

PRIVACY POLICY

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THIS PRIVACY POLICY IS AN ELECTRONIC RECORD IN THE FORM OF AN ELECTRONIC CONTRACT FORMED UNDER THE INFORMATION TECHNOLOGY ACT, 2000 AND THE RULES MADE THEREUNDER AND THE AMENDED PROVISIONS PERTAINING TO ELECTRONIC DOCUMENTS / RECORDS IN VARIOUS STATUTES AS AMENDED BY THE INFORMATION TECHNOLOGY ACT, 2000 AND OTHER APPLICABLE LAWS. THIS PRIVACY POLICY DOES NOT REQUIRE ANY PHYSICAL, ELECTRONIC OR DIGITAL SIGNATURE.

THIS PRIVACY POLICY IS PUBLISHED AND SHALL BE CONSTRUED IN ACCORDANCE WITH THE PROVISIONS OF THE DIGITAL PERSONAL DATA PROTECTION ACT, 2023, THE DIGITAL PERSONAL DATA PROTECTION RULES, 2025, AND OTHER APPLICABLE LAWS.

Your privacy is important to ****us and our affiliates, assigns and successors**** (herein referred to as **“we”, “us” or “our”**). This Privacy Policy explains how we collect, process, use, share and protect information about you.

The Privacy Policy covers both **“online”** (e.g., web and mobile services, including any websites operated by us, however accessed and/or used, whether via personal computers, mobile devices or otherwise) and **“offline”** (e.g., collection of data through mailings, telephone, or in person) activities owned, operated, provided, or made available by us.

Our **“online”** and **“offline”** activities, in relation to our products and services, which include applications for mobile devices and our websites are collectively referenced as the **“Services”**. This Privacy Policy also applies to your use of interactive features or downloads that: (i) we own or control; (ii) are available through the Services; or (iii) interact with the Services and post or incorporate this Privacy Policy.

This Privacy Policy is incorporated into and subject to the Terms & Conditions and is binding on you. We collect and use your personal data only where we have a lawful basis to do so, either with your specific consent or for a permitted purpose, as explained in the **“On What Basis We Process Your Data”** section below.

IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT USE OR ACCESS OUR PRODUCTS AND/OR SERVICES.

If you have questions about this Privacy Policy, please contact us through email address provided on our website and/ or Mobile Application (Our **“Platform”**).

DEFINITIONS

Unless otherwise provided in this Privacy Policy, the terms capitalized in the Privacy Policy shall have the meaning as provided hereunder:

- **“Device”** shall mean computer, mobile or other device used to access the Services.
- **“Device Identifier”** shall mean IP address or other unique identifier for the Device.
- **“Personal Information”** or **“Personal Data”** means any data about you by which you are identifiable, directly or indirectly. This includes information such as your name, email address, phone number, device identifiers, IP address, location data, and any other information that relates to you as an individual.

- **“Promotion”** shall mean any contest and other promotions offered by us or by third party platforms on our Platform.

WHAT INFORMATION DO WE COLLECT?

INFORMATION YOU PROVIDE TO US

- We may ask you to provide us with certain Personal Information. We may collect this information through various means and in various places through the Services, including online account registration forms, contact us forms, or when you otherwise interact with us. When you sign up to use the Services, you create a user profile. When you identify yourself on our site, you may identify yourself through a social network account in which we may receive additional information about your profile. We shall ask you to provide only such Personal Information which is for lawful purpose connected with our Services and necessary to be collected by us for such purpose.
- The data fields that might be requested for and collected currently, are:
 - a) Device type and model, device ID
 - b) Advertisement ID
 - c) OS information and version
 - d) Country
 - e) App Version
- We may also collect information such as:
 - Name
 - Email
 - Password
 - Address
 - Mobile phone Number
 - Gender
 - Network provider
 - Any information shared with us by third Party websites using which you have created an account on our Platform.

INFORMATION WE COLLECT AS YOU ACCESS AND USE OUR SERVICES

- In addition to any Personal Information or other information that you choose to submit to us, we may use a variety of technologies that automatically (or passively) collect certain information whenever you visit or interact with the Services (**“Usage Information”**). This Usage Information may include information regarding the browser that you are using, geo-location, IP address, country, the URL that referred you to our Services (source), all of the areas within our Services that you visit, and the time of day, among other information in order to

gauge your “behaviour” on our Platform and provide you enhanced and more customised Services. For our internal reports and recommendations, we may collect aggregate information about the use of the Service, including information about users accessing our site, using our Services, using SNS Apps on other sites or using Mobile Applications, such as internet protocol addresses, browser type, browser language, referring / exit pages and URLs, other browser history, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, and the date and time (“**Activity Information**”).

- In addition, we collect your Device Identifier for your Device. A Device Identifier is a number that is automatically assigned to your Device used to access the Services, and our computers identify your Device by its Device Identifier. It is peculiar and exclusive to you. Further, when you invite new members into your network or send messages through the Service, we collect and maintain on secure servers, the information associated with those messages, including email addresses and content, amongst other details. Your carrier’s standard fees and rates will still apply, including without limitation SMS/text messaging fees, and you accept responsibility for all charges.
- Usage Information may be collected using a cookie. If you do not want information to be collected through the use of cookies, your browser allows you to deny or accept the use of cookies. Cookies can be disabled or controlled by setting a preference within your web browser or on your Device. If you choose to disable cookies or flash cookies on your Device, some features of the Services may not function properly or may not be able to customize the delivery of information to you. We cannot control the use of cookies (or the resulting information) by third parties, and use of third party cookies is not covered by this Privacy Policy. Any other third party marketing or technology service that may be tracking your use of the Services shall not be covered by our policies and we shall not be liable for the same.
- We may offer you the opportunity to submit other information about yourself (such as gender, age, occupation, hobbies, interests, zip code, etc.), or we may be able to collect that information from social networking systems on which you have used the Services, which would also be covered by this Privacy Policy. Further, when you use an SNS App on your social network page or use an SNS App on someone else’s page, we may record information regarding the use of that SNS App, and we may collect other information that is visible on your social network page in accordance with the relevant terms of use associated with that page. Note it is solely your responsibility to read and accept the ‘terms of use’ of SNS Apps, as well as this Privacy Policy.

INFORMATION WE COLLECT AS YOU ACCESS AND USE OUR SERVICES

- We may, from time to time, supplement the information we collect about you through our Platform or Services with outside records from third parties, upon your authorisation. Further, most content delivered through our Services originates with another content provider. Such other content providers may place “cookies” on your browser, or otherwise gather information about you, including by asking you to provide information through the site itself.

INFORMATION COLLECTED BY MOBILE APPLICATIONS

- Our Services are primarily provided through the Mobile Application. We may collect and use technical data and related information, including but not limited to, technical information about your device, system, Service usage and application software, and peripherals, that is gathered periodically to facilitate the provision of software updates, product support and other services to you (if any) related to such Mobile Applications.

- When you use any of our Mobile Applications, the Mobile Application may automatically collect and store some or all of the following information from your mobile device (“**Mobile Device Information**”), in addition to the Device Information, including without limitation:
 - a) Your preferred language and country site (if applicable);
 - b) The manufacturer and model of your mobile device;
 - c) Your mobile operating system;
 - d) The type of mobile internet browsers you are using;
 - e) Your geolocation;
 - f) Information about how you interact with the Mobile Application and any of our web sites to which the Mobile Application links, such as how many times you use a specific part of the Mobile Application over a given time period, the amount of time you spend using the Mobile Application, how often you use the Mobile Application, actions you take in the Mobile Application and how you engage with the Mobile Application; and
 - g) Information to allow us to personalize the services and content available through the Mobile Application.

HOW WE USE INFORMATION COLLECTED

- Our primary goal in collecting your information is to provide you with an enhanced experience when using the Services. Based upon the Personal Information and other information you provide us when registering for an account, we will send you a welcoming email to verify your username and password.
- We use the information collected from our Mobile Application to serve you the correct and compatible app version for your device type and for troubleshooting purposes.
- We use your Internet Protocol (IP) address to help diagnose problems with our computer server, and to administer our website(s). Your IP address is used to help identify you, but contains no personal information about you.
- We will send you service-related communications where necessary, such as maintenance notices, security alerts, and updates to our terms. These are operational communications, not marketing, and you cannot opt out of them while your account is active.
- We may use the information obtained from you to prevent, discover and investigate violations of this Privacy Policy or any applicable terms of service or terms of use for the products and services, and to investigate fraud, chargeback or other matters.
- We also use your Personal Information or Usage Information and certain technical information about your computer and your access of the Service (including your IP address) in order to operate, manage and maintain the Service, improve the Service and create new services.
- We may disclose information about you to our partners and other content providers in order to provide the Service, resolve service problems and correct errors in the Service, to communicate with you about the Service, to provide you with advertising and promotional information in connection with the Service, and to enhance your experience on the Service.

- We may use your information, where you have consented, to send you newsletters, special offers and promotional materials on behalf of us or third parties; enable you to enter contests and promotions on the Platform; and contact you about your use of the Services or changes to our policies; or for internal operational purposes.
- We use aggregated, non-identifiable analytics data to improve the Services. We will not use your Personal Information for any new purpose without first informing you and, where required, obtaining your consent. However the Personal Information may be used for any legitimate purpose without informing you or obtaining your consent.
- Where you have consented, we use information about your browsing and usage behaviour on our Platform to show you targeted advertisements. This is consent-based; you may withdraw your consent at any time through the settings or by contacting us.
- With your consent, we may send push notifications to your mobile device to provide updates and relevant messages. We may also send local notifications to your mobile device. You may manage notifications from the “Settings” page of the Mobile App or through your device.

ON WHAT BASIS WE PROCESS YOUR DATA

We only collect and use your Personal Data when we have a lawful basis to do so. There are two grounds on which we process your data: (1) with your consent, and (2) for certain permitted purposes that do not require consent.

Consent-based activities include: creating and managing your account; sending you marketing and promotional communications; showing you targeted advertisements based on your browsing behaviour; collecting optional profile information such as gender, occupation or interests; collecting your geolocation for personalisation features; and enabling push notifications. You may withdraw your consent to any of these at any time.

Permitted-use activities (which do not require consent) include: delivering the specific action you asked for when you voluntarily shared your data with us, provided you have not objected; diagnosing faults, maintaining security, and preventing fraud; complying with applicable law or responding to lawful government or regulatory requests; protecting health or safety in an emergency; and transferring data in connection with a corporate restructuring or acquisition. Even for permitted uses, we only collect the minimum data necessary for the specific purpose.

CONTROL OVER YOUR PERSONAL INFORMATION

- You have the following rights over your Personal Data: (a) the right to know what data we hold about you, what we use it for, and who we have shared it with; (b) the right to have inaccurate or incomplete data corrected or updated; (c) the right to have your data deleted once the purpose for collection has been served, unless we are required by law to keep it; (d) the right to withdraw your consent at any time with the same ease as it was given, however this will not affect anything done lawfully before that point; (e) the right to raise a grievance with us and, if unsatisfied, to escalate to the Data Protection Board of India; and (f) the right to nominate another person, in accordance with law, to exercise your data rights if you will become unable to do so due to death or incapacity.
- To exercise any of these rights, please use the tools on our Platform or contact us through the details on our website or app. We will respond within 90 days of receiving your request. We may ask you to verify your identity before processing your request.
- To protect your privacy, we may also take additional steps to verify your identity before fulfilling your request and may seek more information from you on the same.

DATA RETENTION

We retain your Personal Data only for as long as necessary to fulfil the purpose for which it was collected, or as required by law. Once that purpose is served, or you ask us to stop and we have no lawful reason to continue, we will delete your Personal Data and direct our service providers to do the same. We retain processing logs for a minimum of one year for security and compliance purposes. Where we have not heard from you for an extended period, we will give you at least thirty (30) days' advance notice before deleting your account data.

HOW AND WHEN DO WE DISCLOSE INFORMATION TO THIRD-PARTIES

We do not sell, share, rent or trade the information we have collected about you, other than as disclosed within this Privacy Policy or at the time you provide your information. Following are the situations when information may be shared:

- **WHEN YOU AGREE TO RECEIVE INFORMATION FROM THIRD PARTIES:** You may be presented with an opportunity to receive information and/or marketing offers directly from third parties. If you do agree to have your Personal Information shared, your Personal Information will be disclosed to such third parties and all information you disclose will be subject to the privacy policy and practices of such third parties. We are not responsible for the privacy policies and practices of such third parties and, therefore, you should review the privacy policies and practices of such third parties prior to agreeing to receive such information from them. If you later decide that you no longer want to receive communication from a third party, you will need to contact that third party directly.
- **THIRD PARTIES PROVIDING SERVICES ON OUR BEHALF:** We sometimes use third party entities and individuals to facilitate our Services, provide or perform certain aspects of the Services on our behalf - such as other content provider to provide the Services, other third parties to host the Services, design and/or operate the Services' features, track the Services' analytics, process payments, engage in anti-fraud and security measures, provide customer support, enable us to send you special offers, perform technical services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Services' features), or perform other administrative services. These third parties will have access to user information, including Personal Information to only carry out the services they are performing for you or for us. Each of these third parties are required to ensure the same level of data protection as us and are obligated not to disclose or use Personal Information for any other purpose. Content providers may set and access their own cookies, web beacons and embedded scripts on your Device and they may otherwise collect or have access to information about you, including non-personally identifiable information. We use a third party hosting provider who hosts our support section of our website. Information collected within this section of our website by such third party is governed by our Privacy Policy.
- **CO-BRANDED SERVICES:** Certain aspects of the Services may be provided to you in association with third parties ("**Co-Branded Services**") such as sponsors and charities. Such Co-Branded Services will clearly identify the third party before you interact with them. Before we share any of your Personal Data with a co-branded partner, we will ask for your consent. If you sign in to a Co-Branded Service using credentials from our Services, your Personal Data will be shared with that third party only to the extent you have consented and will be subject to their privacy policies.
- **CONTESTS AND PROMOTIONS:** We may offer Promotions through the Services that may require registration. We will share details and information about each of these contests and promotions and their specific terms along with the announcement of the same. By participating in a Promotion, you are agreeing to official rules that govern that Promotion, which may contain specific requirements of you, including, allowing the sponsor of the Promotion to use your

name, voice and/or likeness in advertising or marketing associated with the Promotion. If you choose to enter a Promotion, you agree that your Personal Information may be disclosed to third parties or the public in connection with the administration of such Promotion, including, in connection with winner selection, prize fulfilment, and as required by law or permitted by the Promotion's official rules, such as on a winners list.

- **ADMINISTRATIVE AND LEGAL REASONS:** We cooperate with Government and law enforcement officials and private parties to enforce and comply with the law. Thus, we may access, use, preserve, transfer and disclose your information (including Personal Information, IP address, Device Information or geo-location data), to Government or law enforcement officials or private parties as we reasonably determine is necessary and appropriate: (i) to satisfy any applicable law, regulation, subpoenas, Governmental requests or legal process; (ii) to protect and/or defend the Terms and Conditions for online and mobile Services or other policies applicable to any online and mobile Services, including investigation of potential violations thereof; (iii) to protect the safety, rights, property or security of our entity, our Services or any third party; (iv) to protect the safety of the public for any reason; (v) to detect, prevent or otherwise address fraud, security or technical issues; and /or (vi) to prevent or stop activity we may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity.
- **WHEN YOU SHARE INFORMATION:** Personal Information may be collected and shared with third-parties if there is content from the Mobile Application that you specifically and knowingly upload to, share with or transmit to an online community, website, or to the public, e.g. uploaded photos, posted reviews or comments, or information about you or your activity that you choose to share with others through features which may be provided on our Services. This uploaded, shared or transmitted content will also be subject to the privacy policies of the online community website, social media or other platform to which you upload, share or transmit the content.
- **BUSINESS ASSOCIATES:** We may share your information, including your Personal Information and Usage Information with our parent company, subsidiaries and affiliates for the purposes of operating and improving the Services, internal reporting, compliance, and for other purposes consistent with this Privacy Policy. We may also disclose and transfer your information to a subsequent owner, operator or acquirer of the Services or our business in connection with a merger, consolidation, restructuring, sale of assets, or due diligence process related to any such transaction, and you will be notified of any such transfer where required by applicable law. We engage a number of third-party service providers to help us deliver the Services. These service providers only process your personal data on our instructions, to the extent necessary to perform their specific role, and under contract with us that requires them to maintain the same standards of data protection that we apply.

MINORS / AGE

Our Services are not directed at children under the age of 18 years. We do not knowingly collect Personal Data from a child without first obtaining verified consent from their parent or legal guardian. We do not serve targeted advertising to such children, and we do not track or profile such children's behaviour. If you are a minor / incompetent to contract due to age in the jurisdiction in which you reside, you must have the permission of and be directly supervised by, your parent or legal guardian to provide the Personal Data. If you believe we have inadvertently collected a child's data without proper parental consent, please contact us and we will delete it promptly.

OTHER'S INFORMATION

You may decide to provide us with another person's email address so that person may be invited to join our Services or so that we may facilitate your communication with other people through the Service (such as when you upload an address book). Further, you may also provide us with another person's

contact information for purposes of delivering information. We use this information to contact and, if necessary, remind that person that he or she has been invited to join our Services or use our Services, based on your recommendation.

We consider you to be authorised to share such information with us and also understand that you have sought requisite permissions and approvals from the person whose information you are sharing with us.

THIRD PARTY CONTENT AND LINKS TO THIRD PARTY SERVICES

The Services may contain content that is supplied by a third party, and those third parties may collect website usage information and your Device Identifier when web pages from any online or mobile Services are served to your browser. In addition, when you are using the Services, you may be directed to other sites or applications that are operated and controlled by third parties that we do not control. We are not responsible for the privacy practices employed by any of these third parties. For example, if you click on a banner advertisement, the click may take you away from one of our websites onto a different web site. You are leaving our website/app/platform and going on any such third party platform/website of your own accord and shall be liable to ensure your safety on such platform/website. You understand that these other websites may send their own cookies to you, independently collect data or solicit Personal Information and may or may not have their own published privacy policies. We encourage you to note when you leave our Services and to read the privacy statements of all third party web sites or applications before submitting any Personal Information to third parties.

THIRD-PARTY ADVERTISING COMPANIES

We use third-party advertising companies to serve ads on our site and on certain sites, Mobile Applications. Our system and the third-party advertising technology uses information derived from Activity Information, cookies, your visits to our site, the Services that you view and Mobile Applications you use to target advertising within our site, Mobile Applications. In addition, our advertisers may use other third-party advertising technology to target advertising on our site and other sites. In the course of advertisements being served to you, a unique third-party cookie or cookies may be placed on your Device. Similarly, third-party advertising companies may provide us with pixel tags (also called “**clear gifs**” or “**beacons**”) to help manage and optimize our online advertising. Beacons enable us to recognize a browser’s cookie when a browser visits the site on which the beacon is located, and to learn which banner ads bring users to a given site.

SOCIAL MEDIA FEATURES AND WIDGETS

Our online and mobile Services may include social media features, such as the Facebook Like button, and widgets such as a “Share This” button, or interactive mini-programs that run on our online and mobile Services. These features are being provided to you by the respective third party platforms. These features may collect your IP address, photograph, which page you are visiting on our online or mobile Services, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our online and mobile Services. Your interactions with these features and widgets are governed by the Privacy Policy of the entity providing them.

CHANGE OF INFORMATION AND CANCELLATION/DELETION OF ACCOUNT

- You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of account registration. If your Personal Information changes, or if you no longer desire our Services, you may correct, delete inaccuracies, or amend information by making the change on our member information page or by contacting us through email address mentioned on our website or Mobile Application. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably practicable.

- You may also cancel or modify your communications that you have elected to receive from the Services by following the instructions contained within an e-mail or by logging into your user account and changing your communication preferences.
- If upon modifying or changing the information earlier provided to Us, we find it difficult to permit access to our Services to you due to insufficiency/ inaccuracy of the information, we may, in our sole discretion terminate your access to the Services. We will notify you before we take such action.
- If you wish to cancel your account or request that we no longer use your information to provide you Services, please feel free to contact us.
- Please refer to the Data Retention section of this Privacy Policy for how long we keep your data. After your account is closed, we may retain limited data for as long as required by law to meet legal and regulatory obligations, resolve disputes, and prevent fraud, to enforce our rights, retain as back up/archives and for other legitimate reason. Such Personal Data will be kept securely and used only for those specific purposes.

SECURITY

We take the security of your Personal Data seriously. Our safeguards include: encrypting or masking Personal Data where appropriate; controlling and monitoring who can access our systems; maintaining audit logs to detect and investigate any unauthorised access; keeping data backups to ensure continuity; retaining security logs for at least one year; and requiring our service providers to maintain equivalent standards under contract.

However, as effective as encryption technology is, no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the internet or wireless communication, and any information you transmit to us, you do at your own risk. We recommend that you not disclose your password to anyone.

PERSONAL DATA BREACH NOTIFICATION

If a security incident results in unauthorised access to, loss of, or disclosure of your Personal Data, we will notify you promptly through your registered account or other communication channel we hold for you. We will tell you: what happened and when; what data was affected; what steps we are taking to address the incident; and what you can do to protect yourself. We will also report the incident to the Data Protection Board of India within the timeframe required by applicable law.

COMMUNICATIONS

Where you have given us your consent, we may send you newsletters and promotional communications. You may withdraw your consent to stop receiving these at any time by using the unsubscribe link in any message or by contacting us at info@kashewgames.com. Despite your indicated email/communication preferences, we may send you notices of any updates to our Privacy Policy, Terms of Use or other administrative emails.

TRANSFER OF YOUR DATA OUTSIDE INDIA

Some of the third-party service providers we use are based outside India, which means your Personal Data may be processed internationally as part of delivering the Services. We will only transfer your Personal Data in compliance with applicable law and any requirements notified by the Government of India from time to time regarding cross-border data transfers. We will update this section if specific restrictions come into effect that affect how or where we transfer your data.

GRIEVANCE OFFICER

We hereby appoint Ryan Devitre as our contact for questions about how we handle Personal Data and for exercising your data rights. Their contact details are also published on our Platform and will be included in every response we send you about your Personal Data. You can reach them at info@kashewgames.com or at our address provided on our website www.kashewgames.com. We will respond to all grievances within 90 days of receipt. If you are not satisfied with our response, you may escalate your complaint to the Data Protection Board of India. We will inform you about how to make such an escalation once the Data Protection Board becomes operational.

CHANGES TO THE PRIVACY POLICY

We may update this Privacy Policy from time to time. Where a change involves collecting new categories of Personal Data or using your data for a new purpose that requires consent, we will ask for that consent before the change takes effect. For other changes, such as clarifications or contact detail updates, we will notify you by email or through a notice on the Platform and the update will take effect upon posting. To make sure you are aware of any changes, please review this Privacy Policy periodically.