PRIVACY POLICY OF SIA "BESTROOT LAB"

We welcome your interest in SIA "Bestroot Lab" (hereinafter – "Bestroot Lab") and the opportunity to provide you with the most up-to-date, easy, and secure access to the information, including personal information, and to that you provide us in order to cooperate with the website www.bestrootlab.com, domains bestrootlab.com, connect.bestrootlab.com (hereinafter – "Site") or any Bestroot Lab game provided on another platform (hereinafter – "Game"), and to the processing of personal data in the course of such cooperation.

Please read the privacy policy to understand our views and practices regarding your personal data and how we will treat it. By making this policy in accordance with Bestroot Lab privacy provisions.

1. Introduction and Data Protection

This privacy policy sets out how Bestroot Lab uses and protects any information that you give us when you use this website. In particular Bestroot Lab is committed to protecting your online privacy and to complying with applicable data protection and privacy laws, including the General Data Protection Regulation (EU) 2016/679 of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter – the GDPR), directly applicable starting from May 25, 2018, and the local privacy laws, the data controller is:

SIA "Bestroot Lab"

Registration code 40103126881,

Legal address Brīvības iela 73, Valmiera, LV-4201, Latvia,

Phone +371 26670666,

Email: support@bestrootlab.com

In order to provide you with information and the Services on this Site, our website hosting company AdSoftTech Ltd registers your personal data to ensure the maintenance of websites, administration and support to our users as well as to improve the Services. Bestroot Lab has a contract in place with AdSoftTech Ltd. This means that AdSoftTech Ltd cannot do anything with your personal data unless Bestroot Lab has instructed it to do so. AdSoftTech Ltd will not share your personal data with any company outside the European Economic Area.

Bestroot Lab shall not be deemed responsible for any inaccuracy of individual's personal data submitted to us by you, or collected through the Services about the person, if such inaccuracy was caused by you. We are not responsible for any damages or losses caused by the use of personal data that was not provided by you directly or that was not collected through the Services. We shall not be liable for any inaccuracies which occurred due to provision of misleading information by means of such data.

1. Data protection officer of the processing activities

Bestroot Lab is processing your personal data for diverse purposes, such as ensuring, and improving the Service, handling of your inquiries, when you use the Service or contact us etc. The various tasks are set out in this privacy policy and in our Terms of Use.

We will process and store your personal data for the time period necessary to carry out or as needed to provide you the Service, depending on other purposes of the data processing and other duty stored for certain periods of time according to applicable laws, such as commercial laws, anti-money laundering laws or laws associated with applicable privacy and data regulations.

2. Information and description of data process by Bestroot Lab

When you use the Service, the following information data might be collected about you:

- IP address, your device type, unique device identifiers, browser-type;
- Mobile device identifiers (your unique device ID (for government purposes, hardware type, medical device control ("MAC") address, international mobile equipment identity ("IMEI"), and your device name;
- General location information for the purpose of geo-restriction of the Service, such as cookie IDs;
- Precise geolocation information from your mobile device (we will request this data to set games that work with your primary location);
- Information about your visits, sessions, search or purchase activities;
- Order, username, log, authorisation, and password for your relationship forum;
- Profile information (profile, photo, age, or birthday, links to profiles in other social networking services);
- Device language and the country where you are located (login age limit or double opt-in);
- Game data (your interactions with the game and with the other players inside the game via forum);
- Message content (if you send us a message, we will receive the content of the message and our response to it).

3. Visiting Bestroot Lab website

You may use our website without providing any personal data about yourself. We are not hosting company only our server access data, and, time, and duration of your access, volume of the transmitted data and the requested providers on a website server log files. This information is assessed solely to ensure smooth technical operation and to improve our Services. We cannot disclose any personal information about you from that data because you remain completely anonymous to us.

With regard to each of your visits to our Site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet (we collect this to afford more local and therefore will not be able to disburse any personal information for these purposes);
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time); products you viewed or searched for in this;
- response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

Aforementioned information we will use in order to:

- administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our Site to ensure that content is presented in the most effective manner for you and for your device;
- allow you to participate in interactive features of our service, when you choose to do so;
- keep our Site safe and secure as part of our efforts;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- make suggestions and recommendations to you and other visitors of our Site about goods or services that may interest you or them.

Please, be aware that by using our website you can make available to our hosting company our described and non-identifiable information pertaining to your personal device, but which, however, does not enable us to or hosting company to identify you from non-identifiable information. We use non-personal information for us to our hosting company remedy assistance of internal and aggregated information technical defects, so to ensure the best possible environment for our users. Non-personal information is not shared outside of our hosting company and our affiliates, except under the conditions listed in Service Access Limitation, Language and Information Disclosure sections of this privacy policy.

4. Placing Bestroot Lab games

Our Site is a platform for all games or applications we enable devices, we may record certain information and data about you as for instance:

- your application usage;
- your profile information (photo, course, achievements, in-app purchase history);
- your in-game forum and in-app preferences;
- your unique device ID (government – use purposes);
- hardware type;
- mobile device model ("MAC") address;
- international mobile equipment identity ("IMEI");
- version of your operating system ("OS");
- your device name;
- your Internet service provider of last resort connected to Facebook or Google+;
- your location (based on your Internet Protocol ("IP") address).

Aforementioned information collected through our Service we will use in order to:

- provide Services to you, operate the Services, ensure its continuity and improvement;
- troubleshoot crash game data on all devices you use for Services;
- manage and deliver advertising and game invitations among users to play our games and store, recognize gameplay progress;
- connect you with targeted in your community and questions, and provide customer service;
- send you Service-related information, including confirmations, technical notices, updates, security alerts, and support and administrative messages;
- communicate with you about promotions, rewards, upcoming events, and other news about products and services offered by Bestroot Lab and our partners;
- deliver advertising and marketing and personalized Services to you;
- identify and suggest connections with other users of our games;
- enable you to communicate with other users;
- enables matching and recruitment of members of your relatives or contacts whom you invite to join our Service;
- link or combine it with other information we get from third parties, to help understand your preferences and provide you with better Services.

Processing of game-based data also helps us to:

- offer you a personalized gaming session allowing users to play our games and store, recognize gameplay progress;
- connect you with targeted in your community and questions, and provide customer service;
- send you Service-related information, including confirmations, technical notices, updates, security alerts, and support and administrative messages;
- communicate with you about promotions, rewards, upcoming events, and other news about products and services offered by Bestroot Lab and our partners;
- deliver advertising and marketing and personalized Services to you;
- identify and suggest connections with other users of our games;
- enable you to communicate with other users;
- enables matching and recruitment of members of your relatives or contacts whom you invite to join our Service;
- link or combine it with other information we get from third parties, to help understand your preferences and provide you with better Services.

We may occasionally send you push notifications through our mobile applications to send you game updates, login access and other Service-related notifications that may be of importance to you. You may at any time opt-out from receiving these types of communications by turning them off in the Service level through your settings.

5. Information you provide to Bestroot Lab

When using the Service, you provide us to information about yourself, for instance, by filling in forms on our Site, by corresponding with us via email or online by phone, and otherwise. Aforementioned information may include behavioral information such as:

- Name and contact, email address (e), if you wish to receive information messages or feedback regarding your inquiry);
- Phone number, if you prefer to receive from us a called feedback);
- Profile photo (e.g. if you wish to add a photo to your profile);
- Age or birthday, in the Service is not meant for use by persons under the age of 13;
- Sex, if you prefer to our award-winning website and other Services to you;
- Email address (es), if you wish to receive information messages, joining the mailing list;
- IP address.

This information is processed in accordance with the provisions of the GDPR when you provide it to help you Service and the communications Bestroot granted Service.

Aforementioned information we will use the following purposes:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you, or where you have consented to be contacted for such purposes;
- to notify you about changes to our Service;
- to ensure that content from our website is presented in the most effective manner for you and for your technical device when you are using the Service.

6. Storing information

We are making records with third-party hosting providers, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers. We do not provide your data to such information about you with the purposes for which we intend to use that information.

7. Disclosing and sharing data

We may occasionally share your personal information in any of the following circumstances:

- We may engage other companies and individuals to perform services on our behalf. Examples of these services include analyzing data and providing customer support. These agents and service providers may have access to personal information needed to perform their functions on our behalf.
- We may release your information as permitted by law such as, to comply with a subpoena, or when we believe that release is appropriate to comply with the law, investigate fraud, respond to a government request, enforce or apply our Terms of Use or other agreements, or protect our rights or property or the rights or property of others. If we become involved in a merger, acquisition, or any form of sale of some or all of our assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.
- We may share your information in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business to another company. You will be duly notified via email and/or a prominent notice on our Site of any change in ownership or uses of your personal information.
- We may share aggregate or anonymous information about you with advertisers, publishers, business partners, sponsors, and other third parties which we use to better to ensure compliance data processing.

We may combine the information with information you give to us and information we collect about you when you use the Service. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive). In addition, we may disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets.

We may transfer information that we collect about you to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Please note that the countries and jurisdictions may not have the same data protection laws as your own jurisdiction, and we take steps to ensure adequate safeguards are in place to enable transmission of information to the U.S. and for use and disclosure of information by us as described in this privacy policy.

Aforementioned information we will use the following purposes:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to notify you about changes to our Service;
- to ensure that content from our website is presented in the most effective manner for you and for your technical device when you are using the Service.

8. Storing information

We are making records with third-party hosting providers, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers. We do not provide your data to such information about you with the purposes for which we intend to use that information.

9. Data processing for marketing and advertising purposes

We may process your personal data to deliver relevant and tailored marketing purposes on the basis of your expressed interests. We use this data for example to inform you about our own services and products and strategic events, championships, tournaments) or to personalization the presentation of your content. We may feature advertisements on our games, so. You can prevent this if you like by following instructions described in the Privacy Policy.

10. Advertising

Bestroot Lab may allow third parties to display advertising and to place advertising cookies on your computer in order to send you advertising that is targeted to your interests. The privacy policies of our partners may govern the use of information collected through cookies. Bestroot Lab does not control and does not have responsibility for any such cookies, tags, or other tracking devices in which these privacy policies or their terms about these data collected and any practices, use of cookies and other tracking technologies.

11. Advertising

Advertisements on mobile devices and our third-party advertising and partners sometimes collect and use information for advertising. Advertising IDs on mobile and operate advertising. Advertising IDs are non-permanent device identifiers and can be reset by users. We and our partners may:

- connect information with other personal or non-personal information we collect from you;
- connect information across devices;
- precise information and third-party advertising and analytics partners sometimes collect and use information for advertising IDs on mobile and operate advertising. Advertising IDs are non-permanent device identifiers and can be reset by users. We and our partners may also use your mobile device data across different services for purposes of analyzing, tracking and measuring and advertisement performance and to provide interest-based advertising.

In addition, you may use our games advertised on other services. After clicking on one of these advertisements and installing our game, you will become a user of our Service. In order to notify the installs, a device identifier may be shared with the advertiser or third-party advertiser or analytics partner.

You can exercise an opt-out for interest-based targeting services in mobile applications by disabling the setting of your mobile or PC device or web browser. Turning on "Limit Ad Tracking" (iOS) or "Opt-out of Interest-based ads" (Android). If you opt-out, you will still receive advertisements but they will not be tailored to your interests. We do not control how the opt-out links work in other sites, and we manage the interests that we have collected about you.

Finally, many of our partners that enable online behavioral or interest-based advertising are members of an or more digital advertising industry self-regulatory programs. You may click below for the Network Advertising Initiative ("NAI") and Digital Advertising Alliance ("DAA") to learn more about targeted or interest-based advertising and to opt out of certain targeting programs, you can visit following sites:

http://www.networkadvertising.org/choices

http://www.aboutads.info/choices

12. Analytics

Within the Service, we use methods, which serves for purposes of analyzing your usage of the Service and particular paid thereof. We use the following tools to perform analytical activities:

Tools	Description
Google Analytics	We access monitoring purposes.
Unity Analytics	tracking and monitoring tools of game activity
Facebook Analytics	tracking and monitoring tools of game activity
Appsflyer	tracking and monitoring tools of Google AdWords and Facebook Ads campaigns
Appsflyer Custom Events	activity and advertising products of our activity in all service partners
Appsflyer Retargeting	tracking and monitoring tools of Google AdWords and Facebook Ads campaigns

13. Other processing practices

Bestroot Lab may allow you the opportunity to invite your contacts from a Social Network Service (such as your Facebook friends) so that those contacts can be located in Bestroot Lab games and so you can invite them to play games with you. Bestroot Lab will not store your friends' contact information, but may use it to display their usernames and profile photos to you. Bestroot Lab may also use this information to show you and your friends recommendations for games to play.

We may share aggregate information from you through (1) your access and participation in message boards on the Service, (2) your participation in surveys regarding the Service or (3) your participation in a sweepstakes or contest through the Service.

14. Right to object

We may provide you the opportunity to participate in sweepstakes or contest through our Service. If you participate, we will request personal contact personal information from you. Participation in these sweepstakes or contests is entirely voluntary, so you have the choice whether to disclose this information. We use information you provide to administer these sweepstakes and contests, including to notify winners and award prizes.

15. Right to erasure

We use this information to verify winners and award prizes, or monitor traffic or preparation for the Service. We may use a third-party service provider to conduct these sweepstakes or contests, that company is prohibited from using your personal information except for these purposes.

16. Cookies data

We collect some data, we will store cookies on your device, in order to efficiently provide you with the full functionality of our Site. We use cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

A cookie is a file that is a data that we will have personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at support@bestrootlab.com.

17. Customer service

We may use your email address when you contact our customer service group to contact you about your gaming experience with Bestroot Lab games and notify you about changes such and promotions upon your prior consent.

If you no longer wish to receive certain email notifications, you may opt out at any time by following the instructions included in the footers of such communications or by sending an via email support@bestrootlab.com.

18. Cookies and data collection

We and our marketing and advertising partners, affiliates, or analytics service providers might use technologies such as cookies, beacons, scripts, and tags to identify your device and to "remember" things about you such as your preferences and to collect other data.

Cookies are small text files sent to your browser by our web servers during an access to our Site, and stored on your device in order to be called your. Whenever possible, Bestroot Lab is using cookies that are defined as "session" cookies, which are deleted when you close your browser. Other cookies are "persistent" cookies, which remain on your device for a longer period of time, or "local" cookies, which are stored for example in a folder that can be used for access of your data in various sessions and in order to estimate and provide that our Site is more user-friendly.

Information contained in a cookie may be linked to your personal information, such as your IP address, for purposes such as improving the quality of our Service, following recommendations to your interests, and tracking of your movements.

19. Cookies

The following section applies only to residents of California.

Under the California Consumer Privacy Act (CCPA) and California Online Privacy Protection Act (CalOPPA) require us to disclose categories of personal information Collect we collect how we use it, the categories of many from whom we collect the data, and whether it is disclosed or sold to other entities for business purposes.

In the preceding 12 months, we have disclosed the following categories of the Data as part of our Service:

- activity when using Service (items, audience, interaction within games, or advertisements, in-Service providers and advertising networks);
- unique personal identifiers (device identifiers, cookies, beacons, pixel tags, mobile ad identifiers, and similar technology, customer number, unique pseudonym, or user alias/ID; Service providers, business partners and advertising networks);
- commercial information (records of products purchased and/or Service, advertised or considered, or other purchasing or consuming histories or tendencies – in Service providers and advertising networks).

We use this required to communicate information about rights of California residents under California law. You may exercise the following rights:

- Right to know and access. which means that you may submit a verifiable request for information regarding the:
  - categories of the Data we collect, use, or share;
  - purposes for which categories of the Data are collected or used by us;
  - categories of sources from which we collect the Data; and
  - specific pieces of the Data we have collected about you.
- Right to equal Service. which means that we will not discriminate against you if you exercise your privacy rights.
- Right to Delete. which means that you may submit a verifiable request to close your account and to notify us to delete the Data about you that we have collected.
- Request that Bestroot Lab sell the personal information, under certain circumstances.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us. We do not sell the Data of our users. For more information about your rights, please see the Section of this Privacy policy.

20. Your rights

Please let me hesitate to contact us in your online conversations using the contact details provided in this policy, in case you have questions concerning the data protection or should you wish to make use or an effected you. Bestroot Lab will respond to your request to consider it according to applicable law within a reasonable period of time.

In respect to your personal data you can exercise the following rights:

1. Right of access and right to obtain a copy

You have the right to obtain from us confirmation as to whether or not your personal data, as well as to be informed about the purposes of the data processing by us. You are entitled to request what personal data we possess or process and to where it is stored, why it is processed and for how long it will be possible to be stored.

2. Right to rectification, erasure or restriction

If assess that the data we hold is incorrect or incomplete, you can request that we rectify or supplement such data. You can also restrict to such as data, you can request the processing of your personal data is restricted. Moreover, you are entitled to get your personal data erased, deleted or placed under restricted access regimes in cases where data in accordance with the data incompatible principles – to the extent the erasure is not prevented by overriding interests.

3. Right to object

It means that you have the right to object to the processing of your personal data if we are processing your data for our legitimate interests.

4. Right to data portability

It means that you have the right to obtain your personal data which is processed by us in a structured, commonly used and machine-readable format and to transfer this data to another data controller.

5. Right to withdraw consent at any time

Additionally, you are entitled to lodge a complaint with the data protection supervisory authority in the Republic of Latvia. The authority supervising Bestroot Lab is the Data State Inspectorate and it can be contacted:

Elijas street 17, Riga, LV-1050, Latvia

telephone number: +371 67 22 31 31,

e-mail: pasts@dvi.gov.lv,

website: www.dvi.gov.lv

21. Data security

We have implemented appropriate technical and organizational security measures to protect your personal data in particular from accidental or unlawful destruction, loss, destruction or unauthorized access. In respect to your personal data we have implemented procedures to help safeguard your personal information and to help prevent identity theft, data misuse and security incidents. Our security measures are continuously improved in accordance with technological developments.

Although we make good efforts to store the information collected on the Service in a secure operating environment that is not available to the public, we cannot guarantee the absolute security of that information during or after transmission. Furthermore, we cannot ensure or warrant the security of any information you transmit to us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. It is your responsibility to protect the security of your login information. Please note that emails communication over the Internet, such as emails to or from the Service, may not be secure unless they are encrypted. Your communication may routed through a number of countries before being delivered to the recipient. We cannot be responsible for the communication over the Internet, or transfer of information over the Internet, or transfer of information to us by any third parties.

In case any think processing your personal data is in contrary with any privacy law of you from a security issue or vulnerability, please contact the Bestroot Lab via email support@bestrootlab.com.

22. Amendments to this privacy policy

We may update this data protection policy on regular basis – in particular when we launch new products or services, change business procedures or implement more advanced Internet and electronic data processing security measures.

23. Service Access Limitation

We may update this data protection policy on regular basis – in particular when we launch new products or services, change business procedures or implement more advanced Internet and electronic data processing security measures.

24. Language and Information Disclosure

Unless otherwise specified, our Service is not directed to any person. You may not modify, copy, distribute, transmit, display, perform, reproduce, publish, license, create derivative works from, transfer, or sell any information, software, products or services obtained from our Service.

You may display and, subject to any expressly stated restrictions or limitations relating to specific material, electronically copy and download such portions of the material from the different areas of the Service solely for your personal, non-commercial use, or to the extent authorized by Bestroot Lab or any applicable licensor. You agree not to circumvent, disable or otherwise interfere with security-related features of the Service or features that prevent or restrict use or copying of any content or enforce limitations on use of the Service or the content therein.

25. Intellectual property

Bestroot Lab respects the intellectual property of others, and we ask our users and visitors to do the same.

1. Copyright of Logos and/or Trademarks

Logos and/or trademarks displayed on the Service are registered and/or unregistered trademarks of Bestroot Lab or other third parties. You are not granted any license with any of these.

All trademarks, service marks, and trade names are owned, registered, and/or licensed by Bestroot Lab or other third parties as indicated in the Service.

2. Copyright of Trademarks

Trademarks like phrases, products, names, and/or logos that are used or offered for sale elsewhere on the Service are protected by copyright and other laws and may not be used without the prior written permission of Bestroot Lab.

3. Copyright of Text

Works owned by the Service are copyrighted and protected by worldwide copyright treaties and by the terms and conditions of various users only.