

Privacy Policy

Last updated: November 1, 2024

We are committed to respecting and protecting your privacy and complying with any applicable law and regulation regarding your personal information. This Privacy Policy describes how we collect, use, process, disclose and protect your personal information, including across our website clashofcoins.com (“**Website**”), the Clash of Coins game (“**Game**”), and all content and functionalities accessible via our Website and the Game (collectively, the “**Services**”), in each case operated by or on behalf of **ONEWAYBLOCK Incorporated** (“**Company**,” “**we**,” or “**us**”), a British Virgin Islands corporation.

Please read this Privacy Policy carefully. If you do not agree with this Privacy Policy in general or any part of it, you should not access the Website, use our Services, or otherwise provide your information to us.

I. WHAT INFORMATION WE COLLECT

Information we collect falls into one of two categories: “automatically collected” information and “voluntarily provided” information. “**Automatically collected**” information refers to any information automatically sent by your devices in the course of accessing our Services. “**Voluntarily provided**” information refers to any information you knowingly and actively provide us when using or participating in any of our Services.

A. Automatically Collected Information. When you visit our Services, our servers may automatically log certain standard data. Additionally, if you encounter certain errors while using the Website or Services, we may automatically collect data about the error and the circumstances surrounding its occurrence. This data may include technical details about your device, what you were trying to do when the error happened, and other technical information relating to the problem. You may or may not receive notice of such errors, even in the moment they occur, that they have occurred, or what the nature of the error is. Please be aware that while this information may not be personally identifying by itself, it may be possible to combine it with other data to personally identify individual persons.

Some examples of automatically processed data include, but are not limited to:

1. **Country flag/geolocation data.** This information helps provide localized content, enforce regional restrictions, and improve targeting for marketing campaigns.
2. **Gaming statistics.** We process gaming statistics to enhance user experience, provide personalized game recommendations, and improve game design.
3. **Automatically collected data/usage data.** This includes activities on our Game and

analytics; we use this data to optimize the Game and game performance, enhance security, personalize content, and analyze user behavior for business insights.

4. **Device information.** Information about the type of device, operating system, IP addresses, and unique identifiers is used to optimize game performance for different systems and ensure compatibility, prevent, detect, and identify fraud and cheating.
5. **Gameplay information.** Player progress, choices, avatars, and interactions are monitored to personalize gaming experiences, provide adaptive challenges, and manage in-game rewards.
6. **Social media data.** Data from linked social media accounts is used to enhance user engagement, facilitate social features within the game, and cross-promote content across platforms.
7. **Usage data and logs.** Access patterns and crash reports are used for troubleshooting, improving system stability, and refining game features based on user interaction.
8. **Preference settings.** Custom settings are processed to remember user preferences for a tailored gaming experience.
9. **Analytics data.** Metrics on user behavior and game performance are analyzed to guide product development decisions and marketing strategies.
10. **Performance and diagnostic data.** We collect device performance and error reports to maintain and improve the quality of our Game, ensuring optimal functionality and user satisfaction.
11. **Communication data.** Data from customer support interactions, surveys, and chats are used for responding to user inquiries, improving customer service, and gathering feedback to enhance services.

B. Voluntarily Provided Information. We may ask for personal information — for example, when you register an account, make a purchase, request support for our Services, or when you otherwise contact us, including on Discord — which may include one or more of the following:

1. **First and Last Name.** We use this information to personalize user experience, verify the user's identity, and manage account details.
2. **Email Address.** We use email addresses for contacting the user, sending transactional notifications, and marketing emails.

3. **Account Login Information.** These details are used for securing and authenticating user access to their accounts.
4. **Payment Information.** Payment information is processed to facilitate in-game purchases and subscriptions while ensuring transaction security. This includes Digital Wallet address. Please note that we do not process your credit card details as this information is processed by third-party payment service providers.
5. **Regulatory Compliance Information.** Other information necessary for Anti-Money Laundering (“AML”), Counter Financing of Terrorism (“CFT”), and Know Your Customer (“KYC”) compliance purposes.

C. Third-Party Information. We may combine voluntarily provided and automatically collected personal information with information that is publicly available (such as on social media) or that you provide to third parties that they share with us.

D. Additional Sources of Personal Information. We may obtain personal data from such additional sources as:

1. **Competitions and events.** Data from events, including contact information, gameplay stats, and images.
2. **Indirectly from interactions.** Data from interactions with digital services like forums and online communities.
3. **Physical event attendance.** Data from physical event participants, like conventions and expos.

II. PURPOSES FOR COLLECTING INFORMATION

We may use information for the following purposes, and personal information will not be further processed in a manner that is incompatible with these purposes:

1. To provide you with our Services;
2. To enable you to customize or personalize your experience of our Services;
3. To operate, improve, and develop our Services;
4. To contact and communicate with you;
5. To enable you to access and use our Services, associated interactive features, associated applications, and associated social media or chat platforms;
6. To comply with our legal obligations and resolve any disputes that we may have;
7. For security and fraud prevention, and to ensure that our Services are safe, secure, and used in line with our Terms of Use; and
8. For marketing and analytics purposes.

III. SECURITY OF PERSONAL INFORMATION

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use, or modification.

Although we will implement and maintain practices to protect the personal information you provide to us, we advise that no method of electronic transmission or storage is 100% secure, and no one can guarantee absolute data security. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Any information you transmit to us you do at your own risk.

You are responsible for selecting any password, to the extent one is required, and its overall security strength, ensuring the security of your own information within the bounds of our services. For example, you are responsible for ensuring any passwords associated with accessing your personal information and accounts are secure and confidential.

IV. HOW LONG WE KEEP PERSONAL INFORMATION

We keep your personal information only for as long as we need to. This time period may depend on what we are using your information for, in accordance with this Privacy Policy. For example, if you have provided us with personal information as part of creating an account with us, we may retain this information for the duration your account exists on our system. If your personal information is no longer required for this purpose, we will delete it or make it anonymous by removing all details that identify you.

V. CHILDREN'S PRIVACY

We do not aim any of our Services directly at children under the age of 13, and we do not knowingly collect personal information about children under 13. If we become aware that we have unknowingly collected information about a child under 13 years of age, we will make commercially reasonable efforts to delete such information from our database.

If you are the parent or guardian of a child under 13 years of age who has provided us with their personal information, you may contact us using the below information to request that it be deleted.

VI. DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

We may disclose personal information to third parties as follows:

1. To our subsidiary and/or affiliated entities;
2. To service providers for the purpose of enabling them to provide our Services, including IT service providers, data storage, hosting and server providers, analytics, error loggers, debt collectors, maintenance or problem-solving providers, professional advisors, and payment systems operators;
3. To advertising partners;
4. To our employees, contractors, and/or related entities;
5. To credit reporting agencies, courts, tribunals, and regulatory authorities, in the event you fail to pay for goods or services we have provided to you;
6. To courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, or any obligations arising thereunder, or in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights or those of a third party;
7. To prevent physical harm, financial loss, or fraud on our Services; and
8. To an entity that buys, or to which we transfer, all or substantially all of our assets and business.

VII. YOUR RIGHTS AND CONTROLLING YOUR PERSONAL INFORMATION

A. Marketing permission. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

B. Complaints. If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You may also have the right to contact a regulatory body or data protection authority in relation to your complaint. Eligible users should also see the **EU & UK Users Appendix I** and/or the **California Users Appendix II** below for further details.

VIII. USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

Our Website, like most websites, uses cookies, pixels, and other tracking technologies (“**Cookie Technologies**”) to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer, and accesses each time you visit, so we can understand how you use our Website. This helps us measure and improve our Services and personalize your experience. Cookie Technologies help us improve our Services including by conducting statistical analyses, estimating audience size and usage patterns, and identifying a user’s digital wallet address and wallet provider.

You may control the way in which your devices permit the use of cookies. If you so choose, you may block or delete our cookies from your browser; however, blocking or deleting cookies may cause some of our Services to work incorrectly or you to be unable to access certain parts of our website.

Most browsers accept cookies automatically. However, you may be able to configure your browser settings to use our Services without some cookie functionality. You can delete cookies manually or set your browser to automatically delete cookies on a predetermined schedule. For example, in the Chrome menu bar, select: More → Settings → Privacy and security → Cookies and other site data → See all cookies and site data, where you can choose to allow or block all or certain cookies, and choose to clear cookies when you quit Chrome.

For more information on how to manage your browser settings, please contact the developer of your browser.

IX. BUSINESS TRANSFERS

If we or our assets are acquired, or in the unlikely event that we go out of business or enter bankruptcy or an insolvency proceeding, we would include data, including your personal information, among the assets transferred to any parties who acquire us. You acknowledge that such transfers may occur, and that any parties who acquire us may, to the extent permitted by applicable law, continue to use your personal information according to this

Privacy Policy, which they will be required to assume as it is the basis for any ownership or use rights we have over such information.

X. THIRD PARTY WEBSITES AND LINKS

Our Services may link to or interact with third party sites or services, such as your wallet providers, or chat platforms, such as Discord or X, that are not operated by us. Our inclusion of such links or use of such services or platforms does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on our Services. After following a link to any third-party content, you should read their posted privacy policy information about how they collect and use personal information. Any information submitted by you directly to these third parties is subject to that third party's privacy policy. Please be aware that we have no control over the content and policies of those sites and cannot accept responsibility or liability for their respective privacy practices. This Privacy Policy does not apply to any of your activities after you leave our Services.

XI. USER-GENERATED CONTENT

Please note that we do not control who will have access to the information that you choose to make available to others and cannot ensure that parties who have access to such information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the features permitting creation of User-Generated Content ("**User Content**") or what others do with information you share with them on such platforms. We are not responsible for the accuracy, use, or misuse of any User Content that you disclose or receive from third parties through social media or discussions on our Services.

XII. ADDITIONAL INFORMATION ON EXERCISING YOUR RIGHTS

You have the right to exercise the rights listed above and in this Privacy Policy free of charge or penalty, but we may limit the number of requests you make or charge reasonable fees as legally permitted. You may exercise many of these rights yourself by adjusting your profile, or you can get in touch with us by contacting us using the details below.

XIII. CHANGES TO THE PRIVACY POLICY

At our discretion, we may change our Privacy Policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this Privacy Policy, we will post the changes here at the same link by which you are accessing this Privacy Policy with the last revised date. Updates to our Privacy Policy will apply only to information collected after the date of the change.

Please check the Website regularly for notices of changes to our Privacy Policy. If the changes are significant, or if required by applicable law, we will contact you (based on your

selected preferences for communications from us) and all our registered users with the new details and links to the updated or changed policy. If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.

XIV. CONTACT US

Should you have any questions about our privacy practices or this Privacy Policy, please contact us via e-mail at contacts@onewayblock.com.

APPENDIX I

EU & UK Users

I. THE PURPOSE AND LEGAL BASIS FOR COLLECTING PERSONAL INFORMATION

We process your personal information to perform our contract with you, including but not limited to:

1. To register and maintain your account with us;
2. To provide you with our Services, other content, and Website functionality; and
3. To enable you to access and use our Services, associated applications, and associated social media platforms.

We obtain your consent to process your personal information for the following reasons:

1. To sign you up for marketing communications;
2. To personalize our Services for you; and
3. To communicate with you about products, services, marketing, promotions, events, and other news and information we think will be of interest to you.

To be responsive to you, to provide effective Services to you, and to maintain our business relationship, as a matter of our legitimate interests, we will use your personal information to contact and communicate with you.

We may also use your personal information to comply with our legal obligations (such as compliance obligations) and resolve any disputes that we may have. We may also process your personal information for security and fraud prevention, and to ensure that our Services are safe, secure, and used in line with our Terms of Use.

II. INFORMATION RETENTION

We keep your personal information only for as long as we need to. This time period may depend on what we are using your information for, in accordance with this Privacy Policy. The personal information that we collect from you may be transferred to and stored at/processed in countries outside the European Economic Area (“**EEA**”) and the United Kingdom (“**UK**”). Your personal information may also be processed by staff operating outside the EEA and the UK who work for us or one of our third party service providers or partners. We will take all steps reasonably necessary to ensure that your personal information is treated securely and

in accordance with this Privacy Policy.

III. USER RIGHTS

If you are located in the EEA or the UK, you have certain rights in relation to your personal information:

1. **Access.** You have the right to access personal information we hold about you, how we use it, and who we share it with.
2. **Portability.** You have the right to receive a copy of the personal information we hold about you and to request that we transfer it to a third party, in certain circumstances and with certain exceptions.
3. **Correction.** You have the right to correct any of your personal information we hold that is inaccurate.
4. **Erasure.** In certain circumstances, you have the right to delete the personal information we hold about you.
5. **Restriction of Processing.** You have the right to require us to stop processing the personal information we hold about you, other than for storage purposes, in certain circumstances.
6. **Objection.** You have the right to object to our processing of your personal information.
7. **Objection to marketing.** You can object to marketing at any time by opting out using the unsubscribe/opt-out function displayed in our communications to you.
8. **Withdrawal of consent.** Where we rely on consent to process your personal information, you have the right to withdraw this consent at any time by contacting us as specified in the Contact Us section above.

Please note that the rights described above are not absolute, and in certain cases, may be limited by law. By way of example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests, or where we are required by law to retain your personal information.

To exercise any of these rights, you can contact us as specified in the Contact Us section above. We will respond to requests to exercise these rights without undue delay.

IV. COMPLAINTS

If you have complaints about how we process your personal information, please contact us as specified in the Contact Us section above and we will respond to your request as soon as possible. If you think we have infringed data protection laws, you can file a claim with the data protection supervisory authority in the EEA country in which you live or work or where you think we have infringed data protection laws, or with the UK Information Commissioner's Office, if applicable to you.

APPENDIX II

California Users

Under certain California laws, users who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information.

California consumers have certain rights with respect to their personal information, including the following:

1. **Right to Opt Out.** You have a right to opt out from “sales” or “sharing” of personal information. While we **do not** sell your personal information and have not done so in the past 12 months, please note that we may share or provide access to third-party services as described in this Privacy Policy as necessary for the specified purposes.
2. **Correction.** You have the right to correct any of your personal information we hold that is inaccurate.
3. **Erasure.** In certain circumstances, you have the right to delete the personal information we hold about you. You also have a right to request that we delete personal information under certain circumstances, subject to certain exceptions.
4. **Right to Designate an Authorized Agent.** You may designate an authorized agent to exercise some of your rights; however, in order to help protect the security of your personal information, the authorized agent must follow the same authentication procedures that are required if you exercise your rights without using an agent. We will verify requests made through authorized agents to help ensure the safety of your account and to comply with our policies and procedures.
5. **Right Against Discrimination.** You have a right to not be discriminated against for exercising your legal rights.
6. **Right to Notice.** You have a right to receive notice of our practices at or before collection of personal information.
7. **Additional Information on Exercising Your Rights.** You have the right to exercise the rights listed above and in this Privacy Policy free of charge or penalty, but we may limit the number of requests you make or charge reasonable fees as legally permitted.

To make a request, please contact us as specified in the Contact Us section above. Your request is subject to our verification and data retention practices. Please note that the rights

described above are not absolute, and in certain cases, we may decline your request as permitted by law.