

# THE RADIUTHREE CO., LTD. PRIVACY NOTICE FOR FILLIT THE ABSTRACT STRATEGY

For users outside Asia\* (See the end of this notice for a list of countries/regions in Asia.)

## 1. INTRODUCTION

This privacy notice (Privacy Notice) sets out the ways in which we, Radithree CO., LTD., and its affiliates, collect and use your personal data (your personal information) in connection with FILLIT the Abstract Strategy (our App). It also explains what rights you have to access or change your personal data.

## 2. ABOUT US

2.1 Radithree CO., LTD. is a company registered in Japan, with our address as set out below.

2.2 You can contact us as follows:

Radithree CO., LTD.

Attention: FILLIT the Abstract Strategy

Address: ROSA Ichikawa 103, 1-16-13, Shinden, Ichikawa-shi, Chiba, Japan 272-0035

Email: [support@radiuthree.co.jp](mailto:support@radiuthree.co.jp)

## 3. INFORMATION WE COLLECT ABOUT YOU

3.1 Information that you provide to us.

We don't require personal information to use the App.

If you choose not to disclose personal information, however, you will not be able to enjoy certain features of the App.

3.1.1 We will collect any information that you provide to us when you:

- (a) access certain features or functions in our App that require personal information;
- (b) make an inquiry, provide feedback, or make a complaint via email or our customer support site; and
- (c) submit correspondence to us via post, email, or our customer support site.

3.1.2 The information you provide to us when you use our App will include (depending on the circumstances):

(a) Player profile data. You may also provide a username, support ID (to let you transfer your profile data to a new device) and language preferences.

NOTE: Do not use your real name, initials, or other customer-identifiable information in a username.

This includes:

- Any in-game ID, passwords, et cetera
- Inquiry information
- Any other personal information

### 3.2 Information we collect about you.

(a) Transactional data. We will collect information related to your purchase transactions through our App, including the date and time, the amounts charged, and other related transaction details;

(b) Information contained in correspondence. We will collect any information contained in any correspondence between us. For example, if you contact us for customer support, we keep a record of that correspondence;

(c) Technical data. We will also collect certain information about how you use our App and the device that you use to access our App, even where you have not created an account or logged in. This might include your geographical location, device information (such as your hardware model, operating system information, unique device identifiers, terminal identifier, advertisement identifier, terminal information, terminal setting information et cetera), advertising ID (in apps that display advertising), unique player identifiers, such as a support ID and key or transfer password, player ID, player key, access key, the data transmitted by your browser (such as your IP address, time zone settings, access status / HTTP status code, language settings, and time zone settings referral source), information about your interactions with the App, including time- and date-stamped information such as page views, requests, number of sessions, number of downloads, users' game progress, and gameplay-related data including game errors, in-app purchases, length of visit to the App, keystroke logs, and similar information. This information may be collected by a third-party analytics service provider on our behalf and/or may be collected using cookies or similar technologies. For more information on cookies, please read paragraph 7 below;

(d) App permissions. We may also request permission to access apps and certain features on your device.

## 4. HOW WE USE INFORMATION ABOUT YOU AND RECIPIENTS OF YOUR INFORMATION

4.1 We will use your information for the purposes listed below either on the basis of:

- (a) performance of your contract with us and the provision of our services to you;
- (b) your consent (where we request it);
- (c) our need to comply with a legal or regulatory obligation; or
- (d) our legitimate interests.

4.2 We use your information on the basis of the above (see paragraph 4.1) and for our legitimate business objectives, including for the following purposes:

(a) To provide access to our App. To provide you with access to our App in a manner convenient and optimal and with personalized content relevant to you and to allow you to have a record of your gameplay within the App;

(b) To allow you to access certain App features.

To enable you to access features such as in-App purchases and gameplay;

(c) To enable you to play with other players. We will use the information you have provided (such as your username and language settings) to enable you to play with other players;

(d) To process and facilitate transactions between us. We will use your information to process transactions and payments, and to collect and recover money owed to us;

(e) User and customer support. To provide customer service and support, deal with inquiries or complaints about our App, and to share your information with our App developers, IT support provider, and payment services provider as necessary to provide customer support;

(f) To send push notifications. To send you push notifications about your use of our App, our news, events, new App features, products, or services that we believe may interest you, provided that we have the requisite permission to do so;

(g) Analysis. To use data analytics to improve our App, products/services, marketing, customer relationships, and experiences;

(h) Fraud and unlawful activity detection and prevention.

To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity, including identity fraud; to protect the rights and property of FILLIT the Abstract Strategy, our agents, our customers, and others, including to enforce our terms, policies, rules, and agreements; to protect the safety and security of any person; and/or to protect the safety and security of FILLIT the Abstract Strategy's and our partners' services, websites, and applications;

(i) Compliance with policies, procedures, and laws.

To enable us to comply with our policies and procedures and to enforce our legal rights, or to share your information with our technical and legal advisors, and to comply with laws or respond to lawful requests and legal process, including, for example, complying with a court order or subpoena.

4.3 If you are in the EU or the United Kingdom and have any concerns about our processing, please refer to details of "The Rights of Users in the EU or the United Kingdom" in paragraph 10 below.

## 5. WHO WE MIGHT SHARE YOUR INFORMATION WITH

5.1 In connection with the purposes and on the lawful grounds described above, we will share your personal information when relevant with third parties, such as:

- (a) App users that you play. Other App users who you play with, who are based both inside and outside the EU or the United Kingdom;
- (b) Our service providers. Third-party vendors, consultants, and other service providers who work for us and access your personal information to do that work;
- (c) Prospective sellers and buyers of our business.

In connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction, or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets;

(d) Ad network. Service providers that deliver information to you via ad network system regarding Radiuthree's current or future products and services.

(e) Other third parties (including professional advisers). Any other third parties (including legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) based in the UK, USA, Japan, and other countries/regions to enable us to enforce our legal rights, or to protect the rights, property, or safety of our employees, or where such disclosure may be permitted or required by law.

## 6. USE OF INFORMATION COLLECTION MODULES FROM THIRD PARTIES

We may use the Information Collection Module of a third party to investigate trends in the use of the App, effectively operate the App, prevent fraud, and advertise to customers. In this case, the following organizations may be provided with customer information for this purpose: Please also

refer to the privacy notice set by the relevant company.

Google Inc. (Google Firebase)

## 7. COOKIES AND TRACKING

7.1 We, and others, use cookies, web beacons, device IDs, and other tracking mechanisms to ensure that you get the most out of our App. Cookies are small amounts of information in the form of text files which we store on the device you use to access our App. Cookies and other tracking mechanisms, such as device IDs, allow us, and others, to monitor your use of the software, simplify your use of our App, and to help us and others associate the mobile devices you use, your activities across websites, and your browsers for advertising purposes.

7.2 Our website may contain content and links to other sites that are operated by third parties that may also operate cookies and other tracking mechanisms.

We do not control these third-party sites or their tracking activities, and this Privacy Notice does not apply to them. Please consult the terms, conditions, and Privacy Notice of the relevant third-party site to find out how that site collects and uses your information and to establish whether and for what purpose it uses cookies.

## 8. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

8.1 We use appropriate technological and operational security measures to protect your information against unauthorized access or unlawful use.

8.2 We will retain your information for as long as is appropriate to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for legal compliance and enforcement purposes, and for resolving disputes. Actual retention periods depend on a variety of factors such as the type of product, the type and sensitivity of the data, business needs, customer expectations and needs, the types of available user controls, and the form in which the data is stored.

## 9. INTERNATIONAL TRANSFERS OF YOUR INFORMATION

9.1 Our company is located in Japan, and the personal information that we collect from you will predominantly be stored in Japan. This will involve a transfer of data outside the EEA or the United Kingdom.

9.2 Whenever we transfer your personal data from inside the EEA or the United Kingdom to outside of the EEA

or the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following transfer solutions is implemented:

(a) Where we use certain service providers, we may use specific contracts approved by the European Commission

that give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries; and

(b) Where we use providers based in the USA, we may transfer data to them if they are part of the Privacy Shield,

which requires them to provide similar protection to personal data shared between Europe and the USA.

For further details, see European Commission:

EU-US Privacy Shield.

9.3 Please contact us using the contact details in paragraph 2 of this Privacy Notice if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or the United Kingdom.

## 10. THE RIGHTS OF USERS IN THE EU OR THE UNITED KINGDOM

10.1 If you are in the EU or the United Kingdom, you have certain rights with respect to the information that we hold about you, including:

(a) the right to be informed of the ways in which we use your information, as we seek to do in this Privacy Notice;

(b) the right to ask us not to process your personal data or to limit or cease processing or erase information we hold about you;

(c) the right to request access to the information that we hold about you (or request that we transfer this to another service provider where technically feasible) in a structured, commonly used, machine-readable format, in certain circumstances;

(d) the right to request that we correct or rectify any information that we hold about you which is out of date or incorrect;

(e) the right to withdraw your consent for our use of your information in reliance of your consent;

(f) the right to object to our using your information on the basis of our legitimate interests, and there is something about your particular situation which makes you want to object to processing on this ground; and

(g) the right to lodge a complaint about us with the UK Information Commissioner's Office (<https://ico.org.uk/>),

you are also able to lodge a complaint with the relevant authority in your country/region of work or residence.

Please note that we may need to retain certain information for our own record-keeping and research purposes.

We may also need to send you service-related communications relating to your user account even when you have requested not to receive marketing communications. There may be exceptions to these rights in certain circumstances, and where you cannot exercise a right due to an exception, we will provide that explanation. You may exercise your rights above by contacting us using the details in paragraph 2 of this Privacy Notice; or to stop receiving push notifications, you can update your preferences in your device settings.

## 11. THIRD-PARTY LINKS

Our App may include links to third-party websites, plug-ins, and apps. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, plug-ins, and apps and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every third party you visit.

## 12. WHAT TYPES OF INFORMATION DO WE COLLECT ABOUT CHILDREN?

12.1 If a user has indicated that they are a child when trying to use our App, we will direct the child to a different experience within our App that lets a child use our services much like any other user but that does not allow any additional personal information (as defined under COPPA) to be collected.

12.2 We collect only a subset of the personal information above when a user identifies themselves as a child, including username and unique identifiers. Children can use our App, view content, and enjoy many features without collection of any personal information (as defined under COPPA) and where consent of the parent is required by law, we will request it.

### 13. ADDITIONAL PRIVACY RIGHTS FOR CALIFORNIA RESIDENTS

13.1 This section provides you with additional disclosures required under California law.

13.2 If you are a California consumer whose personal information is collected through the App ("customer"), the California Consumer Privacy Act ("CCPA") provides you with certain rights in respect to that personal information. In particular, you have a right to request that companies provide you with the following information:

- (a) The categories and specific pieces of personal information we have collected about you;
- (b) The categories or sources from which we collect personal information;
- (c) The purposes for collecting and using personal information;
- (d) The categories of third parties with which we share personal information;
- (e) The categories of personal information disclosed about you for a business purpose.

13.3 You also have a right to request that we delete personal information under certain circumstances, subject to a number of exceptions. Additionally, you have a right not to be discriminated against for exercising any of these rights.

13.4 You may exercise your rights above by contacting us using the details in paragraph 2 of this Privacy Notice.

If you submit a request, we will require you to verify your identity where, if feasible, we may match your identification information with personal information we have about you, depending on the type of request made and verification measures proportional to the risk of the personal information involved with the request(s). There is no reasonable method by which we can verify your identity to the degree of certainty required by law for certain pieces of personal information, for example: unique identifiers such as cookie IDs, device ID, and IP address (where that information is not held by us in connection with directly identifiable information). There may be exceptions to these rights in certain circumstances, and where you cannot exercise a right due to an exception, Radiuthree will provide that information. Radiuthree will use reasonable efforts to fulfil your request within the response times of the applicable laws.

13.5 Radiuthree does not sell your personal information as defined by the CCPA and has not done so in the past 12 months.

13.6 In addition to the purpose in which your personal information is shared with other third parties (including professional advisers) in Section 5.1(e) and 6 above, sharing includes sharing for business purposes that require access to our systems that hold personal information (such as supplying cloud data storage, maintaining the security of our systems, and providing



customer support). In the past 12 months, we have disclosed to vendors all of the categories of personal information described in Section 3.

13.6 In addition to the purpose in which your personal information is shared with other third parties (including professional advisers) in Section 5.1(e) and 6 above, sharing includes sharing for business purposes that require access to our systems that hold personal information (such as supplying cloud data storage, maintaining the security of our systems, and providing customer support). In the past 12 months, we have disclosed to vendors all of the categories of personal information described in Section 3.

#### 14. DATA PROTECTION OFFICER

14.1 If you wish to contact our Data Protection Officer, please use the following details:

Radithree CO., LTD.

Attention: Data Protection Officer

Address: ROSA Ichikawa 103, 1-16-13, Shinden, Ichikawa-shi, Chiba, Japan 272-0035

#### 15. CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We may amend this Privacy Notice at any time by changing the last updated date. If we make material changes to how we collect, use, or share your personal information, we will describe the changes, and, if required by law, seek your consent for such changes.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by updating your profile account information or contacting us via the contact details in paragraph 2 of this Privacy Notice.

This Privacy Notice was updated on August 1,2020.

\*Asia

Republic of India

Republic of Indonesia

Republic of Singapore

Kingdom of Thailand

Islamic Republic of Pakistan

Republic of the Philippines

Brunei Darussalam

Malaysia

Republic of Korea

Hong Kong

Macau

Taiwan

Japan