

## PlayTrex Privacy Policy

Last Updated on 24.8.2016

This Privacy Policy is an integral part of our Terms of Use, found at <http://www.playtrex.com/public/termsandconditions.pdf>

We, at PlayTrex Ltd. (the "**Company**", "we" "us", "our", or any variation thereof), care about your privacy. That is why we made every effort to create a platform that would live up to high level privacy standards. This Privacy Policy describes our policy on the collection, use and disclosure of information about our Wild Poker© platform, including any related content, features, pages, etc. (collectively: the "**Platform**"). We strongly encourage you to read this Privacy Policy and make sure you fully understand and agree to it, prior to your access or use of the Platform and/or any of its features. If you do not fully understand or agree to this Privacy Policy, you must immediately delete the Platform downloaded to your device (including the Account created by you in connection with the Platform), cease any use thereof, and/or otherwise close your browsing window (in the event that you have logged in via web-based interface).

### General

When you use the Platform, you explicitly consent to the collection, use and disclosure of your information as described in this Privacy Policy, as well as to Cookies being stored and set and information being accessed on your equipment, while accessing and/or otherwise using the Platform (if applicable).

This Privacy Policy explains what information of yours will be collected by us and stored on our servers when you make use of the Platform and how the information will be used.

**WE WILL NOT USE OR SHARE YOUR INFORMATION WITH ANYONE EXCEPT AS DESCRIBED IN THIS PRIVACY POLICY AND/OR OUR TERMS OF USE.**

If you suspect that the information associated with your account is not accurate or complete, then you must make all necessary changes in order to correct it.

### Changes and Updates of this Privacy Policy

This Privacy Policy may be updated from time to time at our sole discretion, and therefore you are required to periodically check back for the most updated form of Privacy. Your use of the Platform after this Privacy Policy has been updated shall be deemed as your continued acceptance of the terms of this Privacy Policy, as updated and revised from time to time.

We may make available the Platform for use via third party platforms (such as Facebook©). In such event, in addition to this Privacy Policy, the applicable conditions associated with your use of such platforms shall apply as well.

### How Do We Collect Your Information?

We operate various channels in order to collect information. We may, for example, use the following channels and means to collect your information:

- When connecting to us through 3<sup>rd</sup> party login services, such as Facebook Connect, Google + Connect, etc. ("**3<sup>rd</sup> Party Login Services**"), your device and/or any associated 3<sup>rd</sup> party Application Programming Interface (API) through which the Platform is accessed.
- When creating a user account, contacting customer support or making a purchase through the Platform, we may collect certain content provided through such actions.
- When posting on any online community, forum or any other page established by us or on our behalf in connection with the use of the Platform, we may collect and analyze all content provided or otherwise uploaded by our users, and such content will not be subject to any privacy expectations by its lawful contributor.
- When transmitting and/or otherwise making available any content with the use of the Platform (for example, in the process of your account registration or updates, filling forms or submitting inquiries).
- Based on the settings of your device, you may be sharing with us your location, photographs and contacts.
- We may use certain 3<sup>rd</sup> party components or services to improve the performance and experience for our users (the "**3<sup>rd</sup> Party Components**"). The 3<sup>rd</sup> Party Components may monitor your general use of the Platform and your browsing route taken before using the Platform.

You understand that the manner in which we collect your information might defer on the basis of the device you use to access or otherwise use the Platform or any related content or features.

Please note that while in general you are not obligated to actively provide any information, some information may be required in order to use the Platform.

### **What Information Do We Collect?**

#### Personal Information

We may collect and store information which identifies or relates to you personally, such as your name, profile picture, photographs, unique user account ID, your financial and billing information, contact information, email address, etc. (the "**Personal Information**").

Please note however, that any Personal Information which you choose to make publically available, whether on forums, groups or otherwise, will not be deemed, to the extent permitted by applicable law, as subject to your expectation of privacy or deemed as personal, and may be treated accordingly by us.

#### Non-Personal Information

We collect and aggregate non-identifying information regarding your use of the Platform and its features, including, for example, the type, model, ID and location of the device through which the

Platform is accessed, services that interested you or which you have utilized, the type of operating system and browser you are using and its settings, your IP (Internet Protocol) and/or MAC (Media Access Account) address, gender, location, groups you are a member of, fields of interests, the URL you have come from and the time spent at that URL, number of clicks, content of Cookies set by us (as further detailed below) and your domain type and server, your gameplay session, any content posted by you on public forums or communities associated with the Platform, or otherwise ("**Non-Personal Information**").

### Aggregated Information

Non-Personal Information collected can also become Personal Information if and when aggregated by us to a scope which identifies you personally.

Please note however, that generally Non-Personal Information is aggregated separately for each specific IP or device ID. That said, the ID of your device does not contain any information regarding your identity and the same applies to IP addresses which, while identifying a device connected to the Internet and its general location, are in themselves anonymous and contain no information regarding the identity of the ultimate person using the device – such identity should be known solely to your Internet Service Provider (ISP).

Moreover, IP addresses assigned by ISPs are generally (although not always) dynamic and subject to frequent changes – static IP addresses are generally assigned only at subscriber's specific request and frequently require an additional fee. We assume that the IP of your device is dynamic, unless we have a reason to believe otherwise.

### How Is Collected Information Used?

#### Personal Information

Personal Information shall be used in order to facilitate, customize and improve the use of the Platform, process your inquiries and respond to your requests, or as explicitly mentioned herein.

We do not collect any Personal Information from you or related to you without your approval, which is obtained, *inter alia*, through your active acceptance of this Privacy Policy and the Terms of Use.

We may share some or all of your Personal Information with our subsidiaries, other platforms operated by us, joint ventures or other trusted affiliates that we have or may have in the future, provided that such parties undertake to protect your privacy in a manner no less stringent than as set forth herein, and for the purpose of providing us with certain services related to the Platform (such as improvement, development, data processing and analysis, etc.).

We may also disclose your Personal Information in the following cases:

- As required to do so as part of any legal proceedings conducted in connection with the Platform.
- In order to inquire, investigate, prevent, stop or halt any alleged misuse of the Platform, or to impose any sanction thereof.

- As required to do so by court order, decree, or applicable law.
- In case the entire activity of the Platform is transferred to a third party, providing such party undertakes to protect your privacy in accordance with these terms.

### Non-Personal Information

Non-Personal Information shall be used by us or the permitted entities prescribed above to improve, modify, cancel, enrich or adjust the Platform, and ensure the adequate operation thereof. We also use Non-Personal information in order to analyze market and users' trends, and further provide you, or enable other third party content providers to provide you with certain promotional content.

We reserve the right to use and disclose Non-Personal Information to third parties, including, for example, potential and actual business partners, affiliates and consultants, for industry analysis, marketing, advertising, and other business purposes at our sole discretion.

### Why Do We Collect Such Information?

We collect such Personal Information and Non-Personal Information for the following purposes:

1. In order to provide, improve, customize and operate the Platform, and further improve and customize it, based on your (and others) preferences and experiences.
2. In order to be able to provide our users with ongoing, developing customer assistance and technical support.
3. In order to create statistical data, behavioral models and trends, which we or our business partners may use to provide and improve the use of the Platform.
4. In order to remain in compliance with and applicable law or regulations.
5. In order to investigate, prevent or take action regarding illegal activities, suspected fraudulent behavior, potential threats or any other violations of our Terms of Use and Privacy Policy.
6. In order to offer you promotional content based on your preferences based on the analysis of the information we collect, provided that no Personal Information shall be made available by us to third parties offering such content to you, without your prior consent.
7. In order to introduce to you with our additional products and/or service (the "**Additional Products**") which we believe might interest you, enable you with easier access to the Additional Products (for example, we may import your user account to such additional products and/or services) and/or otherwise use the information collected or derived from the use of the Platform (as detailed herein), in enhancing and improving the Additional Products, and vice-versa.
8. As otherwise stated under this Privacy Policy.

### How Do We Keep Your Personal Information Secure?

We do so by following industry standards on information security management to secure sensitive information such as financial information and Personal Information entrusted to us.

## **Promotional Content and Notifications**

As stated under this Privacy Policy, we may, or allow others to provide you with certain promotional content, and/or otherwise inform you of new features, updates or any other information which we feel could be relevant to you. If you want to stop receiving promotional content by electronic mail, click on the "unsubscribe" link in any promotional email received. Please note that once we receive your request to opt-out, your change will be processed promptly, and no longer than ten business days.

If you do not wish to receive any in-Platform notifications, kindly uninstall the platform and terminate your account.

When you install our Platform on your mobile we may send you push notifications. If you no longer wish to receive push notifications from our mobile applications, you may opt-out by logging into the application and changing push notifications.

The Platform may include a feature which will enable you to invite your friends to become users of the Platform (the "**Friends Finder**"). The Friends Finder feature may request access to your contact list, or may otherwise gain access to your friends list stored in connection with the 3<sup>rd</sup> Party Login Service and/or any other similar services (such as Apple Game Center, etc.). By inviting a friend via the Friends Finder feature will cause the Platform to send an email to such friend, containing an invitation to download and/or otherwise join the Platform and its community. You are to refrain from any misuse of the Friends Finder feature in any manner which may be illegal and/or otherwise in contrary with the provisions of this Privacy Policy and our Terms of Use.

## **Cookies**

### What are Cookies?

Cookies are small data files downloaded and stored on user's device while browsing a website, often used to keep record of actions taken on such website or track related browsing activity.

For additional information regarding Cookies and the way to control them, please check out the Help file of your browser or visit <http://www.aboutcookies.org>.

### Our use of Cookies

We may use Cookies in order to ensure proper operation, collect Non-Personal Information, verify information, tailor the Platform to your specific preferences and ensure information security. Additionally, we may use third-party content companies in order to present content through the Platform. Such parties may use Cookies placed on your device (as well as web beacons and other similar technologies) in order to adjust or track the content presented through the Platform.

Regarding use of Cookies by third-party content companies, please note that such use is subject to the privacy policy of said parties and is not subject to this Privacy Policy (for example, regarding advertisements served by Google, see <http://www.google.com/privacy/ads>).

## **Information Security**

Note that although we take great measures to secure the information and reduce the risk of unwanted disclosure, we cannot guarantee the information will not be exposed as a result of unauthorized penetration to our servers.

We use commercially reasonable physical, managerial and technical safeguards to preserve the integrity and security of your Personal Information. We cannot, however, ensure the security of any information you transmit to us and you do so at your own risk.

If you have any questions about this Policy, or if you feel your privacy has been violated, please contact us at [support@playtrex.com](mailto:support@playtrex.com)

### **California Privacy Rights**

California law permits residents of California to request certain details about what Personal Information a company shares with third parties for the third parties' direct marketing purposes. We do not share your Personal Information with third parties for the third parties' own and independent direct marketing purposes unless we receive your permission.

The California Law permits you to request information regarding the disclosure of your Personal Information by us to third parties for the third parties' direct marketing purposes. To make such a request, please write us at: [support@playtrex.com](mailto:support@playtrex.com)

### **Sale, Merger or Acquisition**

In the event we undergo a business transition or transaction such as acquisition, merger or sale of some or all of our assets, we may disclose or transfer all of your information including Personal Information, to the successor party of such transition.

### **Account Termination; Updating Your Information**

You can access, view, change, update or delete the information appearing in your account, by accessing it through the "Settings" feature in the Platform. However, certain information might still be kept in our backup facilities and/or systems.

If you would like us to delete your records completely, you may ask us to do so, and we will use reasonable efforts to delete such information. However, note that we might not delete such information immediately from our systems. Also, we retain the right to continue and make use of your Non-Personal Information in accordance with this Privacy Policy.

Please note that deleting your account we will remove your account from view. However, the Company may keep information about you that is on our system following your termination, to the extent permitted under applicable law and this Privacy Policy.

We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Also, please note that if you have created an

account via the use of 3<sup>rd</sup> Party Login Services, you might be required to take other and/or additional actions under the platforms of such 3<sup>rd</sup> parties in order to ensure the complete deletion of your user account.

### **Governing Law and Jurisdiction**

This Privacy Policy shall be construed and governed by the laws of the State of Israel. Any dispute arising from the terms of this Privacy Policy shall be subject to the exclusive jurisdiction of the competent courts in the District of Tel Aviv, Israel.

### **Contact Us**

Please contact us at [support@playtrex.com](mailto:support@playtrex.com) for any question concerning your privacy or any violation thereof. Please also use the above contact information details if you wish to opt-out of certain services and offers described under this Privacy Policy.