

# PRIVACY POLICY Mines of Dalarnia

12 April 2022

Welcome Miners!

Mines of Dalarnia provides a social digital goods platform via the website "minesofdalarnia.com" (or such other URL as the website may subsequently be hosted at) (the "Website") The Website and Services(as defined below) are operated by Mines of Dalarnia Foundation Ltd. Singapore ("Dalarnia", "we" or "us") for users of the Website and the Service ("user" or "you"). This Privacy Policy sets forth our policy with respect to information that is collected from visitors to the Website, the Game Client Mines of Dalarnia (the "Application") and/or users of the Services. Under applicable law, Dalarnia is the "data controller" of personal data collected through the Website, the Application and the Services.

We take the privacy of your information very seriously. This Privacy Policy outlines Dalarnia's practices in relation to the storage, use, processing, and disclosure of personal data that you have chosen to share with us when you access the Website, the Application or use the Services. This Policy, together with our Landsale Terms & Conditions, applies to your use of the Website and the Application.

Please read this privacy policy carefully.

By accessing the Website and Application or using the Services, you consent to the collection, storage, use, and disclosure of your personal data, in accordance with, and are agreeing to be bound by this Policy. We will not collect any information from you, except where it is knowingly and explicitly provided by you.

## Definitions and interpretation

In this Privacy Policy, the following definitions are used:

**data** means collectively all information that you submit to Dalarnia via the Website, Services, Application or a user account.

This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;

**cookies** means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);

**Data Protection Legislation** means any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation; and

**Services** means any and all of (i) any Dalarnia smart contract, meaning a smart contract installed on Chromia Relational Blockchain or Binance Smartchain, (ii) any user interface, documents, materials and/or services made available through the Website, such as NFT/Land sales, in each case as updated or amended from time to time, as well as (iii) the Application.

## THE DATA WE COLLECT ABOUT YOU

We respect data protection principles, and process personal data only for specified, explicit, and legitimate purposes for which such personal data were provided. We primarily use your personal data to enable your use of the Website, the Application and the Services. We may also use your personal data for the purposes provided in this Privacy Policy, and the purposes listed below.

We may collect the following types of information from you:

### **A) Information you provide directly to us, including:**

- when you create a user account (in accordance with the section named "Registration" in the Dalarnia Landsale Terms & Conditions), your email address if you provide one, MetaMask (or other EVM-compatible wallets and browsers) digital wallet address and user name;
- if you purchase NFTs, your MetaMask or EVM compatible wallet address;
- your purchase history and other information relating to transactions made through the Website and/or the Application; and information contained in your correspondence with us, for example, when you send us an email;

### **B) Information collected during the course of your use of the Website, the Application or Services, including:**

- character names and gameplay information;
- any posts or images;
- your credited name (if any);
- ‘crash reports’ in the event that a software crash occurs, which may include details of your user account, a portion of the memory state of the game when the crash occurred and the game settings you were using, but not other information from your computer or its memory; and
- information about the computer or device you use to access our Service, including the hardware model, operating system and version, MAC address, unique device identifier ("UDID"), phone number, International Mobile Equipment Identity ("IMEI") and mobile network information.
- data contained in log files. The information in log files may include your IP address, your ISP, the Web browser you used to visit the Services, the time you visited the Services, which web pages you visited on the Services, and other anonymous usage data.
- information collected from third parties where the information is publicly available or you have authorised this; and
- information collected through our use of cookies or similar technologies. Please refer to our Cookies Notice for further information, including information on how you can disable these technologies.

### **C) Other contacts**

- We collect and process information about you if you offer or provide products or services to us, if we evaluate your products or services, and generally when you request information from us or provide information to us.

## CHILDREN

Our Services are for users age 18 and over and we do not knowingly collect personal information from children under the age of 18. If you are a parent or guardian of a child under the age of 18 and believe he or she has disclosed personal information to us please contact us at [support@minesofdalarnia.com]. For residents of the EEA, where processing of personal information is based on consent, Dalarnia will not knowingly engage in that processing for users under the age of

consent established by applicable data protection law. If we learn that we are engaged in that processing with such users, we will halt such processing and will take reasonable measures to promptly remove applicable information from our records.

## HOW IS YOUR PERSONAL DATA USED?

We use the information provided by you in connection with providing our Services:

- to provide access to the Website, the Application and Services to you;
- to verify your identity and verify that your user account is not being used by others;
- to fulfill any orders for Services;
- to market products and services to you, including contacting you via email that you may choose (or opt in) to receive. You can stop receiving our promotional emails by following the unsubscribe instructions included in those emails;
- to respond to communications from you; and
- to manage our relationship with you including notifying you of changes to any Website and/or Application.

We use the information generated by your access or use of the Website, the Application or Services:

- to monitor the performance of the Website, the Application and Services and ensure that the Website, the Application and Services perform in the best manner possible;
- for security and system integrity purposes; and
- to conduct research and statistical analysis (on an anonymised basis) (see also the Statistics section below);

We may also use your personal information in connection with our rights and interests:

- to protect and/or enforce our legal rights and interests, including defending any claim;
- for any other purpose authorized by you, Data Protection Legislation or other applicable law;
- to respond to lawful requests by public authorities, including to meet law enforcement requirements; and
- where this is necessary for our legitimate interests (except where such interests would be overridden by your fundamental rights and freedoms which require the protection of personal data).

We do not use personal information to make any automated decisions - automated processes to monitor gameplay to identify cheating and fraud- but human intervention is applied in the decision making process. Information is gathered transiently for these purposes but is not stored.

## HOW WE MAY SHARE YOUR PERSONAL INFORMATION

We may share your personal information with third persons (such as advisors, authorities and other persons) in the EU or other countries if required or useful for providing our products and services. Further, we may share your personal information with third persons where:

- you have consented to us doing so (where necessary) or any other person has obtained your consent for us to do so (where necessary);
- we are under a legal, regulatory or professional obligation to do so (for example, to comply with anti-money laundering or sanctions requirements);
- it is necessary in connection with legal proceedings or in order to exercise or defend legal rights.

We use third parties who provide products and services on our behalf and may share your information with them, for example banks, insurance companies or technology suppliers who may have access to your personal information when providing software support. We may disclose research and statistical analysis (on an anonymised basis) derived from your personal information to third parties (see more in the Statistics section below).

## TRANSFER OF PERSONAL DATA

As a part of your use of and to ensure better access to the Website and the Application, the information, and personal data you provide to us may be transferred to and stored at countries other than your home jurisdiction. Such data shall be subject to data laws of their respective countries. We and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it. By using the Website and/or the Application, you expressly consent to this transfer, and agree and acknowledge that we will not be responsible for any additional terms and conditions, policies, and guidelines.

By submitting your information and personal data to us, you agree to the transfer, storage and/or processing of such information, and personal data outside the country you are based in, in the manner described above.

The personal data we collect may be transferred to, and stored in, a country operating outside the European Economic Area (“EEA”). Under the GDPR, the transfer of personal data to a country outside the EEA may take place where the European Commission has decided that the country ensures an adequate level of protection. In the absence of an adequacy decision, we may transfer personal data provided appropriate safeguards are in place.

## STATISTICS

We may use and publish non-personal aggregate statistics and group data about those people who access or make use of any of the Website, the Application or Services and their usage of any of the Website, Application or Services.

## PROTECTION OF PERSONAL INFORMATION

We will take reasonable steps to keep your personal information safe from loss, unauthorized activity or other misuse. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risks inherent in processing personal information.

Unfortunately, no data transmission over the Internet can be guaranteed as totally secure. You can play an important role in keeping your personal data secure by maintaining the confidentiality of any password and accounts used in relation to the Website, the Application and Services, including using a unique password that you do not use on any third-party websites or related services. Please do not disclose your user account password to third parties. Please notify us immediately if there is any unauthorised use of your account or any other breach of security. While we take reasonable steps to maintain secure internet connections, if you provide us with personal information over the internet, the provision of that information is at your own risk. If you post your personal information on the Website’s and/or Application’s public pages, you acknowledge that the information you post is publicly available. If you follow a link on the Website or the Application to another website, the owner of that website will have its own privacy policy relating to your personal information that you should review before you provide any personal information.

## HOW LONG WE KEEP YOUR PERSONAL DATA

We will retain your personal information for as long as is necessary for the purpose for which it was collected. We will further retain your personal information to comply with legal and regulatory obligations, for as long as claims could be brought against us and for as long as legitimate interest, including data security, requires.

## YOUR RIGHTS

In relation to the processing of your personal information you have rights that you can exercise under certain circumstances. These rights are to:

- request access to your personal information and certain information in relation to its processing;
- request rectification of your personal information;
- request the erasure of your personal information;
- request that we restrict the processing of your personal information; and
- object to the processing of your personal information.

If you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

We may refuse to provide access if the relevant data protection legislation or other legislation allows or obliges us to do so, in which case we will provide reasons for our decision as required by the law.

If you would like to exercise these rights, please contact us in writing by email to: [support@minesofdalarnia.com ]

You will not, in general, have to pay a fee to exercise any of your individual rights. However, we may charge a fee for access to your personal information if the relevant data protection legislation allows us to do so, in which case we will inform you as required by the law.

We reserve the right to update and change this Privacy Notice from time to time in order to reflect any changes to the way in which we process your personal information or changing legal requirements. Any changes we may make to our Privacy Notice in the future will be posted on this website. Please check back frequently to see any updates or changes to our Privacy Notice.

## THIRD PARTY SERVICES

Our Website and/or Application may, from time to time, contain services provided by or links to and from the websites of our partner networks, advertisers, and affiliates ("Third Party Services"). Please note that the Third Party Services that may be accessible through our Services have their own privacy policies. We do not accept any responsibility or liability for the policies or for any personal data that may be collected through the Third Party Services. Please check their policies before you submit any personal data to such websites or use their services.

Your relationship with these third parties and their services and tools is independent of your relationship with us. These third parties may allow you to permit/restrict the information that is collected. It may be in your interest to individually restrict or enable such data collections.

The place of processing information depends on each third-party service provider and you should check the privacy policy of each of the service providers to identify the data shared and its purpose. You will be subject to a third party's privacy policy if you opt in to receive communications from third parties. We will not be responsible for the privacy standards and practices of third parties.

## COOKIES

We collect data by way of 'cookies'. Cookies are small data files which are sent to your browser from the Website and are stored on your computer or device (hard drive). The cookies shall not provide access to data in your computer or device such as email addresses or any other data that can be traced to you personally. The data collected by way of cookies will allow us to administer the Website and provide you with a tailored and user-friendly service. The cookies shall enable you to access certain features of the Website. Most web browsers and devices can be set to notify when you receive a cookie or prevent cookies from being sent. If you do prevent cookies from being sent, it may limit the functionality that we can provide when you visit the Website.

Additionally, you may encounter cookies or other similar devices on certain pages of the Website that are placed by third parties. We do not control the use of cookies by third parties. If you send us personal correspondence, such as emails or letters, or if other users or third parties send us correspondence about your activities or postings on the Website, we may collect such information into a file specific to you.

## DATA SECURITY

We implement certain reasonable security measures to protect your personal information from unauthorized access, and such security measures are in compliance with the security practices and procedures as prescribed under the applicable laws. However, you agree and acknowledge that the above-mentioned measures do not guarantee absolute protection to the personal information and by accessing the Website and/or the Application, you agree to assume all risks associated with disclosure of personal information arising due to breach of firewalls and secure server software.

We will comply with the requirements of applicable laws in the event of a data or security risk.

## DATA RETENTION

You are aware that your personal data will continue to be stored and retained by us for a reasonable period after your use of the Website and/or the Application.

## BUSINESS TRANSITIONS

Dalarnia may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Dalarnia. Data provided by users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the data for the purposes for which it was originally supplied to us.

#### CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any information. This Privacy Policy was last updated on the date indicated above. Your continued use of the Services after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.