

This privacy policy will explain what information we collect online, why we collect it, and the choices we offer to you.

This privacy policy (“Policy”) describes the data practices of Shallot Games, LLC and its subsidiaries (collectively, the “we”, or “Company”), covering its services under its control, including this website, any products, mobile applications, console or PC applications (collectively “Services”). This includes, but is not limited to, Putthole, Vista Golf, and Vista Golf Rivals. By using the Services, you are consenting to this Policy and the processing of your data in the manner provided in this Policy. If you do not agree with these terms, please do not use the Services.

### **Information we collect**

We may collect information about the Services you use and how you use them, such as the selections you make on our Services. We collect PII, DII, and log information about your interactions as described below.

Personally identifiable information (PII) is information that can be used to identify or contact you online or offline, such as your name, address, email, phone number, photos or audio data, username, and payment information. The Service may collect PII when it is provided to us, such as when you use our Services, attempt to contact us, submit a resume or job application, or connect with us on social media or one of our partners. For example, you may see a “Log in with…” button, which means we request PII from a partner to streamline the login process. You will likely be presented with a “request for permission” screen by a third party asking to share your ID, profile picture, and other listed information with us. We also may have PII in user-submitted data, like chats and emails.

We may also create or collect device-identifiable information (DII), such as cookies, unique device and advertising identifiers, usernames, and similar identifiers that are linkable to a browser or device. From these platforms, we may also receive other information, such as your IP address, user agent, timestamps, precise and imprecise geolocation, sensor data, apps, fonts, battery life information, and screen size.

Our Services also collect information about your interactions, including navigation paths, search queries, crashes, timestamps, purchases, clicks and shares, and referral URLs. We may combine this data with PII and DII. For efficiency’s sake, information about your interactions may be transmitted to our servers while you are not using the app. We may also partner with third parties that collect additional information – please see their privacy policies for more details and see below for your choices regarding these parties.

### **How we use information we collect**

We use the information we collect from our Services to provide, maintain, protect and improve our Services, to develop new Services and offerings, and to protect us and our users.

PII is used primarily for business purposes, such as for sending you occasional newsletters and updates, hiring, responding to inquiries, logins, and providing Services. When you contact us, we may keep a record of your communication as well as the other information to help solve any issues you might be facing. We may use your email address to inform you about our Services, such as letting you know about changes or improvements. Please keep in mind that comments

sections, forums, and other similar areas of our Services are public. Any information posted in those areas is viewable and usable by anyone that has access.

We use PII and DII for our products and related services, such as the data necessary to make the game function, to monitor usage of the game to debug and improve our services, to provide users with targeted ads, and additional features, such as connecting users to eSports platforms.

We share PII with companies, outside organizations, and individuals for limited reasons, outlined below:

- A. **With your consent** - We will share PII with companies, outside organizations or individuals if we have your consent to do so.
- B. **For external processing** - We provide PII to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- C. **For legal reasons** - We will share PII with companies, outside organizations or individuals if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, legal process or enforceable governmental request, detect, prevent, or otherwise address fraud, security or technical issues or protect against harm to the rights, property or safety of our users or the public as required or permitted by law.
- D. **In case of a sale or asset transfer** - If we become involved in a merger, acquisition or other transaction involving the sale of some or all of our assets, user information, including PII collected from you through your use of our Services, could be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you, either through email and/or a prominent notice on the Services.
- E. **In aggregated form for business purposes** - We may share aggregated information and DII with our partners such as businesses we have a relationship with, advertisers or connected sites. For example, we may share information to show trends about the general use of our services.

We use DII to operate our Services and manage user sessions, including analyzing usage of our Services, preventing malicious behavioral and fraud, improving the content, to link your identity across devices and browsers in order to provide you with a more seamless experience online, and helping third parties provide relevant advertising and related metrics. We share DII with third parties primarily for advertising and analytics purposes, for external processing, and for security purposes.

### **Third Parties**

While we strive to work with reputable companies with good privacy practices, this Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you on the Services. We also do not control the privacy policies and your privacy settings on third-party sites, including social networks. We may use third parties to help offer you more tailored ads and better Services, such as obtaining analytics about the users of our site and to help tailor advertising to your preferences. For further information, please see the relevant privacy policies for each third party and industry codes of conduct.

## Legal Bases for Processing

The data we process may qualify for multiple legal bases for processing under Article 6 of the General Data Protection Regulation (and similar laws that specify legal bases for processing). Below are our primary legal bases for each type of data for users covered under such laws:

We obtain consent or rely on a legitimate interest or contractual necessity for the processing of data necessary for chatrooms, forums, and private messages, including login and account information, usernames, passwords, and the content of posts themselves.

We have a legitimate interest and a contractual necessity in collecting data relating to the sharing of high scores on a public leaderboard. This includes, but is not limited to, the scores, the user's difficulty, when the high score was achieved, a display name, a "badge" to accompany the display name, and an ID representing the device or app install.

We have a legitimate interest in conducting analytics, measuring usage and conversions, detecting fraudulent users, implementing data security measures, and analyzing game telemetrics to improve our services. We and our processors have measures in place to protect your privacy.

We have a legitimate interest in storing users' purchase history for the purpose of providing users help in fixing purchase and payment issues.

We have a legitimate interest in enabling third party ads and data collection on our sites and apps to help provide a more customized ad experience for our users and site visitors. Our reputable partners provide opt outs and other measures to protect your privacy.

We have a legitimate interest in sending periodic email and direct marketing to inform registered users of updates and offers.

It is contractually necessary to process your username, email, password, cookie data, IP address, financial information, screenshots, user-loaded content, in-game bios, names, and descriptions, and similar information to fulfill our obligation to provide you with high quality games.

## Choices

If you wish to cancel your account, you can do so by accessing our platform or contacting us for assistance with the process. Our email is included at the end of the privacy policy.

Like many other companies, we do not honor DNT flags but instead offer other choices with respect to third parties. Many third parties participate in self-regulation to offer you a choice regarding receiving targeted ads. Please note that you'll still see generic ads after opting out, but they won't be based on your activities online. On the web, you can opt out of participating companies by visiting the following sites:

- <http://youronlinechoices.eu/>
- <http://optout.networkadvertising.org/>
- <http://optout.aboutads.info/>

If you wish to similarly opt out of cross-app advertising on mobile devices, you can enable the Limit Ad Tracking flag on the device. Enabling Limit Ad Tracking sends a flag to third parties that

you wish to opt out of targeted advertising on that device, and major mobile platforms require companies to honor this flag. Screenshots on how to find these options on various devices are available here: <http://www.networkadvertising.org/mobile-choices>.

We aim to provide all users with the opportunity to access, update, and delete their data. Users covered under the EU General Data Protection Regulation (or similar laws) have the right to access their data, rectify mistakes, erase their data, restrict certain processing (i.e., opt out), move their data, withdraw consent, and lodge a complaint with a supervisory authority. In some cases, we may have to keep information for legitimate business or legal purposes or may be restricted for other reasons. Before updating or accessing your information, we may ask you to verify your identity and your country to determine your legal rights.

### **Data Security**

We work hard to protect our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold and undertake reasonable security measures with appropriate confidentiality, integrity, and availability protections. However, since no software or storage system is 100% secure, we cannot guarantee for the security of your information associated with the Services or any other service. You can help protect your account information by using unique and hard-to-guess passwords. We store data if we have a valid business reason for keeping such data and only for reasonable time periods.

### **Children**

Our Services are not directed toward children under 13 and we will not knowingly collect information for any child under the legal age to provide consent to data processing (13 in the US and up to 16 in the EU). If you are the parent of a child under those ages and have a concern regarding your child's information on our Services, please contact us at [privacy@shallotgames.com](mailto:privacy@shallotgames.com).

### **Updates**

Our Privacy Policy may change from time to time and we will post any Policy changes on this page. This Privacy Policy was last updated on May 8, 2019.

### **Contact**

If you have any questions or requests regarding your privacy, please contact us at [privacy@shallotgames.com](mailto:privacy@shallotgames.com).