

ALTO LUSSO LLC

MASTER PRIVACY POLICY

Covers: Alto Lusso Social Casino • Alto Lusso Sweepstakes • Alto Lusso Skill Based Arcade

Effective Date:

This Master Privacy Policy ("Privacy Policy" or "Policy") explains how Alto Lusso LLC ("Alto Lusso," "we," "us," or "our") collects, uses, shares, and protects your personal information across all of our products and services.

This Policy applies to all Alto Lusso products that share a single unified account ("Account"), including:

- **Alto Lusso Social Casino** — a social entertainment video game. It does not involve real-money gambling and no real money can be won or lost through gameplay.
- **Alto Lusso Sweepstakes** — a sweepstakes promotion platform, currently available to eligible residents of Texas aged 18 or older. No purchase is necessary to enter or win, and making a purchase does not increase your chances of winning.
- **Alto Lusso Skill Based Arcade** — a multiplayer virtual reality skill-based arcade game involving real-money entry fees and prize competitions, available exclusively through the Meta Horizon Store to eligible users who are at least eighteen (18) years of age.

Because all three products share the same Account, the personal information you provide when registering and any activity data we collect as you use any product is governed by this single unified Policy. We may issue separate Terms of Service for each product, but this Policy is the single governing document for all privacy and data-handling matters.

Please read this Policy carefully. We have also attached a Supplemental Statement for California Consumers under the CCPA at the end of this document.

SECTION 1 — WHO WE ARE & HOW TO CONTACT US

Alto Lusso LLC is a Delaware limited liability company.

General / Support (Social Casino): support@altolussosocialcasino.com

General / Support (Sweepstakes & Skill Based Arcade): support@altolussocasino.com

Privacy Rights Requests / Legal: policy@altolussosocialcasino.com

Mailing Address: P.O. Box 24, Pacific Palisades, CA 90272

If you have any questions, concerns, or requests regarding this Privacy Policy or our privacy practices across any of our products, please contact us at the details above.

SECTION 2 — SCOPE OF THIS POLICY

This Privacy Policy applies to all personal information we collect in connection with any Alto Lusso product that uses the shared Account, including through the Social Casino game, the Sweepstakes platform, the Skill Based Arcade game, our websites, applications, mobile experiences, and any communications between you and us. It applies when you:

- Create or maintain an Account (which grants access to all Alto Lusso products);
- Access or use the Social Casino game on any device or platform;
- Enter, browse, or participate in the Sweepstakes platform (including via mail-in entry);
- Access or use the Skill Based Arcade game, or enter or participate in a real-money tournament or competition, on any device or platform;
- Make an in-app or in-platform purchase through a Platform Store or payment processor;
- Contact customer support or submit a support ticket for any product;
- Participate in promotions, events, or surveys across any product;
- Otherwise interact with us.

This Policy does not apply to third-party websites, applications, or services that may be linked from any of our products. Their privacy practices are governed by their own privacy policies.

SECTION 3 — INFORMATION WE COLLECT

We may collect the following categories of personal information, depending on which products you use and how you interact with us:

3.1 Account & Profile Information

Information you provide when creating or maintaining an Account, including your username, email address, date of birth, password, authentication methods, account identifiers, language preference, and profile settings. This information is shared across all Alto Lusso products.

3.2 Contact Information

Your name, email address, mailing address, phone number, and similar contact details you provide to us.

3.3 Identity Verification & Eligibility Information

For the Sweepstakes platform and the Skill Based Arcade (and where required by law or our internal compliance procedures), we collect identity and eligibility information, including date of birth, age confirmation, government-issued identification images and ID numbers, selfie or biometric-derived facial match results (if used by our verification vendor), and residency or eligibility confirmations. Completion of identity verification and KYC screening is a mandatory precondition to participating in any real-money tournament or competition on the Skill Based Arcade. For the Social Casino, we reserve the right to request identity verification for purposes including fraud prevention, legal compliance, dispute resolution, or Account security, as further described in our Social Casino Terms of Service.

3.4 Gameplay & In-Game Activity (Social Casino & Skill Based Arcade)

Information about your use of the Social Casino game and the Skill Based Arcade, including game or tournament history, game or match outcomes, Gold Coin and Ticket balances and transaction history, Virtual Item ownership, entry fees paid and prizes won, session start and end times, in-game or in-tournament events participated in, preferences, and settings.

3.5 Sweepstakes Entry & Promotion Data

Information related to your participation in sweepstakes, including entry history, entry method (including whether an entry was a mail-in entry), timestamps, promotions entered, prize fulfillment status, and communications related to entries.

3.6 Social & Multiplayer Interaction Data

Information arising from your social interactions on the Social Casino platform and the Skill Based Arcade, including voice communications (including in-VR voice communications on the Skill Based Arcade), text messages, in-game chat logs (where permitted), friend lists, social connections, user-generated content (such as avatar customizations), and interactions with other players.

3.7 Payment & Transaction Information

Information about purchases and transactions across any Alto Lusso product, including transaction identifiers, purchase amounts, purchased items, payment method type, billing ZIP or postal code, payment status, refunds, chargebacks, and related logs. Payment card numbers and full payment credentials are collected and processed directly by the applicable Platform Partner or payment processor, not by us. We receive only limited transaction data (such as transaction ID, purchase amount, and item purchased) to credit your Account or process your order.

3.8 Device, VR Hardware & Network Information

Information about the device(s) you use to access any Alto Lusso product, including device model, serial number (where applicable), operating system, device identifiers, advertising identifiers, VR headset model and firmware version (Social Casino and Skill Based Arcade), Internet service provider, IP address, unique device and online identifiers, device performance data, and error or diagnostic reports. Also includes browser type, version, plug-in type, language and time zone settings, and similar technical information.

3.9 Usage & Activity Information

Information about how you use any Alto Lusso product, including access times, screens and pages viewed, links clicked, session duration, scrolling and interaction behavior, referring URLs, clickstream data, search activity within the product, content viewed, and standard server log information.

3.10 Location Data

Approximate location derived from your IP address and, if you grant permission, more precise location data from your device. We use location data to verify eligibility (including state or country of residence), personalize the experience, and comply with applicable legal requirements. The Sweepstakes platform is currently only available to eligible Texas residents. Real-money competitions on the Skill Based Arcade are currently offered only in jurisdictions where such competitions are lawful, as further described in the Skill Based Arcade Terms of Service.

3.11 Communications & Support Information

The contents of any messages you send to us, including support tickets, chat logs (where permitted by law), emails, call logs, and feedback you provide.

3.12 Mail-In Entry Data (Sweepstakes)

If you enter a sweepstakes by mail, we collect the information on your mail-in entry, including your name, return address, email address (if provided), and the contents of your request, which we use to validate eligibility, prevent duplicate or fraudulent entries, record your entry, and administer the promotion.

3.13 User-Generated Content

Content you create, upload, or share through any Alto Lusso product, such as custom avatar elements, in-game messages, and other user-generated content.

3.14 Demographic Information

Where voluntarily provided or required by law, information such as country, preferred language, age, and gender.

3.15 Social Media & Third-Party Login Information

If you choose to log in or connect your Account using a third-party social media or identity service, we may collect information from that service, such as your name, profile picture, and email address, as permitted by that service's settings and terms.

SECTION 4 — HOW WE COLLECT PERSONAL INFORMATION

4.1 Directly From You

You provide personal information to us when you:

- Create or maintain an Account;
- Use any Alto Lusso product or interact with its features;
- Make a purchase through a Platform Store or payment processor;
- Enter a sweepstakes (online or by mail);
- Enter or participate in a real-money tournament or competition on the Skill Based Arcade;
- Contact customer support or submit a support ticket;
- Participate in promotions, events, or surveys;
- Submit user-generated content;
- Request information or communicate with us by email, chat, or other means;
- Apply for employment or work with us.

4.2 Automatically When You Use Our Products

We (and our service providers) collect information automatically when you:

- Access, download, install, or use any Alto Lusso product on any device;
- Navigate within any product, including which screens or features you use;
- Open emails from us or click links in our communications;
- Interact with social, multiplayer, or sweepstakes features;
- Connect via VR headset or other hardware (Social Casino and Skill Based Arcade).

4.3 From Third Parties

We may also receive personal information from:

- Platform Partners (e.g., Apple, Google, Meta, Valve, Sony) in connection with in-app purchases or account sign-in;
- Payment processors in connection with Sweepstakes and Skill Based Arcade transactions;
- Third-party social media services if you choose to link your Account;
- Analytics and security service providers;
- Identity verification providers (where applicable);
- Fraud prevention and anti-abuse partners;
- Other publicly available sources, such as public records or open databases.

SECTION 5 — HOW WE USE YOUR PERSONAL INFORMATION

We process your personal information only when we have a lawful basis for doing so. We may process your personal information: (i) where necessary to perform our contract with you (e.g., to operate your Account and provide our products); (ii) where we are required to do so by law or regulation; (iii) with your consent; or (iv) where it is in our legitimate interests to do so, provided those interests do not override your rights and freedoms.

The following table summarizes the key purposes for which we process your personal information across all Alto Lusso products:

Purpose of Processing	Lawful Basis
Create and administer your Account	Performance of contract
Provide and operate all three Products (Social Casino gameplay, Sweepstakes platform, and Skill Based Arcade tournament competition), including multiplayer, social, and competition features	Performance of contract
Process purchases and transactions through Platform Stores and payment processors; maintain Gold Coin, Ticket, Virtual Item, and Sweepstakes Coin records	Performance of contract
Process Sweepstakes entries (including mail-in entries) and Skill Based Arcade tournament entries, validate eligibility, administer promotions and competitions, and fulfill prizes	Performance of contract / Legal obligation
Send transactional and administrative communications (e.g., account confirmations, entry confirmations, service alerts)	Performance of contract

Purpose of Processing	Lawful Basis
Provide customer support and respond to inquiries and requests	Performance of contract / Legitimate interests
Verify age, identity, residency, and eligibility	Legal obligation / Legitimate interests
Detect, prevent, and investigate fraud, abuse, cheating, chargebacks, and security incidents	Legitimate interests / Legal obligation
Monitor platform integrity and enforce our Terms of Service, Sweepstakes Rules, and Skill Based Arcade Terms of Service	Performance of contract / Legitimate interests
Comply with applicable laws, regulations, and lawful governmental requests	Legal obligation
Conduct analytics, debug, and improve Platform, Sweepstakes platform, and Skill Based Arcade performance and develop new features	Legitimate interests
Personalize the user experience	Legitimate interests / Consent
Send marketing and promotional communications (where permitted by law)	Consent
Record and respond to customer support communications for quality assurance	Legitimate interests
Handle chargebacks, payment disputes, and related investigations	Legitimate interests / Legal obligation
Administer promotions, in-game events, and seasonal content	Performance of contract / Consent
Protect the rights, safety, and property of Alto Lusso, our users, and the public	Legitimate interests / Legal obligation

We may also process your personal information for other purposes that are compatible with those described here and will update this Policy if we do so.

SECTION 6 — HOW WE SHARE YOUR PERSONAL INFORMATION

We do not sell your personal information. We do not share personal information for cross-context behavioral advertising. We may share your personal information with the following categories of recipients:

6.1 Service Providers & Vendors

We share personal information with third-party service providers that perform functions on our behalf across any Alto Lusso product, including hosting and data storage providers, analytics providers, customer support platforms, security and fraud prevention vendors, identity verification providers, and prize fulfillment vendors. These providers are contractually required to process personal information only as directed by us and in accordance with this Policy.

6.2 Platform Partners (Social Casino & Skill Based Arcade)

We may receive and share limited transaction and Account-related data with Platform Partners (e.g., Apple, Google, Meta, Valve, Sony) in connection with in-app purchases made through their Platform Stores, to validate entitlements and deliver purchased Virtual Items. This includes purchases of Item Money made through the Meta Horizon Store in connection with the Skill Based Arcade. Platform Partners process payments under their own privacy policies.

6.3 Payment Processors (Sweepstakes & Skill Based Arcade)

We share transaction and Account-related information with our payment processors to facilitate purchases and transactions on the Sweepstakes platform, and to facilitate Gold Coin deposits and withdrawals on the Skill Based Arcade, including routing of funds through a third-party custodial For Benefit Of ("FBO") account or designated merchant reserve account. Payment card details are handled directly by these processors under their own security and privacy practices.

6.4 Social Media Services

If you link your Account to a third-party social media service, we may share limited information with that service as permitted by your settings and that service's terms and privacy policy.

6.5 Fraud, Safety & Compliance Partners

We may share personal information with fraud prevention networks, anti-abuse services, and law enforcement or regulatory agencies when reasonably necessary to: (a) detect, prevent, or investigate fraud, abuse, chargebacks, or security incidents; (b) comply with applicable law or legal process; (c) respond to lawful governmental requests; (d) protect the rights, safety, or property of Alto Lusso, our users, or the public; or (e) enforce our Terms of Service, Sweepstakes Rules, or Skill Based Arcade Terms of Service.

6.6 Chargeback & Payment Dispute Partners

If you initiate a chargeback or payment dispute, or if we suspect fraud or misuse, we may share relevant Account, identity verification, device, usage, and transaction information with payment processors, banks, dispute resolution networks, identity verification providers, and law enforcement (as appropriate) to investigate, respond to, and resolve the issue.

6.7 Corporate Transactions

In connection with a merger, acquisition, financing, reorganization, bankruptcy, dissolution, or sale of assets, personal information may be disclosed or transferred to the relevant parties, subject to appropriate confidentiality protections and applicable law.

6.8 With Your Consent

We may share personal information with other parties when you have provided consent, including where you expressly direct us to share your information.

6.9 Advertising Partners

We may work with advertising partners, ad exchanges, and marketing agencies to help promote Alto Lusso products and to deliver interest-based advertising. These partners may collect information about your online activity across sites and services to serve you relevant ads. You may have options to limit this through your device or browser settings.

SECTION 7 — PLATFORM STORE PURCHASES & PAYMENT PRIVACY

Social Casino purchases: All in-app purchases of Gold Coins and Virtual Items through the Social Casino are processed by the Platform Partner who operates the Platform Store through which you downloaded the game (e.g., Apple App Store, Google Play, Meta Store, Steam, PlayStation Store). We do not collect, process, or store your payment card details or full payment credentials. Payment information is handled directly by the relevant Platform Partner under their own privacy policies and security practices. We receive only limited transaction data from the Platform Partner to credit your Account.

Sweepstakes purchases: Purchases on the Sweepstakes platform are processed by our designated payment processor(s). We do not store your full payment card numbers. We receive transaction records (such as transaction ID, purchase amount, payment method type, and status) to process your order and maintain required records.

Skill Based Arcade purchases: Purchases of Item Money made through the Meta Horizon Store are processed by Meta Platforms, Inc. as the Platform Partner, under Meta's own privacy policies and security practices. Gold Coin deposits made directly through our website are processed by our designated third-party payment processor and routed to a custodial FBO or designated merchant reserve account, as described in the Skill Based Arcade Terms of Service. We do not collect, process, or store your full payment card details or credentials in connection with either type of transaction.

We encourage you to review the privacy policy of the applicable Platform Partner or payment processor before making any purchase.

SECTION 8 — COOKIES & TRACKING TECHNOLOGIES

We (and our service providers) may use cookies, pixels, software development kits (SDKs), web beacons, and similar tracking technologies across all Alto Lusso products to operate and improve the products, remember your preferences, support authentication and security, analyze usage, and serve relevant advertising.

These technologies may be used for the following purposes:

- **Strictly necessary:** To enable the products to function correctly (e.g., authentication, session management). These cannot be opted out.
- **Analytics:** To understand how users interact with the products, identify errors, and improve performance.
- **Preference:** To remember your settings and preferences across sessions.
- **Marketing / Advertising:** To deliver relevant advertising on and off the products.
- **Security & Fraud Prevention:** To collect login activity, risk signals, and device characteristics for fraud detection purposes.

You can manage cookies through your browser or device settings. Disabling certain cookies may affect the functionality of one or more of our products. Our products may include web beacons in emails to determine whether messages have been opened.

SECTION 9 — DATA RETENTION

We retain personal information for as long as reasonably necessary to: provide our products and maintain your Account; administer sweepstakes promotions (including records of entries and prize fulfillment) and Skill Based Arcade tournaments (including records of entries, scores, and prize distributions); comply with applicable legal and regulatory obligations; resolve disputes and enforce our agreements; prevent fraud and abuse; and fulfill the other purposes described in this Policy. Retention periods vary based on the type of information, the purpose for which it was collected, and applicable law.

Mail-in entry data is retained for recordkeeping, auditing, fraud prevention, and legal compliance purposes consistent with the above. When we no longer need personal information, we will securely delete or de-identify it.

SECTION 10 — SECURITY OF PERSONAL INFORMATION

We maintain administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, loss, misuse, alteration, and disclosure. These include

appropriate encryption, access controls, secure communications protocols, and security monitoring. Access to personal information is limited to personnel and service providers with a need to know.

However, no method of transmission over the internet or electronic storage is completely secure. We cannot guarantee the absolute security of your personal information. Our security procedures may require us to verify your identity before we disclose personal information to you or process certain requests.

If you have reason to believe that your interaction with us is no longer secure, please contact us immediately at policy@altolussosocialcasino.com.

SECTION 11 — CHILDREN'S PRIVACY & COPPA COMPLIANCE

All Alto Lusso products are intended for users who are at least eighteen (18) years of age. We do not knowingly collect personal information from individuals under 18. When a user registers for an Account, they represent that they are at least 18 years of age.

If we learn that we have inadvertently collected personal information from a person under 18, we will take steps to delete that information promptly. If you believe that a minor may have provided us with personal information, please contact us at policy@altolussosocialcasino.com.

COPPA Compliance Notice: Our products and services are exclusively directed to individuals at least eighteen (18) years of age. We do not knowingly collect, maintain, or use personal information from children under the age of thirteen (13) in compliance with the Children's Online Privacy Protection Act ("COPPA"). If we discover that a child under 13 has created an Account or provided us with personally identifiable information, we will immediately take steps to permanently delete that information from our servers and terminate the associated Account.

In furtherance of our COPPA compliance obligations:

- We do not knowingly collect, use, or disclose personal information from children under 13 for any purpose, including targeted or behavioral advertising;
- We do not knowingly permit children under 13 to create an Account, make purchases, or otherwise participate in the Social Casino, Sweepstakes platform, or Skill Based Arcade;
- Parents or legal guardians who believe their child under 13 has provided us with personal information may contact us at policy@altolussosocialcasino.com to request review, deletion, or confirmation of removal of that information;
- We reserve the right to request additional verification of age or identity at any time where we have reason to believe an Account holder does not meet the minimum age requirements described in this Policy; and

- If we become aware that an Account holder is under the age of 13, in addition to deleting the associated personal information, we will terminate the associated Account and, where applicable, void any pending transactions, prizes, or entries associated with that Account.

SECTION 12 — THIRD-PARTY LINKS & SERVICES

Our products may contain links to third-party websites, applications, or services. We are not responsible for the privacy practices of those third parties. Your interactions with any third-party site or service are governed by that third party's own privacy policy and terms. We encourage you to read those policies carefully.

SECTION 13 — LOCATION OF PERSONAL INFORMATION

Alto Lusso LLC is located in the United States. All Alto Lusso products are currently offered for use in the United States, the Sweepstakes platform is currently available only to eligible residents of Texas, and real-money competitions on the Skill Based Arcade are currently offered only in jurisdictions where such competitions are lawful.

If you access any of our products from outside the United States, your personal information may be transferred to, stored, and processed in the United States or other countries where our service providers operate. Data protection laws in those jurisdictions may differ from those in your home country.

By using any Alto Lusso product, you consent to the transfer of your personal information to the United States and other jurisdictions as described in this Policy.

SECTION 14 — MARKETING CHOICES

Where we send marketing communications by email, you can opt out at any time by using the unsubscribe link in the message or by contacting us. Opting out of marketing emails will not stop transactional or service-related communications.

You may also control certain advertising preferences through your device settings (for example, by enabling "Limit Ad Tracking" on iOS or "Opt out of Ads Personalization" on Android).

SECTION 15 — YOUR PRIVACY RIGHTS

Depending on where you live, applicable data protection laws may give you certain rights with respect to your personal information. These rights may include:

- **Access:** The right to request confirmation of whether we process personal information about you and to obtain a copy of that information.

- **Rectification:** The right to request correction of inaccurate or incomplete personal information.
- **Erasure / Deletion:** The right to request deletion of certain personal information we hold about you.
- **Restriction:** The right to request that we restrict further processing of your personal information in certain circumstances.
- **Objection:** The right to object to certain processing of your personal information.
- **Data Portability:** The right to receive a copy of personal information you have provided to us in a structured, commonly used, machine-readable format.
- **Withdrawal of Consent:** Where we rely on your consent to process personal information, the right to withdraw that consent at any time (without affecting the lawfulness of processing prior to withdrawal).
- **Right to Appeal:** The right to appeal certain decisions regarding your privacy requests where required by law.
- **Right to Complain:** The right to lodge a complaint with a supervisory authority or data protection regulator in your jurisdiction.

IMPORTANT: WE ARE ONLY REQUIRED TO HONOR RIGHTS TO THE EXTENT THEY HAVE BEEN GRANTED TO YOU UNDER APPLICABLE DATA PROTECTION LAWS. PLEASE CONSULT YOUR LOCAL DATA PROTECTION LAWS TO DETERMINE WHAT RIGHTS APPLY TO YOU AND WHEN ACCESS TO THOSE RIGHTS MAY BE LIMITED.

To exercise any of the above rights, please contact us at policy@altolussosocialcasino.com. Please include your name, the email address associated with your Account, your state or country of residence, and the nature of your request. We may need to verify your identity before processing your request. We aim to respond within the timeframe required by applicable law.

Do Not Track / Global Privacy Control (GPC)

Some browsers and devices support "Do Not Track" or Global Privacy Control signals. Because there is no single industry-standard approach to these signals, we do not currently respond to all such signals. However, since we do not sell personal information or share it for cross-context behavioral advertising, such signals would not result in different treatment in those respects.

SECTION 16 — CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. When we do, we will update the Effective Date at the top. If we make material changes, we will provide notice as required by applicable law, which may include posting a prominent notice on the applicable product and/or sending an email to the address associated with your Account. We encourage you to review this Policy periodically.

Your continued use of any Alto Lusso product after we post changes constitutes your acceptance of the updated Privacy Policy, to the extent permitted by applicable law.

SECTION 17 — RELATIONSHIP TO PRODUCT-SPECIFIC TERMS OF SERVICE

Alto Lusso may maintain separate Terms of Service for each product (e.g., Social Casino Terms of Service, Sweepstakes Official Rules, Skill Based Arcade Terms of Service). Those documents govern gameplay rules, eligibility, promotion mechanics, and your contractual relationship with us for each product. This Privacy Policy is the single governing document for all privacy, data collection, data use, and data sharing matters across all Alto Lusso products.

Where any product-specific Terms of Service address a privacy matter, that section is superseded by this Policy. In the event of a conflict between the English version of this Policy and any translated version, the English version controls.

SECTION 18 — YOUR ACCEPTANCE OF THIS POLICY

By creating an Account or using any Alto Lusso product, you acknowledge that you have read and understood this Privacy Policy. If you do not agree, please do not create an Account or use our products. Your continued use of any Alto Lusso product after we post changes will mean you accept those changes to the extent permitted by applicable law.

SECTION 19 — CONTACT US

Alto Lusso LLC — A Delaware Limited Liability Company

General / Support (Social Casino): support@altolussosocialcasino.com

General / Support (Sweepstakes & Skill Based Arcade): support@altolussocasino.com

Privacy Rights Requests / Legal Notices: policy@altolussosocialcasino.com

Mailing Address: P.O. Box 24, Pacific Palisades, CA 90272

SUPPLEMENTAL PRIVACY STATEMENT **FOR CALIFORNIA CONSUMERS (CCPA)**

Alto Lusso LLC

This Supplemental Privacy Statement for California Consumers ("California Statement") applies to California consumers (natural persons residing in the State of California) and supplements the Privacy Policy above. This California Statement is provided in compliance with the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act ("CPRA").

Personal Information Under the CCPA

When used in this California Statement, "personal information" has the meaning given to it under the CCPA, which generally means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include publicly available, de-identified, or aggregate consumer information as defined in the CCPA.

Categories of Personal Information We Collect

In the preceding 12 months, we have collected the following categories of personal information across all Alto Lusso products:

- Identifiers (e.g., username, email address, IP address, device identifiers, Account ID);
- Personal information under Cal. Civ. Code § 1798.80 (e.g., name, email address, mailing address);
- Protected classification characteristics (e.g., age/date of birth used for eligibility verification);
- Commercial information (e.g., Virtual Item purchase and transaction records, Sweepstakes purchase records, Skill Based Arcade entry fee and prize records);
- Internet or other electronic network activity (e.g., gameplay activity, session data, platform browsing history);
- Geolocation data (approximate location derived from IP address);
- Audio, electronic, or similar information (e.g., voice chat data where you participate in Social Casino or Skill Based Arcade multiplayer voice features);
- Sensitive personal information (e.g., government-issued ID images and numbers, biometric-derived facial match results, where collected for identity verification in connection with the Sweepstakes platform or the Skill Based Arcade, or as permitted under the Social Casino Terms of Service);
- Inferences drawn from the above to create a profile about preferences and characteristics.

Sources of Personal Information

We collect personal information from the sources described in Section 4 of this Privacy Policy, including directly from you, automatically from your device and product activity, and from third-party service providers, Platform Partners, and payment processors.

Purposes for Collecting Personal Information

We collect and use personal information for the business and commercial purposes described in Section 5 of this Privacy Policy.

Categories of Third Parties With Whom We Share Personal Information

We share personal information with the categories of recipients described in Section 6 of this Privacy Policy, including service providers, Platform Partners, payment processors, fraud prevention and compliance partners, and in connection with corporate transactions.

Sale or Sharing of Personal Information

We do not sell your personal information for monetary or other valuable consideration. We do not share personal information for cross-context behavioral advertising as defined under the CCPA/CPRA.

Your California Privacy Rights

California residents have the following rights under the CCPA/CPRA:

- **Right to Know:** The right to request information about the categories and specific pieces of personal information we have collected about you, the sources of that information, the purposes for collecting it, and the categories of third parties with whom we share it.
- **Right to Delete:** The right to request deletion of personal information we have collected from you, subject to certain exceptions.
- **Right to Correct:** The right to request correction of inaccurate personal information.
- **Right to Opt-Out of Sale/Sharing:** As noted above, we do not sell or share personal information for cross-context behavioral advertising.
- **Right to Limit Use of Sensitive Personal Information:** Where we process sensitive personal information, you may have the right to limit our use of such information to certain permitted purposes.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising your rights under the CCPA.

How to Submit a Privacy Request

To submit a CCPA/CPRA privacy request, please email us at policy@altolussosocialcasino.com. Please provide your full name, the email address associated with your Account, your California residency, and the specific nature of your request. We may need to verify your identity before processing your request. If we cannot initially verify your identity, we may request additional information (such as a copy of a government-issued ID or a recent utility or credit card bill).

Authorized Agents

You may designate an authorized agent to submit a CCPA request on your behalf. To do so, either: (1) have your agent provide us a signed letter from you certifying the agent is acting on your behalf and showing proof of registration with the California Secretary of State; or (2) provide the agent with a notarized power of attorney. We may still require you to verify your identity directly.

Right to Opt Out of Sale of Personal Information

California residents have the right to opt out of the sale of their personal information. As noted above, we do not sell personal information. If our practices change, we will update this statement and provide a "Do Not Sell or Share My Personal Information" mechanism as required by law.

Notice to California Residents — California Civil Code § 1798.83

California Civil Code Section 1798.83 permits California residents to request information about the disclosure of personal information to third parties for direct marketing purposes. As noted above, we do not share personal information with third parties for their own direct marketing purposes without your consent. You may contact us at policy@altolussosocialcasino.com for more information.

Changes to This California Statement

We reserve the right to update this California Statement at any time. Please review this statement periodically for changes.