

PRIVACY POLICY

1. GENERAL TERMS

At Snatch B.V. ("Company", "we", or "us"), we are committed to protecting the privacy of our users. We are a company registered in the Netherlands. Our registered office is at Overschiestraat 59, 1062XD Amsterdam, the Netherlands.

This privacy policy statement explains how Snatch B.V. collect, use, and disclose personal information in relation to the use of our esports tournament application "Snatch Battle" (the "App") and our website (the "Site"), and all related websites, materials, tools, and services that we provide, all of which are referred to as the "Services".

By using our Services and layering the App you agree that your information will be handled as described in this Policy. This Privacy Policy should be read in conjunction with our Terms of Use for the App and any terms applied to any of our Services. Your use of our Services, and any dispute over privacy, is subject to this Policy and our Terms of Use.

We may update this Privacy Policy from time to time. If we make material changes, we will notify our users by messages or through a notice on our Site.

2. INFORMATION WE COLLECT

We collect personal information from our users in order to provide and improve our services. The types of personal information we collect include:

A. Registration and Account Data

In order to access our App, users are required to register an Account through their phone number. During the registration process, we collect personal information including the user's username, age, and location information to verify eligibility to use our services. Additionally, we may collect payment information for processing entry fees to participate in tournaments. In order to distribute prizes, we may require users to submit additional information, including name and ID. Users also have the option to provide additional profile information such as updated usernames and preferences.

B. Optional Information

After registering with the App, users have the option to provide additional personal information through their App account settings or while using the App. This may

include time zone, avatar picture, usernames at third-party platforms such as EA Games, Sony Play Station, and XBOX.

Additionally, users can link their App account to third-party platforms such as Twitch. When linking accounts, we collect the Twitch user ID, username, profile image, profile update date, email address, and email verification status, access token, and refresh token to ensure the proper connection of third-party accounts. The refresh token allows us to request additional access tokens for continued connection to third-party platforms until the user decides to disconnect their account.

C. Usage Data

We collect various types of information from users of the App such as location, and operating system, automatically collected through cookies and other technologies. We also collect information on App activity, including tournaments played, scores, game outcomes, and rankings. Geolocation information is collected for verification purposes, ensuring compliance with applicable laws and regulations, and due diligence purposes. We collect and maintain records of customer service and other communications with users. All information collected may be used to improve our Services, enhance our understanding of user behavior, market, and make appropriate hiring decisions.

D. Streaming and Broadcast Information

As a participant in competitions or tournaments set up through the App, we collect and retain information and records of your streaming and broadcasting activities related to your gaming. By agreeing to our Terms of Use, you authorize us to use the footage of your gameplay that you broadcast on Twitch for promotional, marketing, and other purposes associated with our Services. We may retain such footage, record it, and share it (including on social media). If you do not agree to such use, you may not use our Services.

E. Analytics and Tracking Data

We may use tracking technologies and analytics to collect technical information about your use of the Services. This may include personal data such as the number of times you visit the Site, which pages you go to, traffic data, online identifiers such as cookie data, your IP and MAC address, your internet service provider, your Console ID, your device operating system and version, your device make, brand, and model, your browser type, version, and language, the App application type and version, gameplay attempts, progression and results, session client time start, end and duration, the country of your device, and identification of crashes and defects.

3. HOW WE USE YOUR INFORMATION

We collect information about you to provide our online Services under the agreed Terms of Use, to analyze and improve our Services, and to respond to your inquiries and requests. We also use your information to engage with you, prevent cheating, fraud, and illegal activity, process payments, deliver your merchandise items and prizes, serve marketing, promotions, and advertising, and conduct research, contests, surveys, and sweepstakes. We process your personal data to pursue our legitimate interests, such as ensuring fair play, acquiring new users, and understanding the success of our marketing efforts. In addition, we may share your personal data with other companies to avoid and sanction cheating. If you have any concerns about the content published on our Site or App, please contact us. We may also disclose your identity to any third party claiming that your user content violates their intellectual property rights or right to privacy. Finally, we may use your personal data to potentially conclude a contract for the provision of Services. We shall not retain, use or disclose the information we collect for any purpose other than for the specific purpose of performing the services specified in this Privacy Policy or Terms of Use.

4. COOKIES

We use cookies and similar technologies to collect information about your use of our Services. We use cookies to remember your preferences and settings, authenticate your access to our Services, analyze how our Services are used, deliver and personalize our Services, and advertise our Services.

We use both session cookies, which expire when you close your browser, and persistent cookies, which remain on your device until they expire or are deleted. We also use third-party cookies, which are cookies that are set by third-party providers of services such as advertising and analytics.

You can control the use of cookies through your browser settings. However, please note that disabling cookies may affect the functionality of our Services.

5. DISCLOSURE OF INFORMATION

As per our Privacy Policy, we may share your information, including personal information, in certain situations. These include:

- Sharing user scores, achievements, competition results, and other user activity within the App with other users, and allowing users to share a game or competition on their personal social media accounts.
- Disclosing information to service providers who perform functions on our behalf.

- Disclosing information to another entity in connection with an acquisition or merger, sale or transfer of a business unit or assets, bankruptcy proceeding, or any other similar business transfer, including during negotiations related to such transactions.
- Disclosing information to protect the safety, rights, property, or security of our Company, the Services, the App, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop the activity which we may consider to be an illegal, unethical, or legally actionable activity; to use as evidence in litigation; and to enforce this Policy or Terms of Use.
- Disclosing information to comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; in response to a subpoena, warrant, court order, or other legal processes; or as part of an investigation or request, whether formal or informal, from law enforcement or a government official.

6. YOUR RIGHTS

We take the privacy of our users very seriously, and we are committed to complying with the EU, Dutch, and UK legislation to protect the personal data of all individuals in the European Union and the United Kingdom of Great Britain and Northern Ireland (UK). This chapter outlines the measures we have put in place to ensure legislation compliance and the rights that data subjects have under the regulation.

A. Legal Basis for Processing Data

We process personal data on lawful bases. We obtain consent from users before processing their personal data. We process personal data to fulfill our contractual obligations to users. We process personal data for our legitimate interests, such as improving our Services or preventing fraud.

B. Data subjects rights

Data subjects have certain rights regarding their personal data, including:

- Right to access: Data subjects can request access to the personal data that we hold.
- Right to rectification: Data subjects can request that any inaccurate personal data we hold about them be corrected.
- Right to erasure: Data subjects can request that we delete their personal data.
- Right to restrict processing: Data subjects can request that we restrict the processing of their personal data.
- Right to data portability: Data subjects can request that we provide a copy of their personal data in a machine-readable format.

- Right to object: Data subjects can object to the processing of their personal data for certain reasons, such as direct marketing.

If we make material changes to the Services, we will notify you by messages or through a notice on our Site. We may use automated decision-making in processing your personal information for match-making services for tournaments. You can request a manual review of the accuracy of an automated decision if you are unhappy with it.

All the requests should be addressed by email at support@snatchproject.com. Please note that we may request you provide us with additional information in order to confirm your identity and ensure that you are entitled to access the relevant personal data.

7. SECURITY

We take appropriate technical and organizational measures to protect the personal data we collect from users against unauthorized or unlawful processing and against accidental loss, destruction, or damage. We use industry-standard security measures to protect personal data, such as encryption and access controls. In the event of a data breach, we will notify the relevant authorities and affected users within 72 hours of becoming aware of the breach and within 24 hours if the breach concerns credit card or payment information. We do not transfer data to third countries unless required by law.

8. RETENTION OF INFORMATION

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws and regulations. Where we have no legitimate reason to continue to hold your information, you have the right to be forgotten.

9. CONTACT US

If you have any questions or concerns about our Privacy Policy, please contact us by email at support@snatchproject.com and by mail to Snatch B.V., Overschiestraat 59, 1062XD Amsterdam, the Netherlands.