

# Privacy Policy

Effective Date: 29 November 2024

## 1. Introduction

This privacy notice applies to the processing activities performed by PIP World with the personal data of its clients, prospective clients, and website visitors.

Your privacy is of the utmost importance to us. It is our policy to safeguard the confidentiality of information and respect the privacy of each individual.

See below for information about how we manage personal data and your rights with respect to the processing of your personal data.

We have added links to our "Terms & Conditions" and "Privacy Policy" on the login screen to ensure our users' transparency and ease of access. These links are positioned at the bottom of the screen for optimal visibility and accessibility, allowing users to review these important documents before proceeding.

## 2. Definitions

The following terms are defined as follows:

2.1 "AML" means anti-money laundering.

2.2 "Digital Asset" means any digital representation of value that may be traded within PIP World's Game (as defined within the [End User License Agreement \("EULA"\)](#)).

2.3 "PIP World", "We", "Us", refers collectively to PIP World LLC and its subsidiaries.

2.4 "Personal data" refers to any information relating to an identified or identifiable natural person, including names, identification numbers, location data, an online identifier, or to one or more factors specific to the physical, economic, cultural or social identity of a natural person.

## 3. Your Data Controller

You are contracting with PIP World as specified in our EULA. PIP World is your Data Controller, and is responsible for the collection, use, disclosure, retention and protection of your personal data in accordance with our Privacy Notice, as well as any applicable national laws.

## 4. Information we may collect about you

We obtain information about you in a number of ways through your use of our products and services, including through any of our websites, the account opening process, and from information provided in the course of on-going support service communications.

If you open an account with us, you must first complete and submit responses to our account opening questions. By submitting these answer, you are requested to disclose some personal data to enable PIP World to assess your application and comply with the relevant laws and regulations.

The minimum information required for entering into a contract governing your use of our products and services, and for enabling us to comply with our statutory obligations is biographical information and

contact information. Depending on the services used, we may require this information to provide certain services and/or aspects of the Game.

#### The information that we may collect from you is as follows:

- Full name and contact details (e.g. email address, etc.), age, social media usernames and profiles (“**Biographical information and contact information**”);

#### Information we collect about you automatically:

- **Browser information** – Information that is automatically collected via analytics systems providers from your browser, including your IP address, domain name, any external page that referred you to us, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform (“**Browser information**”);
- **Log information** – Information that is generated by your use of the Game, websites, applications, services, or tools operated by the Company that is automatically collected and stored in our log records. This may include device information such as device identifier, device operating system and model, device storage, Media Access Control (MAC) address and Subscriber Identity Module (SIM) information, signals relating to user behavior and device interaction, marketing identifier, location information, network address, system activity and any internal and external information related to pages that you visit through and from our Website or App (including date and time, 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 (“**Log information**”).

### 5. Disclosure of your personal data

As part of processing your personal data for the purposes set out above, PIP World may disclose your personal data to required members of the Company and to third parties. For example, the Company may disclose your personal data to our service providers and business partners for business or other legitimate purposes, such as specialist professionals who we contract to provide administrative, financial, legal, tax, compliance, insurance, IT, analytics, research or other services.

If we disclose your personal data to service providers and/or business partners, in order to perform the services requested by clients or to comply with our legal and regulatory obligations, such providers and partners may store your personal data within their own systems. We require them to protect the confidentiality of this personal data and comply with all relevant privacy and data protection laws.

The Company will share your data with Auth0 (Okta, Inc.) to validate your use of the Services.

We may also disclose personal data when it is compelled by law, for example to a government agency as a result of a valid court order.

### 6. Where we store your personal data

Our operations are supported by a network of computers, servers, other infrastructure and information technology, and third-party service providers. We and our third-party service providers and business partners store and process your personal data in the United Kingdom, the United States of America and elsewhere in the world. Courts, law enforcement and security agencies of these jurisdictions may be able to use legal processes to access your personal data.

## **7. For UK & EEA clients: Transfers of personal data outside of the European Economic Area (EEA) and the United Kingdom (UK)**

We may transfer your personal data outside the EEA and UK to other PIP World companies, service providers and business partners. Transfers outside of the EEA or the UK (as appropriate) are done in accordance with lawful transfer mechanisms. If personal data is transferred to a country which has been found by the European Commission to have an essentially equivalent standard of data protection to the EEA, then we may rely on an 'adequacy decision' to transfer that personal data.

## **8. Data retention**

When personal data is no longer necessary for the purposes for which it may lawfully be processed or past the legally required retention date, we will remove any details that will identify you, or we will securely destroy the relevant records. We may need to maintain records for a significant period of time after you cease being our client for legal or regulatory reasons, for example when we need to retain information to help manage a dispute or legal claim. Additionally, we are subject to certain anti-money laundering laws which may require us to retain the following for a period after our business relationship with you has ended.

If you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your personal data for longer than 5 years if we cannot delete it for legal, regulatory, or technical reasons.

## **9. Cookies**

Cookies are small text files that provide information regarding the device used by a visitor. Click on Cookie Settings in the footer of this page for additional detail on the types of cookies this website uses and why, and to adjust your Cookie Settings. Cookie information does not usually directly identify you, but it can give you a more personalized web experience. Because we respect your right to privacy, you can choose not to allow some types of cookies although doing so may impact Game functionality.

## **10. Your rights regarding your personal data**

The rights that are available to you in relation to the personal data we process are outlined below. You may request to exercise these rights subject to any limitations provided for under applicable data protection laws.

### **Access**

You can ask us to confirm whether we are processing your personal data and, if so, what information we process and to provide you with a copy of that information.

### **Rectification**

It is important to us that your personal data is up to date. We will take all reasonable steps to make sure that your personal data remains accurate, complete and up-to-date. Please inform us if your personal data changes. If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal data to others, we will let them know about the rectification where possible.

You may inform us at any time that your personal details have changed by emailing us at [support@pip.world](mailto:support@pip.world). Subject to applicable law, we will change your personal data in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof i.e. personal data that we are required to keep for regulatory or other legal purposes.

### **Erasure**

You can ask us to delete or remove your personal data in certain circumstances. Such requests may be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal data to others, we will let them know about the erasure request where possible. Once your data is deleted, the process is irreversible.

Users can request the deletion of their account and associated data at any time. The account deletion process is as follows:

1. Request Submission: Users can request account deletion either:
  - By emailing [support@pip.world](mailto:support@pip.world) or using the online form found at <https://pip.world/support>
  - Through the in-game interface.
2. Deletion Scope: Upon request:
  - All personal data associated with the user's email will be permanently deleted from Auth0.
  - Corresponding data stored in our in-game database will also be permanently deleted.
3. Irreversible Process: Once data is deleted, it cannot be recovered. Users will be informed of this before completing the deletion request.

You may request your data to be deleted by completing the form located at: <https://pip.world/support>

### **Processing restrictions**

You can ask us to block or suppress the processing of your personal data in certain circumstances such as if you contest the accuracy of that personal data or object to us processing it. It will not stop us from storing your personal data. If we have disclosed your personal data to others, we will let them know about the restriction of processing if possible. If you ask us, and if possible and lawful to do so, we will also inform you with whom we have shared your personal data.

### **Objection**

You can ask us to stop processing your personal data, and we will do so, if we are:

- Relying on our own or someone else’s legitimate interests to process your personal data except if we can demonstrate compelling legal grounds for the processing or for the establishment, exercise or defense of legal claims;
- Processing your personal data for direct marketing; or
- Processing your personal data for research unless we reasonably believe such processing is necessary for the performance of a task carried out for reasons of public interest (such as by a regulatory or enforcement agency).

### **Automated decision-making and profiling**

If we have made a decision about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to access our products and services or has another significant effect on you, you can request not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even if a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention. We may not be able to offer our products or services to you, if we agree to such a request and may end our relationship with you.

### **Complaints**

You have the right to complain to a competent data protection authority. We ask that you first contact [dpo@pip.world](mailto:dpo@pip.world) to give us an opportunity to address any concerns.

### **Withdraw consent**

You have the right to withdraw consent to processing based on consent at any time. Note this will not affect the lawfulness of processing based on consent prior to the withdrawal of consent or on grounds where consent is not required.

## **12. Data Sharing Practices**

In addition to the information outlined above, we want to clarify our data-sharing practices:

- **Third-Party Service Providers:** We share user data with Auth0, our authentication service provider, to facilitate secure account login and management.
- **Data Retention and Deletion:** Upon a user's request for account deletion, all data associated with the user's email is deleted from Auth0 and our in-game database. We ensure that no residual data remains in our systems after this process.
- We do not sell or rent personal data to third parties. Any data sharing is strictly for operational purposes, as described in this policy.

## **13. Changes to this privacy notice**

Our privacy notice is reviewed regularly taking into account new regulations, technologies, and changes to our business operations. Any personal data we process will be governed by our most recent privacy notice. Please review this privacy notice from time to time.

## **14. Our products and services are not available to children**

Our products and services are not directed to persons under the age of 18 (herein, “Children”, “Child”) and we do not knowingly collect personal data from children. If we learn that we have inadvertently processed personal data from a child, we will take legally permissible measures to remove that data from our records.

#### **15. Contact information**

Any questions, complaints, comments and requests regarding this privacy notice are welcome and should be addressed to [support@pip.world](mailto:support@pip.world). You can also contact our Data Protection Officer at [dpo@pip.world](mailto:dpo@pip.world).

#### **16. Data Protection Authorities**

If you are not satisfied with our response to your complaint, you have the right to submit a complaint to a competent data protection authority.