

WARGAMING PRIVACY POLICY

Effective: 17 July 2020

Previous versions: [before 12 November 2018](#), [before 17 July 2020](#).

We are committed to protecting and respecting your privacy. This Privacy Policy (“**Policy**”) describes how we collect, process, use and share your personal information when you download and play our games and use our websites, applications and other products.

By “**Personal Data**”, we refer to data that relates to you as an identified or identifiable natural person. The term “Personal Data” may include, for example, your name, your postal address, your telephone number, your e-mail address, your age, your gender, and your game preferences. Anonymous or de-identified information, which we are not able to identify you, does not qualify as “Personal Data”.

1. CONTROLLER’S NAME AND CONTACT DETAILS

The data controller in respect of our Products (as defined below) is:

Wargaming Group Limited
105, Agion Omologiton Avenue
Nicosia 1080
Cyprus
Email: privacy@wargaming.net

In this Policy, “**Wargaming**”, “**we**”, “**us**” or “**our**” means Wargaming Group Limited and the term “**Products**” means:

(i) our PC and mobile games that post a link to this Policy and are made available through the Sites, the Wargaming Game Center and game platforms such as iOS and Android (the “**Games**”).

(ii) Our websites that post a link to this Policy, including those at:

<http://worldoftanks.eu>
<http://worldofwarplanes.eu>
<http://worldofwarships.eu>
<https://wotblitz.com>
<https://wowsblitz.com>
<http://wargaming.net>
<https://godsandglory.com>
<https://playcaliber.eu>
 (“**Sites**”).

(iii) Our console games for play on Xbox One, PlayStation®4 computer entertainment system and other gaming consoles and our associated Console Games websites, including <https://console.worldoftanks.com> and <https://wowslegends.com> (“**Console Games**”);

(iv) Our products and applications (including support applications and forums) related to the Games, including “World of Tanks Assistant”, “Wargaming Check” and “Wargaming Game Center”; and

(v) Wargaming account (“**Account**”) and any other online game, website, application and product operated by us that posts a link to this Policy.

This Policy also applies to any of our offline activities that make this Policy available to you.

2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

For questions regarding this Policy, our data practices, or our compliance with applicable laws, please contact our Data Protection Officer as follows:

Wargaming Data Protection Officer

105, Agion Omologiton Avenue

Nicosia 1080

Cyprus

Email: dpo@wargaming.net

3. CALIFORNIA AND NEVADA RESIDENTS

For California and Nevada residents, we have also prepared a supplemental privacy policy in compliance with the California Consumer Privacy Act of 2018 (“**CCPA**”) and Nevada law (NRS 603A.340). Please review our supplementary privacy policy attached below for more information.

4. GENERAL INFORMATION IN BRIEF

We process Personal Data only when necessary for the performance of a contract with you, for compliance with a legal obligation to which we are subject, or based on our legitimate interests, except where such interests are overridden by your interests or fundamental rights and freedoms for which require the protection of your Personal Data.

Our legitimate interests are to render and improve our Products in an effective, safe and harmless manner. We want to provide everyone with a fair and balanced experience when using our Products.

4.1. YOUR PREFERENCES

You can choose how we use your Personal Data using the Account Management tool. As we need to verify your identity before we follow your instructions on Personal Data use, you need to have a registered Account in order to access the Account Management tool. This means that if you are using a demo version of the Account, you will only be able to fully control our use of your data after you complete the Account.

For example, through the Account Management tool you can:

- opt-out of receiving direct marketing, offered via email, within Games and online. Read more below in Section 8.1 “Opt-Out of Direct Marketing and Right to Object”;
- access the Personal Data we collect and store about you. Read more below in Section 8.2 “Right of Access”;
- have your Account, and the related Personal Data, deleted. Read more below in Section 8.4 “Right to erasure”.

4.2. INFORMATION SECURITY

We maintain reasonable and appropriate security safeguards designed to protect your information from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the information.

4.3. PROCESSING INFORMATION BY THIRD PARTIES

We may share Personal Data with our affiliates, subsidiaries, vendors or agents working on our behalf for the purposes described in this Policy. For example, we may hire companies to assist with protecting and securing our systems or Products. Any vendor or agent that we retain must comply with our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose unless so instructed by us. Those companies may be located outside of the European Economic Area. Read more in Section 7 “How we share your information”.

4.4. CHILDREN

We recognise that we have a special obligation to protect personal information obtained from children. We do not knowingly collect Personal Data from any child, or process such information, without parental consent. For the purpose of this Policy, a child means any individual who is under the age of 18 (or the minimum legal age to consent to the collection and processing of Personal Data where this is different under applicable law). If you are a parent or guardian and believe we have collected your child's information in violation of applicable law, contact us at privacy@wargaming.net. We will remove the information in accordance with applicable law.

4.5. DATA RETENTION

We keep most of your Personal Data collected and processed for the purposes described in this Policy for as long as you continue to use our Products, e.g. you have an active Account in one of our Games. We will delete your Personal Data after you request your Account to be deleted via the Account Management and the grace period of 45 (forty-five) calendar days, during which we can restore your Account, expires. The process of erasing your Personal Data can take up to one month from expiry of the grace period and, considering the complexity and number of requests, may be extended by a further two months. Read more in Section 8.4 "Right to erasure".

4.6. GAMES NOT USING THE ACCOUNT

Some of the Games do not use the Account. You will not be able to exercise your rights with regard to those Games through the Account Management tool. For this reason, we are offering you other tools to export your Personal Data, delete them, and object to our use of your Personal Data in accordance with Section 8 "Your rights", as well as to manage your subscriptions.

Also, there are some differences in the Personal Data that we collect about users of the Games for which the Account is created and users of other Games.

With regard to the Games that do not use the Account, you can exercise your rights by contacting directly our Player Support or as otherwise indicated in the respective Game.

Where such function is available, you may link to your Account some of the Games that do not use the Account. Please note that control over your Personal Data in such Games is separate from control over your Personal Data relating to your Account. For example, to delete your Personal Data in "World of Warships Blitz" you will need to contact Player Support as suggested in this Game, while deletion of the Personal Data relating to your Account shall be performed through the Account Management tool.

5. INFORMATION WE COLLECT

In relation to your use of our Products, we collect information either directly from you (when you provide information to us) or indirectly (e.g. through our Products technologies).

5.1. INFORMATION WE COLLECT DIRECTLY

We collect Personal Data and other information that you provide to us.

Account Data

When setting up an Account, you may be asked to provide Personal Data including, but not limited to, your in-game name, in-game password and email address. Once you set up your Account, you have the opportunity via the Account Management settings to specify your date of birth for receiving gifts at your birthday as well as to link your Account with your telephone number as a second authentication factor tool or to receive marketing communication via SMS. You can also use your credentials from other services such as Google, Facebook or Twitch to create an account faster with us. In such case we may collect additional information as per section 5.3 below. We also generate a unique number / identifier which we call "Wargaming ID" in connection with your Account and your use of our Products can be identified via Wargaming ID.

Content Data

We may obtain your Personal Data when you register for and use our other Products, e.g. game forums, chats, or when you provide feedback about our Products. These data include:

- Information that you post, comment, share content or like in any of the Games-related forums owned or operated by Wargaming (“Forums”), on the pages of social network groups operated by Wargaming, and on the Sites;
- Information sent through the “game-chat” functionality in the Games, including through in-Game voice chat;
- Information you provide when you request information or support from us or purchase a product or service from us, including information necessary to process your orders with the relevant payment merchant, which may include the amount of any transaction, but will not include your financial information, which will only be submitted directly to the payment merchant under secure protocols;
- Information other than the Account Data you provide to us when participating in competitions, contests, tournaments, loyalty programs, at offline events, responding to surveys, e.g. your contact details;
- Information that you provide to us to become or as a participant of alpha-tests, super tests, and UX tests.

Personal Contacts Data

To fulfil a request by you, we collect data about your personal contacts, such as their name, nickname, email address, and phone number with your consent, such as finding your contacts on our Products or inviting your contacts to join our Products via our referral programs etc. By using such functionalities, you acknowledge and agree that you have your contact’s consent for us to use their contact information to fulfil your request.

Other data provided by you voluntarily

You may choose to voluntarily provide other information to us that we do not request, and, in such instances, you are solely responsible for such information.

5.2. INFORMATION WE COLLECT INDIRECTLY

We indirectly collect a variety of information through your interaction with and use of our Games, Sites and other Products.

This information may include, but is not limited to, anonymized browser and device information (both software and hardware), data collected through automated electronic interactions, application usage data, demographic information, geographic, geo-location information, statistical and aggregated information (“**Other Information**”). Statistical or aggregated information does not directly identify a specific person, but it may be derived from Personal Data. For example, we may aggregate Personal Data to calculate the percentage of users in a particular country. If Other Information is combined with Personal Data, we will treat the combined information as Personal Data.

5.2.1. Tracking Data and Cookies

We and our partners, such as marketing partners and analytics providers, use “**Cookies**”, which are text files placed on your computer, to help us analyse how users use our Products, and similar technologies (e.g. web beacons, pixels, ad tags and device identifiers) to recognise you and/or your device(s) on, off and across different devices and our Products, as well as to improve the Products we are offering, to improve marketing, analytics or website functionality. The use of Cookies is standard on the internet. You may adjust your browser settings to prevent the reception of cookies, or to provide notification whenever a cookie is sent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to access the full functionality of our Sites.

Website traffic volume and patterns, such as the number of visitors to a given website or page on a daily basis is typically referred to as “**Tracking Data**”. This type of indirectly collected information is gathered through various means, such as an IP address, which is a number that is automatically assigned to your computer whenever you are surfing the web. Web servers, the computers that “serve up” web pages,

automatically identify your computer by its IP address. When you visit any of our Sites, our servers log your computer's IP address.

For more information about the names of the cookies used on our Sites, the cookie provider (Wargaming, third-party analytics partner, or third-party advertising partner), the purpose of the cookie (necessary for website to function, performance, or marketing), and the cookie life cycle please see <http://legal.eu.wargaming.net/en/cookies/>.

5.2.1.1. How to delete cookies and opt out of targeted advertising and analytics

Like most online services, we and our partners use cookies and similar technologies to provide and personalize the Service, analyse use, target advertisements and prevent fraud. You can disable cookies in your browser settings, but some parts of the Service may then not function properly.

If you wish to limit behaviourally targeted advertising, you can do so by limiting ad tracking in your device settings. Please note that opt-outs are specific to each browser and device and it may take a little bit of time before your opt-out choice will take effect.

For mobile advertising in apps, you can reset your Advertising Identifier and depending on your device, select to opt out of interest-based ads (Android) or turn on the Limit Ad Tracking setting (iOS).

For display advertising on the Web, you can also adjust your browser settings to limit certain tracking by means of cookies (e.g. for Chrome <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>), and by visiting the following sites: <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu>.

We also work with a number of other analytics and ad serving partners within our mobile apps and websites. These partners can use cookies, web beacons, and other tracking technologies to collect or receive data about you and might claim controller rights over your personal data. For more information about their privacy practices and opt-out possibilities, please visit the links below.

Google

Privacy Policy: <https://policies.google.com/privacy>

Facebook

Privacy Policy: <https://www.facebook.com/about/privacy>

Unity Technologies

Privacy Policy: <https://unity3d.com/legal/privacy-policy>

Do Not Track: Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track” visit <http://www.allaboutdnt.com>.

5.2.2. Game-Related Information

In order to provide you with efficient services, we need to collect, store and use various information about your use of our Games. “**Game-Related Information**” are stored under your Wargaming ID as provided in the Account Data in section 5.1 above as well as what is usually referred to as “game statistics”. By “game statistics” we mean information about your Games preferences, progress in the Games, participation, performance and achievements in clans and battles, frequency of playing, etc.

5.2.3. Device Information and Geo-Location

In order to fix crashes and other technical issues that may arise while you are installing the Games and using our Products, as well as to make our Products more suitable for you, we collect, store and use information about the device you are using the Products on, including what type of device it is, what

hardware and operating system you are using, the device settings, unique device identifiers, and crash data (if any). Whether we collect some or all of this information often depends on what type of device you are using and its settings. You may also install applications collecting and using additional data required for fixing crashes, errors and other technical issues arising during your use of the Products, e.g., Wargaming Game Center and Wargaming Check.

To make our Products more suitable for you and only upon your permission we can also collect your precise GPS location from mobile devices. Wi-Fi and IP addresses received from your browser or device may be used to determine approximate location.

5.2.4. Information required for fraud and violations detection

We may also collect certain data (like IP address, username, etc.) that is required for our detection, investigation and prevention of cheating in the Game and EULA violations. This data, being used only for the purposes of detection, investigation and prevention of frauds and cheating in the Game are deleted six months after their collection, unless the data can be used to prove that cheating has occurred. If the data can be used to prove that cheating or another fraud or EULA violation has occurred, we will further store the data for the establishment, exercise or defence of legal claims during the applicable statute of limitations. Please note that the specific data stored for this purpose may not be disclosed to you or any third parties, since the disclosure will compromise the mechanism through which we detect, investigate and prevent frauds and cheating in the Game, as well as other EULA violations.

5.2.5. Information from publicly available online resources

We may use the information made publicly available, e.g. through YouTube, Facebook, Instagram and Twitter, in order to find out your opinion about Games and Products, so that we could take them into account while improving our Products. Such data collection can be carried out by Wargaming independently, or received from our partners making analysis of public sentiments on various issues.

5.2.6. Information from our partners

In some cases, Wargaming receives your personal data as a data processor, which means that the data are controlled by our partners and we use them only in accordance with their instructions and applicable laws. We use this data in order to fulfil our obligation under the EULA, improve the Products, and when processing is required in order to comply with a legal obligation to which we are subject.

Payment partners. When you purchase in-game items, in-game currency, or time-limited premium memberships with your credit card, we may receive from our payment partners and process a part of your credit card number, information about your credit card issuer, as well as your full address for billing purposes;

Co-Promotion Partners. In order to provide you with in-game items and/or in-game currency for participation in various loyalty programs, we may also receive information from our partners, such as telecommunication companies, banks, cashback partners, travel agencies, and others;

Platforms. We also receive and use your identifiers and other information on other platforms like PlayStation®4 computer entertainment system, Xbox One, App Store, Google Play Store, Steam, so that you can play our Games through these platforms;

Social networks. We have registered certain Games-related group accounts and pages at Facebook, YouTube, Instagram, Discord, Twitter, Reddit, and other social networks to better communicate with our players in case they have questions about our Products, as well as prefer to learn about news about our Products through the social networks. Also, we get information relating to your account on social networking sites in order to allow you to integrate or link your social network account with your Account or our Products. For example, you may link your Account via your YouTube account credentials. In such case, we will collect from YouTube your channel ID to link your social network account with your Account. If you are a content creator, we may access your channel subscribers/members to find

our players' accounts to provide them with some in-game customization or goods. Any personal data collected from such sources will be stored in accordance with this policy.

We also automatically collect information via our Games application technologies that are not browser-based like cookies and cannot be controlled by browser settings or cannot be controlled via the Account Management tool or while you play our Games. For example, our Games applications may include SDKs, which is code that sends information about your use to a server, for instance through the Facebook SDK or other partner's SDKs. These SDKs allows us to track our conversions, bring you advertising, and provide you with additional functionality, such as the ability to connect our Products with other services.

5.3. INFORMATION FROM OTHER SOURCES

The categories of sources from which we collect information include:

5.3.1. Game platforms: We collect data (such as the relevant user identifier, email, nickname), from partners that make our Games available on their platforms, such as Valve (Steam), Apple (iOS), and Google (Android). Our partners, and not us, are responsible for your accounts on their platforms, and we recommend that you review their privacy policies. When you play our Console Games, we collect data from the gaming platforms on which you play the Console Games, such as Microsoft (Xbox) and Sony (PlayStation). Such gaming platforms are responsible for your accounts on their platforms, and we recommend you review their privacy policies.

5.3.2. Developers who use our API: We collect data from developers who use the Wargaming API. Use of API is subject to our API Terms of Use .

5.3.3. Verification partners: We collect data from verification services such as ID.me to confirm your eligibility for discounts (e.g., related to your military status).

6. HOW WE USE YOUR INFORMATION

We need to process your Personal Data in order to perform the contract with you. As a user, we will use your Personal Data, unless otherwise prohibited by law, for the following purposes:

- to provide you with the Products you request, i.e., to allow your installation of the Games, operate the Products and verify and confirm your payments;
- to communicate with you about your Account or transactions with us and send you information about features on our Sites or changes to our policies;
- to provide support including, but not limited to, product updates, product patches and fixes and other similar communications;
- to arrange your travel, receipt of gifts and awards, to which you may be entitled as a result of winning an offline competition, etc.

6.1. COMMUNICATION PURPOSES

We will use your Personal Data for our legitimate interests to advertise our Products in accordance with this Policy. Namely, once you have created an Account we may use your email address, nickname, IP address, mobile phone number, in order to send you personalized marketing emails, messages, targeted in-game and web offers about Games. Also, if you opt-in, we will send you personalized marketing emails, messages and in-game and web offers about Wargaming offline events, co-projects of Wargaming and its partners, as well as about Wargaming games, not using Wargaming ID.

6.2. IN-GAME OFFERS

We will also use the Game-Related Information to send you in-game offers that we believe are most useful to you. To make the offer we first collect Game-Related Information from various players, identify patterns in their behaviour, and create algorithms that identify pools of players following the pattern or particular players who follow the pattern. To those players who actually follow the pattern – we send

the in-game offers, which can be personalized (i.e., we want the in-game offer to reach you or a relatively small number of players specifically) or non-personalized (i.e., we want the in-game offer to reach a large number of players following a pattern). We always make sure that such offers have no significant impact on you or our other players. For example, we may notice that you are a player who is very good at playing with French vehicles and has registered the account more than five years ago: so, we may specifically offer you the new French vehicle for rent, but in any case not more expensively than it is offered to other users. You can unsubscribe from personalized in-Game offers through our Account Management tool.

6.3. PRODUCTS IMPROVEMENT PURPOSES

We analyse your information to identify how to improve the Products and our operations to make them more suitable and interesting for our players in general. We also may ask you to respond to our Products-related surveys or questionnaires, and you always have the choice about whether to respond to them and which information you provide.

6.4. FRAUD AND EULA VIOLATIONS DETECTION

We use the information required for our detection, investigation and prevention of cheating in the Game and violations of EULA and Game Rules and policies only for the purposes of detection, investigation and prevention. If the data can be used to prove that cheating or another fraud or EULA violation has occurred, we will further store the data for the establishment, exercise or defence of legal claims during the applicable statute of limitations.

6.5. AUDIENCE MATCHING SERVICES

We will also use your information for audience matching services to reach people (or people similar to people) who have used or visited our Products or are identified in one or more of our databases ("Matched Ads"). This is done by us sharing a list of hashed emails. For instance, we use Facebook Custom Audiences to serve ads to our players on Facebook and Facebook Lookalike Audiences to serve ads to users on Facebook similar to our players.

Vendors and ad partners may act as our processors or in certain contexts, they may act as data controllers and independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use. To opt-out of us sharing your hashed email address for Matched Ads please contact us at privacy@wargaming.net and specify that you wish to opt out of Matched Ads. We will remove your email address from any subsequent lists shared with ad partners for purposes of Matched Ads.

7. HOW WE SHARE YOUR INFORMATION

For the performance of a contract with you, compliance with a legal obligation to which we are subject, and based on our legitimate interests, we may share your personal data with the following categories of third parties:

1. **Payment partners:** we share your email address, IP address, information about in-game purchases requested by you at Wargaming's web-sites, and other information you provide to us for the purpose of fulfilling your purchase and withdrawal requests;
2. **Advertising and advertising measurement partners:** we share your email, nickname, IP address and other information you provide to us in order to facilitate targeting, delivery, and measurement of online advertising on third-party services, facilitate transmittal of information that may be useful, relevant, or of interest to you, e.g.. allowing you to get rewards for viewing in-Games advertisements. These parties may act as our processors, or in certain contexts, independently decide how to process your information;
3. **Data storage partners:** we store some of your information using third-party data storage services owned or operated by other entities, e.g., while some of your Game-related information is stored

using Google Cloud Platform (BigQuery), as well the services of Amazon Web Services, Inc., G-Core Labs S.A.;

4. **Software providers:** proper Products rendering requires us to use software solutions of third parties, e.g., for our in-Game questionnaires, including storage of your replies, we use the software of Widgix, LLC dba Survey Gizmo, to provide you with easy access to your game statistics we use software of Mixpanel, Inc.;
5. **Research partners:** we may provide access to some of your data, such as your Game statistics, to provide marketing-related and other research. We share anonymous data with our partners unless your personal data is necessary for the requested services or research;
6. **Player Support partners:** for some territories and products we engage third parties to provide you with appropriate player support services. Such companies may get access to your personal data, including personal data that you may provide in your player support requests.;
7. **Developers of applications based on the Game:** we make your nickname and some of your Game statistics available to other players and our partners through Public API. The data can be used for developing and support of the applications created by the Game community, mobile applications, e.g. World of Tanks Assistant, authorized mods to the Games. Public API enables us to improve your gaming experience, fulfil potential of our games' community, and put use of our players' statistics under our control by creating rules and requirements for their use by other players and community. Use of your information is subject to the restrictions set out in our API Terms of Use;
8. **Information available to other players:** making your nickname and game statistics available to other players through our Products is an important part of making players' experience more enjoyable. If you are banned in a Game based on other players' complaints, we may inform them about the ban. Please note that members of your clan have access to a bigger amount of your game statistics than others;
9. **Public information:** our Products may also have message boards, forums and/or chat areas, where users can exchange ideas and communicate with each other. When posting a message to a board, forum or chat area, please be aware that the information is being made publicly available on-line; therefore, you are doing so at your own risk and you are solely responsible for any information you make public. Your nickname and game statistics may also become available within Games replays and other videos, which Wargaming or other players may generate and put online. Please do not include into your nickname any data that can identify you personally. To change your nickname please contact Player Support;
10. **External moderators and testers:** some information about you (such as your IP address, nickname, content of Player Support ticket) may become available to volunteering moderators and testers who contribute to providing you with better Products, e.g. to quickly respond to your questions about the Games. We ensure that use of your information by moderators and testers in this context is subject to confidentiality and data protection agreement.
11. **Anti-cheat and anti-fraud companies:** we may share the information required for our detection, investigation and prevention of cheating in the Games and EULA violations only for the purposes of detection, investigation and prevention of cheating in the Game. Such partners include ACI Worldwide (EMEA) Ltd., UK. Easy Anti-Cheat software provided by Epic Inc., US;
12. **Logistics partners:** to arrange your trips (e.g., as an eSports player) and deliver the prizes you may be entitled to thanks to use of your Products, we can share your post address and other required details with our logistics partners or ask you to share that data with our logistics partners directly;
13. **Third-party websites:** you can choose to log into some websites using Wargaming OpenID. In this case we pass to the websites your nickname and your profile link. Please check our Player Support articles on OpenID for more details and note that Wargaming does not control further use of this data by third-party websites, i.e., we cannot request their erasure of your data;
14. **Game Developers and Change of Publisher:** Wargaming is the data controller with regard to certain Games developed by third parties and published by Wargaming. Such developers can process certain data required for the Games' and other Products' further improvement, e.g., to Game-Related Information. Should Wargaming transfer the right to publish such or other Games and other related

Products to a third party, the new publisher will have the right to continue using your data in the manner substantially the same as set out in this Privacy Policy unless you are specifically informed otherwise.

15. **Public authorities and auditors:** some personal data shall be disclosed to public authorities, e.g., tax and customs authorities, auditors, and other competent parties, in accordance with the laws of each local jurisdiction where we operate;
16. **Wargaming subsidiaries and affiliates:** as a global company, we share information with our affiliates and related entities which they act as our processors. This information may be processed in our offices worldwide. Your information may also be processed outside of the jurisdiction in which it was collected (e.g. in the United States, Korea, Russian Federation, the Republic of Belarus, or any other country in which we, our affiliates or subsidiaries maintain a presence).
17. **Change of control:** we may share your information as part of, or during the negotiation/preparation of, our company's sale, merger, change in control, or any other type of acquisition or business combination of all or any portion of our assets, or transfer of all or a portion of our business to another business. In addition, should we transfer the right to publish any Games or other related Products to another entity, the new publisher will have the right to continue using your information in the manner substantially the same as set out in this Policy unless you specifically informed otherwise.
18. **Third-party game developers:** We also publish on our platform (Wargaming Game Center) games developed solely by third party developers. When you choose to play such games, we may share your data with the third-party game developer, such as your Wargaming ID, nickname, in-game purchases, in-game bans of our Games, language preference of Wargaming Game Center. In such case we and the third-party game developer act as independent data controllers. Such third-parties are responsible for your activities on their platforms and we recommend you review their privacy policies.
19. **Security and compelled disclosure:** We share information to comply with the law or other legal process (e.g., tax and customs authorities, auditors, and where required, in response to lawful requests by public authorities, including to meet security or law enforcement requirements). We also share information to protect the rights, property, life health, security and safety of us, the Products, or anyone else;
20. **Competitions:** Our competitions, contests, and tournaments ("**Competitions**") may be jointly sponsored or offered by other parties. When you voluntarily enter a Competition, we share information as set out in the official rules that govern the Competition as well as for administrative purposes and as required by law (e.g., on a winners list). By entering a Competition, and may, except where prohibited by applicable law, allow the sponsor and/or other entities to use your name, voice and/or likeness in advertising or marketing materials.

When your personal data is shared with Wargaming affiliates and subsidiaries, as well as third parties outside the European Union or the European Economic Area, Wargaming guarantees an adequate level of personal data protection, including but not limited to, by entering into standard data protection clauses adopted by the European Commission with Wargaming affiliates and subsidiaries, as well as such third parties. We will provide you with a copy of the standard data protection clauses upon your request.

Sharing anonymous information. We also may share anonymous information, i.e. information which does not directly or indirectly disclose your identity, and aggregated information (meaning information about groups and categories of users, including game statistics and behaviour, but which does not identify and that cannot reasonably be used to identify any individual user) with our advertising partners. We may also allow our advertisers to collect anonymous information and aggregated information within the Products and they may then share that information with us. Our advertisers may collect this information through the use of tracking technologies like cookies and web beacons. This enables our advertisers to develop and deliver targeted advertising in the Products and on the websites of third parties, so that they can try to serve you with advertisements for products and services that are

most likely to be of interest to you. Advertisers will also use this information to monitor, improve or modify their operations.

8. YOUR RIGHTS

To allow you to exercise your data protection rights in a simple way we have improved the Account Management tools available [here](#) and – for Console Games – [here](#). If you are using a demo account, you will only be able to fully control our use of your data after you create the Account [here](#) or – for Console Games – [here](#). This means that if you are using a demo version of the Account, you will only be able to fully control our use of your data after you complete the Account here. Please visit it to make choices about which direct communications you would like to receive, as well as to exercise your rights to data access, data erasure and objection to data processing. In some cases, for games developed solely by third parties and published by Wargaming on Wargaming Game Center (see section 7(18) above), you can exercise your rights directly from the third-party developer. You may contact us to assist you on how you can exercise your rights for games developed solely by third parties.

If you have linked your Account with linked services (e.g., Google, Microsoft, Facebook, Steam, Twitch etc) you may unlink your accounts at any time through the Account Management settings. Please note that unlinking your accounts will not affect any information previously shared through linking. We are not responsible for the data practices of any other parties, and we recommend that you carefully review their privacy policies and terms of use.

8.1. OPT-OUT OF DIRECT MARKETING AND RIGHT TO OBJECT

You can manage your subscriptions to direct marketing through our Account Management tool. Please note that even if you unsubscribe from all our personalized marketing emails, messages, in-game and web- offers, we will still send you some notifications (we often refer to them as “transactional”), e.g. to confirm purchases or changes in your Account, give warranty or security information, information about changes to the EULA, Terms of Service and Privacy Policy, as well as will show to you non-personalized marketing in-game and web offers. We will be able to stop all communications only after your Account is deleted. Also, even after you have unsubscribed from our in-game and web offers, you may still see them within the Games and on some web-sites: that would mean that such offers are shown to everyone or to a very broad audience and are not specifically directed to you.

You can opt-out of personalized advertising in mobile applications, including our mobile Games, by checking the privacy settings of your Android or iOS device and selecting “limit ad tracking” (Apple iOS) or “opt-out of interest-based ads” (Android). You can adjust your mobile push notifications in your Android or iOS device settings menu.

Where processing of your Personal Data is based on legitimate interests, you can use your right to object at any time. If you object we will no longer process your Personal Data unless there are compelling and prevailing legitimate grounds for the processing or the data are necessary for the establishment, exercise or defense of legal claims.

8.2. RIGHT OF ACCESS

You have the right to access your Personal Data that we hold about you, i.e. the right to require free of charge (i) information whether your Personal Data is retained, (ii) access to and/or (iii) duplicates of the Personal Data retained. You can use the right to access to your Personal Data through the “Data Export” tool available in the Account Management tools [here](#) and – for Console Games – [here](#). Normally, we provide the duplicate of the Personal Data retained within 30 (thirty) days upon your request. Once the archive with the Personal Data we retain is ready, you will be able to download it from our resources. If the request affects the rights and freedoms of others or is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee (taking into account the administrative costs of providing the information or communication or taking the action requested) or refuse to act on the request. We also will not be able to provide you with some Personal Data that you may post or provide using our Products regardless of our request not to provide the Personal Data in this particular field, website, etc.

8.3. RIGHT TO RECTIFICATION

You control which nickname, email, phone number, country (only in exceptional circumstances), social networks accounts, trusted sites and payment methods we associate with your Account. If they change, please modify the data in the Personal Account directly. Please inform us if any of the Personal Data we retain about you is inaccurate.

8.4. RIGHT TO ERASURE

You have the right to obtain deletion by us of Personal Data concerning you by deleting your Account via our “Account Deletion” tool available in the Account Management tools [here](#) and – for Console Games – [here](#).

As a result of deleting your Account, you will lose access to most Products, including the Account and Game-Related Information linked to the Account, subscriptions to Wargaming forums and the possibility to access other services you are using the Account for.

Grace period. We allow you to restore your Account during a grace period of 45 (forty-five) days from the moment you request deletion of your Account. This functionality allows you not to lose various Game-Related Information and other important information and options by mistake. During the suspension period, we will be able to finalise financial and other activities that you may have initiated before sending the Account deletion request.

No payments after Account deletion. As a result of deleting your Account, you will lose the possibility to make payments in the Premium Shop, including during the grace period. Should any payment be made after Account deletion due to a technical error or for any other reason, we will refund the amount paid by you and will not grant you the rights to the respective Additional Features.

Complicated Account deletion. In some cases, deletion of your Account, and therefore Personal Data deletion, is complicated. Namely, if you are a clan commander in the Games, it is highly likely that you will only be able to delete your Account after you have transferred the clan and placed it under the command of another user or dissolve the clan. In some cases, considering the complexity and number of the requests, the period for Personal Data erasure may be extended, but for no longer than two further months.

Earlier Personal Data deletion. We store most Personal Data we retain about you until you request deletion of your Account through the Account Management tools. However, certain Personal Data is deleted even while you have a valid Account. For example, we will delete:

- your Contact Data, clothes sizes, colour preferences, etc., you have provided for customisation, or for us to send you an award or arrange travel to one of our events, within 45 (forty-five) days after us sending the award to your address;
- the data about you that we have collected in the course of alpha-tests, super tests, UX tests, surveys, analysis of publicly available sentiments in social networks such as YouTube, Facebook, Instagram, at onsite events: within no longer than 45 (forty-five) days after completion of the data analysis, data aggregation and generating of the reports for our Products improvement;
- technical logs such as records of communication between Products, access logs, errors logs: normally within 45 (forty-five) days after their creation.

Information we retain. Upon expiry of the suspension period we will delete all your Personal Data, except for the data which are required for our compliance with the requirements of applicable laws (e.g. tax and accounting requirements) or for our detection, investigation and prevention of cheating in the Game and EULA violations or to resolve disputes and enforce our agreements. We will also retain anonymous or de-identified information after your Account has been deleted. Information you have shared with others (e.g. through in-Games chats, updates or group posts) will remain visible after you

have deleted your account or deleted the information from your own profile or mailbox, and we do not control the data that other members/users copied out of our Products. Groups content associated with deleted accounts will show an unknown user as the source. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache.

COMPLAINTS

If you have any issues with our compliance you may contact our Data Protection Officer as set out in section 2 above. You also have the right to lodge a complaint with the data protection regulator in your jurisdiction.

10. WE CAN CHANGE THIS POLICY

We may change this Policy from time to time for various reasons, such as legal and regulatory changes, changes in industry practices and technological developments that need to be reflected. If the changes are material, we may provide you additional notice to your email address.

ADDITIONAL DISCLOSURES FOR CALIFORNIA AND NEVADA RESIDENTS

These additional disclosures apply only to California and Nevada residents. For questions regarding this Policy, our data practices, or our compliance with applicable laws, please contact us as follows:

United States

Address: 500 108th Ave NE, Suite 2350, Bellevue WA 98004-5582

Email: privacy@wargaming.net

This Policy has been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at privacy@wargaming.net.

11. CALIFORNIA RESIDENTS

The California Consumer Privacy Act of 2018 (“CCPA”) provides additional rights to know, delete and opt-out, and requires businesses collecting or disclosing personal information to provide notices and means to exercise rights.

11.1. NOTICE OF COLLECTION

In the past 12 months, we have collected the following categories of personal information enumerated in the CCPA:

- **Identifiers**, including name, postal address, email address, and online identifiers (such as IP address).
- **Customer records**, including phone number, billing address, and credit or debit card information (as per section 5.2.6 above).
- **Commercial or transactions information**, including records of products or services purchased, obtained, or considered.
- **Internet activity**, including browsing history, and interactions with a website, email, application, or advertisement.
- **Geolocation data**.
- **Inferences drawn** from the above information about your predicted characteristics and preferences.

For further details on information we collect, including the sources from which we may have collected personal information in the past 12 months, review the “Information We Collect” section above. We collect and use these categories of personal information for the business purposes described in the “How We Use Your Information” section above, including to manage our Products.

We do not generally sell information as the term “sell” is traditionally understood. To the extent “sale” under the CCPA is interpreted to include the activities set out in this Policy, such as those disclosed in section 5.2.1 above we will comply with applicable law as to such activity. We disclose the following

categories of personal information for commercial purposes: identifiers, customer records, commercial or transactions information, internet activity, geolocation data, and inferences drawn. Please review the “How We Share Your Information” section above for further details about the categories of parties with whom we may have shared personal information in the past 12 months.

11.2. RIGHT TO KNOW AND DELETE

You have the right to know certain details about our data practices in the past 12 months. In particular, you may request the following from us:

- The categories of personal information we have collected about you;
- The categories of sources from which the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold;
- The categories of third parties to whom the personal information was disclosed for a business purpose or sold;
- The business or commercial purpose for collecting or selling the personal information; and
- The specific pieces of personal information we have collected about you.

In addition, you have the right to delete the personal information we have collected from you.

To exercise any of these rights, visit your Account Management tool. Alternatively, you can do so by submitting a request via email at privacy@wargaming.net. In the request, please specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete. For more information, please refer to section 8 above.

For games developed by another developer and published by Wargaming on the Wargaming Game Center, you should exercise your rights directly with the other developer. If personal information about you has been processed by us as a service provider on behalf of the developer and you contact us to assist you on exercising your rights, please provide the name of the developer on whose behalf we processed your information. We will refer your request to that developer and will support them to the extent required by applicable law in responding to your request.

11.3. RIGHT TO OPT-OUT

To the extent Wargaming sells your personal information as the term “sell” is defined under the CCPA, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out by clicking [Do Not Sell My Personal Information](#).

11.4. AUTHORIZED AGENT

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verify your identity directly.

11.5. RIGHT TO NON-DISCRIMINATION

You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

11.6. FINANCIAL INCENTIVES

The CCPA allows businesses to offer consumers financial incentives for sharing personal information. For example, a business can offer a reward program or provide other benefits or offerings to consumers as compensation for the personal information. Where we offer these programs, your participation is optional. If you choose to participate, your participation will be subject to any applicable terms.

11.7. SHINE THE LIGHT

Customers who are residents of California may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out above and specify that you are making a "California Shine the Light Request." We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

11.8. MINORS

If you are a California resident under 18 years old and registered to use the Products, you can ask us to remove any content or information you have posted on the Products. To make a request, email us at privacy@wargaming.net with "California Under 18 Content Removal Request" in the subject line, and tell us what you want removed. We will make reasonable good faith efforts to remove the post from prospective public view, although we cannot ensure the complete or comprehensive removal of the content and may retain the content as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

12. NEVADA RESIDENTS

Nevada law (NRS 603A.340) requires each business to establish a designated request address where Nevada consumers may submit requests directing the business not to sell certain kinds of personal information that the business has collected or will collect about the consumer. A sale under Nevada law is the exchange of personal information for monetary consideration by the business to a third party for the third party to license or sell the personal information to other third parties. If you are a Nevada consumer and wish to submit a request relating to our compliance with Nevada law, please contact us at privacy@wargaming.net.