

## Privacy Policy

*Internet Panda LLC* (hereinafter, Company) recognizes the right to private life of any person(s) that use Company's online Services. This document (hereinafter, Policy) defines the Company's policy and regulations on processing Users' personal data and on information about inherent requirements for Users' personal data protection.

The following Policy is integral to our [User Agreement](#) that includes, amongst other things, the following Appendices: Privacy Policy and Game Rules (Appendix 1 to the User Agreement). The Privacy Policy, the User Agreement and their Appendices are public documents and are available for review by any Internet user by simply following the hypertext links displayed above.

The Policy has been designed in accordance with personal data protection legislation, and it regulates the terms of processing personal information received by the Company from its Users as a result of their use of Company's Services.

This Policy is applicable to Company's Services only and does not in any way regulate Internet websites that belong to and/or are operated by other companies and organizations. and that may be somehow referenced by this Company's Services.

By choosing to register with a social network (Facebook, VK.com, OK.com, MyMail.ru, Photostrana, Kanobu Games and other networks that provide access to the Game) and proceeding to log in to the Game by clicking on *Play, Play Now, Run Game* or similar buttons, or installing the Game on a mobile device via Google Play or App Store Mobile Platforms, the User expresses full and unreserved agreement with the terms of personal data processing that are defined in this Privacy Policy.

### 1. Personal User Information That Is Received And Processed By The Company

1.1. Under this Policy "Personal User Information" constitutes the following:

- Personal information that the User enters at her own discretion upon registering her account or while using Company's Services, including, but not limited to, personal identification data such as the name, last name, gender, age, photo(s), email address, etc.
- Data that is forwarded to the Company automatically during using/playing the Game and/or Game Services, including, but not limited to, IP addresses, cookies, feedback on user's Internet browser (or any other software that provides the User with access to the Services), time of access, requested page URL address.
- Additional personal data entered by the User at her own discretion.

1.2. The Company does not control, operate or manage, as well as accept any responsibility for third-party websites that the User may move on to by following external links available from the Company's Website, including, by not limited to, appropriate search results.

1.3. The Company reserves the right to collect, source and process information associated with User behavior during her use of the Company's Services, as well as gaming data, such as achievements, ratings, etc., in order to adjust its Services with regards to User interests and to improve the overall quality of Services.

1.4. The Company accepts no responsibility for Personal User Information that has been entered by the User on the Website, in the Game, and/or in the social networks in a commonly available manner (e.g. on forum pages, in social network user comments, etc.).

1.5. The Company reserves the right to process anonymous User data associated with visits and Websites and social networks use for statistical purposes.

## 2. Rationale Behind Collecting And Processing Personal User Information

- 2.1. The Company collects, sources and stored only the kind of personal information that is integral to use the Game and to provide the User with its Services.
- 2.2. The Company reserves the right to use Personal User Information as required in the following circumstances:
  - User identification;
  - Defining whether the User's age is appropriate to carry out purchases in the Game and/or use its Services;
  - Providing the User with personalized Services;
  - Getting in touch with the User with a specific purpose, including cases of customer and/or tech support;
  - Services provision;
  - Improving quality of Services and the ergonomics and simplicity of their use;
  - Development of new Services and features;
  - Performing statistical and other research based on anonymous data;
  - Registration of entries for competitions and/or events;
  - Informing Users of new Services and features provided by the Company;
  - Informing Users of innovations and updates to Services and features;
  - Target advertising.

## 3. Terms Of Processing Personal User Information And Sharing It With Third Parties

- 3.1. Confidentiality of Personal User Information is observed in all cases except for when the User enters information about herself with public availability to unlimited persons/parties at her own discretion.
- 3.2. The Company reserves the right to forward Personal User Information to a third party in the following cases:
  - The third party is acting on the basis of a contract with the Company, seeking to execute their obligations towards the User (e.g., provide necessary information to a payment system or application);
  - The User has expressed her consent for the specified action(s);
  - The information must be shared as part of use of a specific Service by the User, and/or to provide a Service to the User;
  - Forwarding the information is defined by the Russian legislation, or any other applicable legislation, as a set procedure, including, but not limited to, cases when the business is partly or fully sold or in any other way consigned to another party; in this case the party to acquire the Company assets receives all the obligations to the Users outlined in this Policy and associated with any personal data they come into possession of;
  - In order to legally protect the rights and legitimate interests of the Company or any third party in cases when the User breaches the User Agreement;
  - In accordance with rational and applicable legal requirements.
- 3.3. When processing Personal User Information the Company resorts to the Russian Federal law titled *On Personal Information*.

## 4. Using Cookies And IP Addresses

- 4.1. The Company employs the cookies technology (where cookies are files carrying technical service information, sent by the web server to the User's computer and subsequently stored in the User's web browser; this technology is used to store data that is specific to the particular user). Cookies carry no confidential information and are not forwarded to any third parties.

The Company uses the cookies to:

- Identify the User and her device, e.g. by matching her IP address with previous records;
- Enable the Company's Services and features to interact with third-party services (e.g., social networks or mobile platforms);
- Allow the Company's payment systems and/or applications process User's payments;
- Provide the User with targeted personalized services, e.g. specific languages;

- Obtain data that will help the Company determine how the Users use Services in order to improve those appropriately.

4.2. The Company obtains information of the User's IP address (a unique ID assigned to a device in a particular Intranet or Internet) in order to provide security to all its users. This information is never used to establish the user's identity.

## 5. Platforms

Company's Services are offered to Users via a range of platforms, such as social networks (including, but not limited to, Facebook, VK.com, OK.com, MyMail.ru, Photostrana, Kanobu Games, that provide access to the Game), mobile platforms (App Store and Google Play), and other platforms for applications and software.

Any platform of this type may collect, source and use Personal User Information. When the User connects with the platform, it registers her personal data for future use.

Users can find more detailed information on each specific platform by studying that platform's privacy policy.

## 6. Protecting Minors' Personal Information

6.1. The Company recognizes children's personal right to confidentiality. If a user is below 18 years of age, she is highly recommended not to forward any of her personal information to the Company. Before forwarding their personal information to the Company, minors must always seek permission from their parents or their legal representative or guardian to do so.

6.2. The User agrees to fully comply with clause 6.1 of this Policy in cases she is a minor (that is, under 18 years of age); otherwise she must immediately quit using any of the Company's Services.

## 7. Amending Personal User Information

7.1. The User has the right to amend (update, alter, extend) her personal information provided originally, or any part of it, as well as its confidentiality parameters.

7.2. The User has the right to delete personal information originally provided for a specific user account, or any part of it, by selecting an appropriate function.

7.3. The User has the right to request the following from the Company: clarifying her personal data, blocking and destruction of personal data, should it be incomplete, obsolete, inaccurate, illegally obtained and/or not essential for the processing purposes as given, as well as request the Company to take legally defined measures to protect her rights.

7.4. The request to clarify, block or destroy personal data must contain the following:

- User's identification document number, information of its date and place/body of issue;
- Information confirming User's relations with the Company, or information in any other way confirming that the User's personal data has indeed been processed by the Company;
- Personal data subject's signature (or that of her representative).

Such a request can be forwarded in the form of an electronic document, accompanied by an electronic signature, or via traditional post. The request may be forwarded to the following addresses:

- email address: [support@crazypana.ru](mailto:support@crazypana.ru)
- postal address: 105187, Russia, Moscow, Okruzhnoi proezd, 15, ap. 66, *Internet Panda LLC*

7.5. The User has a right to revoke her consent on processing her personal data, however, the Company reserves the right to continue processing personal data in cases where it may help resolve a conflict, when it is part of executing services to the User and/or standing agreements, as well as to provide security in cases when the User's consent to process her personal data is not required.

## 8. Measures Taken To Protect Personal User Information

- 8.1. The Company takes all the necessary and sufficient measures, organizational and technical, to protect Personal User Information from unlawful and/or accidental access, destruction, amendment, blocking, copying, distribution, and any other unlawful actions, by any third party.
- 8.2. Personal User Information collected by the Company is stored on the premises/in archives/on various media, access to which is unavailable to unauthorized persons (that is, including physically locked premises). In order to avoid unauthorized access to Personal User Information over the Internet the Company uses servers protected by firewalls and cryptographic technology.
- 8.3. The Company also demands full compliance with security and protection measures associated with Personal User Information from any third party or person(s) that come in contact with such information as part of their work duties.

## 9. Other Regulations

- 9.1. The Company reserves the right to introduce amendments to this Privacy Policy. Should any amendments be introduced, the latest version will receive an indication of the exact date of the latest update. The new version of the Policy is deemed validated from the moment of its publication, unless defined otherwise by such new version of the Policy.
- 9.2. The User obliges to regularly review the Privacy Policy at her own discretion in order to keep up-to-date with its contents.
- 9.3. By using the Websites and/or accepting appropriate electronic information forms (such as social network registration and/or when starting to use the Company's Services), the Users express their consent to have their personal information processed in accordance with this Privacy Policy.
- 9.4. If the User does not agree with any of the clauses as set out by this Privacy Policy, she must immediately quit using any of the Services offered by the Company (such as the Website, the Game, etc.).
- 9.5. Should any questions or concerns arise in relation to this Privacy Policy, the User may contact the Company at either of the following addresses:
  - email address: support@crazypanada.ru
  - postal address: 105187, Russia, Moscow, Okruzhnoi proezd, 15, ap. 66, *Internet Panda LLC*
- 9.6. This Privacy Policy is always available to review from the Company's website at <http://www.crazypanada.ru/privacy-policy>
- 9.7. Recognizing any of the clauses of this Privacy Policy as invalid does not entail invalidity of any other clauses of this Policy, the User Agreement and/or any of the Appendices.

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