

# Privacy Policy

Effective Date: November 18, 2024

Thank you for using our service! This Privacy Policy describes:

- The ways we collect personal data about you and why we do so
- How we use your personal data, and
- The choices you have about your personal data.

This Privacy Policy applies to HaiJoy website, and related services, which we here collectively call the Service. If we make any material changes, we'll notify you by posting a notice within the Service before the change becomes effective. Your continued use of the Service after the effective date is going to be subject to the new Privacy Policy.

## CONTACT US

If you've got questions on data protection, or if you have any requests for resolving issues along with your personal data, we encourage you to primarily contact us through the sport, so we will reply to you more quickly.

Name of the controller: InspirAI HK Co. Limited

Address: ZJ 300, FLAT/RM A, 12/F, 300 LOCKHART ROAD, WAN CHAI, HONG KONG

Email: [Contact@HaiJoy.com](mailto:Contact@HaiJoy.com)

## 1. Personal Information We Collect and How We Collect It

### 1.1 Information You Provide Directly to Us

When you use our Services, you may give us information directly, such as when you register your account. This information is limited to:

- Your first and last name
- Your username and password

- Profile information(such as profile photo)
- Your gender
- Your age or birthday
- Your email address
- Other information you choose to give us (such as data to identify a lost account, chat logs, and player support tickets).

You may also give us information when:

- You upload user-generated content (such as photos, comments, or other materials) that you post to our website.
- You correspond with our customer support team(such as your name, email address, information about your gameplay or activity in our Services) which we will store and may share with our internal teams to provide support, diagnose technical issues, and improve our Services. For example, we may send you website-related emails (such as account verification, and technical or security notices).
- You voluntarily participate in our surveys, promotions, and contests, which we conduct from time to time.
- You opt-in to receive marketing email newsletters for updates related to our Services.

## **1.2 Information You Generate Using Our Services**

When you use our services, we will collect information on the ways you use and interact with our services, such as:

- Data about your account and game progress
- How long and often you return to use our website and games
- In-app purchases you make and consume
- Other gameplay-related activities, such as your interactions with other players inside the Service.

## **1.3 Information We Get from Connected Third-Party Applications and Platforms**

We may automatically collect information from other companies, including social networks (such as Facebook) or platforms (like Apple, Google, Microsoft, and Amazon), if you access our games through your accounts with those companies or you choose to connect your accounts with those companies to our website and

services.

The information we receive depends on the HaiJoy you are playing, the third-party application, your privacy settings, and, if applicable, your friends' privacy settings on that third-party application or platform, but may include:

- Your first and last name
- Your profile picture or its URL
- Your user identification number(e. g., Facebook ID) or Online handles
- Your friends' user ID numbers and other public data
- The email address provided to that third-party application
- Your gender
- Your birthday, age, and/or age range
- Any Information about your activities on or through connected third-party applications, either publicly available or that you or the provider of the third-party application shares with HaiJoy.

When you play HaiJoy's website or access any of our Services on connected third-party applications or platforms (like Facebook, Apple, Google, Microsoft, or Amazon), any purchases you make will be processed by that third party and subject to their terms of service and privacy policy. For these purchases, HaiJoy does not receive your financial information but may receive non-financial information related to your purchases, like your name, approximate physical location, and the items purchased.

## **1.4 Automated Information Collection**

When you use our Services, we use cookies or similar technologies(e. g, beacons, pixel tags, clear gifs, and device identifiers) to recognize you and save your progress (e.g., completed levels or puzzles) in our website across our Service and devices.

We and our Partners (defined below) also use cookies or similar technologies to passively collect and analyze certain technical information, limited to:

- IP Address
- The type of computer or mobile device you are using
- Platform type(for example, Apple iOS or Android)
- Your operation system version
- Your mobile device identifiers, such as Apple Identifier for Advertising (IDFA) and/or Android Advertising ID (AAID)

- Your device information, such as type and model, manufacturer, carrier name, mobile browser, and screen size
- Your website activity information, such as the start/stop time of your website session, your current time zone, and your network connection type (e.g., wifi, cell)
- Advertisement (personalized and non-personalized) information related to ads served, viewed and clicked on
- Your specific geolocation (with your permission)

When location services have not been enabled, we may infer personal information about your location based on your IP address.

In most cases, we will also create a HaiJoy-specific ID for you when you use the Service.

## 1.5 Other Sources

We may collect or receive information about you from other sources like third-party information providers. We use this information and the information you provide us directly, for instance, to provide you with better Service and show you advertising that we believe is most relevant for you.

## 2. Purposes of collection

The primary use of the personal information we collect and store is to provide you with the Services you request from us and to improve the experience. But, there are other uses as well, namely:

- Improving and optimizing our Services
- Creating accounts and allowing you to play our website and use our Service
- Saving your account information and game progress, no matter the device and platform you use to access our website and service
- Showing personalized advertisements to support the Service
- Enabling players to share user content and communicate with each other
- Providing technical support and resolving customer support inquiries
- Preventing fraud or potential illegal activities, protecting the safety and well-being of our users, and enforcing our Terms of Service
- Communicating with you about updates to the website and promotional offers we believe might be of interest to you
- Managing in-game events, online tournaments, contests, or sweepstakes (that

you agree to participate in).

- Complying with our legal obligations and protecting HaiJoy's rights and property in connection with our Services

For purposes of the EU Data Protection legislation and California Consumer Privacy Act, HaiJoy is the "data controller" of your personal information.

### **3. Who We Share Personal Information with and the Purposes of Data Sharing**

We may share your information, including personal information, with third parties (collectively, our "Partners"), and allow third parties to collect information to provide our Services for you.

#### **3.1 Advertising Partners**

We use advertising to enable us to offer some of our website, in-app features, and other Services for free. We and our advertising partners collect and share personal information with each other, so our advertising partners can decide to bid on ad inventory and serve ads best personalized for you.

Our advertising partners collect aggregated information (non-personal information) to measure the effectiveness and value of advertising on our Service, such as ad views, ad clicks, and whether users perform post-click actions like clicking on the advertiser's website or installing the app.

#### **3.2 Analytics Partners**

We collect and share personal information with analytics partners to perform marketing optimization and data analytics, such as:

- How long and often do you use our website and games.
- Other gameplay-related activities.
- Game features you and other players interact with.

#### **3.3 Third-party Service Providers and Other Partners**

We share personal information with Partners only according to HaiJoy's instructions to provide the Service, such as hosting, player support, website performance tracking, and fraud prevention.

In all the above cases and purposes, we may analyze, profile, and segment all collected personal information. With your consent, we may process information for additional purposes.

Our Partners are obligated to use the personal information we share through our Service in compliance with applicable laws and regulations. We ensure we have appropriate agreements in place with Partners to protect your information.

We have identified the provider names of some of our Partners. Please see the links below to learn more about the data practices of our third-party service providers(including opt-out mechanisms they may offer):

- websiteflyer--<https://www.websiteflyer.com/privacy-policy/>
- Applovin--<https://www.applovin.com/privacy/>
- Google AdMob--<https://policies.google.com/privacy>
- Facebook--<https://www.facebook.com/policy.php>
- MoPub--<https://www.mopub.com/legal/privacy/>
- Unity Ads--<https://unity3d.com/legal/privacy-policy>
- Vungle--<https://vungle.com/privacy/>
- Adjust--<https://www.adjust.com/terms/privacy-policy/>

The inclusion of a hyperlink to any third party privacy policies does not imply endorsement of the linked site or service by us.

Please note that we are not responsible for the collection, usage, and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, or any other social media platform provider, operating system provider, wireless service provider, or device manufacturer, including any personal information you disclose to other organizations through or in connection with our website.

You should always read the privacy policy of any website you access or social network page through which you share information carefully in order to understand their specific privacy and information usage practices.

## 4. Your Rights and Options

### 4.1 General

You have the right to correct your personal information, have your personal information deleted, object to how we use or share your personal information, and restrict how we use or share your personal information. You can submit your request by emailing us at [Contact@HaiJoy.com](mailto:Contact@HaiJoy.com).

We will respond to all requests within a reasonable timeframe.

### 4.2 Rights of Access, Rectification, Erasure, and Restriction

You can manage many aspects of information collection and use from your device by visiting the "settings" page on your mobile device and reviewing the access permission for each HaiJoy website.

If you request, we will provide you with a copy of your personal information in an electronic format.

You also have the right to correct your personal information, have your personal information deleted, object to how we use or share your personal information, and restrict how we use or share your personal information. You can submit your request by emailing us at [Contact@HaiJoy.com](mailto:Contact@HaiJoy.com).

We will respond to all requests within a reasonable timeframe. Such requests will be processed in line with local laws.

If you have posted user content (such as a photo) on the Service, we may not be able to delete it. We will keep certain records (e.g., personal information relating to payments or customer service matters) where we need (and have rights) to, such as for legal or accounting purposes. We'll also keep information in order to exercise, defend, or establish our rights.

Although we make good faith efforts to provide you with access to your personal information, there may be circumstances in which we are unable to provide access, including but not limited to where the information contains legal privilege; would compromise others' privacy or other legitimate rights; where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question; or, where it is commercially proprietary. If we determine that

access should be restricted in any instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, we will take commercially reasonable steps to verify your identity before granting access to or making any changes to your personal information.

- You have the following data protection rights:
- You have the right to request access to or that we change, update, or delete your personal information at any time. Please note that we may impose a small fee for access and disclosure of your personal information where permitted under applicable law, which will be communicated to you.
- If we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- The right to opt out of receiving marketing communications from us. You may opt out of receiving promotional communications, such as marketing emails from us, by following instructions in such communications. Please also note that if you do opt out of receiving marketing-related emails from us, we may still be required to send you administrative messages relating to our services from time to time.

Residents of the European Countries have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Economic Area (EEA) are [here](#).

Please note that because most of the information we store can only identify a particular browser or device, and cannot directly identify you personally, you may need to provide us with some additional information to enable us to identify the personal information we hold about you and ensure that we accurately fulfill your request and do not infringe on the privacy rights of other individuals.

United States (excluding California) and Other Countries

Opt Out: If you are located in the United States (excluding California) or another country outside the European Countries, you can opt out of receiving personalized advertising by changing your device settings, per method above.

### **4.3 Managing Third-Party website and Platform**



## Information Sharing

To manage the information HaiJoy receives from a third-party application or platform where you play our website and games, like Facebook, Apple, Google, Microsoft, or Amazon, you will need to follow the third-party application's instructions for updating your information and changing your privacy settings.

### State of California

Opt-Out: at any time, you may direct HaiJoy to stop sharing your Personal Information with third-party service providers and other partners.

Exercising such rights will not affect the quality or cost of Services.

To exercise your rights, you may contact us either at [Contact@HaiJoy.com](mailto:Contact@HaiJoy.com)

### Rights of Access

At your request, we will provide you with a copy of your personal information in an electronic format free of charge. Please note, that we may ask for proof of your identity. This right may be exercised no more than twice in a 12-month period.

## 5. Disclosure

Types of Personal Information collected, modes of collection, and purposes of collection are disclosed above.

## 6. International Data Transfers

Our Service is global by nature and your personal information can therefore be transferred anywhere in the world, including the United States. Because different countries may have different data protection laws than your own country, we take steps to ensure adequate safeguards are in place to protect your information as explained in this Policy.

## 7. How Do We Protect Your Data

### 7.1 Security Safeguards

The security of your personal information is important to us. We maintain appropriate safeguards and current security standards to protect your personal information from unauthorized access, disclosure, or misuse. However, no system can be completely secure, and we cannot ensure or warrant the security of any information you provide to us. While we take meaningful steps to secure your information, we do not promise,

and you should not expect that your personal information will always remain secure. We do not accept liability for unintentional disclosure.

By using our Service or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of the Service. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on the Website or sending an e-mail to you. You may have a legal right to receive this notice in writing.

## **7.2 Data Retention**

HaiJoy will retain personal information for the period necessary to fulfill the purposes outlined in this Policy and where we have ongoing legitimate business needs to do so (for example, to provide the Services, to comply with applicable legal, tax, or accounting requirements, to enforce our agreements or comply with our legal obligations) unless a longer retention period is required or permitted by law. Otherwise, we will take reasonable measures to delete your personal information from our records.

## **8. Children's Privacy**

HaiJoy does not knowingly collect, maintain, or share personal information from children under 13 (and in certain jurisdictions and the European or United States Countries, under the age of 16). If you are under 13 years of age (or in certain jurisdictions, including the European Countries and United States, under the age of 16), ask your legal guardian's permission to use or access the Services and please do not send any personal information about yourself to us.

We take children's privacy seriously and encourage parents/guardians to play an active role in their children's online experience. We hereby state that our Service is not directly targeted at users under 13 (or in certain jurisdictions, under the age of 16). If we learn that we have collected any personal information from children under 13 (and in certain jurisdictions under the age of 16), we will promptly take steps to delete such information and terminate the child's account.

## **9. Safety, Security, and Compliance with Law**

We may share your information as we believe to be necessary or appropriate: Under applicable law, including laws outside your country of residence; to comply with subpoenas, warrants, or other legal processes; to respond to requests from public

and government authorities including public and government authorities outside your country of residence; to enforce our terms and conditions; to protect our operations; to protect our rights, privacy, safety or property, and/or you or others; to allow us to pursue available remedies or limit the damages that we may sustain.

## **10. Cookies and Similar Technologies**

We and our Partners use cookies and similar technologies to provide and personalize the Service, analyze use, personalize advertisements, and prevent fraud. You can disable cookies in your browser settings, but parts of the Service may then not function properly.

## **11. Merger, Sale, or Other Asset Transfers.**

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. Should such an event occur, HaiJoy will endeavor to direct the transferee to use personal information in a manner that is consistent with the Policy in effect at the time such Personal Information was collected.

## **12. Contact Us**

If you have questions about personal information and data protection, or if you have any requests for resolving issues with your personal information, we encourage you to contact us at:

Email: [Contact@HaiJoy.com](mailto:Contact@HaiJoy.com)

## **13. Updates to this Policy**

We will review and update this Policy periodically and will note the date of its most recent revision at the top of this Policy. If we make material changes to this Policy, we will post the revised Policy on our website and may take additional measures to inform you about such changes if required by applicable data protection laws. We encourage you to review this Policy frequently to be informed of how HaiJoy is protecting your information.