

PRIVACY AND COOKIE POLICY

1. Introduction

1. We are committed to protecting and respecting your privacy. This Privacy and Cookie Policy ("**Policy**") describes how we treat information that you provide to us or that we collect about you.

2. By personal data, we refer to data that relates to you as an identified or identifiable person. Personal data include your name, your address, your telephone number, your e-mail address, your age, your gender and your game preferences. Anonymous information, which we are not in a position to relate to you, does not qualify as personal data.

3. We may collect personal data as well as other information when you use the following services:

- Our websites, including <http://www.melesta-games.com/>, <http://www.toy-defense.com>, <http://www.toy-defense.ru> and any other Melesta sites on which this Policy is posted (the "**Sites**").
- Our Games, including "Toy Defense", "Toy Defense 2", "Toy Defense: Fantasy", "Coffee shop" games (the "**Games**"). Your use of the Game will be subject to the EULA in respect of that Game.
- Any of our products and services (including support services) which may be accessible via a third party platform, web application, gaming or social networking service (together the "**Ancillary Services**").

In this Policy we refer to the Sites, the Games and the Ancillary Services together as the "**Services**".

4. Please read this Policy carefully. If you wish to use our Services, you will need to accept our EULA and this Policy. By accepting this Policy, you signify your consent to the collection and other processing of your personal data in accordance with and for the purposes set out in this Policy.

2. Who we are

We are

**Melesta Publishing Limited,
105, Agion Omologiton Avenue,
Nicosia 1080,
Cyprus**

("Melesta", "we", "our" and "us").

We respect your right to privacy and will only process personal data and other information you provide to us or we collect about you in accordance with applicable privacy and personal data protection laws.

3. Information we may collect from you

1. When you use the Services we may collect and process the following categories of data:

a. "**Account Data**":

- Your social network or gaming services ID, user name, your user account password and account profile picture, email address and date of birth.

- You may also choose to provide some other optional information about you.

b. "Tracking Data":

- Information relating to your use of our Services including, but not limited to, information about when and how you use the Services and data traffic and recordings of the parts of the screen you click on while using our Services (so called "clickstreams").- Log files and statistics in relation to actions taken on our Sites and in the Games.

- Technical information about any device and operational system that you use when you visit the Sites or use a Games, including your Media Access Control (MAC), Unique Device Identifier (UDID) or equivalent device identifier, your IP address and the browser you are using.

For the collection and processing of Tracking Data on the Sites we use cookies. Their functionality and your options regarding their use are explained in section 4 below.

c. "Content Data":

- Information that you post in any of the Games forums.

- Information sent through the "game-chat" functionality in the Games.

- Information you provide when you request information or support from us or purchase a product or service from us, including information necessary to process your orders with the relevant payment merchant which may include the amount of any transaction, but will not include your financial information which will only be submitted directly to the payment merchant under secure protocols.

- Information other than the Account Data you provide to us when participating in competitions, sweepstakes, contests, tournaments and other promotions and responding to surveys.

- Information relating to your profiles on social networking sites in order to allow integration with such social networking sites.

2. When you communicate while using the Services or within any other Melesta product or service (e.g. live chat, instant message services and the like), even "privately" to another person, you do so with the understanding that those communications go through our servers, can be monitored by us, you have no expectation of privacy in any of those communications and, accordingly, you expressly consent to monitoring of communications that you send and receive. Please note that any information that you post to a public discussion group, such as a user forum, is available to all persons accessing that location. In addition, you should be aware that some discussion groups offer a service in which subscribers are emailed a copy of all messages posted to the group on a particular topic. Consequently, if you post a message to the group, your email address may be sent to those subscribers that have indicated an interest in the topic of your message.

3. When you create an account for your use of the Services through one of your third party social networking accounts ("**SNS Accounts**") or through other integrated services provided by the third party ("**TPIS**"), you may have to provide us with your username (or user ID) so that your identity can be authenticated by the SNS Account or otherwise through TPIS. When the authentication is complete, we will be able to link your account with the SNS Account or with any other TPIS account and access and store certain additional information that SNS or TPIS makes available to us (e.g. your first name, account profile picture and account identification number and any other information, relating to your profile; we do not receive or store passwords for any of your SNS or TPIS Accounts)

and use and disclose it in accordance with this Privacy Policy. You should check your privacy settings on each SNS or TPIS to understand and change the information sent to us through each SNS or TPIS. Please review each SNS and TPIS terms of use and privacy policy carefully before using their services and connecting to our Services.

4. Cookies

1. The Sites use cookies and similar technologies that collect Tracking Data to distinguish you from other users. This helps us to provide you with a good experience when you access the Sites and use the Services.

2. A cookie is a small file of letters and numbers that a website places on your computer or device when you visit a website. You are given the opportunity to opt out from using of cookies. Your consent to the use of the cookies will be deemed to be given if your browser settings / configuration at the relevant time are configured to accept cookies. If you have opted out, we only store one permanent 'compliance' cookie which tells us that you want to opt out of use of any other cookies. For more information about cookies, we recommend that you visit www.allaboutcookies.org.

3. The cookies that are used on the Sites fall into the categories described below. These descriptions can help you determine if and how you would like to interact with our Sites and other online services.

Strictly necessary cookies

These cookies are essential in order to enable you to navigate the Sites and use certain features. Without these strictly necessary cookies, the online services provided by the Sites cannot be provided. It is therefore not possible for you to opt out of use of these cookies. In addition, the coding language the Sites are written in uses session cookies. These are deleted each time you close your browser. These cookies do not store any information about the visitor once the browser is closed.

Performance cookies

Our performance cookies collect anonymous information about how you use the Sites and their features. For instance, our performance cookies collect information about which pages on the Sites are visited most often, which advertisements you view or interact with on the Sites or other websites on which our advertisements appear and if you receive any error messages.

Analytics cookies

The Sites may use Google Analytics, a web analytics service provided by Google, Inc. ("**Google**"). Google Analytics uses "cookies", which are text files placed on your computer, to help us analyse how users use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymisation, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent by us to and shortened by Google servers in the USA. On behalf of us, Google will use this information for the purpose of evaluating your use of the Sites, compiling reports on website activity for us and providing other services

relating to website activity and internet usage to us. Google will not associate your IP address with any other data held by Google.

The Sites may use other similar analytics cookies. These cookies are used to collect information about how visitors use the Sites. The information is collected anonymously, and used to report on the number of visitors to the Sites, where they have come from, and the pages they have visited.

Furthermore you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout/>. Further information can be found under <http://www.google.com/analytics/terms/gb.html> (Google Analytics Terms of Service & Privacy). Also, you can prevent Google Analytics to collect the information about IP addresses by clicking on the following link: <https://tools.google.com/dlpage/gaoptout/>.

Functionality cookies

Functionality cookies are used to remember choices you make (such as language preference, country location, or other online settings) and collect anonymous information.

Targeting or advertising cookies

Third-party targeted advertising cookies may be placed on your device by third-party advertisers, ad networks, data exchanges, marketing analytics and other service providers. Third-party targeted advertising cookies collect information about your browsing activity across multiple websites and online services in order to provide you with relevant advertisements on the websites and online services of third parties. Ad networks may share this information with the advertisers using their network. The information collected using these third-party advertising cookies does not disclose your identity, but will be used to identify you across multiple web sites. We can use third party advertising services. You can opt out from their services via the instructions and/or links available at their websites or by contacting them directly.

4. If you wish to refuse from use of cookies by us or by third parties, you can change your browser settings to reject cookies. As the means by which you can do this varies from browser to browser, please visit your web browser's "Help" menu for further details. Please note that, should you choose to refuse from use of cookies by us, this might impair some of the functionality of the Sites and the Services.

5. How we use your information

We may use the information that you provide to us or that we collect about you for the following purposes:

1. Provision of services. Account Data, Tracking Data and Content Data may be collected and processed by us to provide you with the Services that you request from us and to perform the EULA accepted by you. Data collected for that purpose will only be kept as long as necessary to provide the requested Services, and comply with applicable laws.
2. Any data collected may be processed by us to detect, investigate and prevent activities that may be illegal, or that may violate the EULA.
3. Additional promotion and advertising :
 - **Under applicable law, we may use your e-mail address to provide you with information about our product and services and those similar to the Services that**

you request from us, if you have previously chosen to opt-in this service. You may opt out from use of your e-mail address for this purpose at any time by clicking “unsubscribe” at the bottom of each e-mail you receive from us.

4. We may use Tracking Data to monitor, improve, or modify the Services and our operations.

6. Sharing your information

1. We will not share your personal data with anyone else unless in the following limited circumstances:

- To the extent that we are required to do so by applicable law, by a governmental body or by a law enforcement agency, or for crime prevention purposes.
- Where necessary to enforce the EULA in respect of any of the Games, to provide you with Services you request from us, to protect the safety of our users and third parties, to protect our rights and property and the rights and property of other users and third parties, or in other cases if we believe in good faith that disclosure is required by law.
- Where necessary to provide you with Services you request from us, we may share your personal data with third parties who provide services to us.

2. Where such sharing involves our transfer of your personal data to a country outside the European Economic Area, we will ensure compliance with applicable law.

3. We may share anonymous information, i.e. information which does not directly or indirectly disclose your identity, and aggregated information (meaning information about groups and categories of users, including game statistics and behaviour, but which does not identify and that cannot reasonably be used to identify any individual user) with our advertising partners. We may also allow our advertisers to collect anonymous information and aggregated information within the Services and they may then share that information with us. Our advertisers may collect this information through the use of tracking technologies like cookies and web beacons. This enables our advertisers to develop and deliver targeted advertising in the Services and on the websites of third parties, so that they can try to serve you with advertisements for products and services that are most likely to be of interest to you. Advertisers will also use this information to monitor, improve, or modify their operations.

7. Children

We recognise that we have a special obligation under applicable laws to protect personal data obtained from children. We do not knowingly collect personal data from children under 18 years old. If you are under 18, you may not register for an Account or otherwise provide any personal data to us. If we become aware that a child under 18 has submitted information to us, we delete this information immediately. We encourage parents to instruct their children to never give out their personal data, without permission, when online.

8. Security

1. We take reasonable precautions to prevent the loss, misuse or alteration of your personal data. Our employees, contractors and agents may be given access to your personal

data which we collect, but their use shall be limited to the performance of their duties in relation to facilitating your use of the Services. Our employees, contractors and agents who have access to your personal data are required to keep that data confidential and are not permitted to use it for any purposes other than those listed above or to deal with requests which you submit to us.

2. We have implemented all reasonable technical, administrative and physical security measures to protect the security of your data.

9. Third party sites

The Services may contain links to other websites operated and services provided by third parties, including those retailers you enter into a transaction with. Please note that this Policy applies only to the personal data that we collect through the Services and we cannot be responsible for personal data that third parties may collect, store and use through their websites or their services. You should always read the privacy policy of each website you visit carefully.

10. Your rights

In addition to your opt-out right under section 4.2, you may exercise the following rights at any time:

- You may ask us to provide you with copies of the personal data that we hold about you, or with data about the processing of such information.
- You may ask us to update and correct any out-of-date or incorrect personal data that we hold about you.

If you wish to exercise any of these rights, then please contact us at support@melesta-games.com. If you ask us to delete personal data about you then we may retain an archived copy of this data if required to do so by law.

11. Changes to this Policy

We may change this Policy from time to time for various reasons such as to reflect changes in law and regulation, changes in industry practices and technological developments. In case you have a registered Account, you will be notified of any changes of this Policy via e-mail to the e-mail address related to your Account. The latest version of this Policy will always be available on the Sites. Any new version of this Policy shall take effect (i) immediately upon the date of your receipt of the notification e-mail where the changes to this Policy relate to non-material changes which do not reduce your rights; or (ii) no less than thirty (30) days after your receipt of the notification e-mail where the changes to this Policy potentially reduce your rights; or (iii) in case you do not have a registered Account, the moment they are uploaded to our Services.

12. Questions and comments

If you have any questions or comments about this Policy, please contact us at support@melesta-games.com or by phone +375 17 2908360