

Privacy Policy for Truegame Token Sale

TRUEGAME S.R.L., a company duly established and registered in Costa Rica under the registration number 3-102-747491 and company seat at 10901, Costa Rica, San Jose, Santa Ana, 350 metros al Norte de Restaurante Ceviche del Rey (hereinafter, collectively, »TRUEGAME«, "we", "us" or "our") is committed to protecting and respecting your privacy.

This Privacy Policy, together with our **Terms and Conditions for Participating in the Truegame Token Sale** available at <https://ico.truegame.io/> and any other documents incorporated thereto by reference ("**Terms**") sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Unless a different use is indicated herein, or required due to the context, the terms used in this Privacy Policy shall have the same meaning as provided for in the Terms.

This Privacy Policy applies to your (»you«, »user« or »customer«) purchase of Truegame Tokens during a TGAME token sale (as applicable, hereinafter: "**Tokens**"), in accordance with the published Terms, accessible via <https://ico.truegame.io/> (the "**Website**"), and issued by TRUEGAME (the »**Sale**«), as well as your any other form of participation in the Sale, or interaction or use of the Website.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting the Website, participating in the Sale and acquiring any Tokens, you are accepting and consenting to the practices described in this policy.

We reserve the right to amend or modify this Privacy Policy at any time and in response to changes in applicable law or our business practices, or due to technical or any other grounded reasons or issues that might emerge during the Sale.

Any changes we may make to this Privacy Policy in the future will be posted on this page and, when appropriate and necessary, notified to you by e-mail. Please check back frequently to see any updates or changes to this Privacy Policy.

Information we may collect from you

We may collect and process the following data about you as a Buyer as defined in the Terms:

1. Information you give us

- 1.1. We require users who participate in the Sale and acquire any Tokens during the Sale to give us certain personal identification and contact information. Depending on the scope of whitelisting and compliance with Know-Your-Customer ("**KYC**") and Anti-Money-Laundering ("**AML**") regulations and procedures (as specified in the Terms), you may be asked to provide the following personal identifiable information: your personal name and last name, full address (including postal code, city, and country), citizenship, mobile phone number, date of birth, email address, copy of your personal identification document (passport, national ID card or driver's licence), selfie with personal identification document. Should

you purchase Truegame tokens on behalf of a legal entity you represent, you will be required to provide us with the following information: Legal entity's name, registered office, business address, registration number, name of the representative, country of registration, tax ID number, e-mail address, excerpt from the business register which is not more than three months old. The legal entity's representative will need to be physically present and identify himself to us and provide his personal information listed in the previous paragraph.

If you have a reason to believe that someone has provided us with your personal information, or wish to discontinue your participation in the Sale, and you would like to request that your personal information be removed from our database, please contact us at support@truegame.io.

Notwithstanding the foregoing, we will hold the above information for as long as is necessary in order to provide you with the service on the Website, deal with any specific issues that you may raise or otherwise as is required by the applicable law (including, but not limited to KYC and AML regulations).

2. Information we collect about you

With regard to each of your visits to the Website and participation in the Sale:

- quantity of purchased Tokens, date and hour of purchase, and identification number (address) of ETH, BTC or LTC wallet (as applicable);
- information about your visits, including the full Uniform Resource Locators (URL) clickstream to, through and from the Website (including date and time);
- products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page; and
- technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- any other information with regard to the participation in the Sale we might receive from any other sources.

We may receive information about you from publicly available sources. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

Third Party KYC service providers

You understand and agree that information as outlined above in **Sections 1** (*Information you give us*) and **2** (*Information we collect about you*) may be collected with the help of (and may be stored and processed) by our KYC specialized service providers, in particular **Sum And Substance Ltd**, a company established under the laws of UK, with registration number 09688671 _____ Suite 1, 5 Percy Street, Fitzrovia, London, England, W1T 1DG _____ (<https://sumsub.com/>).

Cookies

The Website uses cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy, as outlined below.

Uses made of the information

We use information held about you in the following ways:

- to enable your participation in the Sale;
- to provide you with information about other services that you request or that we offer which are similar to those that you have already purchased/provided or enquired about;
- to notify you about changes to our services;
- to ensure that content from the Website is presented in the most effective manner for you and for your computer;
- to comply with applicable KYC/AML regulations or any other applicable laws;
- to prevent fraud and other prohibited or illegal activities;
- to protect the rights and safety of our affiliated entities and third parties, as well as our own;
- to monitor compliance with our Terms;
- to ensure you receive information relevant to you;
- to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep the Sale and the Website safe and secure.

Disclosure of your information

We do not distribute or share any customer personal information, except as noted in this Privacy Policy, or as may be required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process.

We use the information we collect to set up the Sale for individuals and their organizations. We may also use the information to contact customers and prospects to further discuss their interest in the Sale, the other services we provide, ways we can improve our services, and send information such as announcements of promotions and events regarding Truegame or our partners.

We may also email you a newsletter and/or updates about the Sale, our company or our other services. You can opt out of receiving these communications by following the instructions at the bottom of each such message, or at any time by contacting us at support@truegame.io.

We may disclose your personal information to third parties in any of the following events:

- if TRUEGAME or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;

- to keep you up-to-date on the latest service announcements, updates, special offers or other information that we think you'd like to hear, either from us, our business partners or third parties.
- in order to enforce or apply our Terms and any other relevant agreements;
- or to protect the rights, property, or safety of TRUEGAME, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; or
- other events as outlined in this Privacy Policy.

In addition to the above cases, we may disclose your personal information also to any affiliated company of TRUEGAME, participating in whatever capacity (for example, as agent, representative, or seller of the Tokens) in the Sale or performing any services during or for the purposes of the Sale (including, but not limited to: IT company specialized in the performance of the KYC/AML procedure during the Sale), to the extent such disclosure is necessary for its provision of such services or its engagement in the Sale.

We will not otherwise provide your personal data to a third party without obtaining your prior consent.

Correcting, Deleting and Updating Your Information

Upon request, we will provide you with information about whether we hold or process any of your personal information, whether on behalf of a third party or otherwise. To request this information, please contact us at support@truegame.io.

If your personally identifiable information changes, or if you no longer desire to participate in the Sale, you may correct, update, discontinue the participation in the Sale or delete it by making the change on our member information page or by emailing our Support at support@truegame.io. We will respond to your request to access within 30 days.

We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We use a third party platform host, who hosts the forms on our site, they do not have any access to the personal information that you submit on our website.

Where we store your personal data

The data that we collect will be stored on the cloud with the hosting infrastructure based in the European Union.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Please note that by visiting and using the Website, participating in the Sale and giving us your personal data, you consent to your personal data being collected, used, processed, disclosed and stored by us, only as described in the Terms and this Privacy Policy.

Safeguarding personal data

The communication internally between our servers (e.g. between application server and database) is handled via secure socket layer (“SSL”) to provide AE-256 encryption and all information between our servers and your browser is handled via SSL (up to 256-bit encryption, depending upon your browser), providing an industry-standard level of protection for data in-transit.

You should always make sure that your browser can validate the Website’s certificate.

We also implement an advanced security method based on dynamic data and encoded session identifications in a secure server environment using preventive, detective and corrective technology and processes to safeguard information from attackers. These safeguards help prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of data.

The security of your personal information is important to us. When you enter sensitive information in our registration or order forms, we encrypt that information using transport layer security (TLS) technology. We also encrypt any information entered within the platform once users log into their accounts. If you have any questions about security on our Website, you can contact us at support@truegame.io.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential.

Your passwords are stored on our servers in encrypted form using a one-way hashing algorithm.

Please be reminded that you must protect any passwords or other credentials associated with your account for the participation in the Sale, and take full responsibility for any use of the account under your password. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your data transmitted to the Website, although we will do our best to protect your personal data. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

In the case of a personal data breach, we shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, of the General Data Protection Regulation of the European Union unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. In such case we will also notify you without undue delay and, where feasible, not later than 72 hours after having become aware of the breach, and suggest any actions to be taken to secure your personal information (change your username and password, etc.).

Your rights and access to information

You may ask us not to process your personal data for a particular purpose, or to access such information, by contacting us at support@truegame.io. Please note, however, that you shall remain liable for any fees or costs incurred at the time of the withdrawal of your consent to process your personal data. Furthermore, such request may result in you being unable further participate in the Sale.

You may ask us to receive your personal information, which you have provided to us, in a structured, commonly used and machine-readable format and shall have the right to transmit such information to another controller. You may submit such request by contacting us at support@truegame.io. Please note that the processing of such request may take up to 30 days to complete.

The Website may, from time to time, contain links to other third party websites.

If you follow a link to any of these websites, please note that these websites have their own privacy policies (including, as the case may be, landing pages of other TRUEGAME products or services) and that we do not accept any responsibility or liability in respect of these policies.

Please check these policies before you submit any personal data to these websites.

Cookie Policy and Information about our use of cookies

Our Website uses cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of the Website. They include, for example, cookies that enable you to log into secure areas of the Website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way the Website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to the Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Cookie Type	Purpose
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_cfduid	Session	For session management
sid	Session	For session management
XSRF-TOKEN	Security	For security purposes

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after 720 hours.

Opt-Out Statement

We offer you a means to choose how we may use the information you provide. If, at any time after registering for participation in the Sale, you change your mind about receiving certain email communications from us or about sharing personal information with third parties, send us a request to opt-out from receiving promotional emails or from having your personal information shared with third parties. Send your request to support@truegame.io.

Social Media Widgets

Our Website may include Social Media Features, such as the Facebook button and Widgets, such as the Share this button or an interactive mini-programs that run on our site. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are governed by the privacy policy of the company providing it.

Additional Information

Questions regarding this Privacy Policy or the security practices of the Sale should be directed at support@truegame.io.

Contact Information

If you have questions, concerns or suggestions related to our Privacy Policy or our privacy practices you may contact us at: support@truegame.io.

Date of Last Revision: April 20, 2018