Privacy Policy

(Last updated on January 10, 2022)

Table of Contents

- 1. Introduction
- 2. Information We Collect
- 3. How We Collect Information About You
- 4. How We Use the Information We Collect
- 5. Sharing of Your Information
- 6. Our Policies Concerning Children
- 7. How to Access and Update Your Information
- 8. Your Sharing and Messaging Options
- 9. International Operations and Transfers out of Armenia
- 10. Privacy Policies of Linked Sites and Advertisers
- 11. Security of Your Information
- 12. P3P (Compact Machine Readable Policies) & Changes to Our Privacy Policy
- 13. Your California Privacy Rights
- 14. Contact Us

1

Introduction

Blot Club develops and publishes game for the web. In this policy, "Blot Club" refers to Candy Wings LLC. We may also refer to Blot Club as "We" or "Us". Personal data of users that reside outside of the Armenia is jointly controlled by Candy Wings LLC.

This Privacy Policy describes:

- the information We collect, how We do so and the purposes of our collection
- how We use and with whom We share such information
- how you can access and update such information
- the choices you can make about how We collect, use and share your information
- how We protect the information We store about you

If you have questions regarding this Privacy Policy or our collection and use of information, please contact us as described in Section 14 ("Contact Us").

back to top

Information We Collect

Information about You Received from an SNS

When you use any Blot Club game at an SNS such as Facebook or Google +, where our game may also be referred to as applications, you allow Blot Club to access certain information from your profile for that site. The information you allow Blot Club to access varies by game and SNS, and it is affected by the privacy settings you and your friends establish at the SNS. You can control and find out more about these settings at the SNS where you play our game. For example, Blot Club may access and store some or all of the following information, as allowed by you, the SNS and your preferences:

- your first and last name
- your profile picture or its URL
- your user ID number, which is linked to publicly available information such as name and profile photo
- the user ID numbers and other public data for your friends
- the login e-mail you provided to that SNS when you registered
- your physical location and that of your access devices
- your gender
- your birthday

By playing a Blot Club game through an SNS, you are authorizing Blot Club to collect, store, and use in accordance with this Privacy Policy any and all information that you agreed the SNS could provide to Blot Club through the SNS Application Programming Interface ("API"). Your agreement takes place when you "accept" or "allow" (or similar terms) one of our applications on an SNS.

Information We Collect from You Directly

When you interact with the Service (whether or not on an SNS), at www.blotclub.am, or any Blot Club-owned website, We may collect and store information from you directly as described below:

Registration Information

We may allow you to register with Us by using Facebook Connect or other SNS authentication options to create an account or profile within the Service. We may also provide a more typical registration flow where you may be required to provide the following information: your age or birthday (for age screening and/or to better understand who our users are); your first and last names; your e-mail address; a password and other information that helps Us confirm that it is you accessing your account.

We may also offer you the option to complete a user profile that is visible to other Blot Club users. Your user profile may include: a profile photo; one or more game username(s); your gender; biographic details that you provide; links to your profiles on various SNS; details about the game you play; and a Blot Club user ID number that is

created by Blot Club and used to identify your profile.

The Blot Club user ID number used to identify your account and profile will be public and will appear in the URL of your profile page, but will only permit access to information that is considered public or that you have designated as public in your settings.

Your first and last names and profile picture are considered "public" on Blot Club websites that offer direct access to Blot Club game and search engines may index this publicly available information. When We offer profiles, We will also offer functionality that allows you to opt-out of public indexing of your public profile information.

We may also offer you the ability to import your address book contacts or manually enter e-mail addresses so that you can (i) locate your contacts on Blot Club; and (ii) invite those contacts to join you in our game. We will store those contacts for purposes of helping you and your contacts make connections on our site. If you do not want your contacts stored just follow the instructions available at the "Learn More" link. Passwords provided to Blot Club for the purpose of accessing your address book will not be stored.

Payment Information

If you purchase a license to use in-game virtual currency or virtual items directly from Blot Club, We will collect the billing and financial information necessary to process your charges, which may include your postal and e-mail addresses. Blot Club may also receive the billing and payment information that you provide when your purchase is processed by another party, such as Facebook (for Facebook Credits) or Apple (for purchases on iOS devices). Please note that purchases of third party credits or currencies like Facebook Credits may also be subject to additional policies.

Customer Support Correspondence

When you ask for assistance from our <u>Customer Support</u> team, We will collect and store the contact information you provide (generally your name and e-mail address), information about your game play or activity on the Service, and your user ID number. We will also store the correspondence and any information contained within.

SMS Notifications, Push Notifications & Local Notifications

Technical and Usage Information

When you access our websites or play our game, We collect (i) certain technical information about your computer system, including MAC Address and IP Address; and (ii) usage statistics about your interactions with the Service. This information is typically collected through the use of server log files or web log files (Log Files), tracking technologies like browser cookies to collect and analyze certain types of technical information. Some of the cookies the Service places on your computer are linked to your user ID number(s). For more information on how We utilize cookies and other tracking

technologies please review the "Cookies and Automated Information Collection" portion of Section 3 ("How We Collect Information about You").

back to top

3

How We Collect Information about You

We may collect information about you in any one or more of the following ways:

Information about Players and Play

When you play one of our game, Blot Club collects and stores certain information that you provide directly or through the SNS or other third party website that is offering our game(s). To provide a richer game play and social experience, We also collect information about your play and interaction with other players and the Service. The bulk of this information is collected and stored through the use of Log Files, which are files on our web servers that record actions taken on our game and website.

Communications Features

You may be able to take part in certain activities on our website or game that give you the opportunity to communicate or share information not just with Blot Club, but also with other users of our Service. These include:

- participating in player forums and message boards
- posting public comments to other users' profiles or gameboards
- sending private messages or invitations to other users, either directly on our websites or to their e-mail accounts
- chat with other users
- posting photos

We may record and store archives of these communications on Blot Club's servers to protect the safety and well being of our users and Blot Club's rights and property in connection with the service. You acknowledge and consent to the recording and storage of such communications for these purposes.

Cookies and Automated Information Collection

When you access the Service, We collect certain technical information in order to (i) analyze the usage of our sites and services; (ii) provide a more personalized experience; and (iii) manage advertising. We and service providers acting on our behalf, such as Google Analytics, use Log Files and tracking technologies to collect and analyze certain types of technical information, including cookies, IP addresses, device type, device identifiers, browser types, browser language, referring and exit pages, and URLs, platform type, the number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, game state and the date and time of activity on our website or game, and other similar information. In some

cases, We will associate this information with your user ID number for our internal use.

We may also employ other technologies including (i) web beacons, which allow Us to know if a certain page was visited or whether an e-mail was opened; (ii) tracking pixels, which allow Us to advertise more efficiently by excluding our current users from certain promotional messages, identifying the source of a new installation or delivering ads to you on other websites; and (iii) local shared objects also known as flash cookies, which help Us to prevent fraud, remember your in-game preferences and speed up load times.

You can set your web browser to warn you about attempts to place cookies on your computer or limit the type of cookies you allow. Flash cookies operate differently than browser cookies and cookie management tools available in a web browser may not remove flash cookies. If you disable cookies, you may lose some of the features and functionality of playing our game, as Blot Club cookies are necessary to track and enhance your game activities. Please note that companies delivering advertisements in our game or on our website may also use cookies or other technologies, and those practices are subject to their own policies.

Other Sources

We may collect or receive information from other sources including (i) other Blot Club users who choose to upload their email contacts; and (ii) third party information providers. This information will be used to supplement your profile - primarily to help you and your friends connect. It will be combined with other information We collect.

back to top

4

How We Use the Information We Collect

In general, We collect, store and use your information to provide you with a safe, smooth, efficient, and customized experience. For example, We may use information collected from you in any one or more of the following ways:

- to create your game accounts and allow play of our game
- to identify and suggest connections with other Blot Club users
- to enable user-to-user communications
- to provide technical support and respond to user inquiries
- to prevent fraud or potentially illegal activities, and enforce our Terms of Service
- to deliver and target advertising
- to notify users of in-game updates
- to provide in-game leader boards and promote in-game player achievements
- to solicit input and feedback to improve Blot Club customize your user experience
- to inform users about new products or promotional offers
- to engage in commonly accepted practices, such as contacting you at the email address We have on file if you are a potential winner in a tournaments

One important use of your information is communication. If you have provided your e-

mail address to Blot Club, We'll use it to respond to (i) customer support inquiries, and (ii) keep you informed of your in-game activity, including comments from friends, notifications about in-game status such as "crops ready" as well as notifications of gift and neighbor requests. Some messages, such as invites for friends to join you in a game, may include your name and profile photo. We may also send promotional e-mail messages and promotional SMS messages ("Promotional Communications") directly or in partnership with parties other than Blot Club. Each Promotional Communication will generally offer recipients choices about receiving additional messages.

back to top

5

Sharing of Your Information

We will share your information (in some cases personal information) with third parties, that is parties other than Blot Club, in the following circumstances:

Third Party Service Providers

We will provide your information to third party companies to perform services on our behalf, including payment processing, data analysis, e-mail delivery, hosting services, customer service and to assist Us in our marketing efforts. We direct all such third party service providers to maintain the confidentiality of the information disclosed to them and to not use your information for any purpose other than to provide services on Blot Club's behalf.

Friends and Other Blot Club Players

The Service supports and may encourage interaction among players. In most Blot Club game your SNS friends will see your name, profile photo and descriptions of your game activity. In many Blot Club game friends and other players will be able to see your game profile, which may include your name or a game name and your profile photo, which in certain cases can reveal your SNS User ID number or Blot Club ID. For example, in Blot Club any other player may encounter your game profile, if you are playing at the same table. Access to a Blot Club ID or your SNS User ID may allow others to view the public information associated with your related SNS or Blot Club account. Other players may also be able to send you game requests or even friend requests through the related SNSTM communication channels.

Advertising of Third Party Products and Services

We do not actively share personal information with third party advertisers for their direct marketing purposes unless you give Us your consent.

We may share (i) aggregated information (information about you and other users collectively, but not specifically identifiable to you); (ii) anonymous information; and (iii) certain technical information (including IP Addresses, MAC Addresses for mobile

devices and mobile device IDs) to develop and deliver targeted advertising in the Service and on the websites of third parties. We may also allow advertisers to collect these types of information within the Service and they may share it with Us. Advertisers may collect this information through the use of tracking technologies like browser cookies and web beacons. The information collected may be used to offer you targeted ad-selection and delivery in order to personalize your user experience by ensuring that advertisements for products and services you see will appeal to you, a practice known as behavioral advertising, and to undertake web analytics (i.e. to analyze traffic and other end user activity to improve your experience).

Our collection, use, and disclosure of anonymous or aggregated information are not subject to any of the restrictions in this Privacy Policy.

Offer Walls

Blot Club game or may display an "offer wall" that is hosted by an offer wall provider. The offer wall allows third party advertisers to provide virtual currency to users in exchange for interacting with an advertisement or for completing a marketing offer that may include signing up for an account with one of those advertisers. These are not offers made by Blot Club. These offers may be displayed to you based on certain technical information, such as your geographic area or anonymous demographic information. After clicking on one of these advertisements, you will no longer be on a site hosted by Blot Club or a partnering SNS. To properly credit user accounts and to prevent fraud, a unique identifier, in some cases your user ID number, will be shared with the offer wall provider.

Safety, Security and Compliance with Law

Your information, and the contents of all of your online communications (including without limitation chat text, voice communications, IP addresses and your personal information) may be accessed and monitored as necessary to provide the Service and may be disclosed: (i) when We have a good faith belief that We are required to disclose the information in response to legal process; (ii) to satisfy any applicable laws or regulations (iii) where We believe that the Service is being used in the commission of a crime, including to report such criminal activity or to exchange information with other companies and organizations for the purposes of fraud protection and credit risk reduction; (iv) when We have a good faith belief that there is an emergency that poses a threat to the health and/or safety of you, another person or the public generally;

Sale or Merger

In the event that Blot Club undergoes a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, We may transfer all of your information, including personal information, to the successor organization in such transition. If material changes to Blot Club's privacy practices will occur as a result of the business transition, We will notify you and other users (in the manner described in Section 12) of the business transition prior to transferring your personal information.

6

Our Policies Concerning Children

Our website and game are not intended for children under the age of 13 and We do not knowingly collect any personal information from such children. Children under the age of 13 should not use our websites or game at any time. In the event that We learn that We have inadvertently gathered personal information from children under the age of 13, We will take reasonable measures to promptly erase such information from our records.

back to top

7

How to Access and Update Your Information

Information We Receive From an SNS Where You Play Blot Club

To manage the information Blot Club receives about you from an SNS where you play our game, you will need to follow the instructions at that site for updating your information and changing your privacy settings. The privacy management tools for applications on Facebook can be found here. The privacy management tools for Google + can be found <a href=here. You can manage certain aspects of information collection and use by going to the settings of your (mobile) device and reviewing the permissions of each application.

Once Blot Club receives your information from an SNS, that information is stored and used by Blot Club in accordance with this Privacy Policy, and you may access and update that information as described below. Game or other accounts created with Blot Club are considered active until We receive a user request to delete them or deactivate them.

Other Methods of Accessing and Controlling your Information

- If you no longer want Blot Club to make active use of your information, you may send an e-mail to support@blotclub.am. Place "Delete My Account" in the subject line and include your first name, last name, e-mail address and user ID number for the SNS from which you access our game (if applicable) in the body of the e-mail. We will respond to your request within thirty (30) days. Please note that certain records, for example those pertaining to payments or customer service matters, will be retained for legal and accounting purposes. If you have sent or posted content on the Service, We may not be able to delete it.
- If you wish to review or change the information Blot Club has about you, e-mail Us at the address provided herein.
- You may change your e-mail preferences at any time, by visiting your e-mail preference page.
- If you have additional questions about this Privacy Policy, contact Us at

support@blotclub.am.

back to top

8

Your Sharing and Messaging Options

Information We Receive from Third Party SNS Where You play a Blot Club Game

If you play our game at a third-party SNS, Blot Club will be able to access and store profile and other information about you as described above. The categories of information you share with Us will depend, in part, on the permissions you grant Us and the privacy settings you have established at the SNS where you access the application. Blot Club does not offer an "opt out" option for specific fields that are shared by the SNS where you access and play the game(s).

back to top

9

International Operations and Transfers out of Armenia

Personal data of users that reside outside of the Armenia is jointly controlled by Fusion Lab LLC

Blot Club stores information about site visitors and players on servers located in the Germany, and Blot Club may also store such information on servers and equipment in other countries.

We will take reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

back to top

10

Privacy Policies of Linked Sites and Advertisers

Our website and game may contain advertisements from companies other than Blot Club that may link to their own websites. We are not responsible for the privacy practices or the content of such websites. If you have any questions about how these other websites use your information, you should review their policies and contact them directly.

back to top

11

Security of Your Information

Blot Club implements reasonable security measures to protect the security of your information both online and offline, and We are committed to the protection of customer information.

For user accounts registered directly with Blot Club profile information is protected by the password each member uses to access their online account. It is important that you protect and maintain the security of your account and that you immediately notify Us of any unauthorized use of your account. If you forget the password to your Blot Club account, the website allows you to request that instructions be sent to you that explain how to reset your password. When you sign into your account or enter payment information (such as a credit card number when purchasing virtual currency), We encrypt the transmission of that information using secure socket layer technology ("SSL").

While We take reasonable precautions against possible security breaches of our websites and our customer databases and records, no website or Internet transmission is completely secure, and We cannot guarantee that unauthorized access, hacking, data loss, or other breaches will never occur. We urge you to take steps to keep your personal information safe (including your account password), and to log out of your account after use. If your SNS account is hacked, this may lead to unauthorized play of your Blot Club game, so be careful to keep your account information secure. If you have questions about the security of our websites, please contact Us at support@blotclub.am.

back to top

12

Changes to Our Privacy Policy

We may make P3P "compact machine-readable "policies and headers available. If we do so, we will try to ensure that they are consistent with this human readable policy. However, in the event of a conflict between a machine-readable policy and this policy, this (human readable) policy will control.

If We decide to make material changes to our Privacy Policy, We will notify you and other users by placing a notice on www.blotclub.am or by sending you a notice to the email address We have on file for you. We may supplement this process by placing notices in our game and on Blot Club website. You should periodically check www.blotclub.am and this privacy page for updates.

back to top

13

Your Privacy Rights

We do not share personal information with third parties for their direct marketing purposes unless you affirmatively agree to such disclosure, typically by "opting in" to receive information from a third party that is participating in a sweepstakes or other

promotion on one of our sites. If you do ask Us to share your personal information with a third party for its marketing purposes, We will only share information in connection with that specific promotion, as We do not share information with any third party (other than our service providers) on a continual basis. To prevent disclosure of your personal information for use in direct marketing by a third party, do not opt in to such use when you provide personal information our site.

Right to Access

Users in certain jurisdictions have a right to access personal information held about themselves. Your right of access can be exercised in accordance with applicable law. Please submit any requests for access to your personal data in writing to support@blotclub.am.

back to top

14

Contact Us

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please send an e-mail to support@blotclub.am.

Candy Wings LLC.

Volokolamskoye highway, b1, h1, r1, residence 31, Moscow, Russia