

# PRIVACY POLICY

Effective date: January 1<sup>st</sup>, 2026

## 1. INTRODUCTION

This Privacy Policy explains how we collect, use, disclose, and protect personal data when you use our game and related services. It is designed to satisfy the disclosure requirements of the Apple App Store and Google Play, including App Privacy and Data Safety disclosures.

## 2. WHO WE ARE

Controller/Operator: **WARVARG GAMES L.L.C-FZ**

Address: Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, United Arab Emirates

Privacy: [privacy@warvargames.com](mailto:privacy@warvargames.com)

Support: [support@warvargames.com](mailto:support@warvargames.com)

If you are in the EEA/UK, the controller is the entity above. Where required by law, we will designate an EU/UK representative and update this Policy. If not applicable, we confirm that we do not target or monitor EEA/UK users at a scale requiring such appointment.

## 3. SCOPE

This Policy applies to our websites and support channels that link to it. It does not cover processing by app stores, payment processors or other third parties acting as independent controllers (e.g., Apple, Google).

## 4. DATA WE COLLECT

We collect the minimum data necessary for functionality, analytics, safety and compliance. Categories may include:

- Identifiers: device identifiers (e.g., IDFA/GAID if permitted), app instance IDs, session IDs, push tokens.
- Technical and diagnostics: IP address (country/region), device/OS/app version, crash logs and performance data.
- Usage data: gameplay events, progression, session metadata, anti-cheat signals.
- Purchases: in-app purchase status and receipts from Apple/Google (we do not receive payment card details).
- Contact data: email and message content you send to support.
- Marketing and attribution: campaign/source metadata via attribution SDKs.
- Approximate location: country/region inferred from IP for localization and legal compliance.
- Age information: date of birth or age band that you self-declare in an age gate (see Section 6).
- Social features (if you use them): player identifiers, friend lists, leaderboard name and score, party/clan membership, invitations and block lists.

We do not intentionally collect precise geolocation (GPS), your device address book, photos, microphone or camera data unless you explicitly use a feature that requires them and grant permission. The MVP does not request these permissions.

## 5. SOURCES OF DATA

- Directly from you (e.g., support requests, social features you enable).
- Automatically from your device when you use the game.
- From platform providers (Apple/Google) regarding purchase status.
- From analytics, diagnostics and attribution providers (see Section 10).

## 6. PURPOSES AND LEGAL BASES

We use your data only for specific purposes and on lawful bases. Where we rely on legitimate interests, you can object at any time (see “Your rights”).

- Provide and operate the game (account/session management, gameplay, purchases) — performance of a contract / legitimate interests.
- Social features (friends, leaderboards, platform friends) — performance of a contract / legitimate interests; you can disable social features in settings.
- Prevent fraud and cheating, ensure security and integrity — legitimate interests / legal obligations.
- Measure performance and improve features, balance and stability — legitimate interests (you may object in Settings → Privacy → Analytics); consent where required by local law.
- Customer support and communications — performance of a contract / legitimate interests.
- Marketing communications and push notifications — consent (you can withdraw consent at any time; see Section 12 and 13).
- Compliance with law and requests of authorities — legal obligations.

Purpose of Processing	How we collect the data?	Data Subjects: Categories of Data	Storage Period	Legal Basis
Creation of new accounts which allows new players to initially access the Services	Directly from you Automatically through third parties	Our users: Contact information provided by you within the Services, such as nickname and email address Data about your device, such as device name, model and operating system, screen resolution, browser type, country and language settings, internet provider, cellular net operator, network type Data obtained through third parties, such as your application store ID (Google Play Store, App Store)	Until the termination of a contract or until the deletion of an account, whichever happens earlier, and within the terms specified by law	Processing is necessary for the performance of a contract to which you are a party. We will not be able to provide you with our Services if you do not provide these data
Delivery of the requested services and products	Directly from you Automatically through your use of our apps	Our users: Data about your game progress & account Data about your use of the Services, such as gameplay data and your interactions with other players inside the Services		
In-service communication, such as chats with other Services' users and/or communication with the support team	Directly from you Automatically through your use of our apps	Our users: Data about your game progress & account Data about your use of the Services, such as gameplay data and your interactions with other players inside the Services Your communication logs with the Services support or the community team, such as support tickets or in-service chat texts		Our legitimate interests to improve the quality of our Services, Processing is necessary for the performance of a contract to which you are a party. We will not be able to provide you with our Services if you do not provide these data
Verification and confirmation of payments processed through and/or within the Services	Automatically through your use of our apps	Our users: Contact information provided by you within the Services, such as nickname and email address		
Timely notification & related information delivery, such as support messages, updates, and security alerts	Directly from you Automatically through your use of our apps	Our users: Contact information provided by you within the Services, such as nickname and email address Your communication logs with the Service support or the community team, such as support tickets or in-service chat texts		Our legitimate interests to improve the quality of our Services; Processing is necessary for the performance of a contract to which you are a party. We will not be able to provide you with our Services if you do not provide these data
Player experience improvement, development, and customization	Automatically through your use of our apps	Our users: Data about your game progress & account Data about your use of the Services, such as gameplay data and your interactions with other players inside the Services		Our legitimate interests to improve the quality of our Service

Purpose of Processing	How we collect the data?	Data Subjects: Categories of Data	Storage Period	Legal Basis
Services security maintenance	Directly from you Automatically through your use of our apps	Our users: Contact information provided by you within the Services, such as nickname and email address Data about your game progress & account Data about your use of the Services, such as gameplay data and your interactions with other players inside the Services	As long as necessary in order to maintain the security	Our legitimate interests to manage security, risk and prevent fraud
Ads personalization	Automatically through your use of our apps	Our users: Data about your device, such as device name, model and operating system, screen resolution, browser type, country and language settings, internet provider, cellular net operator, network type Your IP address and mobile device identifiers, such as your device ID, advertising ID, MAC address, approximate location (country/region). Data obtained through third parties, such as your application store ID (Google Play Store, App Store)	Until you withdraw your consent or until we lose interest in achieving the processing purpose whichever happened earlier	Your consent to receive personalized ads You may withdraw your consent by changing your device settings. If you're using iOS, go to Settings > Privacy > Advertising and turn on Limit Ad Tracking. For most Androids, the option is in the Settings app under Google > Services > Ads. Other Androids may have it under Settings > Privacy > Advanced > Ads.
Better understanding your preferences, helping you navigate our website, personalizing and providing more convenient experience to you, analyzing which pages you visit, and measuring advertising and promotional effectiveness	Automatically through your use of our websites	Our website visitors: IP-address, GEO (country or town), OS type and version, browser type and version, type of device and its display resolution, traffic source for the visitor, OS and browser language, which buttons are being clicked and what pages are being opened.	2 years or until you withdraw your consent, whichever happened earlier	Your consent to store cookies in your browser You may withdraw your consent at any time by changing the settings of your web browser as set in our Cookie Policy
General complaints and requests processing	Directly from you	Persons sending us requests or complaints: name, phone number, email-address, troubleshooting and support data (content of a message)	As long as necessary in order to assist you with your queries unless, and within the terms specified by law	Our legitimate interests to assist you with your queries
Communications on potential partnerships, sending news, updates, and other information relevant to game developers	Data is submitted by data subject at the website	Representatives of game developers: • email • company name	Until data subject exercises the right to opt out	Legitimate interest to maintain communication with professionals in the industry and inform interested parties about our services. Necessity to take steps prior to entering into a contract for the further partnership.

In any case once data is no longer required for a particular purpose, it will be securely destroyed or anonymised (so the data no longer identifies you) even though the set retention period is not expired yet.

## 7. AGE GATE AND CHILDREN

We apply an age gate at first launch (and when material features change). You must provide either your date of birth or select an age band. We do not perform hard identity verification.

- Users under 13: we do not allow them to create an account or use the game; we promptly delete any personal data collected in error.
- EEA/UK teens (13–16): we restrict data uses to those strictly necessary for the service, disable personalized ads and social discovery by default, and seek consent from the user (and, where required by local law, a parent) before enabling optional features.
- For U.S. users under 13, we comply with COPPA and do not collect personal data without verifiable parental consent. If we later introduce UGC/chat, we will gate access by age and enable reporting/blocking before exposure to user content (see Section Social Features).
- All regions: we design defaults to high privacy for minors and avoid dark patterns. Parents/guardians should supervise their children's app use.

- For verifiable parental consent (VPC) we may use email-plus or card verification per COPPA guidance. We re-prompt the age gate after material feature changes (e.g., enabling chat/UGC) or when the user changes platform accounts.

## 8. SOCIAL FEATURES AND CONTACTS

You can choose to use social features such as friends, leaderboards, parties/clans, and platform friends (Apple Game Center / Google Play Games / Steam where applicable).

- Platform friends: we process your platform-level gamer ID and friend relationships as provided by the platform under its own privacy policy.
- Find friends by contacts (optional, may be introduced after MVP): only if you explicitly enable the feature and grant OS permission. Where available, we hash contact identifiers client-side and transmit only salted hashes for matching; we do not store your address book in readable form and do not contact your contacts.
- You can disconnect social accounts, revoke permissions in the OS, and manage friends/blocks in Settings or via platform tools.
- We provide in-app reporting tools, mute/block lists, automated filters, and human moderation for user-generated content where available. We may retain report metadata for 90-180 days to investigate abuse.
- We operate zero-tolerance for child sexual abuse material and serious abuse; reports may be escalated to platforms and competent authorities. Evidence for investigations may be retained beyond 180 days where legally required.

## 9. RETENTION

- Account/progression: for the life of the account and up to 24–36 months after deletion for dispute resolution and backups.
- Logs and diagnostics: 90–365 days.
- Purchase records (non-financial): up to 5 years or longer if required by accounting/tax law.
- Social data (friends/leaderboards): retained while your account is active; you can remove friends or hide your profile from leaderboards in Settings.
- Backups: deleted records roll off encrypted backups within up to 30–90 days; backups are inaccessible for routine processing.

## 10. YOUR CHOICES AND CONSENT WITHDRAWAL

- Marketing emails: use the unsubscribe link in each message.
- Push notifications: disable in the app (Settings → Notifications) or in your device OS settings.
- Analytics and personalized ads: manage in Settings → Privacy → Consent Management (in-app controls) and via your device advertising settings (limit ad personalization / reset ID).
- Account deletion and data requests: use in-app Settings → Privacy → Delete Account/Data or <https://warvargames.com/privacy/delete> or email us at [privacy@warvargames.com](mailto:privacy@warvargames.com).
- We honor browser-level Global Privacy Control (GPC) signals, where applicable, as an opt-out of “sale/sharing”. You can also manage choices in-app (Settings → Privacy) and via our web center: <https://warvargames.com/privacy/preferences>.

## 11. SHARING AND PROCESSORS (SDKS/SERVICES)

We use third-party service providers acting as processors to support hosting, analytics, diagnostics, attribution, ads mediation/networks, and messaging. The current stack at launch includes (may vary by platform/region):

- Analytics/diagnostics: Google Firebase (including Crashlytics).
- Attribution: AppsFlyer; AppMetrica (Yandex AppMetrica).
- Ads and mediation: AppLovin MAX (mediation), Unity Ads, Meta Audience Network, Google AdMob (and we may add others over time).
- Push notifications: Firebase Cloud Messaging (Android), Apple Push Notification service (iOS).
- In-app purchases: Google Play Billing / Apple In-App Purchase (IAP) — independent controllers for payments/receipts.

We may update this list as our services evolve and timestamp each update on the partner's page. We do not sell your personal data.

We maintain a live SDK/Partners list with roles and links at <https://warvargames.com/privacy/partners>.

## 12. INTERNATIONAL TRANSFERS

We operate globally and may transfer data internationally, including to countries outside your own. Where required (e.g., EEA/UK), we use appropriate safeguards such as Standard Contractual Clauses (SCCs) or UK IDTA/addendum, and implement supplementary measures. Transfers outside EEA/UK use SCCs, with encryption in transit/at rest and access controls.

## 13. ADVERTISING AND TRACKING

We do not enable third-party personalized ads without your consent where required. On iOS, we request App Tracking Transparency (ATT) only when strictly necessary and provide a clear purpose string. The game remains fully functional if you select “Ask App Not to Track”. You can change this anytime in iOS Settings. On Android, you can reset your advertising ID and limit ad personalization in device settings. Ad networks may use device identifiers to deliver ads; you can opt out via in-app controls and device settings.

## 14. YOUR RIGHTS

Depending on your jurisdiction, you may have rights to access, rectify, erase, restrict, object, portability, withdraw consent, and lodge a complaint with a supervisory authority. To exercise these rights, contact us at the privacy email above or use the in-app tools. When we rely on legitimate interests, you can object to such processing in the app (Settings → Privacy). We respond within 30 days (EEA/UK GDPR) or 45 days (California; extendable by 45 days). If we decline a request, you may appeal by replying to our decision email; unresolved issues may be raised with your supervisory authority.

## 15. CALIFORNIA PRIVACY NOTICE (CCPA/CPRA)

If you are a California resident, you have additional rights under the CCPA/CPRA, including the right to know, delete, correct, and to opt out of the “sale” or “sharing” of personal information. You can submit a “Do Not Sell or Share My Personal Information” request and deletion request at <https://warvargames.com/privacy/ccpa>. We honor Global Privacy Control (GPC) signals as an opt-out.

We do not exchange your personal information for money. However, our use of advertising identifiers and ad networks to deliver personalized ads may constitute “sharing” for cross-context behavioral advertising under the CPRA.

- Opt-out of “sale/sharing”: use device settings to limit ad personalization, toggle off personalized ads in-app (Settings → Privacy → Consent Management), or visit <https://warvargames.com/privacy/ccpa-optout>.
- Sensitive information: we do not use or disclose sensitive personal information for purposes requiring a right to limit.
- Authorized agent and appeals: you may use an authorized agent to submit a request; if we deny your request, you may appeal by replying to our decision email.

## **16. PRIVACY BY DESIGN AND MINIMIZATION**

- We avoid collecting precise geolocation and unnecessary data; where possible we use aggregated or pseudonymous identifiers.
- Defaults are set to high privacy for minors; optional features (e.g., social discovery, personalized ads) are off until you enable them.
- We apply data protection impact assessments (DPIAs) where required.
- We enforce retention limits and access controls; telemetry is scoped to product improvement and safety.
- We run DPIAs/LIAs when introducing new data categories, personalized ads, UGC features, or processing likely to result in high risk; records of processing (ROPA) are maintained and reviewed annually.

## **17. REGION AVAILABILITY**

The game is available worldwide except Mainland China. Our services are not intended for, and should not be used by, users located in Mainland China. We do not provide services there.

## **18. WEBSITES AND COOKIES**

Our websites may use cookies and similar technologies for essential functions and, with consent where required, for analytics. You can control cookies via your browser settings and any consent tools we provide. Our cookie banner presents equally prominent “Accept all” / “Reject all” options. You can revisit choices anytime via the persistent “Manage Cookies” link in the footer. We keep a consent log (date/time/preferences) for compliance. See our Cookie Policy: <https://warvargames.com/cookie-policy>.

## **19. LANGUAGE VERSION**

This Policy is provided in English, which is the sole legally binding version of the Agreement. Any translations of this Policy into other languages are provided solely for informational and convenience purposes. In the event of any inconsistency or conflict between the English version and any translated version, the English version shall prevail.

## **20. CHANGES TO THIS POLICY**

We may update this Policy from time to time. We will post the updated version with a new effective date and, where required, notify you in-app or on our website.

For material changes (for example, new data categories, new data uses, or enabling social features or personalized ads), we notify in-app and on website at least 15 days in advance and request active consent in-app (for example, via a new checkbox or consent prompt) before continuing processing where required.

## 21. CONTACT

Privacy inquiries: [privacy@warvargames.com](mailto:privacy@warvargames.com)

Address: Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, United Arab Emirates