

# PRIVACY POLICY OF SIA "BEETROOT LAB"

We welcome your interest to SIA "Beetroot Lab" (hereinafter - "Beetroot Lab", "we", "us") privacy policy which describes the ways we collect, store, use, and manage the information, including personal information, and data that you provide or we collect in connection with our websites, including [www.beetrootlab.com](http://www.beetrootlab.com) (hereinafter - "Site") or any Beetroot Lab game provided on mobile platforms (for example, iOS and Android), all aforementioned collectively referred herein as the "Service".

Data protection is of high importance for us and Beetroot Lab is dedicated to protecting the privacy rights of the Service users ("users" or "you"). Careful handling of your personal data is a matter of course for us and thus any personal data are handled at all times in compliance with the applicable data protection laws.

Please read this privacy policy to understand our views and practices regarding your personal data and how we will treat it. By reading this policy we believe that you will be acquainted with Beetroot Lab privacy governance.

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## **1. General Information on Data Protection**

This privacy policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by Beetroot Lab. Gathered data are available only in the event of necessity and only to our employees or authorized persons. For the mentioned purpose we have taken the necessary technical and organizational measures to ensure that data privacy regulations are observed.

The following data privacy policy covers only the processing of data through the Service provided by Beetroot Lab. If you follow a link to a different website or app, the applicable policy will be the subject to data privacy policy regulations of the party operating respective service.

## **2. Responsible party and its contact details**

For the purpose of the 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) (hereinafter – the GDPR), directly applicable starting from May 25, 2018, and the local privacy laws, the data controller is:

SIA "Beetroot Lab",  
Registration code 44103112043,  
Legal address Beātes iela 5, Valmiera, LV-4201, Latvia,  
Office address Ūnijas iela 8 / k-7, Riga, LV-1084, Latvia  
Phone: (+371) 26675481,  
Email: [support@beetrootlab.com](mailto:support@beetrootlab.com)

In order to provide you with information and the Service on this Site, our website hosting company Advailo Ltd might process your personal data to ensure the maintenance of website, administer and support us in case of breaks, errors and other issues affecting website. In such case this company is considered as data processor in accordance with the Article 28 of the GDPR. With terms of personal data processing by this hosting company you can get acquainted by visiting this [site](#).

Beetroot Lab shall not be deemed responsible for any inaccuracy of individual's personal data submitted to us by you, or collected through the Service about that person, if initially these data belong to someone else. We are not required to verify the correctness of the information you provided to us, and Beetroot Lab shall not be liable for any consequences, which occurred due to provision of incorrect or misleading information in course of such data processing regarding purposes described herein.

## **3. Data processing and duration of the processing activities**

Beetroot Lab is processing your personal data for diverse purposes, such as ensuring, operating and improving the Service, handling of your inquiries, when you use the Service or contact us, etc. The sections below sets out how we obtain and handle your personal information.

We will process and store your personal data for as long as your account is active or as needed to provide you the Service. Also, depending on other purposes of the data processing your data may be stored for a period exceeding aforementioned time in order to comply with record retention obligations in accordance with applicable privacy laws and regulations.

### **3.1. Information and description of data process by Beetroot Lab**

When you use the Service, the following personal data might be collected about you:

- IP address, your device's operating system, browser type and language;
- Mobile device identifiers (your unique device ID (persistent/non-persistent, hardware type, medial access control ("MAC") address, international mobile equipment identity ("IMEI"), and your device name;
- General location information for the purpose of providing you with the correct version of the Service;

- Precise geolocation information from your mobile device upon login in our games (but only with your prior express consent);
- Contact information (name, surname, email or postal address);
- Alias, username, tag, nickname, and password for our community forum;
- Profile information (profile photo, age or birthday, links to profiles on other social networking websites);
- Facebook login (public profile name, e-mail) and/or Apple sign in details (e-mail, display name);
- Game data (your interactions with the game and with the other players inside the game via server log files, your player ID);
- Phone number (e.g. if you submit the information through contact form available on the Site);
- Public cryptocurrency wallet address if you choose to provide it.

### **3.1.1. Visiting Beetroot Lab website**

You can visit our website without submitting any details about yourself. We or our hosting company may only save access data (such as: date, time and duration of your session; volume of the transmitted data and the requesting provider) in so-called server log files. This information is assessed solely to ensure smooth website operation and to improve our Service. We cannot deduce any personal information about you from that data because your IP address is only saved in its abbreviated form.

With regard to each of your visits to our Site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet (we collect this in abbreviated form and therefore will not be able to deduce any personal information from this);
- your browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for on Site;
- response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number;

Aforementioned information we will use in order to:

- administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our Site to ensure that content is presented in the most effective manner for you and for your device;
- allow you to participate in interactive features of our service, when you choose to do so;
- keep our Site safe and secure as part of our efforts;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- make suggestions and recommendations to you and other visitors of our Site about goods or the Service that may interest you or them.

Please, be aware that by visiting our website you can make available to our hosting company un-identified and non-identifiable information pertaining to you (non-personal data), but which, however, does not enable us or our hosting company to identify you from such information collected. The non-personal Information collected by us or our hosting company mainly consists of technical and aggregated usage information mentioned above, as well as website visitors' browsing and 'click-stream' activity, session heatmaps and scrolls, non-identifying information regarding the visitor's device, operating system, Internet browser, screen resolution, language and keyboard settings, internet service provider, referring/exit pages, date/time stamps, etc.

### 3.1.2. Playing Beetroot Lab games

When you use any of Beetroot Lab games or applications on a mobile device, we may record certain information and data about you. For instance:

- your application usage;
- your profile information (photo, career, achievements, in-app purchase history);
- access, session times and in-app purchases;
- your unique device ID (persistent / non-persistent);
- hardware type;
- media access control ("MAC") address;
- international mobile equipment identity ("IMEI");
- version of your operating system ("OS");
- your device name;
- your email address (if you have connected to Facebook or Google+);
- your location (based on your Internet Protocol ("IP") address);
- your public cryptocurrency wallet address if you choose to provide it.

Aforementioned information collected through our Service we will use in order to:

- provide Service to you, operate the Service, ensure its continuity and improvement;
- synchronize your game data on all devices you use the Service;
- create unique user ID and gaming accounts allowing users to play our games and save, recognize gameplay progress;
- contact you and respond to your comments and questions, and provide customer service;
- send you Service-related information, including confirmations, technical notices, updates, security alerts, and support and administrative messages;
- communicate with you about promotions, rewards, upcoming events, and other news about products and services offered by us and our selected partners;
- deliver advertising and marketing and promotional information to you;
- identify and suggest connections with other users of our games;
- enable you to communicate with other users;
- conduct marketing and research on preferences of users to enhance your experience and enjoyment using our Service;
- link or combine it with other information we get from third parties, to help understand your preferences and provide you with better Service;
- create reports for internal use;
- credit your cryptocurrency wallet with the cryptocurrency of our cooperation partners.

Processing of game-related data also helps us to indicate issues, inconsistencies, bugs, deal with troubleshooting and gives the opportunity to understand usage trends and needed improvements so that you could get better satisfaction and experience while using the Service. Processing of game-related data may also be utilized for other purposes, such as interest-based advertising as described elsewhere in this Policy.

When you have downloaded our game, prior starting to experience the game you will receive a pop-up notification where the present Privacy policy and Terms of the Service are available. Please, before proceeding with playing the game, read and accept our Privacy policy and Terms of the Service.

You can play our games without creating an individual profile. However, if you decide to connect your Facebook, Game Center, Apple or other profile, you may do so when signing/login into our games. Either way we create for you a unique user ID to track your use of the Service. This unique user ID is stored in connection with your profile information to track Beetroot Lab games you are playing, as well as for situations to determine your activities therein.

Our Service offers publicly accessible blogs, private messages, or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal information from our blog or community forum, please contact us via email [support@beetrootlab.com](mailto:support@beetrootlab.com). In some cases, we may not be able to remove your personal information, in which case we will let you

know if we are unable to do so and why. If you choose to use Facebook connect to use our blog or community forums, the information you provide is tied to your Facebook account. You will need to contact Facebook directly.

With only your prior and explicit consent, we or our partners (such as Service support providers) may collect your precise location-based information (GPS) for the following purposes:

- to match you with opponent players in your local area,
- to tailor content specific to your area (such as event announcements),
- to show your location to other players, and
- to match your device location to certain points of interest for purposes of interest-based advertising as described elsewhere in this Policy.

Allowing us to disclose your precise location data to other players in our game makes them able to see that you are available to play a game when you participate in specific areas of our games. Please note, participation in this part of the Service is not a requirement for all gameplay in our games, but it may be a requirement, for example, to participate in local gameplay with others in your area.

We may occasionally send you push notifications through our mobile applications to send you game updates, high scores and other Service-related notifications that may be of importance to you. You may at any time opt-out from receiving these types of communications by turning them off at the device level through your settings.

We store game-related information on servers located in the European Union (Frankfurt), United States (Ohio, Oregon, N. Virginia), and Mumbai via Amazon Web Services and may store information on servers and equipment in other countries. In any case, before transmitting and storing data outside the European Union, we assess such a need and make sure that the privacy requirements of the territory in question comply with the regulatory provisions of the European Union.

### **3.2. Information you provide to Beetroot Lab**

When using the Service, you provide to us information about yourself, for instance, by filling in forms on our Site, by corresponding with us via email or within the games, therefore such information may include following personal data:

- Name and surname, email address (e.g. if you wish to receive informative messages or a feedback regarding your inquiry);
- Phone number (e.g. if you prefer to receive from us a verbal feedback);
- Profile photo (e.g. if you wish to individualize your profile);
- age or birthday, as the Service is not intended for use to persons under the age of 12;
- links to your profiles on social networking websites and other third party sites;
- Email address (e.g. if you wish to receive informative messages, joining the mailing list);
- IP address;
- Public cryptocurrency wallet address if you choose to provide it.

This information is processed in accordance with the provisions of the GDPR when you provide it by using the Service and the communication features granted therein.

Aforementioned information we will use for following purposes:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you, and other similar products to those which were the subject of a previous sale or negotiations of a sale to you;
- to notify you about changes to our Service;
- to ensure that content of our Service is presented in the most effective manner for you and for your technical device when you are using the Service;

- to credit your cryptocurrency wallet with the cryptocurrency of our cooperation partners.

### **3.3. Sharing information**

We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

Beetroot Lab does not share your personal information except as approved by you or as described below:

- We may engage other companies and individuals to perform services on our behalf. Example of these services include analyzing data and providing customer support. These agents and service providers may have access to your personal information in connection with the performance of services for Beetroot Lab.
- We may release your information as permitted by law, such as to comply with a subpoena, or when we believe that release is appropriate to comply with the law; investigate fraud, respond to a government request, enforce or apply our rights; or protect the rights, property, or safety of us or our users, or others. This includes exchanging information with other companies and organizations for fraud protection. In certain situations, we may be required to disclose personal information in response to lawful requests by public authorities or for local law enforcement requirements.
- We may share your information in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business to another company. You will be duly notified via email and/or notice on our Sites of any change in ownership or users of your personal information.
- We may share aggregate or anonymous information about you with advertisers, publishers, business partners, sponsors, and other third parties which in turn are liable to ensure compliant data processing.

We may combine this information with information you give to us and information we collect about you when you use the Service. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive). For instance, to send you our game merchandise, we give the required details about you to the service company in charge of making the delivery. Furthermore, your details may be communicated to the payment service provider (e.g. the bank) in charge of handling your financial claims (in any) depending on the payment modality chosen by you.

We may transfer information that we collect about you to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Please note that these countries and jurisdictions may not have the same data protection laws as your own jurisdiction, and we take steps to ensure adequate safeguards are in place to enable transfer of information to the U.S. and the use and disclosure of information about you, including personal information, as described in this Policy.

Please be assured, whenever Beetroot Lab collaborates with service providers, our terms and conditions imposes an obligation on the service providers to protect data privacy and act according to applicable laws and regulations binding for them, as well as for us.

### **3.4. Data processing for marketing and advertising purposes**

We process your name, surname, and an e-mail address and other data for own marketing purposes on the basis of your expressed interests. We use this data for example to inform you about our own new products and campaigns (events, championships, tournaments) or to personalize the presentation of your wishes. We may feature advertisements in our games, too. You can prevent this if you like by following instructions described in this Privacy policy.

#### **3.4.1. Marketing**

Both Beetroot Lab and with the help of our partners, we process data and information about you and your device in connection with marketing and advertising. These measures allow us to better determine your needs, when you are viewing and interacting with any of the Service, in

order to deliver, enable, target and optimize advertising and promotional information that is more relevant to you and is based on your game and device usage, online behavior and interests (this is commonly referred to as online behavioral or interest based advertising).

We and our partners may use cookies or similar tracking technologies to track the content you access within the Service or your device location for purposes of interest based advertising. The privacy policies of our partners may include additional terms and disclosures regarding their data collection and use practices and tracking technologies, and we encourage you to check those privacy policies to learn more about their data collection and use practices, use of cookies and other similar tracking technologies.

### 3.4.2. Advertising

Advertisers on mobile devices and our third-party advertising and analytics partners sometimes collect and use Advertising IDs to enable and optimize advertising. Advertising IDs are non-permanent device identifiers such as the Android advertising ID and/or Apple's ID for advertising.

These advertisers and third party advertising and analytics partners may collect and use data and information about you, such as your Service session activity, viewing of and interaction with an advertisement, device identifier, MAC address, IMEI, geo-location information and IP address for the purposes of analyzing, tracking and measuring advertisement performance and to provide interest based advertising.

In addition, you may see our games advertised in other services. After clicking on one of these advertisements and installing our game, you will become a user of our Service. In order to verify the installs, a device identifier may be shared with the advertiser or third-party advertiser or analytics partner.

You can exercise an opt-out for interest based advertising services on mobile applications by checking the privacy settings of your Android or iOS device and selecting "[limit ad tracking](#)" (Apple iOS) or "[opt-out of interest based ads](#)" (Android). If you would like to adjust your choices regarding the use of precise location data, you may also do so via your mobile device settings.

Finally, many of our partner's that enable online behavioral or interest-based advertising are members of one or more digital advertising industry self-regulatory programs. You may click below for the Network Advertising Initiative ("NAI") and Digital Advertising Alliance ("DAA") to learn more about targeted or interest-based advertising and to opt out of certain targeting programs, you can visit following sites:  
<http://www.networkadvertising.org/choices>  
<http://www.aboutads.info/choices/>

### 3.5. Analytics

Within the Service, we use analytic tools, which serves for purpose of analyzing your usage of the Service and particular parts thereof. We use the following tools to perform analytical activities.

Tools	Description
Sentry	for server monitoring purpose
Unity Analytics	tracking and monitoring user in-game activity
Google Firebase	to administer user activity, push notifications, game event tracking
Singular	mobile measurement partner (MMP), which helps tracking user acquisition (UA) activity and providing postbacks of user activity to ad service partners
AppStore Connect/ Google Play Services/ UPD/ Huawei Store/ Galaxy Store	native panel of the app serving platform used to follow app performance in the platform

### **3.6. Other processing practices**

Beetroot Lab may offer you the opportunity to invite your contacts from a Social Network Service (such as your Facebook friends) so that those contacts can be located in Beetroot Lab games and/or you can invite them to join you in Beetroot Lab games. Such contact information will be used only for the purpose of sending communications to the addressee. You or the third party may contact us to request the removal of this information from our database to the extent Beetroot Lab stores any of this information.

We may also acquire information from you through (1) your access and participation in message boards on the Service, (2) your participation in surveys regarding the Service or (3) your participation in a sweepstakes or contest through the Service.

We may provide you the opportunity to participate in a sweepstakes or contest through our Service. If you participate, we will request and process certain personal information from you. Participation in these sweepstakes and contests is voluntary and you therefore have a choice whether or not to disclose this information. The requested information typically includes contact information (such as name and shipping address), and demographic information (such as zip code).

We use this information to notify winners and award prizes, to monitor traffic or personalize the Service. We may use a third-party service provider to conduct these sweepstakes or contests; that company is prohibited from using your users' personal information for any other purpose.

### **3.7. Children data**

By providing the Service, we do not address anyone under the age of 12, as Beetroot Lab provides strategy games and this age is admitted as compliant with the content of Service. We do not knowingly collect or solicit personal information from or direct or target interest-based advertising to anyone under the age of 12 (or other age as required by local law) or knowingly allow such persons to use our Services. If you are under 12, please do not send any information about yourself to us, including your name, address, telephone number, or email address. No one under the age of 12 may provide any personal information. Only with a prior and explicit verification by parents or legal guardian, a child under the age of 12 may use the Service.

In the event that we learn that we have collected personal information from a child under age 12, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under the age of 12, please contact us.

### **3.8. Customer service**

We may use your email address when you contact our customer service group to contact you about your gaming experience with Beetroot Lab games and notify you about company news and promotions upon your prior consent.

If you no longer wish to receive certain email notifications, you may opt-out at any time by following the unsubscribe link located at the bottom of each communication or by notifying us via email [support@beetrootlab.com](mailto:support@beetrootlab.com).

Your mailing address may be used if we have merchandise or other physical promotional materials that we want to send to you. If you no longer wish to receive these types of promotional materials, you may opt-out from receiving them at any time by emailing us your request to email indicated above.

### **3.9. Cookies and other Internet technologies**

We and our marketing and outsourcing partners, affiliates, or analytics service providers might use technologies such as cookies, beacons, scripts, and tags to identify your device and to



"remember" things about your use of Service, such as your preferences or a username and password.

Cookies are small text files sent to your browser by our web server during your session at our Site, and saved therein on your device ready to be called up later. Wherever possible, Beetroot Lab is using cookies that are deleted as soon as the browser is closed (session cookies). Additionally, Beetroot Lab also uses cookies that are stored in your device for longer periods of time, if need be. Such cookies are used for example to gather data in case our Site is visited for use of such data in statistic assessments and in order to estimate and provide that our Site is more user-friendly.

Information contained in a cookie may be linked to your personal information, such as your IP address, for purposes such as improving the quality of our Service, tailoring recommendations to your interests, and making the Service easier to use.

According to the law, we can place cookies in your device if they are necessary for a proper functioning of the Service. Your consent is needed if cookies are placed for other purposes, e.g. gathering of statistics, advertising, etc. Of course, you can also try to use the Service basically without cookies. Please note, however, that some functions of our Service, access to and use of its features will possibly not function properly or at all in case you deactivate use of cookies.

### **3.10. Other use of personal data**

Automated individual decision-making, including profiling, is not practiced by Beetroot Lab while providing you the Service. However, we might use profiling for statistics and analytical purposes assessing individual types of your game data.

When profiling personal data, Beetroot Lab does not take any decision based solely on automated processing, including profiling, which might produce effect on you or your capability to use the Service.

We also might offer links to third-party services in addition to our own Service. The content and design of third-party services are beyond our control. We do not ensure that the information on third-party websites is accurate or correct. The links also represent no endorsement, support or confirmation of the contents at the linked sites. Only respective third-party shall be held liable for illegal, incorrect or incomplete contents and for any damages arising from the use or non-use of the information available in the hyperlinks linked to our Service. The individual authors of the linked sites are responsible for the information, opinions and facts presented within their Service.

### **3.11. Specific regulations**

The following section applies only to residents of California.

Both the California Consumer Privacy Act (CCPA) and California Online Privacy Protection Act (CalOPPA) require us to disclose categories of personal information (Data) we collect and how we use it, the categories of sources from whom we collect the Data, and the third parties with whom we share it, which we have explained above in this Privacy policy.

In the preceding 12 months, we have disclosed the following categories of the Data as part of our Service:

- activity when using Service (history, updates, interaction within games, or advertisement) - to Service providers and advertising networks;
- identifiers (username, alias, tag name, account name, profile photo and game results, IP address, or other) - to other players (username and profile only), Service providers, business partners and advertising networks;
- commercial information (records of products purchased within Service, obtained, or considered, or other purchasing or consuming histories or tendencies) - to Service providers and advertising networks.

We are also required to communicate information about rights of California residents under California law. You may exercise the following rights:

- Right to know and access, which means that you may submit a verifiable request for information regarding the:
  - a. categories of the Data we collect, use, or share;
  - b. purposes for which categories of the Data are collected or used by us;
  - c. categories of sources from which we collect the Data; and
  - d. specific pieces of the Data we have collected about you.
- Right to equal Service, which means that we will not discriminate against you if you exercise your privacy rights.
- Right to delete, which means that you may submit a verifiable request to close your account or profile and we will delete the Data about you that we have collected.
- Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us. We do not sell the Data of our users. For more information about your rights, please see the next Section of this Privacy policy.

## **4. Your rights**

Please do not hesitate to contact us at your earliest convenience using the contact details provided in this policy, in case you have questions concerning the data protection or should you wish to make use as an affected party of the rights granted to you under the applicable data protection laws and regulations concerning procession of your personal data by Beetroot Lab.

In respect to your personal data you can exercise the following rights:

### **4.1. Right of access and right to obtain a copy**

It means that you have the right to freely and at any time get access to your personal data, as well as to be informed about the purpose of the data processing by us. You are entitled to request what personal data we process and for what purpose. In our response to your inquiry, we will also inform you about further specific circumstances relevant for the data processing.

### **4.2. Right to rectification, erasure or restriction**

It means that you have the right to request us to rectify or erase your personal data as far as it does not interfere with the execution of any legal obligations. You can also request the processing of your personal data to be restricted. Moreover, you are entitled to get your personal data adjusted, deleted or placed under restricted access regime or to obtain that data in accordance with the data transmissibility principles - to the extent the statutory conditions prerequisite are satisfied.

### **4.3. Right to withdraw consent**

It means that when the data processing is based on your consent, you have the right to withdraw your consent. You are entitled to recall at any time your consent given to us in accordance with the data protection laws and regulations (e.g. your agreement to receive our newsletters) with immediate effect for the future. If we process data on the basis of expressed interests (e.g. for marketing purposes), you have the right to ask us not to process your personal data for marketing purposes.

### **4.4. Right to object**

It means that you also have the right to object to the use of your personal data if we are processing your data for our legitimate interests.

### **4.5. Right to data portability**

It means that you have the right to obtain your personal data which is processed by us in a structured, commonly used and machine-readable format and/or to transfer this data to another data controller.

#### **4.6. Right to submit a complaint to a supervisory authority**

Additionally, you are entitled to lodge a complaint with the data protection supervisory authority in the Republic of Latvia. The authority supervising Beetroot Lab is the Data State Inspectorate and it can be contacted:

office address: Blaumaņa iela 11/13-11, Riga, LV-1011, Latvia;

telephone number: +371 67 22 31 31;

e-mail: [info@dvi.gov.lv](mailto:info@dvi.gov.lv);

Homepage: [www.dvi.gov.lv](http://www.dvi.gov.lv).

### **5. Data security**

Beetroot Lab has implemented certain technical and organisational security measures to protect your personal data in particular from accidental or intentional manipulations, loss, destruction or unauthorized access. In this regard, we have physical, electronic, and managerial procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your information. Our security measures are improved on an ongoing basis in line with technology development.

Although we make good faith efforts to store the information collected on the Service in a secure operating environment that is not available to the public, we cannot guarantee the absolute security of that information during its transmission or its storage on our systems. Further, while we attempt to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining access to this information. We do not warrant or represent that your information will be protected against, loss, misuse, or alteration by third parties. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

In case you think processing your personal data is in controversy with any privacy law or you found a security issue or vulnerability, please contact the Beetroot Lab via e-mail: [legal@beetrootlab.com](mailto:legal@beetrootlab.com).

Unfortunately, please be aware that the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **6. Amendments to privacy policy**

We may update this data privacy policy on regular basis - in particular when we launch new products or services, change Internet procedures or implement more advanced Internet and electronic data processing security techniques.

We will publish the amendments here in this section. That is why you are recommended to visit our website from time to time to acquaint yourself with the current updated version of the data privacy policy. The version published at the time of your visit to our website is the latest effective version.

### **7. Other matters**

#### **7.1. Legal disclaimer**

We have compiled our Service very carefully and it is continually expanded and updated. Nevertheless, we assume no liability for the accuracy or completeness of the contents. We do not assume any liability for direct, indirect, material or immaterial damages that may arise from infringements of the Terms of Service. Although we make every effort to protect our information systems, our Site, games and other services, they cannot be guaranteed as 100% secure. Therefore, we do not guarantee the absence of computer viruses, and, thus it is expected that you will take reasonable security measures for your own protection.

We are entitled to make changes or improvements to the information and configurations of the entire Service whatsoever at any time and in any extent without prior or following notification thereof.

Any existing or future legal relationships are exclusively subject to Latvian law and under the jurisdiction of Latvian courts only.

## **7.2. Use of Service, personal and non-commercial use limitation**

Unless otherwise specified, our Service is for your personal and non-commercial use. You may not modify, copy, distribute, transmit, display, perform, reproduce, publish, license, create derivative works from, transfer, or sell any information, software, products or services obtained from our Service.

You may display and, subject to any expressly stated restrictions or limitations relating to specific material, electronically copy, download and print hard copy portions of the material from the different areas of the Service solely for your own non-commercial use, or to place an order with us or to purchase our products. Any other use of information about the Service, including but not limited to the modification, reproduction, distribution, republication, display or transmission of the content of the Service, without prior written permission of Beetroot Lab is strictly prohibited.

## **7.3. Intellectual property**

Beetroot Lab respects the intellectual property of others, and we ask our users and visitors to do the same.

### **7.3.1. Copyright of Logos and/or Trademarks**

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### **7.3.3. Copyright of Text**

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