

PRIVACY POLICY

Introduction

This Privacy Policy (**Policy**) sets out the basis on which you provide us with our personal data, and the data will be processed by our contractors or us. Please read the following document carefully to understand our views and practices regarding your personal data. By practicing in the Game «Waves Ducks» <https://wavesducks.com/> (**Game**), you are accepting and consenting to practices described below.

1. IMPORTANT INFORMATION. WHO WE ARE

1.1 THE PURPOSE OF THIS PRIVACY POLICY

This Policy aims to give you information about how WX Development Ltd. (Organizer) collects and processes your personal data when you take part in the Game or when you communicate with us, including with our Support team.

Game is not intended for children (under 18 years old or the age under which they cannot participate in this Game according to the legislation of the country of residence), and we do not knowingly collect and/or process any personal data relating to children without the permission of their parents or guardians.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

WX Development Ltd., certificate of incorporation No 212764, registered address: Suite 1, Second floor, Sound&Vision House, Francis Rachel Street, Victoria, Mahe, Seychelles, is responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy policy).

1.2 CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on April 9, 2021. We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

It is essential that the personal data we hold about you is accurate and current. Please keep us

informed if your personal data changes during your relationship with us.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

2.1 Information you give us.

We receive and store information:

- you provide us directly or indirectly through Twitter when you leave a comment on the Promotional Activity's tweet. In this case, we can see your Twitter profile information;
- you give when you communicate with us by post, e-mail, or otherwise. As a result of those actions, you might supply us with such information as your display name, the username (name/pseudonym), e-mail, phone number, and other personal data as may be necessary to resolve your issue;
- you let us know to get the Prize. This information includes your Waves blockchain wallet address.

We may also receive some information from your Twitter account (e.g., your display name on Twitter, the username (name/pseudonym), date of birth, e-mail, phone number, address, information about your occupation/work, other available data, etc.).

2.2 Information we collect automatically.

As we use Twitter for the Game, Twitter may receive and store certain types of information whenever you use this application. For example, cookies, server logs and other similar technologies. For more information about Twitter's Privacy Policy and Cookie Policy, see <https://twitter.com/en/privacy>.

2.3 We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you. We will collect and process the following data about you:

3.1 Information you give us. This is information about you that you give us by leaving a comment to the Game's tweet, either by corresponding with us by post, phone, e-mail or otherwise or giving us

if you are the winner.

3.2 Automated technologies or interactions. As you interact with us via Twitter, Twitter may automatically collect data about you, your equipment, etc. For more information about Twitter's Privacy Policy and Cookie Policy see <https://twitter.com/en/privacy>.

3.3 Automated technologies or interactions. As you interact with us via Google (by filling in Google forms), Google may automatically collect data about you, your equipment, etc. For more information about Google's Privacy Policy and Cookie Policy see <https://policies.google.com/privacy?hl=en-US>

4. HOW DO WE USE YOUR PERSONAL DATA?

4.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

If you need details about the specific legal base we are relying on to process your personal data they are set out in the table below.

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide our communication at the proper level (a) The notification you about changes of the Rules or this Policy (b) Provide you with support within the Game	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation

(c) To enable you to take part in the Game and to verify your compliance with requirements set forth in the Rules	(a) Identity (b) Contact	(a) Necessary for our legitimate interests and your interests and to comply with a legal obligation
To determine the winner of the Game	(a) Identity (b) Contact	(a) Necessary for our legitimate interests and your interests and to comply with a legal obligation

4.2 Change of purpose

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via e-mail: info@wavesducks.com

If we need to use your personal data for an unrelated purpose, we will notify you, and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4 above:

- Third Parties who help us to provide the winner with the Prize;
- Third Parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other companies or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Policy.

(Hereinafter together such Third Parties referred to the Partners)

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our Partners to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. COUNTRY OF DATA PROCESS

We process your personal data in the Republic of Seychelles.

Please contact us via e-mail info@wavesducks.com if you want further information on the specific mechanism used by us when processing your personal data.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA?

We will only retain your personal data as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances, you can ask us to delete your data (*Request erasure*).

9. YOUR RIGHTS

You have rights under data protection laws in relation to your personal data. Please contact info@wavesducks.com if you wish to know more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.

- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.
- Right to receive information about the time of processing of your personal data, including the time for storage;
- Right to require notification of all persons who have previously been informed of incorrect or incomplete personal data about all exceptions, corrections or additions made in them;
- Right to appeal to the authorized body for the protection of the rights of personal data subjects or in court against illegal actions or omissions in the processing of the personal data;
- Right to protect the rights and legitimate interests, including compensation for losses and/or compensation for moral damage in court.

If you wish to exercise any of the rights set out above, please contact us via e-mail info@wavesducks.com

Please note that if you withdraw your consent, we may not be able to fulfill our obligations.

10. NO FEE

You do not have to pay a fee to access your personal data or to exercise any of the rights (see section 9).