

Privacy Policy

(Revised as of 1st September 2022)

Thank you for choosing MarketStars Agency (“We”, “Us”, “Our” or “Project”).

Please review our Privacy Policy (hereinafter referred to as the “Policy”) to understand what type of data, for what purposes, and in which ways we can process it. The Policy is designed in such a way, in order to make its content to you as clear as possible. If you have any questions or suggestions regarding our Policy, please contact us through the Help and/or Support section of the Project so we can reply to you in a quicker and more straightforward fashion.

We act as a controller under the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (“General Data Protection Regulation” or “GDPR”) and we are responsible for the personal information we process. This Policy informs you how we protect your Personal Information and informs you of your privacy rights. 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:

Blockstein GmbH
Pilatusstrasse 50 6052 Hergiswil
CH-400.4.441.770-2
Email: hello@marketstars.io

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

By accepting this Policy, you also accept the Terms of Service [\[link\]](#). You acknowledge and agree that you have reached the age allowing you to enter into a 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 the applicable law). A child (or a legal minor) is a person that has not reached the minimum age required to provide consent for data collection and processing in accordance with the applicable laws of the respective country.

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

This Policy describes:

What data do we process;

Whom we may share your data;

Purpose of data processing;

How long do we store data;

How do we protect your data;

How you can manage the data.

1. PROCESSED DATA

In general, by “Data” we mean any information that identifies, relates to, describes, or is reasonably capable of being associated with a particular individual. By the “Data”, we also refer to any information that relates to you and usage of the Services (as defined in the Terms of Service). All information of your activity in the Project and/or Services, processed by us where it is necessary for providing access to the Project and/or Services, is hereinafter referred to as the “Account”.

Despite the fact that the data processed by us may not include data in the “personal data” category, we treat all information associated with your Account as personal data. We collect the following personal data related to users of our Services:

Your IP address and unique mobile device identification numbers (such as your device ID, advertising ID, android Id);

Broad location data (e.g. country Code);

Data for advertising and analytics purposes (gpsAdid, Idfv / Idfa);

Data about your device (Name, RAM, Resolution, OS, OS version, device language);

Details of orders (transaction currency (including cryptocurrency), amount spent, date, time, vouchers, or offers used);

Time zone;

For data about your account and game progress, we create a specific ID for you when you use the Services. We store your actions inside the Project, including waste of resources, behavioral activity, and time entering the game;

Contact information (such as name or nickname or email or other identification information);

Data from platforms that the games run on (such as to verify payment);

Your messages to the Services (such as chat logs and player support tickets) any feedback you submitted about your experience with us; and/or

Other data you choose to give us.

We collect your personal data on the following lawful basis:

The data necessary to provide you with access to the Project or the provision of our Services on the basis of the Contract;

The data is necessary for marketing or analytical purposes on the basis of your consent.

Methods of collecting information (categories of sources used in the collection).

1.1. Data you provide by yourself

We include the following information that you provide to this type of data:

Date of creating an Account;

Your use of social functions and channels for communicating with other people in the Project;

Purchases or financial transactions, such as in-house (in-game) purchases and/or received prizes;

Technical and support services.

WARNING! We are not responsible for the relevance, correctness, completeness, or quality of the information you provide. When you place the data indicated independently, we proceed on the presumption that you have acted in good faith and accept the specified information as relevant, correct, complete, and reliable. If you indicate inaccurate and/or irrelevant information, access to a number of Services may be limited for you, and technical support and support services regarding the processing of personal data are suspended until the confirmation of your

Ownership of the specified information. 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 your in-game activity, your use of our services and 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. The processing of information about your in-game activity is related to the social nature of our Project, the results of your in-game actions are reflected throughout the in-game world.

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 a network. 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 see the Cookies Policy [\[link\]](#).

2. PROVIDING DATA TO THIRD PARTIES

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

Technical and customer support providers who assist us in the provision of the Services;

Third-party software providers, including 'software as a service solution providers, where the provider hosts the relevant personal data on our behalf;

Analytical services that help us develop and improve the Project;

Providers that help us generate and collate reviews in relation to our goods and services;

Advertising and promotional agencies and those organizations 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

Professional advisers such as solicitors, accountants, tax advisors, auditors, and insurance brokers;

Service providers assist us in providing our services.

You can get a non-exhaustive list of such companies here: ANNEX to the Privacy Policy.

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 it 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 Project affiliates and partners outside the EU/EEA.

Learn more about the EU Commission's approved Standard Contractual Clauses [link - https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en].

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 equivalent data controllers. 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. REASONS FOR DATA PROCESSING

We process your data only when necessary to provide 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 covered by 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. E.g., we may use the information we collect:

To provide our Services or information you request, as well as to process and complete any transactions;

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 websites, such as by providing ads, Content (as defined in the Terms of Service), or features that match their profiles or interests as well as to increase the Project's functionality and user-friendliness;

To provide gifts and rewards that you may win in the Project, etc.;

To send you confirmations, updates, security alerts as well as support and administrative messages and otherwise;

To facilitate your use of and our administration and operation of our websites; and

Any other purpose for which the information is collected.

Data is collected when you provide it within the Project and/or Services. Indirect collection shall be allowed only on an anonymous basis.

4. TERM OF PROCESSING AND STORAGE

We process and store data during the Project period and within 30 (thirty) days from the confirmation of the request for deletion, except for the information that is necessary to fulfil 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.

The information contains personal data of users (if applicable), collected or created by providing technical support to users, and is stored during the period of the User Account 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

The Project 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, any measures that we apply will not have any effect if you neglect the reasonable data security requirements.

The project implemented 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. As some means of protecting information from unauthorized access, alteration, disclosure, or destruction, we use the following methods:

Data encryption during storage and transmission;

We carry out two-stage user authentication when requesting action with the data;

We improve the techniques and methods of collecting, storing, and processing the data;

Access to the data, in an encrypted and impersonal form, has only authorized employees, consultants, or interested groups of people who need access to this information to perform their duties;

All persons having access to the data are briefed on working with data, and their knowledge and skills are systematically checked.

In spite of all measures taken by us, your careful attitude in respect of the Account and access to it has great importance in the safety of your data. To prevent unauthorized access to your data and Account, 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 Services. In case of your violation of the Terms of Use of the Services, we will not be able to guarantee the security of your data.

WARNING! The following actions are prohibited by this Policy and the Terms of Use of the Services, and may also violate the confidentiality of your data:

Transfer of information about the Account and/or access rights to third parties. Please note that our official representative will never request access to your Account;

The use of unauthorized third-party programs, the use of robot programs, and/or programs that change the game process, including assistance in the game process. In addition to the fact that the use of such programs is expressly prohibited by the Terms of Use, they may contain malicious software that could harm the security of your data;

The acquisition of in-game values/assets from third parties. By acquiring in-game values/assets bypassing the Terms of Use, you can become a victim of fraudsters.

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 can form a request within the Project by sending a request in the Help section. 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 be 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 given in full or in part;

Access to your Data received by us;

Require limitation of 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 your Account.

Object to the processing of your data. If you believe that we have no legitimate reason for processing your data, please contact us using the contacts provided below. You may also file a complaint with the local supervisory authority;

Delete your Account and Data related therewith.

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 Account data, you will lose access to the Project and your data will be permanently deleted.

The order of execution of the request:

An initial request that meets the requirements of this Policy can be sent through the contact form in the Project in the section "Support" / "Privacy protection request".

Confirmation of the request — carried out by you through the specified and verified email address.

Execution of the request — usually carried out within 30 days from the date of confirmation of the request. This period is necessary for organizational and technical measures to fulfill your request and, if necessary, may require more time, for which we shall notify you in writing.

PLEASE NOTE 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:

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Recipient: MarketStars Privacy Policy

In the letter, you must provide information, by which we can uniquely identify you and the ownership of the Account data.

CONTACT DETAILS OF THE AUTHORIZED DATA PROTECTION SECTION:

Blockstein GmbH
Pilatusstrasse 50 6052 Hergiswil
CH-400.4.441.770-2
Email: hello@marketstars.io

7. LOCAL LEGISLATION

We provide you with access to international projects and strive to comply with applicable local laws. Please note that our Services are provided “as is” and you should inform yourself of the relevant applicable laws. By continuing your use of the Project, you represent and warrant that your use of the Project is not contrary to the applicable law and Terms of Service.

8. FINAL PROVISIONS

We reserve the right to modify this Policy at any time, so please review it on a periodic basis.