

VGW Website Privacy Policy

At VGW, we are committed to protecting and respecting your privacy and maintaining your confidence and trust. This privacy policy ("Privacy Policy") explains how your personal information is collected, why it is collected and how it is kept secure by VGW.

The games provided by VGW are provided through different URLs or mobile applications (each a "Platform"), belonging to, or licensed to, an entity within the VGW group of entities. Therefore, there are a number of entities through which VGW collect, use, maintain and disclose personal information of users (each, a "User") in connection with the provision of its games. VGW Holdings Limited is the ultimate parent company of this group of entities ("VGW Group"). Depending on which Platform you are using or accessing, another entity in the VGW Group may be the data controller in relation to your personal data and this will be specified in the relevant Platform's terms and conditions and privacy policy. Once you access a Platform, you are subject to that Platform's terms and conditions and privacy policy, which may differ from this Privacy Policy.

This Privacy Policy applies to your use of the website, www.vgw.co (the "Website"), any services or applications provided through the Website and any interaction with VGW Holdings Limited.

1. Data Controller

1.1. This Privacy Policy is issued on behalf of the VGW Group so when we mention "**VGW**", "**we**", "**us**" or "**our**" in this Privacy Policy, we are referring to the relevant company in the VGW Group responsible for processing your data.

1.2. The data controller responsible for processing data collected through your use of the Website or otherwise any interaction with **VGW Holdings Limited** is VGW Holdings Limited, having its registered address at Level 11, 15 – 17 William Street, Perth 6000, Western Australia (the "Data Controller").

2. Type of information we collect

General

2.1. We collect two basic types of information - personal information (as defined below) and anonymous information (as defined below) - and we may use personal and anonymous information to create a third type of information, aggregate information (also defined below). We collect:

2.1.1. contact details, such as your first name and surname, email address, residential address and mobile or other phone numbers;

2.1.2. information sent bilaterally or within a small group using email, post or other methods of communication;

2.1.3. information we obtain from a third party, such as a site or platform provider (including Facebook), about your use of or interest in our services;

2.1.4. location information, including location information provided by a mobile or other device interacting with one of our Websites, or associated with your IP address, where we are permitted by law to process this information; and

2.1.5. activity, technical and device information about your use of our Website, such as the content you view, the time and duration of your visit on our Website, how often you use our services, how you first heard about our Website, your preferences and information about your interaction with the content offered through our Website, your hardware model, device type, other unique device identifiers, operating system version, browser type and IP address.

Recruitment

2.2. In addition, if you apply for a job position with us, we typically collect information about you including information about your work history, relevant checks or records from recruitment consultants or previous employers, universities and others who may be able to assist us in our decision as to whether to make you a job offer.

2.3. Depending on the jurisdiction, certain laws contain exemptions in relation to particular acts undertaken in relation to employee records and related bodies corporate. VGW Group may make use of relevant exemptions where applicable.

2.4. While we will collect most information directly from you, we may also collect information from third parties, such as your employer or contracting organisation, your business contacts or other organisations that you deal with, regulatory or credit reporting agencies, a service provider or from a publicly available record.

3. How we collect your information

3.1. We collect information that Users provide to us in a variety of ways, including when Users visit our Website, respond to a survey, fill out a form and in connection with other activities, services, features or resources we make available on our Website.

You warrant any contact information you provide, included (but not limited to), your e-mail address and mobile phone number is true and accurate.

3.2. In addition to collecting information via our Website, we collect information from Users by telephone, video or in correspondence (including email, live chat, mail, text message or social media). All telephone or video calls between Users and VGW Group representatives may be recorded for training, quality control and compliance purposes and by continuing with any such call you consent to it being recorded.

3.3. We also collect information about your use of our products and services through a variety of technologies that are present when you visit our Websites or use our applications on third party sites or platforms (whether or not you are logged in or registered) including cookies, flash cookies, pixels, tags and application program interfaces (“API”). Please see the section entitled “Personal Data Collected via Technology” below for further information.

3.4. Finally, we also use trusted sources to update or supplement the information you provided, or we collected, including in order to verify or validate information (for example, postal address, documentation and names).

4. How we use collected information

4.1. The Data Controller is responsible for and may use your information for the purposes described in this Privacy Policy. Other members of VGW Group may access your information where they act on behalf of the Data Controller as a data processor for the purposes described in this Privacy Policy.

4.2. In accordance with applicable law and any elections made available to you, VGW may collect and use the information of Users for the following specific purposes:

4.2.1. **To respond to your job application or queries in relation to positions within the VGW Group** - This includes, for example, processing your personal details, performing background checks and interviews and responding to your queries.

4.2.2. **To improve customer service and our services** - Information you provide helps us respond to your customer service requests more efficiently; we may use feedback you provide to improve our products and services.

4.2.3. **To personalize user experience** - We may use information which has been aggregated for analytical purposes including to understand how our Users as a group use the services and resources provided on our Website.

4.2.4. **To communicate with you** – We may use the information collected to communicate with you, to build and maintain our relationships with you and to process and respond to your requests, enquiries or complaints.

4.2.5. **To send important notices to you** - From time to time, we may send important notices to you, such as communications about purchases you have made, or legal notices regarding the changes to our terms and conditions or other policies. This information is important to your interactions with us and you acknowledge that you may not opt-out of receiving these communications.

4.2.6. **To comply with our legal and regulatory obligations** - We may use information we collect about you to comply with applicable laws and our other regulatory, accounting, taxation, reporting or professional obligations and to protect, exercise or defend our legal rights.

5. Personal data collected via technology

5.1. When you interact with our Website, we try to make that experience simple and useful. We and our partners use industry standard identifiers, such as cookies or other similar technologies.

5.2. Our Website may use technologies to enhance User experience. These technologies are small files that are placed on your computer, tablet, mobile phone or other devices when you visit a website. They allow us to record certain pieces of information whenever you visit or interact with the website.

5.3. The following are examples of these types of technologies:

5.3.1. **Cookies.** These are small text files placed in your device browsers to store your preferences. Most browsers allow you to block and delete cookies. However, if you do that, the service may not work properly.

5.3.2. **Pixel tags/web beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Website that collects information about Users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on or forwarded.

5.3.3. Mobile device identifiers. We may share the advertising identifier associated with your mobile device or tablet (such as the Apple IDFA and Google Advertising ID) with advertisers. It is used to identify your device for internet-based advertising.

For instructions for using the advertising choice mechanisms provided by the most popular mobile operating systems, visit the NAI's Mobile Choices page [here](#).

Behavioral Advertising

5.4. We may partner with a third party to either display advertising on our Website or any application accessible via our Website or to manage our advertising on other websites (for example, using custom audiences on Facebook). Our third-party partner may use technologies such as cookies to gather information about your activities on our Website and other websites in order to provide you advertising based on your browsing activities and interests.

5.5. If you wish to opt-out of interest-based advertising click [here](#) (or if located in the European Union click [here](#)). Please note you will continue to receive generic advertisements.

6. Your rights over your information

General Rights

6.1. Depending on the applicable jurisdiction, you have a number of rights concerning the personal information we hold about you. If you wish to exercise these rights, you should contact our [Data Protection Officer](#).

6.2. These rights include the right to access the personal information we hold about you, the right to correct or update your data and the right to opt-out of direct advertising.

Right to complain

6.3. If you believe we have acted contrary to your rights, or you wish to make a complaint about the way we have handled your personal information, please contact our Data Protection Officer. Please include your name, email address and/or telephone number and clearly describe your complaint.

6.4. If you are not satisfied with the way we have handled your complaint, you also have the right to complain to the relevant data protection supervisory authority about our processing of your personally information.

Rights in direct advertising

6.5. If we process your personally identifiable information for the purpose of direct advertising, you have the right to object at any time to the processing of personally identifiable information relating to you for the purpose of such advertising; this also applies to profiling, where appropriate, insofar as it is associated with such direct advertising.

6.6. You may opt-out of receiving commercial messages from us by following the instructions contained in those messages or by completing the [VGW Privacy form](#). In the event of your objection to processing for the purpose of direct advertising, we will no longer process your personally identifiable information for these purposes.

7. How we protect your information

7.1. We have in place, physical, electronic and operational procedures to protect the information that we collect. We adopt appropriate data collection, storage and processing practices and security measures to

protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Website. Our security measures are reviewed regularly and updated in keeping with technological advances.

8. How long do we retain your information

8.1. We will retain your information for the period of time required to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

9. Sharing your information

9.1. We do not sell, trade, or rent the personal information of Users to others. However, there are circumstances when we share your personal data with other companies in the VGW Group, with third parties that provide services to you on our behalf, and with other third parties in the course of complying with our legal obligations.

With other companies within VGW Group

9.2. We may share the information we collect with other companies in the VGW Group for the purposes set out in this Privacy Policy. Please see Transfers below for further information on how we share information within the VGW Group.

With third parties

9.3. We only share information with third parties in limited circumstances including the following:

9.3.1. when you allow us to share your information with third parties;

9.3.2. when providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;

9.3.3. with our service providers to enable us to provide our services, such as companies that help us with technology services, storing and combining data, processing job applications or providing relevant marketing and advertising for our products and services. The partner companies will have access to your personal information only to perform services on our behalf and are prohibited from using your personal information for purposes other than those requested by us or required by law. Where service providers use personal information for their own purposes, where permitted by law, such service providers will act as data controller;

9.3.4. in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, when ordered to do so by any regulatory body and/or under any legal provision contained in the governing law of a particular jurisdiction; and

9.3.5. to enforce our terms and conditions set out on our Website, to protect our rights and property and the rights and property of our customers and third parties, to detect fraud or other illegal activities, and to comply with law or legal processes.

9.4. We may also share generic aggregated demographic information not linked to any personal identification information regarding visitors to and Users of our with our business partners, trusted affiliates and advertisers for the purposes outlined above.

Transfers

9.5. VGW Group operates in several international jurisdictions and personal information we collect may be transferred to, and stored and processed by, individual companies in the VGW Group or third parties in the European Union, the United States, Canada, Australia, the Philippines or any other country in which we or our third party processors maintain facilities. We will ensure that transfers of personal information to any country or organization are subject to appropriate safeguards. Additionally, without limitation and where applicable, when transferring personal information from the European Union, we may use standard contractual clauses approved by the European Commission or otherwise adopt other means in accordance with European data protection laws for ensuring adequate safeguards.

10. Do-not-track signals and similar mechanisms

10.1. Some web browsers may transmit “do-not-track” signals to the websites with which the user communicates. Due to the different ways that web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. As there is currently no industry standard concerning what, if anything, websites should do when they receive such signals, our Website currently does not take action in response to these signals. If and when a final standard is established and accepted, we will reassess how to respond to these signals.

11. Changes to this privacy policy

11.1. This Privacy Policy may be updated from time to time to reflect changes in the way we work or the way our work is regulated.

11.2. Any changes to the Privacy Policy will become effective when the updated policy is posted on our Website.

11.3. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect.

12. Definitions

12.1. **Personal information** means information that identifies (whether directly or indirectly) a particular individual, such as the individual’s name, postal address, email address, and telephone number. When anonymous information is directly or indirectly associated with personal information, the resulting information is also treated as personal information.

12.2. **Anonymous information** means information that does not directly or indirectly identify, and cannot reasonably be used to identify, an individual.

12.3. **Aggregate information** means information about groups or categories of customers, which does not identify and cannot reasonably be used to identify an individual customer.

13. Contacting us

13.1. If you have specific questions regarding your personal information or how we use it, please contact our Data Protection Officer directly by email at the following email address dataprivacy@vgw.co and specify your place of residence and name and clearly describe your request or, alternatively, complete the [VGW Privacy form](#).

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