

Privacy Policy of the NEXTERS BOOST project (the “Project”) (Revised as of September 24, 2021)

Thank you for choosing NEXTERS GLOBAL LIMITED Project.

Please read our Privacy Policy (hereinafter referred to as the “Policy”) to understand what type of data, for what purposes, and what methods we use to process it. We made this Privacy Policy so that its content to be as clear as possible. If you have any questions or suggestions regarding our Policy, please contact us through the Help and Support section of the Project so we can reply to you more quickly.

The Controller for the purposes of the GDPR and other applicable data protection or data privacy laws of the EU Member States, as well as other data protection requirements in respect of the Project, is:

NEXTERS GLOBAL LIMITED

107 Faneromenis Avenue
6031, Larnaca, Cyprus
Email: info@nextersglobal.com

Data processing is carried out by us solely for the purposes specified in this Policy. Please note that you have the right to withdraw your consent at any time, in the manner specified by this Policy.

By accepting this Policy, you also accept the [Participation Rules](#). You acknowledge and agree that you have reached the age allowing you to enter into such binding agreement in the country of your residence or domicile, or that you have your parent or legal guardian’s permission (if required by applicable law). Child is a person that has not reached the minimum age required to provide the consent for Data collection and processing in accordance with applicable laws of the resident country.

We may update this Privacy Policy by posting a notice in the Project before such changes take effect.

This Policy describes:

- What data we process;
- Whom we may share your data with;
- Purpose of data processing;
- How long do we store data;
- How we protect your data;
- How you can manage the data

TERMS AND DEFINITIONS

The Applicant - a legal entity (i's Representative), an individual entrepreneur, or an individual who submitted an Application on the Website, thereby expressing their will to participate in the Project.

Application - information provided by the Applicant via the Website to notify the Company on the Applicant's willingness to participate in the Project. The information that shall be in the Application is provided through the Website by activating the "Take off" button with the preliminary filling of the indicated and required fields (name of the studio, Name, and Surname of the Applicant, description of the Product, E-mail, contact information: website/phone). By clicking the "Take off" button, the Applicant confirms his consent with the Participation Rules in the Project, Privacy Policy, as well as with the text of this Consent, thus sending the above information, as well as the presentation and other additional materials and documents, the Applicant expresses his explicit and informed consent to process your personal data.

Website - the website of Nexters Global Limited company located on the Internet at the address: <https://boost.nexters.com/>.

Project - the Company's activity referring to identifying possible options for interaction with Applicants and implemented through expertise, analytics, support, and mentoring.

1. PROCESSED DATA

In general, by “Data” means any information that relates to you and Services used by you. All information of your activity in the Project and (or) Service processed by us where it is necessary for providing access to the Project, is hereinafter referred to as the "Data".

Even though the data processed by us may not include data of the "personal data" category, we treat all information associated with the Data as personal data.

We collect the following personal data associated with users of our Project:

including the following:

- any information related to you (the Applicant) and your use of the Service;

– surname, name, patronymic; e-mail address, phone number; mailing address, other personal data provided by you on the Website and / or received by us in the process of the Applicant's interaction with the Website.

– data automatically transmitted in the process of using the Website through the software installed on the individual's computer (personal data subject), such as information about the browser used (or other software whereby the Website is accessed); IP address; cookie data.

– other information that you (the Applicant) choose to provide to us.

We collect your personal data on the following lawful basis:

– the data necessary to provide you with access to the Project or to provide our Services to you;

– the data necessary for marketing or analytical purposes based on your consent.

Data-collection methods (categories of sources used in the collection process).

1.1. Data you provide us. This type of data includes the following information:

– the information when providing the Applicant's data;

– the information necessary for you to use social functions and channels for communicating with other people within the Project;

– the information necessary for the technical and support services.

WARNING! We are not responsible for the relevance, correctness, completeness or quality of the information you provide us. When you provide us with data by yourself, we rely on the presumption of your good faith and treat this information as relevant, correct, complete and reliable. In case you provide us with the inaccurate and (or) irrelevant information, we may limit your access to a specific Services and may suspend the technical support and support on the personal data processing until you prove your ownership of this information to us. These measures are necessary to ensure the protection of your data.

1.2. Information we receive or generate as a result of your use of the Project. We may collect data related to your use of the Project and our services as well as to the nature of this use and to your devices. The collection of such information is necessary for the analysis of possible technical errors in the Project and their timely elimination.

1.3. Information collected from external sources. We may receive information about you and your actions from third parties when you connect external accounts; from advertisers or service providers - about your contacts and interactions with them.

1.4. COOKIES

Cookies are text files with small pieces of data — like a username and password — that are used to identify your device as you use the Internet. Specific cookies known as HTTP cookies are used to identify specific users and improve your web browsing experience.

Data stored in a cookie is created by the server upon your connection. This data is labeled with an ID unique to you and your device.

For more information, please read the Cookies Policy.

2. PROVISION OF DATA TO THIRD PARTIES

For the provision of the Services, we may give the Data to suppliers or agents working on our behalf. We do not sell your personal data to third parties. We may disclose the Data to third parties that provide a services to us, ensuring that they are contractually obligated to keep your personal data confidential and will comply with the GDPR and other relevant data protection laws.

We may share your information with the following types of third parties:

a) technical and customer support providers who assist us in the provision of the Services,

b) third party software providers, including 'software-as-service' solution providers, where the provider hosts the relevant personal data on the Company's behalf;

c) analytical services helping us to develop and improve the Project;

d) providers helping us to analyze our goods and services;

e) advertising and promotional agencies including companies or online platforms selected by us to carry out marketing campaigns on our behalf and to advertise their own products or services that may be of interest to you; and/or

f) professional advisers such as lawyers, accountants, tax advisors, auditors, and insurance brokers;

g) service providers assisting us in providing our services.

These companies are listed below

We may share your personal data with our affiliates and partners in the EU / EEA and outside the EU / EEA. If the transfer of data outside the EU / EEA is not regulated by an EU Commission sufficiency decision, we base on the legal guarantees set out in Article 46 et al. Seqq. GDPR. This mainly includes EU Commission-approved Standard Contractual Clauses, which we have strengthened with additional security measures such as additional individual risk assessment, additional contractual guarantees, and technical guarantees, including additional encryption or pseudonymization, to enable

international transfers with NEXTERS affiliates and partners outside the EU/EEA.

Learn more about the [EU Commission's approved Standard Contractual Clauses](#).

We may share personal data with external providers or service providers or providers whom we engage to perform services or functions on our behalf and in accordance with our instructions.

If these providers are established within the EU, we ensure that they are contractually bound to comply with EU data protection regulations. We also guarantee in our contracts with these organizations that they only Process Personal Data in accordance with our instructions and provide consistent services and protect the integrity and confidentiality of your personal data entrusted to them. We may also disclose personal information to our advisers, consultants, law enforcement and other government agencies (such as tax and social security authorities), police, prosecutors, and courts. All these recipients are themselves responsible for complying with EU data protection regulations. Some of the suppliers we work with are located outside the European Economic Area. If the EU Commission has not recognized them as providing adequate protection of personal data, we rely on the legal guarantees described above.

These companies may access and process your data in accordance with their own privacy policies, being an equivalent Data Controller. We encourage you to review their privacy policies to learn more about how they process data.

We may disclose your personal data as permitted by law to investigate, prevent, or act regarding illegal activities, suspected fraud, violation of our intellectual property rights, situations involving potential threats to the physical safety of any person, violation of our Terms and Conditions or other agreements, or as required by law.

Please feel free to contact us for additional information on third country data transfers as well as our safeguards and supplementary security measures.

3. PURPOSES OF DATA PROCESSING

We process your Data only when it's necessary to provide you the access to the Project and (or) Services, while taking reasonable security measures to protect your Data from loss, misuse and unauthorized access, disclosure, modification or destruction.

With respect to the users governed by the General Data Protection Regulation (EU) 2016/679 (hereinafter – the “GDPR”), we use the Data collected through the Project and (or) Services for the purposes of our legitimate interests in accordance with Article 6(1)(f) of the GDPR as well as for the purposes stipulated in the Terms of Service and this Policy. For example, we may use the collected information for the following purposes:

- to provide our Services or information you requested as well as to process and complete any transaction;
- to respond to your submissions, questions, comments, requests and complaints as well as to provide customer service;
- to monitor and analyze the Project's use and trends or to personalize and improve the Project or user experience on our web sites, such as providing ads, Content or features that match their profiles or interests as well as to increase the Project's functionality and usability;
 - to send you confirmations, updates, security alerts as well as support and administrative messages;
 - to support you to use, manage and operate our web sites; and
 - any other purpose for which the information is collected.
- the collection of information is carried out when you provide Data as part of the use of the Project and (or) services only with your consent, and you can manage your Data at any time. Indirect collection shall be allowed only on anonymous basis.

4. TERM OF PROCESSING AND STORAGE

We process and store Data during the Project period and within thirty (30) days from the confirmation of the request for deletion, except for the information that is necessary to fulfill the requirements of applicable law (for example, in the field of taxation and accounting) and anonymous information. We do not control the data published by you or copied by other users, as well as the data published in the chat of the Project (if applicable) or on thematic groups and forums. After deleting your data, your anonymized account can be saved in the Project if it is used in conjunction with other users.

Information contains personal data of users (if applicable), collected or created by providing of technical support to users, is stored during the period of the Data that has applied for support in order to provide an optimal solution to issues and problems. Information that does not contain personal data can be stored for the entire duration of the Project.

5. DATA SECURITY AND PROTECTION

NEXTERS GLOBAL LIMITED respects the confidentiality of your data and strives to ensure the highest level of protection. Despite the measures we are taking to protect your information, none of the below will have any effect if you neglect the data security.

We implemented in the Project reliable means of protection to ensure the security of your data. We do everything possible for your safety when using the Project and are constantly improving our information protection methods. To protect your

information from unauthorized access, alteration, disclosure or destruction, we use the following methods:

- we use data encryption during storage and transmission;
- we implement the two-stage user authentication when requesting an action with the Data;
- we improve the techniques and methods of collecting, storing and processing the Data;
- we provide the access to the Data, in encrypted and impersonal form only to authorized employees, consultants or interested groups of people who need access to this information to perform their duties;
- we brief all the persons having access to the Data on how to work with personal data and systematically check their knowledge and skills.

Despite all measures taken by us, your careful attitude to the Data and access to it has a great importance in the safety of your Data. To prevent unauthorized access to your Data, we strongly recommend you not to share access to the account to any third parties and to comply with the rules of the project and use of the Nexters Boost project. In case of your violation of the Terms of Use of the Nexters Boost project, we will not be able to guarantee the security of your Data.

6. DATA MANAGEMENT

You have all the technical capabilities to determine how the Data shall be used. We are constantly improving the data management methods available to you.

You are entitled to obtain information from us on how we handle your personal data, to see copies of all personal data held by us and to request that your personal data is amended, corrected or deleted from our systems. You can also limit, restrict or object to the processing of your data.

For exercising your rights, you can:

- at any time withdraw your consent for Data processing at any time;
- get an access to your Data received by us which means you can request the information on your Data storing, the access to the Data as well as the copies of saved Data;
 - ask for limitation of the Data processing for the time required to verify the reliability of the information provided;
 - change the Data. You may discretionarily determine the Data, which shall be associated with you.
 - object to the processing of your Data. If you believe that we have no legitimate reason for processing your Data, please contact us privacy@nextersglobal.com and boost@nexters.com. If we fail to satisfy your complaint you may also file a complaint to the local supervisory authority:
 - delete your Data.

The procedure for withdrawing consent to the processing and deletion of Data:

PLEASE NOTE that the Data is used by us solely for the purpose of providing you access to the Project and improving the quality of the Services. By deleting of your Data, you will lose access to the Project and your Data will be permanently deleted.

The procedure for request execution:

1. An initial request that meets the requirements of this Policy can be sent through the contact form in the Project by the e-mail on the following addresses privacy@nextersglobal.com and boost@nexters.com.
2. Confirmation of the request - carried out by you through the specified and verified email address.
3. Execution of the request – usually carried out within 30 days from the date of confirmation of the request. This period is necessary for implementation of the administrative and technical measures to fulfill your request and may be prolonged if needed.

PLEASE CONSIDER, that we reserve the right to refuse to fulfill the request if the ownership of the Data is not confirmed by the User and (or) the request affects the rights and freedoms of others.

If you have lost access to the Project and do not have the technical ability to perform actions to confirm ownership of the Data, you can send a letter to the address:

107 Faneromenis Avenue
6031, Larnaca, Cyprus

Recipient: NEXTERS GLOBAL LIMITED

You shall provide the letter with the information which can uniquely identify you and your ownership of the Data.

FULL NAME AND CONTACT DETAILS OF THE AUTHORIZED DATA PROTECTION MANAGER FROM NEXTERS GLOBAL LIMITED:

NEXTERS GLOBAL User Data Protection Manager:

Personal Data Specialist
107 Faneromenis Avenue
6031, Larnaca, Cyprus

Email: privacy@nextersglobal.com and boost@nexters.com

7. LOCAL LEGISLATION

We provide you with access to the international Project and strive to comply with applicable local laws. Please note that our services are provided "as is" and you should get to know with applicable laws. By continuing your use of the Project, you are warrant that your use of the Project is not contrary to the applicable law and Terms of Service of the Nexters Boost project. Please note we do not sell users' Personal Data in California. Data transfer is carried out in order to provide the Services legally.

8. FINAL PROVISIONS

We reserve the right to modify this Policy at any time, so please review it on a periodic basis. This Policy is made in English language. We can provide you with a translation in Russian and other languages at your request. In case of any inconsistency or discrepancies between a non-English translation of this Policy and the English version, the English version shall prevail.

**FAITHFULLY YOURS,
NEXTERS GLOBAL LIMITED**

ANNEX to the Privacy Policy of the NEXTERS BOOST project (the "Project") The list of our partners and service providers

For the technical purposes:

Название	Ссылка
Facebook	https://www.facebook.com/privacy/explanation
Adjust	https://www.adjust.com/terms/privacy-policy/
Firebase	https://policies.google.com/privacy
ironSource	https://www.is.com/privacy-policy/
MoPub	https://www.mopub.com/en/legal/privacy
AppsFlyer	https://www.appsflyer.com/services-privacy-policy/

For the marketing and analytical purposes:

Название	Ссылка
Admob	https://policies.google.com/privacy?hl=ru
Applovin	https://www.applovin.com/privacy/
Facebook	https://www.facebook.com/privacy/explanation
Chartboost	https://answers.chartboost.com/en-us/articles/200780269
IronSource	https://www.is.com/privacy-policy/
Adcolony	https://www.adcolony.com/privacy-policy/
Unity Ads	https://unity3d.com/ru/legal/privacy-policy
Vungle	https://vungle.com/privacy/
Pangle	https://www.pangleglobal.com/privacy

For the social media (if applicable)

Название	Ссылка
Facebook	https://www.facebook.com/privacy/explanation
ok.ru	https://ok.ru/privacy
VK.com	https://vk.com/privacy
mail.ru	https://help.mail.ru/legal/terms/common/privacy