

Privacy Policy

HAVFUN

This Privacy Policy (the "Policy") explains the way HavFun Games Inc. (the "HavFun Games", "Company", "we", "us" or "our") treat information which is provided or collected in the HAVFUN application (the "HAVFUN", "Application") and service (the HAVFUN", "Service") on which this Policy is posted. In addition, the Policy also explains the information which is provided or collected in the course of using the applications and services of the Company which exist in the websites, app, or platforms of other company.

The Company is the controller of the information provided or collected in the Service or websites on which this Policy is posted and in the course of using the Applications of the Company which exist in the websites or platforms of other company. This Policy applies to websites, apps, events and other services we operate under the HAVFUN brand.

Through this Policy, the Company regards personal information of the users as important and inform them of the purpose and method of Company's using the personal information provided by the users and the measures taken by the Company for protection of those personal information.

If found to realize minority personal information of the jurisdiction, the Company shall immediately delete all personal information available.

1. Information collected and Method of collection

(1) Personal information items to be collected

Personal information items to be collected by the Company are as follows:

- Information provided by the users including but not limited to HAVFUN ID/Username, email address, cryptography wallet address, phone number, password, date of birth, gender, SNS(Facebook, Apple, Google, etc) information and a friends list of SNS, payment information, other people information,

The Company may collect the information directly provided by the users from such Services including but not limited to online membership service, 3D avatar service, and invite friends or find other users.

- Information collected while the users use Services including but not limited to photos and images, your bio and your interests, other information stored in the cameras and photo, face data, friends and contact list, and etc.

Besides of information directly provided by the users, the Company may collect information in the course that the users use the Service provided by the Company including but not limited to equipment/device information, ads information and other information.

- Information collected while the users use Services including but not limited to usage information, hardware model name, operation system, hardware version, type and set-up of browser, language of browser, information of the device being used such as mobile network information, installed application information, advertising information, and etc.

Besides of information directly provided by the users or users' system, the Company may collect information from others like other members, social media, affiliates and other partners.

(2) Method of collection

The Company collects the information of users in a way of the followings:

- webpage, written form, e-mailing, tools for collection of created information
- provided by partner companies
- and other ways

2. Use of collected information

The Company uses the collected information of users for the following purposes including but not limited to :

- Member management and identification

- To detect and deter unauthorized or fraudulent use of or abuse of the Service
- Improvement of existing services and development of new services
- Making notice of function of company sites or applications or matters on policy change
- To provide information on promotional events as well as opportunity to participate
- To create users' characters
- Invite friends or find other users
- To comply with applicable laws or legal obligation
- Use of information with prior consent of the users (for example, utilization of marketing advertisement)
- Keep the website and/or app running and to improve it
- Give you access to the website or app and additional features, or to restrict your access
- To provide offers and operate marketing and advertising campaigns

The Company may entrust part of its operations to third-party businesses to provide more convenient and improved services.

Processing personal information by the Company shall be lawful only if and to the extent that at least one of the following applies:

- A user has given consent to the processing of his or her personal information.
- Processing is necessary for the performance of a contract to which a user is party or in order to take steps at the request of a user prior to entering into a contract:

- Member management, identification, etc.
 - Performance of a contract in relation to providing the services required by users, payment and settlement of fees, etc.
- Processing is necessary for compliance with a legal obligation to which the Company is subject
- Compliance with relevant law, regulations, legal proceedings, requests by the government
- Processing is necessary in order to protect the vital interests of users, or other natural persons
- Detection of, prevention of, and response to fraud, abuse, security risks, and technical issues that may harm users or other natural persons
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Company
- Processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party (except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child).

3. Disclosure of collected information

Except for the following cases but not limited, the Company will not disclose personal information with a 3rd party unless required by laws:

- when the Company disclosing the information with online tailored advertisement providers
- when the Company disclosing the information with its affiliates, partners and service providers;
 - when the Company's affiliates, partners and service providers carry out services such as bill payment, execution of orders, products

delivery, dispute resolution (including disputes on payment and delivery) and etc for and on behalf of the Company

- when the users consent to disclose in advance;
 - when the user selects to be provided by the information of products and services of certain companies by sharing his or her personal information with those companies
 - when the user selects to allow his or her personal information to be shared with the sites or platform of other companies such as social networking sites
 - other cases where the user gives prior consent for sharing his or her personal information
 - If you "agree", your contact information will only be used for 'Invite Friends' or 'Find Other Users' services
- when disclosure is required by the laws:
 - if required to be disclosed by the laws and regulations; or
 - if required to be disclosed by the investigative agencies for detecting crimes in accordance with the procedure and method as prescribed in the laws and regulations

4. Cookies, Beacons and Similar Technologies

The Application and the tools in the Service may not use cookies or technologies to collect user information at this time but they might do so in the future, in which case this Privacy Policy shall be updated accordingly.

We may use tracking technology (such as "Cookies") on our websites and app to help us understand and improve our service, as well as to understand your preferences. A Cookie allows us to remember your actions and preferences on the website over a period of time.

5. User's right

The users or their legal representatives, as main agents of the information, may exercise the following rights regarding the collection, use and sharing of personal information by the Company:

- The right to access to personal information;
 - The users or their legal representatives may access the information and check the records of the collection, use and sharing of the information under the applicable law.
- The right to rectification;
 - The users or their legal representatives may request to correct inaccurate or incomplete information.
- The right to erasure;
 - The users or their legal representatives may request the deletion of the information after the achievement of their purpose and the withdrawal of their consent.
 - However, Company will not be able to erase some personal data due to following reasons in accordance with the article 17 of the EU GDPR(General Data Protection Regulation).
 - The processing of your personal data is necessary for compliance with a legal obligation.
 - The processing of your personal data is necessary for the establishment, exercise or defense of legal claims.
- The right to restriction of processing;
 - The users or their legal representatives may make temporary suspension of treatment of personal information in case of the disputes over the accuracy of information and the legality of information treatment, or if necessary to retain the information.
- The right to data portability

- The users or their legal representatives may request to provide or transfer the information.
- The right to object
 - The users or their legal representatives may suspend the treatment of personal information if the information is used for the purpose of direct marketing, reasonable interests, the exercise of official duties and authority, and research and statistics.
- The right to automated individual decision-making, including profiling
 - The users or their legal representatives may request to cease the automated treatment of personal information, including profiling, which has critical impact or cause legal effect on them.

If, in order to exercise the above rights, you, as an user, contact the Company by sending a document or e-mails, or using telephone to the Company (person in charge of management of personal information or a deputy if available), the Company will take measures without delay: Provided that the Company may reject the request of you only to the extent that there exists either proper cause as prescribed in the laws or equivalent cause.

6. User's Obligations

The users shall keep their personal information up to date and be liable for the problems arising out of or in connection with the information incorrectly input by themselves.

The users have responsibility to ensure and maintain the security of their own information such as HAVFUN ID, email address, SNS ID, etc and shall neither assign nor lend such information to a 3rd party. The Company shall not be held responsible for any problems related to personal information that may arise out of or in relation to the mistakes made by individual members or the cause not attributable to the Company.

The users shall appropriately manage their personal information and take full responsibility for such management and be liable for the cooperation with the request of the Company to change the password on a regular basis under this Policy.

The users shall comply with the applicable laws and statutes of personal information protection in each country.

7. Retaining Information

We keep your personal information only as long as we need it for legitimate business purposes and as permitted by applicable law. If you decide to stop using our services, you can close your account and your profile will stop being visible to other members. Note that we will close your account automatically if you are inactive for a period of time. After your account is closed, we will delete your personal information.

8. Security

The Company treats the security of personal information of users very importantly. The company may construct the following security measures to protect the users' personal information from any unauthorized access, release, use or modification

- Encryption of personal information
 - Transmit users' personal information by using encrypted communication zone
 - Store important information such as passwords, contact information after encrypting it
- Countermeasures against hacking
 - Install a system in the zone the external access to which is controlled so as to prevent leakage or damage of users' personal information by hacking or computer virus
- Establish and execute internal management plan
- Install and operate access control system
- Take measures to prevent forging or alteration of access record

9. Children

Our Applications and Services are intended for individuals who are 18 years of age or older or legal age of your residential jurisdiction.

No minority permitted and the Company does not knowingly collect any information from the children under 13 or equivalent minimum age as prescribed in the laws in relevant jurisdiction. The HAVFUN app employs a compliant neutral age gate to prevent children from accessing the service. If HAVFUN acknowledges during the course of business, that the app has collected personal information from a child, all information will be deleted from our records and the account will be closed.

If you'd like to report an account that you believe belongs to someone under 13, please contact the Company. We shall take appropriate action when we receive your report.

HAVFUN is also committed to protecting the privacy of children (i.e., users under the age of 13 under COPPA). To learn more about COPPA, you can consult the US Federal Trade Commission's COPPA website: <https://www.ftc.gov/news-events/topics/protecting-consumer-privacy-security/kids-privacy-coppa>.

10. Modification of Privacy Protection Policy

The Company has the right to amend or modify this Policy from time to time and, in such case, the Company may make a public notice of it through pop-up of its service (or through individual notice such as e-mail) and obtain consent from the users if required by relevant laws.

If this Policy is amended, the Company may announce such amendment with the reason and effective date seven (7) days before the effective date.

11. Others

A. Data transfer to other countries

Considering it engages in global businesses, the Company may provide the users' personal information to the companies located in other countries for the purpose as expressly stated in this Policy. For the places where the personal information is transmitted, retained or processed, the Company takes reasonable measures for protecting those personal information.

B. For users residing in specific jurisdiction

The Company may adapt a guidance to several additional matters to be disclosed as required by the local laws and regulations.

The user may reject the collection and use of optional items and, even in case of rejection, there is no limit on use of services

HAVFUN may entrust part of its operations to third-party businesses to provide more convenient and improved services.

In order to bring the user our services globally and continuously, the Company may provide information and content to service providers located outside of residency of jurisdiction to process personal information.

In principle, the Company destructs personal information of users without delay after 90 days of preservation for the purpose of responding to recovery request after withdrawal when 1) the purpose of its collection and use has been achieved, 2) the legal or management needs are satisfied or users request, 3) Provided that, if it is required to retain the information by relevant laws and regulations, the Company will retain member information for certain period as designated by relevant laws and regulations.

C. Others

If a user does not use the Service for more than one (1) year, the Company, after such period, may forthwith destroy the user's personal information or manage and store the user's information in a place separate from the personal information of the other users, and will inform the user of his/her information to be destroyed or stored separately, the expiration date and the items of his/her personal information thirty (30) days before the expiration of the above period.

In order to prevent the loss, theft, leakage, alteration or damage of personal information of the users, the Company may take technical, managerial and physical measures for securing safety as follows:

- The password set by a member is collected as encrypted(if necessary).
- The Company may implement protective measures to safeguard the personal information of users: the company employs the security measures necessary to prevent personal information from being leaked or damaged by hacking or computer viruses and strives to have all possible technical measures for better security.

- The Company may limit to a minimum number of personnel treating personal information, and complies with relevant Act and subordinate statute such as training of the personnel handling personal information, etc.

The Company may assign staff(s) responsible for managing personal information

12. Contact information of Company

Please use following methods to contact the Company should you have any queries in respect to this policy or wish to update your information:

HavFun Games Inc.

- Address : Suite 2300, 10900 N.E. 4th ST., Bellevue, WA 98004, USA
- E-mail : support@havfun.com

This Policy is effective from May 1, 2025, 12:00AM (UTC)