

PRIVACY POLICY

1. INTRODUCTION

1.1 Affyn Pte. Ltd. (Company Registration Number: 202129354G) (“Affyn”) takes the privacy of your information very seriously. This policy explains how and for what purposes we use the information collected about you via www.affyn.com and any sub-domains thereof (each a “Site”). Please read this privacy policy carefully. By using a Site and any services we offer via a Site, you are agreeing to be bound by this policy in respect of the information collected about you via each Site.

1.2 If you have any queries about the policy, please get in touch with us using the contact details set out at privacy@affyn.com and we will do our best to answer your questions.

2. PERSONAL INFORMATION COLLECTED

2.1 Personal information is data that identifies an individual. This includes information you provide to us, information collected automatically, and information we collected from third parties.

2.2 We will collect the following information from you (but not limited to):

2.2.1 full legal name, nationality, gender, date of birth;

2.2.2 email address, residential address, telephone number;

2.2.3 government-issued identity document, proof of legal formation, proof of address;

2.2.4 ip address, wallet address, face image

2.2.5 other information in connection with your use of Affyn’s account on the Site.

3. USE OF THIS INFORMATION

3.1 We will collect, use, disclose, store and/or process this information in order to:

3.1.1 administer your accounts with us;

3.1.2 provide services and communications;

3.1.3 provide customer support including query requests and complaints;

3.1.4 verify your identity;

3.1.5 maintain legal and regulatory compliance;

3.1.6 engage in marketing activities, promotional events, contests, campaigns and/or other Site features;

- 3.1.7 for analytic purposes to measure business performance, strategy effectiveness, consumer behavior trends, targeted marketing and drive revenue growth;
- 3.1.8 comply with any terms and conditions Affyn is bound by, applicable laws and regulations, codes of practice, guidelines and notices, or to assist in law enforcement and investigation conducted by any government bodies and/or regulatory authorities.
- 3.1.9 prevent, detect or investigate any suspected or actual misconduct, fraud, unlawful or criminal activity including money laundering and terrorism financing;
- 3.1.10 any other purposes for which you have provided the information; and/or
- 3.1.11 for purposes which are reasonably related to the aforementioned.

4. SHARING THIS INFORMATION

4.1 We may share your personal information with:

4.1.1 third-party identity verification and/or screening service provider to fulfill the customer due diligence obligations;

4.1.2 third-party transaction monitoring service provider to assist in the prevention of fraud and other illegal activities and to fulfill our obligations under anti-money laundering and countering the financing of terrorism laws and regulations;

4.1.3 service providers under contracts who provide professional services to us, such as legal and accounting advisories, marketing, payment, or technology services;

4.1.4 financial institutions and payment service providers with which we partner to process payments you have authorized; and

4.1.5 law enforcement, government officials and agencies, regulators, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure, to comply with applicable laws and regulations, to report suspected illegal activity, or to investigate violations of our Terms of Use or any other applicable policies.

4.2 From time to time, we may disclose your data to third parties without your consent but only to the extent allowed by applicable laws.

4.3 We are not responsible for any third party conduct on how the information we share will be used, secured and disclosed in accordance with the third party's privacy practices. However, we do review the privacy policy and practices of the third party as part of the due diligence process.

5. INFORMATION AUTOMATICALLY COLLECTED FROM YOUR COMPUTER

Log files/IP addresses

5.1 When you visit a Site, our web server automatically records your IP address. This IP address is not linked to any of your personal information. We use IP addresses to help us administer a Site, to collect demographic information for aggregation purposes and to restrict access of a certain group of people to comply with any applicable sanction laws and regulations.

5.2 We may also gather other non-personal information (from which we cannot identify you) such as the type of your Internet browser which we use to provide you with a more effective service.

Cookies and other technologies

5.3 When you visit a Site, we may store some textual information (commonly known as a “cookie”) on your Internet browser. Other technologies, including unique identifiers used to identify interaction from devices, browsers, and local storage can also be used for these purposes. Cookies and other technologies as described are used for functionality, security and analytics. Passwords and credit card numbers are not stored in cookies.

5.4 Cookies and other technologies help to make a Site usable by enabling basic functions like page navigation, site preferences and access to secure areas of the site as you interact with a service.

5.5 Cookies and other technologies used for analytics help collect data that allows services to understand how you interact with a particular service. These insights allow services to both improve content and build better features that enhance your experience.

5.6 You can block or erase cookies from your computer if you want to (your browser’s help screen or manual should tell you how to do this), but parts of a Site that are reliant on the use of cookies to operate may not work correctly if you set your browser not to accept cookies.

6. INFORMATION ABOUT OTHER PRODUCTS AND SERVICES

6.1 From time to time we may send you information about our game updates and product launches that we think may be of interest to you.

6.2 You can tell us to stop this at any time by sending an email to support@affyn.com.

6.3 Also, as mentioned above, we may pass your information onto one of our business partners or to other selected third parties to enable them to send you information which may be of interest to you but only if you have given us permission to do so when you register an account with us. You can choose to opt out at any time by sending an email to support@affyn.com.

7. CHANGES TO YOUR DETAILS

7.1 We aim to keep our information about you as accurate as possible. If you would like to review or change the details you have supplied us with, you may do so at any time by contacting us at support@affyn.com, with the email header "Request to Update Personal Information".

8. SECURITY

8.1 We have implemented technology and policies to safeguard your privacy from unauthorized access and improper use. We use secure server software (TLS1.2) to encrypt any personal information you need to input before it is sent to us. TLS 1.2 encryption is the industry standard security protocol used for encryption of data sent over the Internet. All browsers and application software should be upgraded to support TLS1.2 256-bit encryption.

8.2 Confidential data is stored encrypted at rest within our enterprise databases. This adds a protection layer to your data that enforces that the written files for storage are only accessible once decrypted by an authorized process or application.

8.3 We use zero-trust network architecture to secure access to our internal computer systems and all authorized individuals require valid user-ids and passwords, enforcing that only permitted users can gain entry into our systems.

8.4 In order to access our marketplace features, all accounts need to be verified and accessed through their individual valid user-ids and passwords. This ensures that only permitted users can gain entry into our systems.

8.5 When entering your user and password, you should always ensure that the website you are visiting belongs to Affyn.

8.6 Recommended Security Precautions You Should Adopt:

8.6.1 protect and safeguard your account credentials;

8.6.2 protect your endpoints from viruses and malicious programs;

8.6.3 beware of and protect your credentials and sensitive information from phishing, spyware and keyloggers;

8.6.4 avoiding hoax and scams from emails, social media and other unverified sources;

8.6.5 having good cyber hygiene on the Internet and Mobile devices; and

8.6.6 protecting all your wallet private keys and never sharing it with anyone including Affyn Pte. Ltd.

9. LINKING TO THIRD-PARTY WEBSITES

9.1 We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our Site and recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

9.2 In addition, if you are linked to a Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

10. RETENTION OF PERSONAL INFORMATION

10.1 We may retain your personal information for as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable laws, including for the purpose of satisfying any legal and compliance, accounting, reporting obligations, or dispute resolution.

10.2 We will cease to retain your personal information or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal information was collected and is no longer necessary for legal and compliance, or business purposes.

11. TRANSFERRING YOUR INFORMATION OUTSIDE OF SINGAPORE

11.1 As part of the services offered to you through a Site, the information you provide to us may be transferred to countries outside of Singapore. By way of example, this may happen if any of our servers are located in a country outside of Singapore or one of our service providers is located in a country outside of Singapore. If we transfer your information outside of Singapore in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy.

11.2 If you use our services while you are outside Singapore, your information may be transferred outside Singapore in order to provide you with those services.

12. CHANGES TO THIS PRIVACY POLICY

12.1 We may change the terms of this privacy policy from time to time, including doing so to clarify it or ensure that it complies with applicable law. The updated version will be binding on you as long as you use a Site or any services thereon. We have no obligation to update you of any changes to the policy.

13. YOUR PRIVACY RIGHTS

13.1 When we receive an Erasure request from you, we will proceed to tag your account with us as 'Closed' and you will no longer have any access to the Site or any of our services. However, your personal information as well as your request to erase your information will still be stored in our archive database and third parties whom we have

lawfully shared your information with, for a period of time as described within the retention period. This is especially important to deter fraud or any account takeover by ensuring that the person who tries to commit fraud will not be able to avoid detection by closing an account and opening a new account. We will request and use reasonable endeavors to procure the above mentioned third parties to take the same action as us.

13.2 To the extent the processing of your personal information is based on your consent given when you register an account with us, you may Withdraw your consent at any time.

14. CONTACT US

14.1 If at any time you would like to contact us with your views about our privacy practices, or with any enquiry relating to your personal information, you can do so by sending an email to us at privacy@affyn.com, attention: Data Protection Officer.