

## PRIVACY POLICY

**Proplayers Oyun Yazılım Danışmanlık Anonim Şirketi** connects gamers with professionals and provides an online platform for the gamers (“**Customer(s)**”) who wishes to acquire in-game training services, assistance, and gaming related activities or services (“**Services**”) from experts and professional players (“**Professional(s)**”) who wishes to offer such Services (Customer(s) and Professional(s) shall be collectively referred to “**User(s)**”).

This Privacy Policy is intended to be incorporated into the Terms of Service (the “**Terms of Services**”) and it describes how Proplayers Oyun Yazılım Danışmanlık Anonim Şirketi has its headquarters at **Sultan Selim Mah. Hümeýra Sk. Pasha Plaza No:2 İç Kapı No:2 Kağıthane / İstanbul 34415** (“**GG Clan**” or “**we**”) in order to collect, use, process the personal information (“**Personal Information**”) of the Users conferred rights related thereto.

This Privacy Policy applies to all of the Services, whether accessed on the website, mobile devices, PCs, social media platforms, several integration programs, or on other platforms and alike. It also applies to the marketing and advertising activities on all platforms and other services that GG Clan may provide or any of the marketing and advertising activities through third party analytics and ad-network services, social media platforms, and similar platforms and systems from time to time.

The User hereby grants and undertakes the collection and processing of his/her Personal Information under the terms and scope of this Privacy Policy.

By using and downloading the Services, User hereby explicitly agrees to and accepts this Privacy Policy. If the User is not willing to agree and accept this Privacy Policy, the User is obliged to cease the use of the Services and delete the Services from his/her equipment.

GG Clan hereby declares and User hereby acknowledges that GG Clan does not sell any Personal Information of the User for any purpose.

### 1. Types of the Collected Personal Information and How We Collect It

1. Personal Information regarding the current, prospective, and former clients, customers, users, visitors, and guests may be collected. The types of Personal Information GG Clan may collect may vary on the Service that the User gets or the relationship between GG Clan and the User.
2. By using the Services, or sending feedback or conveying information or support requests directly to GG Clan, GG Clan may collect Personal Information about the

User. The types of Personal Information GG Clan may collect (directly from the User or from third parties) and the privacy practices vary on the nature of the relationship that the User has and the requirements of applicable law. Please find below which type of Personal Information we collect and the ways of collection.

### 3. **Information Directly Collected From User**

GG Clan' Services may use a more traditional registration or account set-up process which the User directly provides information:

- User first and last name, email address, Customer/Professional username, password, age or birthday, sex, location, languages spoken, platform on which he/she plays (pc, xbox, playstation, etc.), social media account addresses and other information that helps GG Clan to make sure it is the User itself that is accessing the account or helps GG Clan to improve its services.

GG Clan may also require from User to create a Customer/Professional profile, in such cases, the User profile may include below mentioned information:

- User first and last name, email address, User identification number and/or username, User profile picture or his/her URL, Customer/Professional ID, location, sex, age range, login e-mail, details about the games the User is related, mobile phone number (if provided by User), locale, language of User application, time zone numbers for User friends who are also connected to the Services.

### 4. **Information User Generates While Using GG Clan' Services**

Information that User provides GG Clan with when User fills in forms, and/or questions or completes surveys when using any of the Services, when User creates an account with GG Clan, or if User invites his/her friends to use Services; (such as gender, name, date of birthplace, nickname, nationality); the content of messages sent using the chat and messaging systems; posted photos, drawings, or other user-generated content; public posts or comments on other Customers' profiles.

Please note that GG Clan is entitled to access such records, and/or store archives of these communications, photos, drawings, and other contents generated by the User to satisfy legal compliance and provide the safety of other Users generated content on GG Clan servers to make use of them to protect the safety and well-being of GG Clan' Users as well as to conduct researches to improve, personalize, and optimize GG Clan' Services.

Users hereby irrevocably accept and declare that any comments of the Customers on the Services shared with GG Clan through GG Clan's platform, social media or any other channel may be published and utilized freely by GG Clan.

5. **Information collected when the User makes any purchases**

In case of any purchase of items in a Service, a third-party payment processor may collect the billing and financial information such as the User's postal address, e-mail address, and financial information.

In the case of obtaining Services on connected third-party applications or platforms (like Facebook, Apple, Google, or Amazon), any purchases that the User makes will be processed by that third-party application and subject to that third-party application's terms of service and privacy policy. For these purchases, GG Clan does not receive any financial information but may receive non-financial information related to the purchases, like the User's name, approximate physical location, and the items purchased.

Please note that the information that GG Clan collects depends on the Services that the User is provided with.

6. **Information About Users That GG Clan Get From Connected Third-Party Applications, Including Social Networks**

If the User gets any Services of GG Clan on connected third-party applications or connects GG Clan's Services to any third-party applications, including social networks like Facebook, GG Clan may receive certain information about the User from the provider of the third-party application. The information GG Clan receives depends on the Service, the third-party application, and privacy settings. In such case GG Clan may collect the below information;

- User first and last name, email address, User identification number and/or user name, User profile picture or his/her URL, User ID, location, sex, age range, login e-mail, user identification number (like Facebook ID number), which may be linked to publicly-available information like name and profile photo; friends' user ID numbers and other public data; detail about the games User is related, mobile phone number (if provided by User), locale, language of User application, time zone numbers for User friends who are also connected to the Services; User

personal comments which may include Personal Information; Personal Information to be published on the fan pages, forums, sites or to be provided via contest; information about User's activities on or through the connected third-party application;

## 7. **Cookies and Other Automated Information Collection**

GG Clan collects information about User's devices by using cookies and other similar technologies (e.g., beacons, pixel tags, clear gifs, and device identifiers) to recognize User and/or User device(s) on, off, and across different Services and devices. Users always have the option to opt out from such use and control it where needed.

- Protocol (IP) address, cookie identifiers, mobile advertising identifiers, User mobile device's identifiers like User Identifier For Advertising , Advertising ID, the type of computer or mobile device User is using, User device's operating system, version, model, hardware type and other device identifiers that are automatically assigned to User computer or device when User access the Internet, browser type and language, hardware type, operating system, internet service provider, pages that User visit before and after using the Services, the date and time of User visit, the amount of time User spend on each page, information about the links User click and pages User view within the Services and other actions taken through use of the Services such as preferences; information GG Clan collect via cookies and widgets that allows GG Clan to collect data, such as User device's model, operating system and screen size, IP, preferences and other information about how User use the Services;
- domain names;
- performance and game contextual data like User games session activity;
- aggregated and/or de-identified information that is not intended to specifically identify a user; and
- technical information such as device identifier,
- details about how the User uses and interacts with the Services (for example, information about how and when the User visits the websites(s),
- information that User provides GG Clan when User fills in forms, and/or questions or completes surveys when using any of the Services, when User creates an account with GG Clan, or if User invites his/her friends to use the Services; (such as gender, name, date of birthplace, nickname, nationality etc.)
- User interactions with GG Clan on the social media channels;
- the name User has associated with its device; country; telephone number (if User provides it); specific geolocation (with User's permission); mobile contacts; and/

or information about the GG Clan' Services and other third-party apps on User's device. (if GG Clan Services obtained via mobile device)

## 8. Other Sources

- information that GG Clan collects about User from the other group companies or other third-party companies who have obtained User's consent or have another legal right to share such information with GG Clan (including publishing partners, platforms, advertising platforms, and partners and data aggregators who have obtained it). This may include attributes about the User and User interests, as well as other Services that the User uses, demographic, and general location information.

## 2. **The Purposes of Collecting and Processing Personal Information**

1. The primary goal of processing Personal Information is to provide a better gaming experience, improve the Services, conduct marketing and research activities, and create reports for internal use. The Personal Information may be stored anywhere in the world either physically or electronically.
2. Personal Information may be collected and processed for below-mentioned purposes;
  - the managing the account and relationship with GG Clan and improving the experience during the use of the Services;
  - research, surveying, and engaging with User, for example by sending communications (including by email);
  - to enable Users to interact and communicate with each other;
  - marketing and promotion of Services, to create reports, analyses, or similar services for use by GG Clan;
  - business intelligence, preventing cheating, crime, or fraud;
  - to deliver advertising marketing and promotional information to User;
  - to notify User about products and Services or upcoming special offers/events that the User may be interest;
  - to operate, improve, and optimize the Services; to create accounts and allow Users to personalize the Services, understand the Users and their preferences to enhance user experience and enjoyment using the Services;
  - to send related information, including confirmations, technical notices, updates, security alerts, and support and administrative messages; to enable Customers to

- communicate with each other in GG Clan's platforms or on social media accounts;
- to prevent potentially prohibited or illegal activities and protect the Users; to ensure internal quality control;
  - to provide technical support and respond to User inquiries;
  - to provide services via mobile devices; for third party payment requirements;
  - for serving cookies, pixel tags, analytics information, and interest-based or targeted advertising;
  - to comply with GG Clan' legal obligations, resolve any dispute that GG Clan may come across, and protect the rights of GG Clan.
3. The User accepts, acknowledges, and promises that his / her Personal Information might be used in a limited manner by the GG Clan to the extent that it is limited to the format and purposes outlined in this Privacy Policy.
4. In case the Services include additional links and references to third-party sites, services, and other domains. Such third-party providers can use advertising identifiers, cookies, web beacons, and other tracking technologies to collect or receive information about the User. Statements of GG Clan under this Privacy Policy do not apply to the features, technologies, or practices of such third parties. User acknowledges that GG Clan is not liable for the compliance of such third parties to the protection of the Personal Information. GG Clan shall under no case be held liable for the content of such sites and services.

### **3. The Legal Grounds of Processing Personal Information**

1. The legal grounds that GG Clan relies upon while processing Personal Information of User are the following:
- Explicit consent and/or request of User,
  - Being necessary for the establishment and execution of an agreement (the Terms and Conditions regarding receiving the Services by the User),
  - Being necessary for GG Clan to fulfill its legal obligations as a data controller,
  - Without prejudice to User's fundamental rights and freedoms, being compulsory for GG Clan' statutory interests.

In data processing activities where Personal Information of User is processed based on the explicit consent, User has the right to withdraw its consent at any time.

2. GG Clan' statutory interest in processing the User's device and usage data is to provide better service to the User, to make suggestions, to improve its services, to improve and update Services, to facilitate the use of Services at the works related to User's interest and preferences, within the framework of legal legislation.
3. GG Clan undertakes to keep User's data and any confidential information strictly private and confidential, without prejudice to the contents hereof, to regard it as an obligation to keep confidentiality, to take all measures and act in due diligence to prevent all or any part of User's information from entering into the public domain or be subject to unauthorized use, or to take measures to prevent the confidential information from disclosure to any third party. If, despite all necessary data security measures taken by GG Clan, the confidential information is damaged because of attacks on the system or captured by third parties, GG Clan shall have no responsibility in that respect.
4. GG Clan shall not be responsible for damages caused by using information that User discloses in comments or messages given by third parties in public areas. If User shares its name, password, etc. used by User when creating the membership record with third parties, GG Clan shall not be responsible for any damages that may arise from the information shared with third parties.

#### **4. Using and Sharing Personal Information**

1. The Personal Information shared by the User shall in no case be used for the interest of other third parties either directly or indirectly and shall be disclosed except as provided below. Please note that GG Clan may share User's Personal Information to provide the Services with Third-party Service Providers; to comply with legal obligations; to protect and defend its rights and property or with User's consent.

#### **2. Service Providers**

We may share the information we receive from the User with Service Providers. The types of Service Providers (processors) to whom we entrust Personal Information include Service Providers for (i) provision of IT and related services; (ii) provision of information and services the User has requested; (iii) payment processing; (iv) customer service activities; and (v) in connection with the provision of the Services. GG Clan may also share information with platform partners for SDK Advertising and S2K Tag Advertising with AdColony, Inc., Admob, Inc., AppLovin Limited, Chartboost, Inc., Pubnative GmbH, Inmobi Pte. Ltd., ironSource Mobile Ltd. Mo pub Inc. Tapjoy, Inc. Unity Ads Vungle, Inc., Facebook Analytics for Apps (Facebook, Inc.),

Google Analytics for Firebase (Google Inc.), Google Analytics (Google Inc.), Amazon Web Services (AWS) and Adjust GmbH. In order to provide safety to User's Personal Information, GG Clan takes reasonable precautions information (as required by applicable data protection laws) while sharing such information with such Service Providers.

### 3. **Displaying to Friends and Other Users**

The Services encourage Customers to interact with each other if User accesses the Services. If Users link their social media on their profiles, other Users will be able to access such profiles.

In addition, in Services offered by GG Clan, other Customers, regardless of whether they are User's social network friends, will be able to see User's customer profile (what they write about themselves); view descriptions of User's activity; communicate with User within the Services; send User's friend requests, and talk via chat bot (Discord channel) through Services.

### 4. **Marketing - Interest-based or Targeted Advertising and Third-party Marketing**

In order to carry out advertising tools GG Clan may share, or such third-party provider may directly collect below Personal Information within Services:

- performance data (like the number of clicks on an advertisement);
- certain technical information (for example, IP addresses, non-persistent device identifiers such as Advertising ID and de-identified persistent device identifiers such as a hashed Android ID);
- User's social network ID;
- other contextual data about the User's use of Services (for example, a game's level and session length); and
- pseudonymous data, not directly identifying information (e.g., OS name and versions, device models, time stamp).
- In addition to serving Users with relevant ads, the information collected may be used to:
  - calculate the effectiveness of the ads
  - offer User targeted advertising (both on and off the Services) in order to personalize User experience by showing advertisements for products and services that are more likely to appeal by User (a practice known as interest-based advertising or behavioral advertising); and/or



- undertake web analytics to analyses traffic and another Customer activity to improve User’s experience.

5. **Disclosures to Protect GG Clan or Others (i.e., as Required by Law and Similar Disclosures).**

Personal Information may be used accessed, preserve, and disclosed if GG Clan believe doing so is required or appropriate:

- To satisfy and comply with applicable laws or regulations
- To fulfil to lawful requests by public authorities, including for national security, law enforcement, or legal process purposes (for example, a court order, search warrant, or subpoena);
- To prevent illegal activities such as committing a crime, including to report such criminal activity or to share information with other companies and organizations for the purposes of fraud protection, credit risk reduction, and other security precautions which are carried out via using Services.
- Occurrence of emergency situation that poses a threat to the health and/or safety of the User, another person, or the public generally.

6. **Merger, Sale, or Other Asset Transfers.**

If GG Clan engages in a merger, acquisition, financing, due diligence, reorganization, bankruptcy, receivership, sale of company assets or transition of service to another provider, then User’s Personal Information may be disclosed or transferred as part of such a transaction as permitted by law and/or contract to the successor organization or competent body. In such case, GG Clan will show its best efforts to procure that the manners of such successors are compliant with this Privacy Policy.

**5. Transfer Abroad of Personal Information**

Services provided by GG Clan are global by nature and Personal Information can therefore be transferred to anywhere in the world. Since different countries may have different data protection laws than User’s residential country, GG Clan takes steps to ensure adequate safeguards are in place to protect Personal Information as explained in this Privacy Policy. Since each country has its own jurisdiction, the privacy laws applicable to the places where Personal Information is transferred to or stored, used, or processed in, may be different from the privacy laws applicable to the place where User is resident. GG Clan undertakes to comply with its legal obligations under the applicable law where such Personal Information is

transferred and where User is located and ensure that Personal Information is subject to suitable safeguards or transferred to secure territories.

As part of the Services, GG Clan may transfer several Personal Information abroad to its business partners and service providers from time to time for the legitimate business purposes.

GG Clan stores Personal Information about Users and visitors to the sites on servers located in Frankfurt, and GG Clan may also store this Personal Information on servers and equipment in other countries and may change such location from time to time. Personal information collected in the European Countries may be transferred to, and stored at, a destination outside of the European Countries. The data we hold may also be processed by employees operating outside of the European Countries who work for us, or one of its business partners or service providers. This staff may be engaged in, among other things, (i) the processing of transactions and User's payment details, or (ii) the provision of support services. If GG Clan transfers User's Personal Information internationally, GG Clan will take reasonable steps to ensure that Personal Information is treated securely, lawfully, and in accordance with this Policy.

## **6. User Rights**

1. Users have certain rights in connection with Personal Information and how GG Clan handles it. User can exercise these rights at any time by contacting us. In that vein, regardless of where User is located (applicable for European Union and Switzerland as well) User is entitled and have right to:
  - access and require information regarding the types of personal information of Users is processed and to ask detailed information,
  - learn the purpose of Personal Information processing and whether such Personal Information are used for such purpose,
  - know the parties to which such Personal Information is transferred within the country or abroad,
  - ask the correction of Personal Information in order to be true actual and updated,
  - demand the deletion of User's Personal Information,
  - object to the processing of Personal Information about himself/herself, which is processed on the grounds of legitimate interests,
  - opt-out of marketing communications,
  - demand from GG Clan to inform other third parties regarding the correction, deletion destruction of such Personal Information,

- object the results against to User which occurred through analyze of such Personal Information via exclusively automatic systems,
  - to withdraw its consent at any time, in case of processing Personal Information with User’s request,
  - demand compensation in case of any damages due to the processing of Personal Information in violation of applicable law,
  - request a restriction of the processing of User Personal Information, such as when User is disputing the accuracy of User data held by GG Clan,
  - request data portability,
  - object to the occurrence of an adverse consequence by analyzing the processed data exclusively through automated systems, and
  - lodge a complaint with the relevant data protection authority and claim damages in case of impairment because User’s Personal Information is processed in violation of the relevant legal legislation.
2. To exercise User rights to access or deletion, please submit a request through contact details stated below. GG Clan shall finalize the requests of the User in reasonable time in accordance with the applicable data protection laws and manner and no later than 30 (thirty) days. If the use of right by the User requires additional cost, then GG Clan may be entitled to demand such costs from User.
  3. For the use of rights conferred to User, User may also be required to take additional steps, such as deletion of Services or, suspension of User’ Accounts or the connection with several application or social network. For the use of the rights by User, GG Clan may demand from the User the verification of its identity.
  4. **Accessing and Deleting Personal Information Held by GG Clan**

Users can request a copy of or deletion of their account data by contacting us. To review and update personal information associated with the User profile, visit the “settings” page.

For deletion requests, GG Clan will take reasonable measures to delete Personal Information from GG Clan’ records. GG Clan will keep certain records (e.g., personal information relating to payments or customer service matters) for legitimate purposes.

5. **Managing Personal Information GG Clan Receives from Third-Party Applications / Platforms And From User’s Mobile Device**

To manage the information GG Clan receives from third-party applications or platforms and from User's mobile device, User can use the tools and settings provided by the third-party application and its own mobile device.

In order to manage the information that GG Clan collects from third party applications, User has to follow the instructions of such third parties to update and changes the privacy settings.

User can manage many aspects of the collection and use from its mobile device by visiting the "settings" page of its mobile device or web browser. Such procedures may vary depending on the device and the browser.

If GG Clan receives Personal Information from a third-party application / platform or User's mobile device, that information is stored and used by GG Clan in accordance with this Privacy Policy.

## **7. Opt-Out**

### ***1. Opting out GG Clan Notifications***

- User may opt out in any time in accordance with his/her sole discretion, clicking on the opt out link provided in all marketing mailings, by turning off notifications from the website or mobile device or SNS settings or by sending an e-mail to support@ggclan.com without incurring any costs.
- If User wants to stop receiving promotional e-mails from GG Clan, User may click on the "unsubscribe" link at the bottom of any promotional email from GG Clan.
- Please note that if User opt ins or out of receiving marketing communications from GG Clan, GG Clan may still communicate with User from time to time that GG Clan needs provide User with information about the Service that User using, if GG Clan needs to request information from User with respect to a transaction initiated by User, or for other legitimate non-marketing reasons.
- If User wants to stop receiving push notifications, which are messages an app sends User via the website or mobile device even when the app is not on, User can turn off push notifications by visiting website's or his/her mobile device's "Settings". The Services also offers the ability to turn off push notifications in the "Settings" section of related Services.

## 2. **Opting Out of Third-Party Behavioral Advertising**

For the notification by personalized advertising from third-party partners, User can opt in or opt out of third-party customized advertising through the device Settings and other third-party opt-in or opt-out tools. If User does not want to receive tailored in-application advertisements from third parties that relate to website or his/her interests on his/her mobile device, User may adjust the ad tracking settings on his/her device (such as turning on Limit Ad Tracking). User can also reset the “Advertising Identifier” (such as an IDFA) from website or User’s mobile device’s settings which will prevent continued use of existing behavioral data tied to User’s previous “Advertising Identifier.” Further, depending on the platform provider (such as Apple or Google), User may be able to download apps that offer to provide User with control regarding the collection and use of cross-app data for tailored advertising. All of the opt-in or opt-out tools described in this provision are provided by third parties, not by GG Clan. GG Clan does not control or operate these tools or the choices that advertisers and others provide through these tools.

## **8. Protection and Retention of Personal Information**

1. In order to help ensure a secure and safe experience, GG Clan is continuously developing and implementing administrative, technical and physical security measures to protect the Personal Information from unauthorized access or against loss, misuse or alteration. The Personal Information that User provide to GG Clan is stored on servers that are located in secured facilities and protected by protocols and procedures designed to ensure industry-standard security of such information, such as firewalls and data encryption.
2. If User has an account registered directly with GG Clan, the credential of such account is protected by the password created by the User itself. The protection of the password is on the shoulders of the User and user itself is liable for the unauthorized use of such password. User must not share such password and credentials and has to keep its social network account information, including its social network account password, secure as well.
3. GG Clan retains Personal Information as long as the account is active or as needed to provide User the Service. GG Clan will take reasonable measures to delete Personal Information if User deletes its account. However, User acknowledges that GG Clan may retain some information even after if User closes, has deleted, its account as necessary for legitimate business interests, such as to comply with legal obligations, resolve disputes.

4. The Personal Information is protected by protocols and procedures designed to ensure industry-standard security of such information, such as firewalls and data encryption. Yet GG Clan cannot ensure or warrant the security of any information that User transmits to GG Clan or through the Services.

## **9. Policies with respect to Children**

Generally speaking, our Services are not intended for children under the age of 18 (collectively, “**Children**”). Children are not permitted to use these Services if parental consent does not exist, and we do not knowingly collect any personal information from Children. Children who want to use the Services need to send an e-mail explaining their request to [operations@ggclan.com](mailto:operations@ggclan.com) with a parent and ask for consent. More details are on the FAQ (frequently asked questions) page.

## **10. Revisions and Updates**

This Privacy Policy may be revised, amended, or promulgated upon the sole discretion of GG Clan. The latest version shall apply in each case. In order to be effective, GG Clan does not need to notify User and such amendments shall become effective as of the publication date. Continuing the use of the Services shall be deemed as an acceptance to such revised terms.

## **11. Contact**

If User have any questions and demands about the privacy practices or this Privacy Policy, User should contact GG Clan’ data protection officer by email at [support@ggclan.com](mailto:support@ggclan.com). GG Clan will be at User’s disposal in a timely and urgent manner.

GG Clan shall respond to requests to know and requests to delete within 30 days. The 30-day period will begin on the day that the GG Clan receives verifiable the request.

**Proplayers Oyun Yazılım Danışmanlık Anonim Şirketi**