



United Esport Mobile Application– Privacy Policy

Last Updated: November 17, 2019

United Esport is a skill and strategy game which can be accessed at this website <https://ul.game> (the “**Website**”) and software application, whether in mobile or PC version, (the “**App**”) which are operated by NoGame Ltd (“**NoGame**”, “**United Esport**”, “**we**”, “**us**”, “**our**”).

1. General

- 1.1. Welcome to United Esport. We value the privacy of the visitors to our Website and registered users of our App (together “**Users**”, “**you**”, “**your(s)**”) and are dedicated to protecting it.
- 1.2. This privacy policy (the “**Privacy Policy**” or “**Policy**”) provides important notice regarding the Information we collect, receive, use and manage during your use of the Website and/or App, when you play the games provided therein (the “**Games**”). Please read this Privacy Policy before downloading, accessing or otherwise using the App.
- 1.3. Further information about the permitted uses of the App can be found in the Terms of Use, available at <https://ul.game/Esports/Terms>. Any terms not defined herein but defined in our Terms of Use, shall have the meaning ascribed thereto.
- 1.4. **By downloading, installing, accessing and otherwise using the App, you are expressing your agreement to this Privacy Policy and provide Your informed and freely given consent to the terms herein. If you do not agree to this Privacy Policy, whether in whole or in part, please do not download, install, access or otherwise use the App.**
- 1.5. Unless stated otherwise, this Privacy Policy applies to all Information that we collect about you and your User account (the “**Account**”). NoGame is not responsible for any action of third parties, the content of their sites, their use of Information they collect, or any products or Apps they may offer you. Any link to those sites contained in our App does not constitute our sponsorship or affiliation with those third parties.
- 1.6. We may update this Privacy Policy from time to time in order to comply with applicable privacy laws and to notify you regarding changes in our practices of data collection and processing of Information.
- 1.7. Our updated Privacy Policy shall be available at all times at: <https://ul.game/Privacy> and we encourage you to review it regularly. Your



continued use of the Website or App constitutes your consent to the terms of this Privacy Policy.

- 1.8. In case you have any questions or concerns, please contact us by sending us an Email to: support.ule@ul.game

2. Definitions:

- 2.1. **“EEA”** means the European Economic Area
- 2.2. **“GDPR”** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), and as amended, replaced or superseded from time to time.
- 2.3. **“Applicable Laws”** means GDPR, as transposed into domestic legislation of EU Member States and as amended, replaced or superseded from time to time, including laws, rules and guidelines implementing or supplementing the GDPR or any applicable privacy and data protection law with respect to any Personal Information (as defined below), to which we are subject.
- 2.4. **“Information”** shall mean Personal Information and Non-Personal Information, together.
- 2.5. **“Personal Information”** shall mean any information, data or content, in any format or media, which can personally identify a natural person and/or otherwise can be attributed to a natural person (such as name, telephone number) or as otherwise defined in Applicable Laws.
- 2.6. **“Non-Personal Information”** shall mean any information, data or content in any format or media, which is anonymous and/or does not personally identify you and/or reveal your specific identity as an individual, and/or cannot be attributed to you, in whatever form is collected and/or received in as a result of your use of the App.
- 2.7. **“Data Subject”** means a natural person who can be identified by Personal Information.
- 2.8. **“Controller”** is the natural person or legal entity which determines the purposes and the means of processing of the Information.
- 2.9. **“Processor”** is the natural person or entity which performs processing of the Personal Data on behalf of a Controller.
- 2.10. **“Processing”** means collection, viewing, disclosing and making available, storage and any other use of Information.



3. Personal Information

- 3.1. **No legal requirement.** The decision to access the Website and/or to use the App is entirely up to you, and is solely based on your own free will. You have no legal obligation to provide us with any Personal Information. However, if you do not provide us certain items of Personal Information, we will be technically unable to provide you with access to the Games. For example, in order to play the Game, we require your IP address.
- 3.2. **Your representations regarding Your Personal Information.** By using the Website and/or the App and uploading Personal Information to the App, you hereby represent, acknowledge and provide your informed consent to all of the following: (a) the Personal Information is yours, you have the legal right to provide us such Information and it is complete, accurate and true; (b) your Personal Information will be stored in our database(s). We reserve the right to terminate your access to the Games if for any reason we suspect that you have provided inaccurate Personal Information.
- 3.3. **The Categories of Personal Information We Collect.** When you register to the App, you provide us a Nickname; and by default we also automatically collect your IP address and country of location in order to create your Account. You may contact us to change your country of location provided that cash tournaments are permitted in your jurisdiction. If you decide to link your Account and play on multiple devices or recover your Account if needed, you will be asked to provide your email address or Facebook/Google accounts.

When you contact us through our dedicated support email address, you may choose to provide us additional Personal Information. Please do not share with us any Personal Information which is not required to assist you and to enable your access and usage of the Games.

When you choose to register to the App through your Google account or Facebook account, we may collect the following Information:

- i) if you registered through Facebook: your full name, email, Facebook ID, profile picture; or ii) if you registered through Google: your full name, email address, Google ID, Profile Picture.

As part of our age verification process, you are required to provide your age or date of birth. When a User wishes to enter a cash tournament, we will collect the User's geolocation and e-mail address. The User will be able to begin playing using money accumulated through winning a Bonus. If a User wishes to make a deposit, the User will be required to provide credit card or PayPal details.

We will use third party credit card processing companies to process your transactions. When using a third party processing company, we will not have access to your credit card data. If you choose to deposit or withdraw a large sum of money, we will require you to provide identification information such as



your name, address, ID number and proof of address such as a utility bill. We reserve the right to request additional details (such as copy of identification documentation in certain circumstances, for example, when there is a risk of a fraudulent transaction).

4. [How we use Personal Information \(the purposes of the Processing\).](#)

We may Process your Personal Information for the following purposes: (i) to complete your registration to the App, and identify you when you enter into the App (ii) to enable you to use the App, to communicate with you, and/or obtain feedback from you regarding the App; (iii) to personalize your experience with the App, and to better understand your needs both on an aggregated and individualized basis in order to improve the App; (iv) to provide you with announcements and further administrative information regarding your use of the App; (v) to transfer to third party vendors, service providers, contractors who are working on our behalf for storage, hosting, process and/or back up purposes; (vi) to protect NoGame, enforce the Terms of Use and/or this Privacy Policy, (vii) to ensure that only Users located in jurisdictions in which online cash based Games and tournaments are legally permitted may register to the App and/or (viii) as otherwise authorized by you.

We also process your Personal Information to monitor financial activity, prevent fraud and ensure the you can legally participate in cash tournaments and withdraw funds.

5. [Sharing Personal Information between Users.](#)

- 5.1. Please note that your username will be available to the other users when you choose to participate in tournaments and public forums. In addition, when you register to the Games and open an Account, you will be assigned a “profile” which will automatically be populated with your selected username and country of origin.
- 5.2. The App allows Users to form a group of Users (referred to in the Games as a “**Gang**”) and play the Games together. When Users form a , they can also communicate with each other in an internal Gang chat.
- 5.3. You may decide, at your own initiative and responsibility, to share your Personal Information with other Users in the Gang through the chat functionality. We are not responsible for any User’s Processing of your Personal Information which you have shared with that User.
- 5.4. If another User has shared Personal Information with you, within the course of a Game and/or a discussion forum, you hereby represent that you will use the Personal Information of the other User only for the purpose for which it was disclosed to you by that other User and in accordance with this Privacy Policy, unless you have received explicit consent from that User to Process the Personal Information for other Processing.



5.5. We use external social media platforms (“**Platform(s)**”) to communicate with our Users and allow them to communicate between themselves, such as Facebook.com, Discordapp.com, and others, on our dedicated NoGame “pages” or “channels”, as applicable. These platforms are subject to their own privacy policies and Users should review those policies before using the relevant platform. We are not responsible for any processing of Personal Data shared between Users on our dedicated page/channel which is run on and by an external social media platform. Furthermore, Users may open their own fan pages/channels over which we do not have any control and we are not responsible for any processing of Personal Data which is shared between Users on any such User generated pages/channels on Platforms.

6. Non-Personal Information

6.1. **The categories of Non-Personal Information we may collect.** The collection and Processing of Non-Personal Information via the App commences on your first use of the App. We may collect, including without limitation: information about your mobile device (such as the cellular device's name and model, device operating system, battery status), general location (not your specific address) and usage time of the App.

In order to collect Non-Personal Information stated above, we and our marketing and/or analytics partners, use cookies and other tracking tools. For more information, please see Section 9 “**Cookies**” below.

6.2. **How we use Non-Personal Information (the purposes of the Processing).** We may use the Non-Personal Information for: (a) identify your account on a specific device; and/or (b) research purposes; and/or (c) improving the App by creating system analytics and statistical data; and/or (d) for technical administration and troubleshooting of the App; and/or (e) protect the Platform(s); and/or (f) enforce this Privacy Policy. You hereby warrant and represent that you will not have claim and/or demand, from any kind, regarding the use of the Non-Personal Information for the purposes stated herein.



7. Legal Basis for Processing

7.1. We will only process Personal Information of Data Subjects where we have a legal basis to do so. The legal basis will depend on the purposes for which we received and/or collected and need to use the Personal Information. In almost all cases the legal basis will be:

- a) To provide our App and any related services to our Users.
- b) To fulfill a legitimate interest that we have as a business.
- c) Because a Data Subject consented to us using its Personal Information for a particular purpose.

7.2. More information on each legal basis is provided below.

- a) Processing the Personal Information is required for fulfilling our or a third party's legitimate interests, for example: (1) we collect information about use of our Website and App in order to identify and prevent its abuse; (2) we use Personal Information to maintain and improve our Website and/or App by identifying User trends and technical issues.
- b) A User has consented to the processing of its Personal Information for one or more specific purposes, for example: if a User provides its details in order to register to our App and provides consent for the usage of cookies (where such consent is required), we will track that User's activity on our App.

7.3. It is hereby clarified that the legal bases detailed above are the legal bases for actions to process Personal Information of European residents, carried out by us in accordance with the GDPR. If processing of Personal Information is subject to other Applicable Laws, then the legal basis for processing Personal Information may differ accordingly.

For more information, see Section 910 "**Your Rights**" below.

8. International Transfers of Information to Third Parties

8.1. The Information may be hosted, stored, used, maintained, transferred to and otherwise Processed in various countries outside your state of residence (including to servers located in London, England (via "Google Cloud" services) where the privacy laws may not be as protective as those in your jurisdiction. By using the App, you hereby provide your informed and freely given consent to the any processing, including but not limited to usage, hosting, storage and/or transfer of the Information (including, without limitations, Personal Information) to countries outside your state or country.



- 8.2. If you are a Data Subject in the EU, we will only transfer your Personal Information to a third country or an International Organization (as defined in the GDPR) outside the EEA if one of the following safeguards applies:
- 8.2.1. to a country considered by the European Commission as providing an adequate level of protection of Personal Information;
 - 8.2.2. subject to model contractual clauses adopted by an official decision of the European Commission;
 - 8.2.3. subject to binding corporate rules in accordance with Article 47 of the GDPR;
 - 8.2.4. subject to a binding and enforceable instrument between public authorities and bodies such as the EU-US Privacy Shield;
 - 8.2.5. subject to any other safeguards as applicable, mentioned in the relevant Articles of the GDPR.
- 8.3. If you are a Data Subject in another jurisdiction, other conditions may apply.

9. Sharing Information with Third Parties

- 9.1. NoGame may engage other companies and individuals to perform services on its behalf, such as analyzing data and providing customer support. These service providers may have access to the Information in connection with the performance of services for NoGame, all as specified above.
- 9.2. We may share Information (including your Personal Information) as permitted by Applicable Laws, in order to: i) comply with a subpoena or court order, respond to a government request, when we believe that such release is essential to comply with the law; ii) investigate fraud, enforce or apply our rights; or iii) protect the rights, property, or safety of us or our users, or others. This includes exchanging Information with other companies and organizations for fraud protection and disclosing Personal Information in response to lawful requests by public authorities or for local law enforcement requirements.
- 9.3. We may share Information (including Your Personal Information) in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business to another company. You will be notified via notice on our Website of any change in ownership or users of your Personal Information.



10. Your Rights

- 10.1. In all of the above cases in which we process your Personal Information, you may have the following rights and, in most cases, you can exercise them free of charge.
- 10.2. You have the right to obtain confirmation from us if we Process your Personal Information to access and review your Personal Information which is stored in our database(s) and receive a copy of it, so that you could verify its accuracy and the lawfulness of its Processing.
- 10.3. If you are entitled under the Applicable Laws, you may also request us to restrict Processing of, update, amend and/or delete your Personal Information if it is inaccurate, incomplete, outdated or processed in violation of Applicable Laws.
- 10.4. In order to exercise your rights, you may contact us at support.ule@ul.game
- 10.5. We will act in accordance with the Applicable Laws, in order to comply with your request. When you ask us to exercise any of your rights under this Policy and the applicable law, we may need to ask you to provide us certain credentials to make sure that you are who you claim you are, to avoid disclosure to you of Personal Information related to others and to ask you questions to better understand the nature and scope of data that you request to access. We may redact from the data which we will make available to you, any personal information related to others.
- 10.6. We may retain certain Personal Information as deemed required by and/or as otherwise permitted by Applicable Law and regulations. In addition, we may delete any Personal Information pursuant to our policies as then in effect.

11. Information Retention

- 11.1. **Retention of Your Personal Information.** We may retain your Personal Information at least for as long as your Account is active, and as necessary in order to fulfill the purposes for which it was collected to comply with our legal obligations, resolve disputes, and enforce our agreements.
- 11.2. If you choose to uninstall the App and not to re-install it, or if you close your Account, we shall keep the information including Personal Data as long as we are legally required. If you are an inactive User (you have closed your Account or do not use it), you may contact us and request us to delete your Personal Information. In this case, if we are legally required to retain your Personal Data, we shall retain it in an encrypted manner. After the legal retention period has passed, we will delete your Account and Personal Information. For information about accessing or requesting deletion of your Personal Data after you are inactive, please see Section 10 above. Please note that when you access the App through your Facebook or Google accounts, the Personal Information you



provide is saved to your Facebook or and/or Google account. In order to request the removal of your Personal Information, you will need to contact Facebook and/or Google directly.

11.3. Retention of Non-Personal Information. We may retain your Non-Personal Information for an unlimited period. In any case, as long as a Data Subject uses the Website and/or App, we will keep Information about that Data Subject, unless we are legally required to delete it, or if that Data Subject exercises its rights to delete the Information.

12. Analytics

The collection of Non-Personal Information via the App commences on your first use of the App. We collect Non-Personal Information through the use of Google Analytics, which is subject to its privacy policy, available at: <https://policies.google.com/privacy>. We may use other analytics tools, to Process the Information, subject to Applicable Laws.

13. Our Policy Towards Children

In order to use the App, it is required that the Data Subject must **be above the age of 18**. NoGame has also placed an age limitation of 18+ in the relevant App stores. **Users under the age of 18 are not allowed to participate in a cash tournament.** When a User wishes to deposit money into its Account, it must declare his age and provide its date of birth. User are required to provide accurate information.

If a User which is under the age of 18 accesses the Games and participates in a cash tournament despite the explicit age limitation, the User will do so at its sole responsibility and liability.

14. Information Security And Protection

14.1. NoGame takes reasonable measures to protect the Information from unauthorized access or against loss, misuse or alteration by third parties.

14.2. Although we make considerable efforts to store the Information collected on the App in a secure operating environment, we cannot guarantee the absolute security of that Information during its transmission or its storage on our systems.

14.3. We do not warrant or represent that the Information will be protected against, loss, misuse, or alteration by third parties, because no method of transmission over the Internet, or method of electronic storage, is absolutely secure.

14.4. Please keep your e-mail safe and secure in order to prevent unauthorized access to your User Account and to our systems. Please note that NoGame



does not check the validity of the use of your email, and any User of the App with Your e-mail will be considered as your User of the App.

15. [Changes to this Privacy Policy](#)

- 15.1. We may change the terms of this Privacy Policy from time to time by posting notice on our Website, with a seven (7) day advance notice. However, substantial changes will be effective thirty (30) days after the notice was initially posted. We will make an effort to inform Data Subjects of substantial changes through the channels of communication generally used in such circumstances, and subject to the requirements of Applicable Laws - to obtain their consent.
- 15.2. If we need to adapt the Policy to legal requirements, the amended Policy will become effective immediately or as required.
- 15.3. A Data Subject's continued browsing or usage of the Website and/or App following such notice shall constitute the consent of the Data Subject to any changes made and a waiver of any claim or demand in relation to such changes. If a Data Subject does not agree to the new or different terms, it should not use and is free to discontinue using the Website and/or App.

16. [Applicable Law And Dispute Resolution](#)

- 16.1. This Privacy Policy shall be governed by and construed in accordance with the laws of the State of Israel, without regard to its conflict of law provisions.
- 16.2. The courts of the Tel Aviv – Jaffa district shall have exclusive jurisdiction in all disputes and proceedings arising from this [Privacy Policy](#).



17. Contact Us

17.1. For further information about this Policy, please contact us at: support.ule@ul.game

17.2. We work hard to manage Personal Data responsibly. If you are unhappy about the way we do this, please contact us and we will make good-faith efforts to address your concerns. We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from us, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, we will provide you with the contact details for that regulator.

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