

# TALES OF FABLECRAFT PRIVACY POLICY 2.1

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## Introduction

Riftweaver, Inc. d/b/a Tales of Fablecraft (“**Tales of Fablecraft**”, “**Fablecraft**”, “**Company**”, “**we**”, or “**us**”) is committed to protecting your privacy. The following policy (“**Privacy Policy**”) describes our practices for collecting, using, maintaining, and disclosing information that we collect from you or that you provide to us when you use our Tales of Fablecraft software or mobile app, visit riftweaver.com, fablecraft.riftweaver.com, or any affiliated website (collectively, our “**Platform**”), or use any other products and services made available by us (collectively with the Platform, the “**Services**”).

We ask that you read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. The use of information collected through our Services will be limited to the purposes described under this Privacy Policy and our Terms of Service (or other relevant customer contracts). By accessing or using the Services, you agree to this Privacy Policy. Please be aware that if you are using the Services on behalf of an entity, you are agreeing to this Privacy Policy for that entity and are representing to us that you have the authority to do so (in which case “**you**” will refer to that entity). If you do not agree with our policies and practices, your choice is not to use the Services.

This Privacy Policy may change from time to time. If we make any changes, we will post the changes on this page and indicate at the top of this page the date the policy was last revised. Any such changes are effective immediately when we post them, and apply to all access to and use of the Services thereafter. Your continued use of the Services after the date any such changes become effective constitutes your acceptance of the new policy.

## Information We Collect and How We Collect Information

### A. Information You Provide.

We may collect information you provide directly via the Services. We may ask you for some or all of the following types of information when you register with or use our Services, submit comments and other content, or directly contact us with questions or feedback:

- ❖ Your name
- ❖ Your email address
- ❖ Your phone number
- ❖ Your usernames and passwords
- ❖ Your contact or authentication data

The information you provide may include Personal Information. **“Personal Information”** is information that identifies you personally (whether alone or in combination).

**B.** In connection with certain uses of our Services, you may be required to provide financial information, such as your credit card or bank account number, to a third-party vendor or payment processor that is not affiliated with us. We do not collect or store such financial information and we are not responsible for the collection or storage of such information by third parties. We will, however, have access to certain information associated with your account in connection with certain uses of the Services, including the amount and date of the purchase.

## Information We Automatically Collect

We may (either directly or via a third party provider) also collect certain information automatically when you visit the Services, including:

- ❖ Your browser type and operating system
- ❖ Your Internet Protocol (IP) address, which is the number automatically assigned to your computer whenever you access the Internet and that can sometimes be used to derive your general geographic area
- ❖ Geolocation information
- ❖ Other unique identifiers, including mobile device identification numbers
- ❖ Sites you visited before and after visiting the Services
- ❖ Pages you view and links you click on within the Services
- ❖ Information collected through cookies, web beacons, and other technologies
- ❖ Information about your interactions with email messages, such as the links clicked on and whether the messages were opened or forwarded
- ❖ Standard Server Log Information

We collect the above information in a variety of ways, including by using temporary local storage data, “pixel tags” and “web beacons”. Pixel tags are very small images or small pieces of data embedded in images, also known as “web beacons” or “clear GIFs,” that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device.

## Third-Party Information Collection

We may allow third parties to place and read their own cookies, web beacons, and other technologies to collect information through the Services. For example, our third-party service providers may use these technologies to collect information (i) that helps us with traffic measurement, research, and analytics, and (ii) that is used to serve advertisements across the Internet tailored to your apparent interests.

The information collected and stored by third parties remains subject to their policies and practices. We do not control these third parties' tracking technologies or how they may be used.

We currently use the services of the following third-party vendors, who may collect your information. You can click on the hyperlinks below to view their privacy policies.

[Steam](#) | [Google](#)

## How We Use Your Information

We may use information that we collect about you or that you provide to us, including Personal Information, to measure usage of the Services, to analyze the effectiveness of our Services, to conduct research, to improve and enhance functionality of the Services, to provide support for the Services and respond to requests and inquiries, to provide you with notices, such as updates or changes that we may make to the Services, and to market and advertise the Services, including through promotional email messages, directly or in partnership with other parties.

We may from time to time aggregate information in certain data analysis, reports, or other interpretations of trends for both internal and external purposes.

## Choices About How We Collect, Use and Disclose Your Information

We strive to provide you with choices regarding our collection, use and disclosure of the information you provide to us. The mechanisms listed below aim to provide you with control over such collection, use and disclosure:

- ❖ *Marketing Communications.* If you do not want us to send you marketing or promotional communications, you can opt-out by clicking the “unsubscribe” link in any such promotional emails, checking the relevant box located on the form on which we collect your data or emailing us at [support email].
- ❖ *Cookies.* You have the option to accept or disable cookies at any time through your browser. You may refuse to accept browser cookies by activating the appropriate setting on your browser. If you choose to disable your cookies, your user experience may be limited.

- ❖ *Google Analytics.* You can opt out of tracking by Google Analytics by using Google's Ads Settings or going to <https://tools.google.com/dlpage/gaoptout/>. You may also opt out of Google marketing products, but please note that this does not opt you out of being served generic ads.

## **Disclosure of Your Information**

We want you to understand when and with whom we may share the information we collect. We may disclose information that we collect through the Services with third parties as follows:

- ❖ *Service Providers.* We may share your information with our agents and service providers that perform certain functions or services on our behalf, such as to host the Services, manage databases, host a store or other e-commerce platform, perform analyses, or conduct surveys.
- ❖ *Other Parties When Required By Law or as Necessary to Protect the Services.* We may disclose your information to third parties in order to protect the legal rights, safety, and security of the Company and the users of our Services; enforce our Terms of Service; prevent fraud; and comply with or respond to law enforcement or a legal process or a request for cooperation by a government or other entity, whether or not legally required.
- ❖ *In Connection With a Transfer of Assets.* If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, or in the event of bankruptcy, we may transfer your information to one or more third parties as part of that transaction.
- ❖ *Other Parties With Your Consent.* We may share information about you with other third parties when you consent to such sharing.
- ❖ *Aggregate Information.* We may disclose to third parties information that does not describe or identify individual users, such as aggregate website usage data or demographic reports.

You will be notified via email and/or a prominent notice on our Platform of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding your Personal Information.

## **Social Networking Services**

The Services may allow you to post information to various third-party services or platforms, such as social networking services like Instagram, Twitter and Facebook. You acknowledge that if you choose to use this feature, your friends, followers and subscribers on these third-party services or platforms will be able to view such activity. If you choose to access or make use of third-party social networking services, we may receive information about you that you have made available to those social networking services, including information about your contacts on those social networking services. The use of the information by such social networking websites will be governed by their privacy policies, and we do not control their use of the shared data.

## **Links to Third-Party Sites and Services**

The Services may contain links to other websites or online services that are operated and maintained by third parties and that are not under the control of or maintained by the Company. Such links do not constitute an endorsement by the Company of those other websites, the content displayed therein, or the persons or entities associated therewith. This Privacy Policy does not apply to this third-party content. We encourage you to review the privacy policies of these third-party websites or services.

## **Data Retention**

We strive to keep your information only as long as we need it for legitimate business purposes and as permitted by applicable legal requirements. If you close your account, we will retain certain data for analytical purposes and recordkeeping integrity, as well as to prevent fraud, enforce our Terms of Use, take actions we deem necessary to protect the integrity of our Services or our users, or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.

You acknowledge that the Company may establish general practices and limits concerning use of the Services, including without limitation the maximum period of time that data or other content will be retained by the Services and the maximum storage space that will be allotted on the Company's servers on your behalf. You further acknowledge that the Company reserves the right to change these general practices and limits at any time, in its sole discretion. We will endeavor to give you notice of any such change where required by applicable law.

## **Accessing and Correcting Your Information**

If you wish to access, update, correct or delete any Personal Information in our possession that you have previously submitted via the Services, you may log into your account and make updates. If you wish to make changes not available through your account settings, please contact us at [support@riftweaver.com](mailto:support@riftweaver.com).

## **Security**

We take reasonable steps to protect the Personal Information provided to us from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or email transmission is ever fully secure or error free. In particular, email sent to or from the Services may not be secure. Therefore, you should take special care in deciding what information you send to us via email. Please keep this in mind when disclosing any Personal Information to us via the Internet. In the event that personal information is compromised as a breach of security, the Company will promptly notify our customers in compliance with applicable law.

## Children Under the Age of 13

Our Services are intended for users who are 13 years of age and older. If you are under the age of 13, you are not permitted to submit any Personal Information to us. If you believe we might have any information from or about a child under 13, please contact us at [contact@riftweaver.com](mailto:contact@riftweaver.com).

## International Users

If you are an EEA+ user, please refer to the section below entitled **“Information applicable to EEA+ users”**.

Please note that the Services are directed towards users who reside in the United States. By using the Services, you consent to the collection, storage, processing, and transfer of your information in and to the United States, or other countries and territories, pursuant to the laws of the United States. Some of these countries may not offer the same level of privacy protection as your own.

Notwithstanding the generality of the foregoing, by using the Services you acknowledge and agree that Tales of Fablecraft may transfer your Personal Information to countries other than the one in which you live, including transfers to the United States. To the extent that Personal Information is transferred abroad, Tales of Fablecraft will ensure compliance with the requirements of the applicable laws in the respective jurisdiction in line with Tales of Fablecraft’s obligations.

## Data Protection Officer

To communicate with our Data Protection Officer, please contact us at [contact@riftweaver.com](mailto:contact@riftweaver.com).

## Your Rights

Individuals across the globe have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to your personal information, as well as to seek to update, delete, or correct this information. You can do this as described in **“Accessing and Correcting Your Information”** above.

To the extent that Tales of Fablecraft’s processing of your Personal Information is subject to the General Data Protection Regulation or other applicable laws requiring a legal basis for processing Personal Information, such as the UK Data Protection Act and the Brazilian General Data Protection Act (Lei Geral de Proteção de Dados), Tales of Fablecraft primarily relies on its legitimate interests, described above, to process your Personal Information. Where we rely on legitimate interests to process your Personal Information, you can object to that processing by contacting us as described in the **“Contact Information”** section below. In response to your objection, we will stop processing your information for the relevant purposes unless we have compelling grounds in the circumstances or the processing is necessary in the context of legal claims.

## **Information applicable to EEA+ users**

This Supplemental EEA+ Privacy Notice applies if you are located in the European Economic Area, the United Kingdom, or Switzerland.

### Data Controller and Data Processor

For purposes of the Services, you are the data controller, and we are the data processor.

### Categories of Personal Data, Purposes of Processing and Source

See “**Information we collect and how we collect information**” for categories of personal data that we collect, for the purposes we may process your personal data and, if applicable, the source from which the personal data originated.

### Special Categories of Data

Special categories of personal data include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health, data concerning an individual’s sex life or sexual orientation, genetic data, and biometric data processed for the purpose of identifying an individual.

With your consent, and if you choose to provide it, we may collect special category data, such as in your registration on the Platform or any of our websites, and in your communications to us. We process this personal data solely for the purposes of facilitating your receipt of Services, in accordance with your explicit consent per Article 9(2)(a) GDPR. You can withdraw your consent at any time with future effect.

If there is a life-threatening emergency and the data subject is physically or legally incapable of giving consent, we may process personal data that falls within these special categories as necessary to protect the vital interests of the data subject or another individual per Art. 9(2)(c) GDPR.

### Lawful Bases for Processing

We rely on the following legal bases to process personal data of yours that does not fall within special categories, as appropriate:

- ❖ According to your consent per Article 6(1)(a) GDPR (“**Consent Legal Basis**”)
- ❖ Necessary for us to perform a contract with you or your employer or to take steps at your request prior to entering into a contract per Article 6(1)(b) GDPR (“**Contract Performance Legal Basis**”)
- ❖ Necessary for us to comply with an applicable legal obligation per Article 6(1)(c) GDPR (“**Legal Obligations Legal Basis**”)
- ❖ Necessary in order to protect the vital interests of the data subject or another natural person per Article 6(1)(d) GDPR (“**Vital Interests Legal Basis**”), or



- ❖ Necessary for us to realize a legitimate interest based on an assessment of that interest and your privacy and other fundamental interests per Article 6(1)(f) GDPR (“**Legitimate Interest Legal Basis**”), where the legitimate interests could be in particular:
  - open, maintain, administer, and manage profiles and accounts for registered users;
  - ensuring internal quality control and safety;
  - improving our Services;
  - managing and conducting our relationships with third parties in a business or professional capacity;
  - managing and administering our business;
  - debugging to identify and repair errors with the Services;
  - enforcing our agreements and policies;
  - detecting security incidents;
  - protecting against malicious, deceptive, fraudulent or illegal activity; and
  - prosecuting those responsible for that activity; ensuring internal quality control and safety; protecting your safety or vital interests, or the safety or vital interests of others.

We rely on the following legal bases to process personal data which falls within special categories:

- ❖ Pursuant to your explicit consent
- ❖ Necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent

If we rely on your consent, you can withdraw your consent at any time with future effect by contacting us at the contact details listed below. For additional details regarding the lawful bases of processing your personal data specifically, please contact [contact@riftweaver.com](mailto:contact@riftweaver.com).

### Categories of Recipients

See “**Disclosure of your information**” for information on the categories of recipients that we may share your personal data with.

### International Data Transfers

By using the Services, personal data will be stored within the United States, where privacy rules differ and may be less stringent than those of the country in which you reside. We may transfer personal data to recipients located in countries for which the European Commission has not issued an adequacy decision in respect of the level of data protection.

We take measures to ensure that recipients in other jurisdictions provide an adequate level of data protection, including, for example, by implementing EU standard contractual clauses and equivalent measures. You can receive more information on the measures we take by contacting us at the contact details listed below.



## Your Choices

There is no law or contract between you and us stating that individuals in the EEA, UK, or Switzerland have to use our Services. We may ask you to provide your name, email address, and other personal information to verify your eligibility to receive certain Services from us. We cannot provide the Services to you unless you provide such information. You do not have to consent to our use of personal data for advertising purposes. If you do not allow us to collect the data we automatically collect from users of our Services, some of our Services may not work properly or be as tailored to you as they could otherwise be, but they will still generally be usable.

To the extent that you have given consent, you can withdraw your consent at any time with future effect by contacting us as described below. Such a withdrawal will not affect the lawfulness of the processing prior to the withdrawal of consent.

## Your Rights

In the EEA, Switzerland and the UK you have the following rights relating to your personal data, subject to the conditions under the GDPR and/or applicable local data protection law:

- ❖ Right to request access to personal data: You have the right to obtain from us confirmation as to whether your personal data is being processed, and, where that is the case, to request access to that personal data and details about how we process your personal data, including the categories of personal data processed, the purpose of the processing and the recipients or categories of recipients, the existence of automated decision-making, including profiling and you have the right to obtain copies of the personal data. However, this is not an absolute right and the interests of other individuals may restrict your right of access.
- ❖ Right to rectification: You have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- ❖ Right to erasure (right to be forgotten): You have the right to ask us to erase your personal data.
- ❖ Right to object: Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time, to the processing of your personal data, including profiling, by us. This includes the right to object to our processing of your personal data where we are pursuing our legitimate interests or those of a third party. If we process your personal data based on our legitimate interests or those of a third party, you can object to this processing, and we will cease processing your personal data, unless the processing is based on compelling legitimate grounds or is needed for legal reasons.

Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.

- ❖ Right to restriction of processing: In limited circumstances, you have the right to request restriction of processing of your personal data, in which case, it would be marked and processed by us only for certain purposes.
- ❖ Right to data portability: You have the right to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format and you have the right to transmit the personal data to another entity without hindrance from us.
- ❖ You also have the right to lodge a complaint with a supervisory authority (only for EEA and UK).
- ❖ In some jurisdictions such as France, if applicable pursuant to local law, you also have the right to provide us with guidelines as to the processing of your personal data after your death.

You can exercise your rights by contacting us at [contact@riftweaver.com](mailto:contact@riftweaver.com).

You may view a list of supervisory authorities in the EEA, UK and Switzerland and their respective contact information here (however, you have the right to lodge a complaint in the Member State of your habitual residence, place of work or an alleged infringement of the GDPR):

| <b>Jurisdiction</b> | <b>Data protection authority's website</b>  |
|---------------------|---|
| EEA                 | <a href="https://edpb.europa.eu/about-edpb/board/members_en">https://edpb.europa.eu/about-edpb/board/members_en</a>                           |
| United Kingdom      | <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a>   |
| Switzerland         | <a href="https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html">https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html</a> |

## **Additional Information For California Consumers**

Under the California Consumer Privacy Act (“**CCPA**”), as amended by the Consumer Privacy Rights Act (“**CPRA**”), we are required to provide specific disclosures about how we use and disclose personal information (“**California Personal Information**”) about you (“**consumers**” in this section). This section covers how we have collected, used, disclosed and otherwise processed your California Personal Information over the past 12 months, as well as additional rights you may have with respect to your California Personal Information. This section does not reflect our processing of California Personal Information where an exception under California law applies.

### California Personal Information

Depending on your online and offline interactions with us, we may collect and process the following categories of California Personal Information:

- ❖ Identifiers: including contact details such as real name, postal address, email address, account name, or other similar identifiers;
- ❖ Financial Information: including credit card information;
- ❖ Customer Records: paper and electronic customer records containing Personal Information, such as name, address, telephone number;
- ❖ Purchase History and Tendencies: commercial information including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- ❖ Internet or Other Electronic Network Activity Information: including your interactions with our Platform or other Services;
- ❖ Audio, Electronic, Visual, or Similar Information: audio, electronic, visual, or similar information (but note that we do not sell this information).
- ❖ Inferences, Transcripts or Summaries drawn from the information collected.

Certain California Personal Information that we collect about you may be considered “Sensitive Personal Information” within the meaning of California Privacy Law, including credit card information which we collect for billing and transactional purposes in connection with providing you our products and Services. We only use and disclose Sensitive Personal Information as necessary in connection with the performance of services and the provision of goods, compliance with federal, state, or local laws, and as otherwise permitted by California Privacy Law.

### Sources

We collect the categories of California Personal Information identified in the sub-section above directly from you, automatically as you use our Platform and Services, and from third parties such as data analytics providers, social media networks, and distributors and intermediaries.

Purposes of Use

We use California Personal Information for the following business and commercial purposes:

| <b>Business Purposes</b>  | <b>Commercial Purposes</b>   |
|---|--|
| <p>Negotiate, conclude, and perform contracts with vendors;</p> <p>Manage our accounts and records;</p> <p>Operate our Platform and other Services, including through the use of analytics software;</p> <p>Communicate with individuals that are, or who represent, customers, vendors, or web users related to transactions;</p> <p>Protect our rights and interests;</p> <p>Ensure the security of our App, Services and other assets;</p> <p>Legal and regulatory compliance and internal control evaluations and audits (including where conducted by our internal and external audit service providers);</p> <p>Obtain legal advice, including for legal proceedings and litigation and also in connection with the sale, purchase or merger of a business;</p> <p>To provide the products, information and services you request;</p> <p>For security, credit or fraud prevention purposes;</p> | <p>Advertising, marketing, and public relations (including direct marketing);</p> <p>Market research and competitor analysis;</p> <p>To display personalized advertising when you visit our App, Services or a third party website;</p> <p>To contact you with special offers, such as financial incentives (where based on consent), new products, and other information we believe will be of interest to you;</p> <p>To invite you to participate in surveys and provide feedback to us;</p> <p>To better understand your needs and interests; and</p> <p>To improve our marketing and promotional efforts.</p> |

|  |  |
|--|--|
| <p>To provide you with effective customer service;</p> <p>To provide you with a personalized experience when you use our Services;</p> <p>To contact you with information and notices related to your use of our Services;</p> <p>To improve the content, functionality and usability of our Services;</p> <p>To improve our products and services; and</p> <p>For any other purpose identified in an applicable privacy notice or other agreement between us and you.</p> |  |
|--|--|

***Disclosure of California Personal Information***

We may disclose the categories of California Personal Information described above, for the business purposes described above, to:

- ❖ Third-party service providers and contractors that perform data processing activities on our behalf, subject to appropriate privacy and security obligations;
- ❖ Customers, vendors, and intermediaries in connection with the performance of transactions;
- ❖ Government and other authorities as required by law;
- ❖ Potential purchasers and other parties in connection with the sale, purchase, or merger of a business; and
- ❖ Others to the extent necessary to comply with applicable law and as otherwise permitted under California Privacy Law.

We may disclose Identifiers and Internet or Other Electronic Network Activity Information for the commercial purposes described above to:

- ❖ Third-party service providers; and
- ❖ Social media and advertising networks.

### *Your California Privacy Rights*

Subject to certain exceptions detailed in California Privacy Law, as a California resident, you have the right to request: (i) deletion of your California Personal Information; (ii) correction of inaccurate California Personal Information; (iii) the right to know/ access the categories of California Personal Information that we collect about you, including the specific pieces of California Personal Information; (iv) the categories of California Personal Information disclosed for a business purpose; and (v) information about the categories of California Personal Information about you that we have shared (as such term is defined under California Privacy Law) and the categories of third parties to whom the California Personal Information was shared.

In addition, California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below.

### *Do-Not-Sell or Share My Personal Information*

In addition to the above-stated rights, California residents have the right to opt-out of the selling or sharing of their California Personal Information, as such terms are defined under California Privacy Law. To exercise this right, please contact us at [support email].

In addition, we have configured our cookie management tool to honor opt-out preference signals sent by Global Privacy Control (“GPC”) within the browser. Please note that due to technical limitations, the GPC signal is only honored within the particular browser. Beyond GPC, we do not currently respond to web browser “do not track” signals or other mechanisms that indicate your preference for not having information collected over time and across different Websites or digital apps following your visit to one of our sites.

We will not discriminate against you by offering you different pricing or products, or by providing you with a different level or quality of products, based solely upon your exercising your rights under applicable law.

Finally, we do not “sell” or “share” California Personal Information about consumers that we know are younger than 16 years old without opt-in consent.

### *Exercising Your Rights*

If you are a California resident and wish to request the exercise of these rights as detailed above or have questions regarding the California Personal Information collected or shared with third parties, please contact us at [contact@riftweaver.com](mailto:contact@riftweaver.com). When submitting your request, please include the specific nature of your request, referencing "Your California Privacy Rights," as well as your first and last name, email address, and zip code or mailing address. We may apply any exceptions or other conditions available under law when responding to access, correction, deletion, or other requests. We will generally fulfill requests for access, correction, and deletion within 45 days of receiving a valid verified request. We may extend the response time by another 45 days by notifying the individual of the time extension.

### Authorized Agents

To the extent that you elect to designate an authorized agent to make a request on your behalf, the authorized agent must provide appropriate documentation including written signed permission from you, proof of your identity, and verification of the agent's identity; a valid, designated power of attorney as defined under the California Probate Code, and certificate of registration as an agent before the California Secretary of State. If you are an agent submitting the request on behalf of a California consumer, please contact us at [contact@riftweaver.com](mailto:contact@riftweaver.com).

### Data Retention

We keep your California Personal Information for as long as needed or permitted according to the purpose(s) for which it was obtained. The criteria used to determine our retention periods include (i) for as long as we have an ongoing relationship with you; (ii) for the duration of a contract with you; (iii) as required by a legal obligation to which we are subject to; or (iv) as advisable considering our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations). We may remove California Personal Information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, we may delete California Personal Information from our database at any time and without providing any reason.

### Shine The Light

Separately, under California's "Shine the Light" law (Cal. Civ. Code § 1798.83), California residents who provide us their Personal Information are entitled to request and obtain from us, free of charge, information about the Personal Information (if any) we have shared with third parties for their own direct marketing use; such requests may be made once per calendar year for information about any relevant sharing in the prior calendar year (so, requests submitted in 2023 would be applicable to relevant disclosures (if any) in 2022). If you are a California resident and would like to make such a request, please contact us at [support email], using the subject line "Request for California Privacy Information." In your request, please attest to the fact that you are a California resident and provide a current California address. We will reply to valid requests by sending a response to the email address from which you submitted your request. Please note that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing and the relevant details required by the Shine the Light law will be included in our response.

## **Contact Information**

If you have any questions about this Privacy Policy, please contact us at [contact@riftweaver.com](mailto:contact@riftweaver.com).