## **Privacy Policy**

May 11, 2022

Thank you for choosing to be a part of the PlayEstates community. PlayEstates, Inc. a Delaware corporation ("PlayEstates", "we" "us", "our") are committed to the protection of your personal information. Our community's privacy is very important to us, we are committed to protecting the privacy of all of our community members.

Please read this privacy notice carefully as it contains important information about what we do with the personal information we collect concerning you.

This privacy notice applies to all information collected through our Services. This policy is intended to inform you of:

- The types of information we collect
- How we use the information we collect
- How we share information we collect
- How we safeguard the information we collect
- Other important privacy information

This policy applies to you whenever you access or use any domains or subdomains of our website at http://www.PlayEstates.com(the "Website"), or when you access or use any products, services, features, content, widgets, materials, or other tools offered by PlayEstates (collectively, "Services"). This policy does not govern information you choose to exchange directly with other users of the Website, including communications or transactions with other users via the Discord channel, as we have no direct control over the collection or use of this information. Please note that your relationship with PlayEstates is governed by our Terms of Use and any other agreements you may enter in connection with accessing our Services.

## **Types of Information We Collect**

To provide our Services, we may obtain personal information directly from you (including but not limited to email addresses and phone numbers) and may obtain information indirectly through electronic communications and third parties (e.g., email, Discord, Telegram).

We do not save or store any sensitive wallet information or private keys though we may index transactions recorded on public blockchains. We do not administer or control any public blockchains.

### **Automatically Collected Information**

In addition to the information, you may directly provide us, we automatically collect certain information when you visit, use, or navigate our Services. This information may include your IP address, device identifiers, click path, use of our Website, and other electronic data. We may also collect additional technical information, including your operating system and browser, as

well as the presence of any software that our Services or Website may require to operate with your computer, or other third-party software on your computer.

### Cookies

A "cookie" is a small amount of data, often including an anonymous unique identifier, which is sent to your browser from a website's computer and stored on your computer's hard drive. Cookies can be used to provide you with a tailored user experience and to make it easier for you to use a website upon a future visit. We may include cookies on our Website or within the Services and use them to recognize you when you return to our Website or utilize the Services. You may set your browser so that it does not accept cookies. Cookies must be enabled on your web browser, however, if you wish to access certain personalized features of our Services. By using the Website, you consent to this use.

### **How We Use Information We Collect**

We may use your information for any of the following purposes:

- Administer, operate, facilitate, and manage your relationship with PlayEstates and deliver the Services.
- To communicate with you about the Services and target our marketing, advertising, and other efforts to enhance your user experience and increase engagement.
- Provide you with information about our current Services
- To debug, identify, and correct errors;
- On a de-identified, aggregated basis, for research and development activities, including
  to analyze how you use the Services to help us understand usage patterns and know if
  there are problems with the Services or areas for improvement;
- Send you notifications related to fractions, vaults, or other Services
- Respond to inquiries related to employment opportunities or other similar inquiries
- Comply with applicable laws and regulations and cooperate with investigations by law enforcement or other authorities
- Act in accordance with any reason for which you have provided data to PlayEstates related to the Services

#### **How We Share Information We Collect**

We do not share personal data with third parties for their direct marketing or similar purposes without your consent. We also do not offer financial incentives, preferential service agreements, or any other differences in our prices or services in exchange for your data.

The manner in which partners, service providers, and others with whom we share and/or disclose your information is governed by the policies of such parties, and we shall have no liability or responsibility for the privacy practices or other actions of any such parties.

Generally, you can easily recognize when one of our partners is associated with a service. However, certain parties may provide services anonymously, and, in this case, we will only share information that is directly related to the applicable service(s). This may include the incorporation of your personal information into databases maintained to validate information for identity verification, including verification for anti-money laundering and "Know Your Customer" protocols.

The primary situations in which we may share your data are as follows:

#### Service Providers

To operate the Services, we may share information about you as needed with our service providers, including, but not limited to, accountants, auditors, lawyers, consultants, advisors, and affiliates.

#### **Affiliates**

We may share information with companies closely related to us if any, – our "Affiliates" – for certain purposes under this policy. By "Affiliate," we mean an entity that controls, is controlled by, or is under common control with PlayEstates, whether the control results from equity ownership, contract, overlapping management, or otherwise. In this context, "control" means the ability to replace the officers or directors or otherwise materially influence or control management decisions. Our Affiliates will be entitled to enjoy our rights under this policy, and we will be responsible for our Affiliate's conduct under this policy.

### **Third-Party Sites**

The Website may contain links to third-party websites and may redirect you to third-party websites. These sites include, among others, service providers who may or may not have a relationship with PlayEstates. Third party websites are not under our control, and we are not responsible for any third-party websites, or the accuracy, sufficiency, correctness, reliability, veracity, completeness, or timeliness of their information, links, changes, or updates. The inclusion or access to these websites does not imply an endorsement by PlayEstates, the provider of such content or services, or any third-party website. Please be aware that when you enter a third-party website, any information you provide, including financial information, is subject to the terms of use and privacy policy of that website.

# **How We Safeguard Your Personal Information**

Security Systems and Processes: We have put in place security systems designed to prevent unauthorized access to or disclosure of Personally Identifiable Information, and we take all reasonable steps to secure and safeguard this information, including:

- We use industry-standard encryption technology for any information we store;
- PlayEstates employees are required to acknowledge that they understand and will abide by this policy with respect to the confidentiality of Personal Information;
- Where applicable, companies that we do business with agree to apply similar safeguards to Personal Information;

- We provide access to our databases containing Personal Information on a need-to-know basis only;
- We use automated tools to monitor network traffic to identify unauthorized attempts to upload information, change information, or otherwise seek to "hack into" our systems.

Our security systems are therefore structured to deter and prevent hackers and others from accessing the information you provide to us. Please understand, though, that this information should not be construed as a warranty that our security systems are fail-proof. Due to the nature of Internet communications and evolving technologies, we cannot provide, and we also disclaim assurance that the information you provide us will remain free from loss, misuse, or alteration by third parties who, despite our efforts, obtain unauthorized access.

## **Other Important Privacy Information**

Opting Out of Communications: If you wish to stop receiving marketing or promotional communications or to opt-out of the use of your information for the purposes described in this policy, please follow the opt-out instructions, such as clicking "Unsubscribe" (or similar opt-out language), in those communications. You can also contact us at privacy@PlayEstates.com to opt out. Despite your indicated email preferences, we may send you service-related communications, including notices of any updates to our terms of service or this policy. Please understand that you will not be allowed to opt-out of certain communications required to comply with applicable laws, rules, and regulations, or other legal and related notices concerning your relationship to the Website.

# **Updating or Deleting Information**

All users may review, update, correct or delete the Personal Information furnished by a user by contacting us at privacy@PlayEstates.com. If you request, we will take reasonable steps to remove your personal information from our databases. Please understand, however, that certain Personal Information may remain in our databases following the deletion of your account pursuant to our data retention policy.

#### **Data Retention Period**

We retain information we collect for as long as you use the Services or as necessary to fulfill the purposes for which it was collected, such as providing our Services, resolving any disputes, establishing legal defenses, enforcing our agreements, and complying with applicable laws. We may retain information that is otherwise deleted in anonymized and aggregated form, in archived or backup copies as required pursuant to records retention obligations, or otherwise as required by law. We may retain an archived copy of your records as required by law or for legitimate business purposes.

### **Policy Changes and Updates**

Each time you visit our Website or use our Services, the current version of this privacy policy will apply. When you use our Website or the Services, you should check the date of the last update to the policy (which appears at the top of the policy) and review any changes since the

last version. Our business changes frequently and this policy is subject to change from time to time. Unless stated otherwise, our current policy applies to all information that we have about you. We may require you to affirmatively assent to a revised version of this policy as a condition of continuing to use the Website or our Services.

We Operate in the United States: PlayEstates is based in the United States. The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your personal information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal information.

## European Economic Area Residents

If you are an individual residing in the European Economic Area ("EEA") or the United Kingdom, we collect and process information about you only where we have legal bases for doing so under applicable laws, including the General Data Protection Regulation ("GDPR"). The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services, perform a
  contract with you, take necessary steps prior to performing a contract or at your request,
  provide customer support, and protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promotes the Services, personalize services you receive, and protect our legal rights and interests

You give us consent to do so for a specific purpose, or we need to process your data to comply with a legal requirement. If you have consented to our use of information about you for a specific purpose, you may change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we have a legitimate interest to do so, you may object to that use though, in some cases, this may mean no longer using the Services. To do so, please email us at privacy@PlayEstates.com

In the event of a data breach, we will endeavor to notify you within 72 hours of detection of a breach that we conclude poses significant risks to your rights and freedoms under the GDPR. You may also lodge a complaint with a supervisor authority in the jurisdiction in which you reside.

#### California Residents

Pursuant to the California Civil Code, residents of California have the right to request from a business with which the California resident has an established business relationship what types

of personal information if any, the business shares with third parties for direct marketing purposes by such third parties and the identities of the third parties with whom the business has shared such information in the immediately preceding calendar year. To access this information, please contact us by email at privacy@PlayEstates.com.

### **Residents of Other Jurisdictions**

If you wish to exercise rights granted to you by laws of any jurisdiction other than the EU or the State of California, please contact us for assistance at privacy@PlayEstates.com. We will endeavor to act upon your request in accordance with applicable law. We will not discriminate against you for exercising these rights.

#### Children's Data

We do not knowingly request to collect Personal Data from any person under the age of 18. If a user submitting Personal Data is suspected of being younger than 18 years of age, PlayEstates will require the user to close his or her account. We will also take all necessary steps to delete his or her Data as soon as possible.

### **Contact Us**

If you have any questions about this policy, the practices of this Website, or your dealings with any of the Services, please contact us by email as follows: info@PlayEstates.com