

Privacy Policy

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RRSTUDI.IO is an audio-visual products and services production and games and mobile applications development company, established in the Kingdom of Belgium under number 0769.591.070 (« RRSTUD.IO », « we », « our » and their derivative and our products, games, apps and services) provides a website using <https://www.rrstud.io> (the « Site »), games (the « Game », the « Games »), mobile applications (the « App », the « Apps », the « Application », the « Applications ») and online services (collectively, with the site, games and apps, the « Services »).

What Does This Privacy Policy Cover?

This Privacy Policy (this « Policy ») sets forth how we collect, use, protect, store, disclose, and otherwise process your personal information (defined below). This policy also does NOT apply to information you provide to any third party or is collected by any third party (except as otherwise provided below). By using our services, you are confirming that you understand English well enough to understand this policy. Should you have questions about this policy, please contact us by emailing us at hello@rrstud.io, so we can clarify and address your questions.

How Do We Process Children's Personal Information?

Our services are not designed for children, and we do not intentionally or knowingly collect, use, store, disclose, or otherwise process any personal information from children. A « Child » is a person under 18 years old. If you are a parent or guardian of a child who has submitted personal information, please contact us by emailing us at hello@rrstud.io

What Types of Personal Information Do We Collect?

We may collect different types of information from you depending on how you use our services, including personal information. « Personal Information » means information that relates to an identified or identifiable natural person. The categories of personal information we may collect are listed below. Certain types of personal information may fall under more than one category.

- Identifiers: We may collect your name, username, email address, telephone number, billing address, shipping address, device information, Internet Protocol address, device identifiers, and other online identifiers, such as a support ticket ID.
- Commercial information: We may collect your payment information and purchase history, including the value and details of your purchases.
- Geolocation data: We may collect your location such as your zip code, city, state, and country.
- Internet or other similar network activity: We may collect information regarding your gameplay such as events completed or actions taken within the games and apps and your interaction with the site, including pages viewed.
- Other categories: We may collect information from the content that you share publicly in the games and apps through public functions or that you send to us directly when you contact us or report a problem with the services. We may also

collect information that does not generally identify you but may become associated with your account. We may use information that does not identify you for any permissible business purpose under applicable law.

From What Sources Do We Collect Personal Information?

Directly From You

We may collect your personal information when you provide it to us directly. For example:

- When you create an account for one or more of our services, we may collect your username, email address, and Internet Protocol address.
- When you play our games and apps, we may collect your username, Internet Protocol address, and gameplay information, such as events completed or actions taken within the games and apps.
- When you use the public functions in games and apps, we may collect the information you choose to disclose.
- When you purchase merchandise from our site, we may collect your name, billing address, shipping address, email address, phone number, purchase history, and payment information.
- When you sign up for our newsletter, we may collect your email address.
- When you contact us or report a problem with the services, we may collect your email address and records and copies of your correspondence.
- When you respond to a survey or questionnaire, we may collect the information provided.

Automatically From You

We may collect your personal information automatically as you use our services. For example, we may collect your personal information as you interact with the site, games and apps. For more information about our and third parties use of cookies and other automatic data collection technologies and certain choices we offer you with respect to them, please see below.

From Third Parties

We may receive your personal information from or through third parties' that help us provide or facilitate your access to the services. For example, we may receive your personal information from e-commerce and merchandising service providers such as Shopify, digital content stores such as Apple Store or Google Play, payment service partners such as Stripe, data analytic partners such as Google, and other users of our services (e.g., if a user reports to us that you are using offensive language in the public functions of our services or are attempting to hack our services, we may collect the information provided by that user about you and create a report of your actions). We abide by this policy when we use personal information provided to us by third parties. However, we do not control the personal information that third parties collect or how they use that personal information. You should review the third parties' privacy policies for more information about how they collect, use, and share the personal information they obtain and use.

How Do We and Third Parties Use Cookies and Other Automatic Data Collection Technologies?

Cookies are small data file identifiers that are transferred to your computer or mobile web browser that allow us and third parties to recognize your browser or mobile device and transfer information about you and your use of our Services.

Our Cookies and Other Automatic Data Collection Technologies

We may use cookies and other automatic data collection technologies on the services to collect personal information, for example, regarding your interaction with the site, including pages viewed.

Third Party Cookies and Other Automatic Data Collection Technologies

Cookies and other automatic data collection technologies on the services may come from third parties. These cookies and other automatic data collection technologies improve your experience by helping us better tailor our Services to you.

- **Shopify:** We may use Shopify, an e-commerce service offered by Shopify Inc., a Canadian corporation, with offices located at 151 O'Connor Street, Ground floor, Ottawa, Ontario, K2P 2L8. Shopify may use cookies to collect your personal information on our behalf to help us improve the merchandise sold on the site.
- **Google Analytics:** We may use Google Analytics, an analytics service offered by Google, 232 Santa Margarita, Menlo Park, California. Google Analytics collects personal information directly from your device and uses this personal information to help us analyze your use of our services. You can view their Privacy Policy, which includes instructions on how to restrict the collection of personal information.

Choices about Cookies

You may set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. Please note that, if you disable or refuse cookies or other automatic data collection technologies, some aspects of the services may be inaccessible or not function properly.

For What Purposes Do We Collect Personal Information?

- **To provide or improve the services –** We may use your personal information to process your requests to access the services and certain of their features and to generally present and improve the services. For example, we may use your personal information to improve our services.
- **To administer the services –** We may use your personal information for any lawful business purpose in connection with administering the services. For example, if you reach out to us with a customer service inquiry, we may use your personal information to respond to you or to troubleshoot a problem you reported having with the services.

- To market the services – We may use your personal information to market the services to you. For example, with your prior consent, we may send you news and updates about our products and the services.
- In furtherance of legal, health, and safety objectives – We may access, use, and share with others your personal information for purposes of health, safety, and other matters in the public interest. We may also provide access to your personal information to cooperate with official investigations or legal proceedings (e.g., in response to subpoenas, search warrants, court orders, or other legal processes). We may also provide access to your personal information to protect our rights and property and those of our agents, users, and others including to enforce our agreements, policies, and Terms of Use.
- In connection with a sale or other transfer of our business – In the event all or some of our assets are sold, assigned, or transferred to or acquired by another company due to a sale, merger, divestiture, restructuring, reorganization, dissolution, financing, bankruptcy, or otherwise, your personal information may be among the transferred assets.
- As we may describe to you when collecting your personal information – There may be other situations when we collect your personal information and simultaneously describe the purpose for that collection.

In What Situations Do We Disclose Your Personal Information?

Third Party Service Providers

We may disclose your personal information to a third party such as a service provider for a business purpose. When we disclose personal information for a business purpose, we enter into a contract with the service provider that describes the purpose and requires the service provider to both keep that personal information confidential and not use it for any purpose except performing the contract. These service providers include our consultants, e-commerce and merchandising service providers, and player support service providers.

Others

We may also disclose your personal information:

- To our subsidiaries and affiliates;
- To our lawyers, consultants, accountants, business advisors, and similar third parties who owe us duties of confidentiality;
- To a buyer or other successor in the event of a sale, merger, divestiture, restructuring, reorganization, dissolution, or other transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us pertaining to the users of the Services is among the assets transferred;
- To comply with any court order, law, or legal process, such as responding to a government or regulatory request;
- To enforce any contract we may have in effect with you;
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our users, or others; and
- If you have consented to such a disclosure.

How Is My Personal Information Protected?

Our Retention, Purpose Limitation, and Security Policies

We protect your personal information through a combination of collection, security, and retention policies.

- **Limited retention.** We only keep your personal information for as long as we need it for business and operational needs or to comply with any statutory, regulatory, or legal obligations. For example, we may retain personal information collected from you to support customer service inquiries and prevent repeated violations or suspected violations of our Terms and Conditions if your account has been banned or your access to the services has been disabled for any reason.
- **Purpose limitation.** We will use your personal information only for the services you choose to access and for the purposes for which you choose to share it. We will respect your requests to start or stop processing your personal information for marketing purposes, as well as the types of marketing messages you may wish to receive.
- **Security measures.** We use appropriate measures to ensure a level of security appropriate to the risk involved and have implemented contractual, technical, administrative, and physical security measures designed to protect personal information from unauthorized access, disclosure, use, and modification. As part of our privacy compliance processes, we review these security procedures on an ongoing basis to consider new technology and methods as necessary. However, please understand that our implementation of security measures as described in this Policy does not guarantee the security of your personal information. In the event of a security breach, we will notify the proper regulatory authorities and any affected users of the breach within 48 hours after we become aware of the breach.

Your Practices and Activities

Your practices and activities are likewise very important for the protection of your own personal information. You can take certain steps to help protect your personal information, such as being mindful of what you share publicly in our games and apps. For example:

- Do not use your real name when selecting a username.
- Do not post your real name in public-facing areas of the services and do not share anything private about yourself or anyone else.

Please remember that we have no control over what third parties do with the content of your communications and no responsibility or obligation regarding third parties.

Additional Notice for European Union Residents

The following applies to European Union residents pursuant to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation):

Place of Business

We may store or process your personal information outside of the country where we collect the information or the country in which you reside. Our primary place of business is in Belgium (EU). You should understand that we may transfer some or all of your personal information to Belgium to carry out certain operational and processing needs as described in this policy.

Transfer Mechanisms

When transferring personal information in the EU, we implement technical, organizational, and physical safeguards to protect your personal information. We use European Commission approved standard contractual clauses and implement related measures required by applicable law. Please contact us if you have questions related to the relevant transfer mechanism for your personal information at hello@rrstud.io

Lawful Basis

We only collect, use, or store your personal information if:

- You voluntarily provide it to us with your specific, informed, and unambiguous consent (for example, when you sign up for our newsletter);
- It is necessary to provide you with a service that you have requested (for example, providing you access to a game);
- We have a legitimate business interest that is not outweighed by your privacy rights (for example, to provide customer service);
- It is necessary to protect your vital interests or the vital interests of others (for example, we may collect or share personal information where necessary to resolve an urgent medical situation or protect the health or safety of one of our users or someone else).

Right to Access, Correct, Delete, or Restrict Processing

Subject to any limitations and exceptions under applicable law, you have the right to request access to your personal information and exercise the following rights:

- You have the right to correct or update certain types of personal information. In many cases, you can review or update your account information by accessing your account settings on the App.
- You have the right to request deletion of your personal information. If you choose to have your personal information removed from our services, we will carry out your request within 30 days of account verification, subject to extension and we will only retain minimal personal information to document your request and the actions we took to carry out your request.
- You have the right to restrict certain processing of your personal information and the right to object to some types of processing of your personal information.

- You have the right to withdraw your consent at any time, including objecting to your personal information being used for marketing or advertising purposes.

We will comply with your requests in accordance with, and subject to, applicable law. For example, we are not required to delete your personal information if we have an overriding legitimate ground for retaining that information, such as to prevent fraud. Please note that we are legally prohibited from carrying out requested actions in some instances, including (1) when we are unable to confirm your identity, (2) where the request is considered excessive, and (3) where doing so would adversely affect the rights or freedoms of other individuals.

Need help?

Please email us at hello@rrstud.io with the subject line « Privacy Policy » if you would like to exercise any of the rights described above or if you have questions regarding your rights.

Right to Complain

You have the right to lodge a complaint regarding our collection, storage, or processing of your personal information with a data protection supervisory authority in the country where you live or work.

How Will We Notify Users of Changes to This Policy?

We reserve the right to change this policy from time to time consistent with applicable law. If we make changes to this policy, we will notify you by revising the date at the top of this policy, and in some cases, we may provide you with additional notice (such as adding a statement in our games or the homepages of our services, or sending you an email notification).

How Can Someone Contact Us?

If you have questions, you may email us at hello@rrstud.io