpose has been fulfilled.

## **Grievance Redressal**

In case of any queries regarding our data processing activities or to exercise your rights with respect to your Personal Information, please contact Our Grievance officer at support@Ludo Brawl.com (Grievance Officer). For revoking your consent and requesting deletion of your Personal Information held with us. We will respond to your request as soon as possible, and in any event within 30 days or in accordance with the timeframe permitted under applicable law. and delete your Personal Information, except such information required by law to be retained.

If any court or other competent authority finds any of this Privacy Policy to be invalid or unenforceable, the other terms of this Privacy Policy will not be affected. This Privacy Policy is governed by and interpreted in accordance with the laws of the Republic of India. Any dispute arising in connection with this Privacy Policy will be subject to the exclusive jurisdiction of the courts located in the state of Karnataka, India. You consent to the jurisdiction and venue in such courts and waive any objection as to an inconvenient forum. We reserve the right to revise or amend this Privacy Policy from time to time.