

PRIVACY POLICY

I. Definitions

Haxelo Ltd. (“Haxelo” or “we”, “us”, “our”) is a technology company that offers advertising software and innovative advertising solutions to publishers - including game creators and advertisers. Game Creators use Haxelo’s advertising solutions to monetize their embedded in-game ad space either directly or through Haxelo’s advertising channels including other advertising buyer partners. Advertisers or their intermediaries (e.g. media agencies) display their advertising campaigns through use of Haxelo’s advertising solutions on the websites or within apps or games of our publisher partners. Haxelo’s advertising technology collects and uses data to help make online advertising more relevant, as well as for ad delivery and reporting purposes. All Game Creators and Advertisers using Haxelo’s platform acknowledge our privacy policy and grant their consent for the processing of their personal data as provided herein.

Platform refers to the system provided by Haxelo that facilitates interaction between game creators and advertisers for in-game advertising. The Platform consists of two primary components: Game Engine Side and Platform Website.

Game Creator is an individual or an entity who has designed, developed, or produced video games or interactive entertainment experiences and published them for use by the general public.

Advertiser is an individual or entity responsible for promoting products, services, or brands through using Haxelo’s Platform to reach a target audience.

II. About the Privacy Policy

This privacy policy is issued in accordance with the requirements of the applicable European legislation on the protection of personal data (including the Personal Data Protection Act and Regulation (EU) 2016/679 of the European Parliament and 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)" or "Regulation" for short), as well as any other national data protection laws applicable in EU/EEA Member States, the UK or Turkey (“Data Protection Laws”).

This privacy policy (“Policy”) explains what kind of information we collect and how we collect, process, use and disclose information in a manner compliant with all applicable Data Protection Laws. This Policy applies to the use of our advertising software (the “Platform”) located at <https://platform.haxelo.com/> .

Haxelo is committed to protecting the privacy of users and advertisers accessing the Platform, visitors to our Website, and other Internet users (“Data Subjects” or “you”, “your”). We reserve the right, at our sole discretion, to make changes to the Policy from time to time, which will be notified to you by posting the change on the Platform and Website. If you do not agree to the changes set forth in the Policy, you should notify us before the changes become

effective that you wish to terminate your agreement with us. In this case, your account will be terminated and you should cease using the Platform and the services provided through it.

III. Who is the Personal Data Controller?

In connection with the use of the Platform, insofar as you are an individual - a user, Haxelo, as the Data Controller, exercises overall control of the personal data being processed and is responsible for the processing of your personal data as a Data Subject.

In processing such personal data, Haxelo acts in accordance with this Policy and in compliance with any applicable Data Protection Laws, including GDPR.

Data Controller:

Name - Haxelo

Company number: 405698865,

Registered office and management address Nutsbidze Slope V, #1, #15, Tbilisi, Georgia

Contact person: Nikoloz Jalabadze

IV. What is personal data processing?

Under the applicable Data Protection Laws, personal data is any information relating to you as a natural person by which you can be identified, and Processing of your personal data is any act or set of acts that may be performed with respect to your personal data by automatic or other means (for example: the collection and storage of personal data, its processing by analytical or logical means, its transmission to third parties, etc.).

When you use our software and/or Platform, and/or services offered through it, and/or Haxelo's Website, you agree that we may collect, use and disclose your personal information in accordance with the terms of this Privacy Policy. This Privacy Policy is a part of our Terms of Use, and should be read in conjunction with them.

Haxelo has appointed a Data Protection Officer (DPO) to ensure compliance with all applicable legal requirements. He has direct and immediate connections with the top-level management of Haxelo and remains in an independent position within the corporate structure of Haxelo. Visitors of the Website of Haxelo as well as our prospective and / or existing clients, as well as our prospective and/or existing Game Creators and Advertisers can get in touch with our DPO by email: privacy@haxelo.com

V. What are the purposes for which personal data is processed?

Haxelo use the Information we collect to provide and improve the Haxelo services, and/or Platform, and/or software, and/or our Website, including but not limited, for:

1. Conclusion of contracts, contract and order management and administration.

2. To protect and enforce the legitimate interests of Haxelo, other Users or third parties.

This includes the processing of your personal data in order to protect or enforce the legitimate interests of Haxelo, users of the Platform or third parties, including ensuring the proper functioning and use of the Platform and the Website by any user, detecting and resolving technical or functional problems, identifying and preventing unlawful activities and recovering from their consequences, resolving disputes, protecting the rights and legitimate interests of For this purpose, Haxelo may process all or part of the categories of data, as set out below.

3. To comply with legal obligations

This includes the processing of your personal data in order to comply with Haxelo `s legal obligations, including providing information to competent government authorities, enabling the exercise of the supervisory powers of competent government authorities, notifying you about legally relevant circumstances relating to your rights (including in relation to the use of the Platform/Website and the processing of your personal data), and other activities related to Haxelo 's legal obligations and communication with For this purpose, Haxelo may process all or part of the herein stated categories of data.

4. For other purposes related to our business activities and listed below:

- Serving and optimizing advertisements
- Tracking performance of ads and frequency capping
- Advertisement reporting and tracking including studies and insights
- Billing purposes and financial management
- Fraud detection and protection
- Cross device experience
- Providing customer service
- Geo-targeting
- Interest-based advertising
- Providing and improving our services
- Protecting the rights and property of Haxelo and complying with any applicable law in the country of incorporation of Haxelo or in the countries it does business with.

5. Purposes for which you have given your express consent.

This includes the processing of your personal data in light of your explicit consent. For this purpose, Haxelo may process your personal data to the extent and scope provided for in the consent you have provided, to the extent that there is no other valid basis for processing it.

VI. What personal data is processed? Categories of personal data.

Haxelo may process the following categories of personal data, the scope of which may vary depending on which of the Data Subject groups you fall into:

- Personal data related to your identity: first name, surname, family name, date of birth, age, personal identification number, identity card number, permanent address, current address, biometric data indicated in an identity document (photo, eye color, height), signature;
- Personal data related to your contact information: telephone number, email address, permanent address, current address;
- Personal data related to your use of the technical functionalities of the Platform/Website: IP address, account identification number, account name, account picture, number of requests to which you are a party, location/location, logs verifying the completion of your registration, the confirmation of your account and the granting of your consent to the Terms of Use (date, time, IP address), login access logs, server/system logs, security device logs, electronic consent logs (sender's email address, and recipient's identification, consent number) and similar logs related to ensuring the reliable functioning of the Platform, detecting and resolving technical problems, ensuring the security of the Platform and its users and detecting malicious activity (date and time, IP address, URL, information the Internet browser and technical device used);
- IP address, IDFA, Google Advertising ID, UDID and other unique identifiers;
- Language information, device mark and model, device connection, OS type and version;
- Localization and location;
- Time and date of access and ad view;
- Information about the mobile apps that a user have or currently has installed on its device;
- Information about the ads a user has already been displayed;
- General and non-personal activity log Information unique to you that is automatically collected.
- Other personal data specified by you;
- Cookies used in connection with the operation of the Platform/Website;

Information may also include technical data, such as application data, app name, logo, app store URL, app store category, app bundle ID, app cross apps tag, blocked content categories, etc.

We may use various tracking technologies to collect this information, such as pixel tags and pixel impression trackers from third party services and tracking technologies. We may also receive a list of unique identifiers directly from your devices, from Game Creators and/or

Advertisers, which we may use to determine to what end users to display (or not display) certain ads. We may work with third-party data partners and advertising exchanges to enhance our advertising and targeting capabilities on the Platform. As determined by our partners' business and privacy policies, we may also receive and retain information from partners' publishers, including but not limited to: the current location of the device, third-party applications on the device or in use at the time of our advertising transaction with the device, the users' age, gender or other demographic indicator, and we may use or derive data obtained from third parties such as approximate location based on IP address to help match data sets, although such data is processed outside of our Platform. We may also collect Pseudonymous Identifiers and other personal data over time and across multiple publishers and use that information to provide reports to advertisers and others and to help us display advertisements that may be of interest to users. Based on the privacy rules of the site, the game owner and their business agreement with Haxelo, we may integrate this Information with that acquired from other publishers and third-party data providers. This information is then used to deliver advertisements and promotional information to the specific device identified based on the user's online behavior or interests.

In order to deliver personalized ads as well as non-personalized ads, Haxelo uses the following methods to identify users depending on the device they use, whether they access our Services on web or mobile or game or app, and operating system:

Cookie-based identification

Haxelo drops a cookie on the user web and/or mobile browser. Cookies are alphanumeric identifiers that are created on your device through your web browser for record-keeping purposes. Cookies are used to identify a user and store a randomly generated identifier to identify his or her browser across visits.

Cookie-less environments

For browsers setup to not allow cookies to be dropped, Haxelo may use other identification methodology and technology, e.g. such which is based on IP address, browser, and device characteristics. This method allows Haxelo to identify a user in order to provide the same level of services, such as reporting and targeting information to users, segmenting users, and capping the number of times the same ad is shown to the same user.

Advertising ID

Haxelo uses its software development kit ("SDK") technology to identify your advertising ID for mobile applications. For Google Android operating system, we use the Google Advertising ID and for Apple iOS the IDFA.

You can opt-out of the use of these technologies as described below.

Haxelo does not collect, or process information related to sensitive targeting categories as defined by the European Interactive Digital Advertising Alliance (EDAA) in the European Economic Area (EEA) and under other applicable law (e.g. religion, political opinion, health).

In connection with your use of our services, you undertake not to store or provide through the Platform, in any form, information containing special categories of personal data /

sensitive personal data. The disclosure of such information is entirely at your own risk and responsibility with regard to possible breaches.

Haxelo has no obligation to monitor the existence of special categories of personal data/sensitive personal data on the Platform that you may have voluntarily disclosed, nor to ensure their protection from unlawful processing.

VII. Privacy Practices of Publishers

In our Terms of Use, we require Haxelo's Game Creators to post a privacy policy, to obtain all required end user consents, and to comply with all applicable laws and self-regulatory guidelines, but we are not responsible for your privacy practices. To assist you in your compliance with your obligations under applicable law, our Privacy Policy contains information on the way Haxelo processes end user personal data.

In particular, information given to the end users who are based in the EU at the time their consent is asked, should include the following:

- The collection of their data by Haxelo as described in this Privacy Policy, including a link to this Privacy Policy;
- That their data will be collected by Haxelo to show ads on your applications or games, including ads which are based on behavioral targeting (for example: ads for games which are similar to those which they have installed and played before);
- Their rights as data subjects, as described in this Privacy Policy;
- Their right to withdraw consent at any time;
- Their right to lodge a complaint with a supervisory authority

VIII. To whom is the personal data disclosed?

For EU/EEA and UK based users

Haxelo does not provide your personal data to third parties, except in the cases and under the conditions described in this Policy or provided by law.

Pursuant to this Policy, Haxelo may provide your personal data to third parties only if:

- this is provided by law;
- a request to do so is made by a competent public authority;
- you have given your explicit consent to this;
- when it is necessary to protect the rights and legitimate interests of Haxelo, any users or third parties.

In view of the above, Haxelo uses subcontractors and service providers such as lawyers, consultants, accountants, technical specialists, etc., who may be granted access to your personal data processed by Haxelo when necessary. With regard to the processing of your

personal data and its protection, when working with subcontractors and service providers Haxelo requires them to strictly comply with the rules set out in this Policy.

Insofar as this Policy governs the storage and processing of your personal data by Haxelo as Controller, the processing of personal data by others as Processors shall be governed by the rules as per the applicable Data Protection Laws.

For users based outside EU/EEA & UK

Data shared with Third Parties

In order to provide efficiently the services made available through our Platform, we need to share data (including personal information) with third party vendors, service providers, contractors or agents who perform functions on our behalf, including the ones listed below. Our service providers are authorized to use the information we provide only as necessary to provide these services to us.

- **Programmatic Buyers:** We may send part of the user profile to programmatic buyers using demand side platforms who buy our ad placements through programmatic ad auctions. Those companies are responsible as independent controllers/processors of the data used to deliver their ads on Haxelo's network.
- **Viewability measurement:** We may transmit data to companies specialized in campaign measurement.
- **Fraud detection:** We may transmit data to companies specialized in preventing delivering our ads on fraudulent traffic, such as non-human traffic.
- **Geo-location:** We may transmit the IP address of the user to companies such as digital elements which provide geo-location services.
- **Analytics and Audience measurement:** We transmit data to companies in order to validate the accuracy of our targeting or measure the demographic reach of our network.
- **Affiliates:** We may disclose the information we collect through the Services to our affiliates or subsidiaries for the purposes described in this privacy policy; however, if we do so, their use and disclosure of your personal information will be subject to this privacy policy.
- **Hosting:** We utilize third party hosting and data-center providers to store data.
- **Data sharing agreement:** We process data sharing with selected brands.

Other Disclosures

We also may disclose information in the following circumstances.

- **Business Transfers:** If we are or may be acquired by or merged with another company, if any of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.

- **In Response to Legal Process:** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal processes, such as in response to a court order or a subpoena.
- **To Protect Us and Others:** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use or this Policy, or as evidence in litigation in which Haxelo is involved.
- **Aggregate and De-Identified Information:** We may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.

IX. Personal data protection measures

Haxelo implements appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction or damage.

X. For how long is personal data stored?

We retain the data linked to a user such as email address, telephone number or billing details for as long as you continue to have a business relationship with us. We retain other personal data linked to a user up to 12 months from the date of collection.

We may also store aggregated and non-personal data for a longer period than 12 months for financial and statistical reasons.

For security reasons, user's IP address is stored in a private security log for a period of 4 months.

Haxelo cookie is kept up to 365 days after the last user interaction with our services.

Your personal information will be retained in accordance with our data retention policy which is designed to retain data for as long as needed for us to comply with our legal and contractual obligations, employment obligations, and other business purposes, including global legal obligations to retain data. We may retain some information from closed accounts so that we can comply with law, prevent fraud, assist with investigations, resolve disputes, analyze or troubleshoot programs, enforce our Terms of Use, or take other actions permitted by law.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

XI. What rights do you have regarding the processing of your personal data?

As a data subject, you have certain rights relating to the protection of your personal data, including:

- The right to be informed about the processing of your personal data, including whether, how, why, for how long and by whom your personal data is processed, and what rights you have to protect it. This Policy is intended to provide information about the processing of your personal data by Haxelo in connection with your use of the Platform.
- Right to access your personal data processed by Haxelo, including confirmation of whether Haxelo processes your personal data, on what basis and to what extent, and providing you with the opportunity to exercise your rights in relation to it. You can make such access in person at any time, through the features provided in your account or by sending an explicit request to Haxelo 's Data Protection Officer.
- Right to request correction of your personal data in case it is incomplete or inaccurate. You can do this in person at any time through the features provided in your profile or by sending an explicit request to the Haxelo Data Protection Officer.
- The right to request the erasure of all or part of your personal data, unless there is another basis for processing it (for example, there is a legal obligation for Haxelo to keep your personal data for a certain period of time). You can do this in person at any time through the features provided in your profile or by sending an explicit request to the Haxelo Data Protection Officer. Erasure applies only to personal data stored on the Platform.
- The right to restrict the processing of your personal data in the cases provided for by law. You can do this by sending an explicit request to the Haxelo Data Protection Officer.
- The right to notify third parties to whom Haxelo has provided your personal data in cases where a request is subsequently made by you to correct, delete or restrict the processing of your personal data. You can do this by sending an explicit request to Haxelo 's Data Protection Officer.
- The right to portability of your personal data, by receiving it in a structured form, in a popular machine-readable format and any subsequent use of the personal data by another controller at your discretion. You can do this by sending an explicit request to Haxelo 's Data Protection Officer.
- The right not to be subject to a decision based solely on automated processing of personal data, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where the grounds for doing so are provided for in the applicable data protection legislation and appropriate safeguards are in place to protect your rights, freedoms and legitimate interests. In this regard, Haxelo does not use technologies for automated processing of your personal data.
- The right to withdraw the consent you have provided for the processing of your personal data. Withdrawal of your consent does not affect the lawfulness of the processing of your personal data based on the consent given up to the time of its withdrawal, as well as the further processing of your personal data if there is another valid basis for its processing. You can do this by sending an explicit request to Haxelo 's Data Protection Officer.

- Right to object to the processing of your personal data on the basis of legitimate interest. You can do this by sending an explicit and reasoned request to the Haxelo Data Protection Officer.

- The right to complain to a supervisory authority where you believe that the processing of your personal data is being carried out in breach of the requirements of applicable data protection legislation. You can do this in person by lodging a complaint with the Georgian Personal Data Protection Service (PDPS), which is the competent supervisory authority in Georgia with the address: 7, Vachnadze Str. 0105, Tbilisi, Georgia.

XII. Data Protection Officer

In relation to any questions about your personal data and the exercise of your rights relating to its protection, please contact the Haxelo Data Protection Officer:

Address: Avto varazi st #22, Tbilisi, Georgia

Telephone: +995599052170

Email: privacy@haxelo.com

XIII. Policy on the use of cookies and similar technologies

What are cookies?

"Cookies are text files containing a small amount of information that are downloaded to your computer or mobile device when you visit a website and allow a website to recognize your device.

Why do we use cookies and similar technologies?

"Cookies perform many different jobs, such as allowing you to navigate between pages efficiently, remembering your preferences and improving your experience as a user. They can also help ensure that the ads you see online are more relevant to you and your interests.

Strictly functional/mandatory cookies:

- PHPSESSID?

Optional/marketing/analytical cookies:

- Google Analytics

- Facebook Pixel

Third party cookies:

- Google