

PRIVACY POLICY
FAIRPLAY.IO

Last amended: 24 May 2018

We are committed to protecting and respecting your privacy. We take your privacy seriously and will use your personal information (or data) to provide the services only after obtaining your consent for the collection and processing of your personal data on the terms specified below. We hope you will get all information to be assured your personal information is safe with us.

This Privacy Policy explains when where and why we collect personal information about people who use FairPlay, how we use it, the conditions under which we may disclose it to others, your rights in respect of your personal information as well as how we keep it secure.

Any questions regarding this Policy and our services should be sent to support@fairplay.io

1. GENERAL INFORMATION

- 1.1. We believe that since you chose FairPlay for use you are familiar with the main focus of our services and business, and you have also of course got yourself acquainted with our Terms and Conditions. We will point at it once more for better understanding of the purposes your personal information is being collected and processed according to this Privacy Policy. So, FairPlay is an online gaming platform operated by Goldenrod Securities Ltd which is licensed and regulated by the Kahnawake Gaming Commission.
- 1.2. This Privacy Policy constitutes the integral part of Terms and Conditions. All terms used in this Privacy Policy shall be understood and interpreted as set out in the Terms and Conditions.
- 1.3. We may change the Policy from time to time and indicate the date of the last amendments on the top in the "Last amended" field, so please check this page to ensure that you're happy with any changes. The additional notifications on any amendments shall be sent to your email address. If within one week after the notification is sent you continue to use FairPlay, you will be considered as having accepted all the amendments made.

2. LEGAL BASIS FOR PROCESSING

- 2.1. Note that we may process your personal data not only on the basis of your consent, but also when one of the following applies:
 - processing is necessary to provide our services to you according to our Terms and Conditions, which constitutes a contract between you and us as regards to information services of our website;
 - processing is necessary for the purposes of the legitimate interests pursued by us or by a third party on the conditions prescribed by the data protection legislation;
 - processing is necessary for compliance with our legal obligations;
 - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
- 2.2. In all cases, we will notify you about applied legal basis for processing and other relevant details, before we start process your personal data on the specific legal basis unless we are not able to do so in accordance with our obligations under any applicable legislation.

3. COLLECTION OF THE PERSONAL INFORMATION

- 3.1. Personal information (or data) is any information relating to you and that alone or in combination with other pieces of information gives the opportunity to the person that collects and processes such information to identify you as an individual. It can be your name, your identification number, your location data, or information related to your physical, physiological, genetic, mental, economic, cultural or social life. Processing of the information means any action with your personal data, for example, collection, recording, organization, structuring, storage, use, disclosure by any means and so on.
- 3.2. We may collect Personally Identifiable Information (PII) such as name, telephone number and email address. Also, we may collect Aggregate Information such as frequency of visits to website, IP address, site pages most frequently accessed, browser type, operating system type, your Internet service provider or mobile carrier. Aggregate information is non-personally identifiable /anonymous information about users of the FairPlay platform. Aggregate information is used in a collective manner and no single person can be identified by that compiled information.
- 3.3. When you access the website, or use our products or services we (or a service provider on our behalf) may collect certain analytical or statistical information to recognize you as our user; customize our website and advertising; measure promotional effectiveness and collect information about your computer or other access device to mitigate risk, help prevent fraud, and promote trust and safety. For these purposes, we use third party services, including Google Tag Manager, yandex.metrika, chimpstatic, cdn.sendpulse.com, secure.adnxs.com, intercom and telegram-chat.

4. PURPOSES OF THE COLLECTION

- 4.1. As you can see there is not much personal information FairPlay collects from you. Nevertheless, all the information FairPlay collects from you is crucial for the operation of the FairPlay platform. FairPlay collects and uses the information to:
 - understand your needs and provide services that is relevant to you;
 - boost the quality of the services you get from FairPlay platform including via personalization of the services;
 - generate statistical studies and market;
 - conduct market research and planning by sending user surveys;
 - help you to complete a transaction, or provide services or customer support;
 - communicate back to the user;
 - update the user on services, information, and products;
 - notify the user of any crucial information or changes within the Platform which may affect the user;
 - enforce terms of use within the Platform;
 - allow the user to access services or otherwise engage in activities the user selects;
 - ensure that you use the services in the most effective manner for you and for your computer;
 - administer the Platform including performing troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - keep the Platform safe and secure.
- 4.2. If FairPlay decides to change the purposes of processing specified above, we will inform you on such changes prior to use your personal information within the newly set purposes. The notification on such changes will be sent to your email.

5. PROCESSING OF THE PERSONAL INFORMATION

- 5.1. In order to provide high-quality services within the Platform FairPlay hires people, enter the agreements with independent contractors as well as cooperates with other services providers, companies and organizations. For that reasons, some of your personal information can be passed to

the persons mentioned. For example, FairPlay uses Sum&Substance services (<https://sumsub.com>) to verify your identity and/or address to provide you with the access to all the games available on the Platform. If this is done, the rules for processing and transfer of data set by the relevant services.

- 5.2. In order to achieve the Platform goals in a best way the FairPlay uses various technologies and services including the one provided and/or hosted in EU, US and other countries. Some of them guarantee very high level for the personal data protection, in some of them the level of protection is lower. By registering the TruePlay Wallet, and by using FairPlay you agree to such transfer and processing within the purposes set in Section 4 of this Privacy Policy.
- 5.3. In all cases we pass the information to other persons we ensure that your information is being protected and used only within the purposes specified in Section 4 of this Privacy Policy. This is achieved by using only certified services and products, signing agreements on protection of personal data with contractors as well as taking technical measures to ensure the information is protected when stored, used and while being transferred.
- 5.4. You also have to be aware of the fact that FairPlay may disclose your personal information to enforce and comply with the law. In other words, FairPlay may disclose to officials' information necessary for the investigation or legal process on official request or the official bodies acting within their powers.
- 5.5. Your personal information will be stored by FairPlay within the term of your use of the Platform and up to your termination of such use. FairPlay shall terminate the processing of your personal information unless the special retention period for the storage of such data is set by the relevant legislation.

6. RIGHTS REGARDING THE PERSONAL INFORMATION

- 6.1. You have a right to request FairPlay to access to your personal information.
That means that you can ask FairPlay what personal information of yours is being processed as well as for the clarifications on the information described above, i.e. purpose of collecting and processing, period of processing, third parties that have access to information.
- 6.2. You have a right to request FairPlay to rectify your personal information.
This means you can ask all the inaccurate personal information concerning you being corrected. You can also complete the personal information if you feel there is a need to do so.
- 6.3. You have a right to request FairPlay to erase personal information.
You can request FairPlay to erase such data if its processing is no longer necessary in relation to the purposes for which it was collected as well as if there are no legal grounds for the processing. In most cases FairPlay will erase it unless otherwise will be required by legislation.
- 6.4. You have a right to request FairPlay to restrict the processing of your personal information.
In some cases, prescribed by law you will be able to restrict the processing of your personal data, for example if you contest the accuracy of your personal information being processed or in case FairPlay will not be interested to process your personal information any longer, but you will want FairPlay to do this on different reasons, for example, to bring some claim for somebody and instead of the erasure of information its processing will be just restricted.
- 6.5. You have a right to withdraw consent.
You can withdraw your consent for the collection and processing of your personal information by FairPlay at any time, without affecting the lawfulness of processing based on consent before its withdrawal. After we at FairPlay receive such withdrawal from you we will process it in a timely manner and no longer process such information unless the obligation to proceed is set by law. The phrase "in timely manner" is deciphered below.

6.6. Time for reply and reaction.

FairPlay will provide information on action taken on your request related to your rights specified above within one month of receipt of the request for the longest. That period may be extended by two further months if FairPlay is overwhelmed by the number of the requests. FairPlay will inform you of any such extension within one month of receipt of the request, together with the reasons for the delay.

6.7. You also have the right to lodge a complaint with a supervisory authority that is empowered to process such complaints in your country.

7. PERSONAL INFORMATION PROTECTION

7.1. FairPlay takes technical and organizational measures to ensure the information is processed in a manner that ensures appropriate security of information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. For example, FairPlay uses verified contractors that might have access to the data as specified in Section 5 of the Privacy Policy with which the relevant data processing agreements are signed and strives the data is being processed is encrypted and/or anonymized.

7.2. However, we cannot assure you that personal information will never be used or disclosed in a manner that is inconsistent with this Policy. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of such personal information at any time. You should understand that no feasible system of data security is invulnerable. Accordingly, we cannot guarantee the 100% security of your information.

8. COOKIES POLICY

8.1. Cookies are tiny pieces of code that remains in your computer after you have visited some website. These pieces then enable the server to provide you with the information that is customized with your needs when you use some platform or website for the next time. By accepting this Privacy Policy, you also give your consent to FairPlay to use cookies to make the Platform more efficient, fast, and safe, to improve its functioning. You may block, delete, or disable saving cookies on your device if your web-browser allows to do this.

9. CHILDREN'S PRIVACY POLICY

9.1. The privacy of children is one of our concerns as well. FairPlay provides the Services only in case you as the User is aged 18 or older and is fully able and legally competent to use the Website according to the applicable laws.

We hope this Privacy Policy helped you to understand how your personal information will be dealt with here at FairPlay. Do not be afraid – we will take care of it in order the Platform will only help you to do your staff and not to be concerned over your privacy at FairPlay. So, enjoy our Platform!