

Darways Technologies, Privacy Policy

Darways Technologies (“Darways,” “we,” “us,” and “our”) provides virtual reality (“VR”) gaming experiences on the Oculus, Steam, and other platforms through games such as **BILLIONAIRES SHOW**. This Privacy Policy is designed to help you understand how we collect, use, and share your personal information and to help you understand and exercise your privacy rights. Darways is the data controller for the personal information we process. For information on how to contact us, please refer to Section XIV below.

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I. SCOPE

This Privacy Policy applies to personal information processed by us, including on our websites, mobile applications, games, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, mobile applications, games, and other offerings are collectively called “**Services**”.

II. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us on our websites and through our mobile applications and games, the information we obtain automatically when you use our Services, and information from other sources such as third-party services, organizations, and platforms, as described below.

A. Information You Provide to Us Directly

We may collect the following personal information that you provide to us.

- **Account Creation.** We may collect information from Oculus, Steam or other platforms when you create an account to play our games via such platforms, such as your profile picture, display name, Game Platform User ID, nickname, Avatar ID, or other information that you have made available via your privacy settings on such platforms.
- **Beta User Information.** If you sign up to join a Beta on our Services, we will collect your email address, first name, age, gender, type/model of VR headset, platform type, platform username, and Discord username. We will also collect additional information you provide, including via surveys, such as hours playing the games, comfort and estimated motion sickness levels while playing the game, and a net promoter score and we will add your email to our mailing list for beta testers. For more information about how to unsubscribe from our email list, please see Section III.C below.
- **Purchases.** We may collect aggregate information from Oculus or Steam (e.g., what has been purchased and refund metrics). Any payments made for our Services are processed through Oculus or Steam. We do not collect or store any payment card information for purchases on our Services.
- **Your Communications with Us.** We may collect personal information, such as your name and email address, when you complete the “Contact Us” form on our main website or register for our mailing list, User IDs and headset used, details of your request, and any attachments you provide when you request customer or technical support and other information you may provide when you apply for a job or otherwise communicate with us.
- **Interactive Features.** We and others who use our Services may have access to personal information that you submit or make available through our interactive features (e.g., the games themselves, forums, blogs, and social media pages). Any information you provide on these features will be considered “public”, unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.

- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** We may post job openings and opportunities on our Services. If you reply to one of these postings by submitting your application, CV and/or cover letter to us, we will collect and use your information to assess your qualifications.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- **Automatic Data Collection.** We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, cookie identifiers and platform identifiers, in game analytics, player event data, information on bugs and crashes browser or device information, general location information (including approximate location derived from IP address), and hardware information, system memory. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during, and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.

C. Information Collected from Other Sources

We may obtain information about you from other sources, including from other users, and through third-party services and organizations. For example, if users choose to send us extracts of gameplay.

III. HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services, including game play;
- Answering requests for customer or technical support; and
- Communicating with you about your account, activities on our Services, and policy changes.

B. Administrative Purposes

We use your information for various administrative purposes listed below where we have a legal basis to do so, such as:

- Product research and development (including marketing research);
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading or enhancing our Services;
- Developing new products and Services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual or business identities;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Enforcing our agreements and policies;
- To create aggregated analytics information, such as information about the device from which you access our Services; and
- Processing applications if you apply for a job we post on our Services.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements.

We market to you in the following ways: via email campaigns, targeted on-line advertisements on social media, and at trade shows and other events.

D. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

- **Consent.** We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.
- **To promote safety, integrity and security.** We use the information we collect to verify accounts and activity, combat harmful conduct, detect and prevent bad experiences, maintain the integrity of our services, and promote safety and security.
- **Share Content with Friends.** Our Services may offer various tools and functionalities. For example, our referral services may allow you to forward or share certain content with a friend, such as an invite code to invite your friend to use our Services.

- **Complying with our legal obligations.** We may process personal information as needed to comply with our legal obligations, including if we have a good faith belief that the law requires us to do so or when we have a good-faith belief it is necessary as described in “B. Disclosures to Product Us or Others” below.

IV. WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR INFORMATION

- as necessary to fulfill our Terms of Service and provide the Services;
- consistent with your consent, which you may revoke at any time;
- as necessary to comply with our legal obligations;
- occasionally to protect your vital interests or those of others;
- as necessary in the public interest; and
- as necessary for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

V. HOW WE SHARE YOUR INFORMATION

We share your information to third parties for the following business purposes: to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. To Provide our Services

The categories of third parties with whom we may share your information are described below.

- **Service Providers.** We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, marketing and related services.
- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services.
- **APIs/SDKs.** We may use third-party Application Program Interfaces (“APIs”) and software development kits (“SDKs”) as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in Section XIV below.

B. To Protect Us or Others

We may access, preserve, and disclose information associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect

amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. In the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and contract.

VI. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt-out of those communications. We process requests to be removed from email marketing lists.

VII. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. We have taken appropriate safeguards to require that your personal information will remain protected and require our third-party service providers and partners to have appropriate safeguards as well.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services.

VIII. INTERNATIONAL DATA TRANSFERS

As we are a United States company, it is necessary to transfer your personal information to the US and other third countries outside of the UK/EEA in order for us to provide the Services to you and such third countries may have data protection laws that are different and less protective from the laws where you live. Where we transfer UK/EEA personal data to third parties in third countries, we utilize Standard Contractual Clauses approved by the European Commission, and rely on the European Commission's adequacy decisions about certain countries, as applicable, for such transfers.

IX. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the

purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

“Sales” of Personal Information under the CCPA

For purposes of the CCPA, Darways does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

Accessibility. This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium’s Web Content Accessibility Guidelines, version 2.1. If you wish to print this policy, please do so from your web browser or by saving the page as a PDF.

X. CHILDREN’S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and wish to review information collected from your child, or have that information modified or deleted, you may contact us as described in Section XIV below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child’s account and/or revert them to the underage experience, as applicable.

XI. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Changes to our Privacy Policy. If there are any material changes to this Privacy Policy, we will notify you and take any other steps as required by applicable law. All updated Privacy Policies will have the date and time when the new document is publicly posted.

XII. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at: **contact@darways.co**