

# PRIVACY POLICY

**Last updated: 05-12-2023**

We care about your privacy. This Privacy Policy explains how your personal data is collected, used, and shared when you visit the LVL.IO website <https://LVL.IO.gg/>. (“Website”).

The processing of Personal Data is regulated by the European Union General Data Protection Regulation EU 2016/679 (GDPR), California Consumer Privacy Act (CCPA), California Online Privacy Protection Act (CalOPPA), and other applicable privacy laws.

Please read this Privacy Policy carefully to understand how we handle your personal data. Using the website, you acknowledge you have read and understood the Privacy Policy and that we will collect, use and share your information as set forth below.

## Data Controller Details

LVL.IO LLC - a company incorporated under the laws of the State of Delaware (“LVL.IO” or “we”).  
Registration number: 2398868.

Registered address and principal place of business: 228 Park Ave S, Pmb 85451, New York, NY 10003, United States.

Contact us anytime via: [info@lvl.io](mailto:info@lvl.io)

## How We Collect and Use Your Data

By Personal Data or data, we mean any information capable of identifying you as an individual, such as your name, e-mail address, or that can be connected to you indirectly, such as your language or location.

We collect data directly from you or our partners. When you visit our Website, we collect technical data and information about how you use the Website. We do it using cookies set by us or provided by our partners. We need this data to provide you with the Website, analyze its usage, remember your settings, and personalize content and ads.

## Data We Collect

### Contact Data:

When you send an application for integration, we collect the following data provided by you via the contact form:

- Your name and surname;
- E-mail;
- Phone number.

### Device and Location Data:

When you visit our Website, we collect the following data:

- IP address and location info (country, city, etc.);
- Device and OS information (screen size, OS, browser information).

We use these data to recognize you and provide you with the Website capable of your device, your location, etc.

### Usage Data

We collect information about your use of -and interactions with the Website. These data include your activity on the Websites, such information as:

- your Website’s personal settings;
- your activity logs;
- information you provide when you request information or support from us;
- your recommendations on how to improve our Website.

### **Purposes and Legal Basis of Use of Personal Data**

<b>Description of why we process your personal data ('processing purpose')</b>	<b>Legal Basis for the processing purpose</b>	<b>Categories of personal data used by us for the processing purpose</b>
To contact you regarding your application	Consent	Contact Data
To provide and personalize the Website	Performance of a contract	Device and Location Data Usage Data
To evaluate and develop new features, technologies, and improvements to the Website	Legitimate Interest	Device and Location Data Usage Data
To find, resolve and fix any mistakes and problems in the operation of the Website	Performance of a contract	Device and Location Data Usage Data
For marketing, promotion, and advertising purposes	Consent	Device and Location Data Usage Data
To comply with legal requirements and law enforcement requests	Compliance with legal obligations	Contact Data Device and Location Data Usage Data

To establish, exercise, or defend legal claims	Legitimate interest	Contact Data Device and Location Data Usage Data
To conduct business planning, reporting, and forecasting	Legitimate interest	Device and Location Data Usage Data

If the processing of Personal Data is carried out based on your consent, you have the right to withdraw it at any time by sending us a request to [info@lvl.io](mailto:info@lvl.io) or following the instruction given in the “Cookies” section below.

Our legitimate interests are:

- to develop, improve and deliver our Website;
- to make our products and services known and popular in the gaming industry;
- to make the use of our Website secure for the Users;
- to prevent fraud and other illegal use of our Website.

We may combine all the information we collect from or receive about you for the outlined purposes. We may aggregate or de-identify your information and may use or share aggregated or de-identified information for any purpose. Such information is not subject to this Privacy Policy.

## Data Retention

We store your Personal Data as necessary for providing you the Website, compliance with our legal obligations, fulfillment of our legitimate interests, or during the validity of your consent as stated in this Privacy Policy. As soon as information stops serving these purposes, we delete it.

We will keep some Personal Data that we are allowed or required to maintain in such cases as:

- If there is an unresolved issue, claim and/or dispute - we will retain the necessary Personal Data until the said issue is resolved;
- Where required to comply with legal, tax, audit, and accounting obligations and/or any other legal obligation, we will retain the essential Personal Data for the period required by the applicable law;
- Where essential to fulfill our legitimate interests such as fraud prevention and/or maintenance of our Users' security.

## Your Rights

Right to access your Personal Data - You may request a copy of your Personal Data and/or how we store your Personal Data.

Right to rectification - you may request to change some of your Personal Data and/or correct your Personal Data if this is inaccurate.

Right to erasure - you may request to delete all or some of your Personal Data. For example, if:

- they are no longer needed for any processing purposes;
- consent has been used as a legal basis for their processing;
- there is no legitimate interest in the further processing of Personal Data.

Right to object - you may object to the processing of your Personal Data on grounds relating to your particular situation and/or to object processing your Personal Data for direct marketing purposes.

Right to object to automated processing - you may object to a decision based on automated processing. This means that you may request to review your Personal Data manually if you believe that automated processing of your personal data's automated processing may not consider your unique situation.

Right for data portability - you may request to provide you a copy of your Personal Data in a structured, commonly used, and machine-readable format (e.g., XML, CSV). Furthermore, you have the right to request to transmit the said Personal Data directly to another controller.

Right to lodge a complaint - you have the right to lodge a complaint with a supervisory authority, particularly to the member state of the European Union of your habitual residence, place of work, or place of the alleged infringement.

To exercise any of these rights please contact us via online chat or by email at [info@lvl.io](mailto:info@lvl.io). For security purposes, before exercising any of your rights we may ask you to prove your identity.

## **California Residents Privacy Notice**

California Consumer Privacy Act (CCPA) provides our Users who are California residents, with the following rights listed below in relation to personal information that we have collected about you. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

Right to know - You have a right to request the following information about our collection, use and disclosure of your personal information over the prior 12 months, and ask that we provide you with a copy of the following:

- categories of and specific pieces of personal information we have collected, sold, or shared about you;
- categories of sources from which we collect personal information;
- the business of commercial purposes for collecting personal information;
- categories of third parties to whom the personal information was disclosed for a business purpose; and
- categories of personal information disclosed about you for a business purpose.

Right to correct - You have a right to request that we correct inaccurate personal information maintained about you.

Right to delete - You have a right to request that we delete personal information, subject to certain exceptions.

Right to opt out of Selling or Sharing - You have the right to direct a business that sells or shares personal information about you to third parties to stop doing so.

Right to non-discrimination - We will not discriminate against you for exercising any of these rights.

We do not sell the data of users under 16 years of age, unless affirmatively authorized, as specified, to be referred to as the right to opt in. The act will prescribe requirements for receiving, processing, and satisfying these requests from consumers. The act will prescribe various definitions for its purposes and would define “personal information” with reference to a broad list of characteristics and behaviors, personal and commercial, as well as inferences drawn from this in

We may ask you to provide your residency before responding to your request.

To exercise any of these rights please contact us via online chat or by email at [info@lvl.io](mailto:info@lvl.io).

For security purposes, before exercising any of your rights we may ask you to prove your identity.

### **Sale and Sharing of Personal Data**

We do not sell personal data as the term “sell” is traditionally understood. Although, to the extent that the term “sale” is interpreted under the CCPA, the fact that we use third-party cookies may be understood as a sale.

We disclose the following categories of personal information: identifiers, internet activity, and inferences drawn from Google Analytics, Yandex.Metrica (Third-party Services). We share data with the Third-party Services upon service contracts (Third-party Service’s terms of use) to improve our Website functionality, and marketing. If you do not want your data to be used for these purposes, please contact us at [info@lvl.io](mailto:info@lvl.io) .

Besides, we may disclose Personal Data to the following parties:

Providers of marketing and analytic services	To analyze, develop and improve our Website. To perform marketing research, understand our Users better, provide personalized content and advertisements;
Government authorities, auditors, consultants	To fulfill official requests, our tax, and other obligations;
Other service providers	We may outsource some functions to third-party service providers for any purpose outlined in this Privacy Policy;
Company’s affiliates	To provide you the Website.

### **Personal Data Breach**

A Personal Data breach may, if not addressed in an appropriate and timely manner, result in a physical, material, or non-material risk to your rights and freedoms. Therefore, as soon as we become aware that a Personal Data breach has occurred, we will notify Personal Data Breach to the person whose Personal Data is in breach and the relevant authority such as the Attorney General or the Commissioner for Personal Data Protection without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless we are able to demonstrate, following the accountability principle, that the Personal Data breach is unlikely to result in a risk to your rights and freedoms. Where such notification cannot be achieved within 72 hours, the reasons for the delay should accompany the notification without undue further delay.

## Children's Privacy

We do not knowingly collect Personal Data from children or process such information, without parental consent. For the purpose of this Privacy Policy, a child means any individual who is under 13 in the United States or under 16 in the European Union (or the minimum legal age to consent to the collection and processing of Personal Data where this is different under applicable law). If you are a parent or guardian and believe your child has provided us with personal information without consent, please contact us at [info@lvl.io](mailto:info@lvl.io).

## Cross-Border Data Transfer

To facilitate our global operations, LVL.IO may transfer, process, and store your Personal Data to data controllers and processors anywhere in the world, including but not limited to other countries that may have data protection laws that are different from the laws where you live.

If you reside in the EEA, Switzerland, or the United Kingdom, we rely upon a variety of legal mechanisms to facilitate these transfers of your Personal data. In cases where we intend to transfer your Personal data to third countries outside of the EEA that has not been found to provide an adequate level of protection under applicable data protection laws, we use suitable technical, organizational and contractual safeguards including Standard contractual clauses (SCC) adopted by the European Commission as a mechanism to transfer data from the EU countries in compliance with applicable data protection rules and to ensure confidentiality, security, and legality of the processing of your personal data.

## Use of Cookies

Cookies are files created by websites that you visit. It is a technology that allows collecting information about your device, location, and your acts on the websites you visit.

We may use cookies and similar technologies (e.g., web beacons, pixels, ad tags, and device identifiers) ("Cookies") provided by marketing and analytics service providers.

## What Cookies we use and why

Cookie category	Description
Strictly Necessary	Necessary Cookies help make the Website usable by enabling essential functions like page navigation and access to secure areas of the Website. The Website cannot function properly without these Cookies. For example, your IP address and device info.
Preference	These Cookies let us remember your personal settings. For example, your choice of language.
Analytics/ Statistics	Analytic/ Statistic Cookies help us understand how visitors interact with the Website by collecting and reporting information anonymously. For example, they let us collect information about the traffic, most and the least frequently visited sections of the Website, etc.

Marketing	These Cookies are used for personalizing the contents and ads both on and off the Website. They are also used to assess the advertising efficiency (for example, what actions the user has made after seeing the ad, whether they have followed the link).
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## **Analytic and marketing Cookies**

We use the following analytics and marketing services (“Third-party services”):

Google Analytics. Google Analytics allows us to collect and analyze data, helps us improve our Website. Google Analytics sends us anonymous information about the number of visitors to our Website and the pages they visit.

Google Adwords is a tool for measuring advertising performance. As the user clicks on an ad served by Google, the cookie is set for conversion tracking.

Google Tag Manager does not collect personal data. It facilitates the integration and management of our tags for conversion tracking and marketing.

Yandex.Metrica helps us get reports and record the actions of individual users, find out what people are searching for on the Website, and collect statistics on each ad in Yandex.Direct, and keep track of conversion rates.

Information about your use of the Website may be transmitted to and stored on the servers of the Third-party services, which may be located outside the country of your residency.

## **How to disable Cookies**

When you visit our Website for the first time, we ask for your consent to use cookies. At this time, you may either agree to the use of cookies or manage cookie settings, including agreeing to only necessary cookies.

You can also withdraw or modify your consent to the use of Cookies across all sites at any time following the instructions below:

1. You can use your web browser settings to accept or delete Cookies. To opt-out of Cookies via your browser settings, please use the links:

Google Chrome, Internet Explorer, Mozilla Firefox, Safari, Safari (mobile), Android, Opera, Opera Mobile.

2. To opt-out of the most used Third-party services, please use the following links:

Google Analytics opt-out, Yandex.Metrica opt-out.

3. Send us a direct request to [info@lvl.io](mailto:info@lvl.io).

Please note: Disabling Cookies may reduce the quality of your experience on the Website. Irrespective of your choice and/or device settings, you will continue to see non-customized advertising (e.g., “contextual” advertising). You may continue to receive personalized ads from third-party ad networks that have obtained your consent on other websites.

## **Changes to Privacy Policy**

We may amend this Privacy Policy from time to time. We will post any changes to the Privacy Policy. By using our Website, you acknowledge that you are familiar with the updated Privacy Policy. We encourage you to review our Privacy Policy when accessing the Website for the first time and promptly read the updates.