


# Supplemental California Privacy Statement

We, Arc Games Inc., provide this Supplemental California Privacy Statement solely to residents of the State of California (“consumers” or “you”) with respect to personal information that we process as a business. Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time, including by the California Privacy Rights Act of 2020 and its implementing regulations (“CCPA”) have the same meaning when used in this Statement. This Statement does not reflect our collection, use, or disclosure of California residents’ personal information, or data subject rights, where an exception or exemption under the CCPA applies. This Statement supplements our [Arc Games Privacy Policy](#) and we use the term “Services” in this document the same way that we define our “Services” in our Arc Games Privacy Policy.

## 1. Notices at Collection

We have set out below categories of personal information that we collect about users of our Service who reside in California.

We disclose personal information collected about Service users to advertising partners to provide Service users with more interesting and customized information, promotions, and advertising, which is considered "selling" and "sharing" under the CCPA. Please see our notice of right to opt out of selling sharing here:  [Your Privacy Choices](#)

### What Categories of Personal Information Do We Collect?

#### Non-Sensitive Personal Information:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, physical characteristics or description, address, telephone number, credit card number, debit card number, or any other financial information, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.
- Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.
- Geolocation data.
- Audio, electronic, visual, or similar information.
- Inferences drawn from any personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

### **Sensitive Personal Information:**

- The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.

### **For What Purposes Do We Collect and Use Personal Information?**

We use personal information about our Service users for the following purposes:

- To process your requests or transactions;
- To personalize and provide you with our Services;
- To facilitate your use, and our administration and operation, of our Services;
- To operate any console games you play and provide you with related Services, and maintain their compatibility with the third-party console platform provider's services;
- To contact or communicate with you about your use of our Services, including welcome messages, and other important information about our Services and our relationship with you;
- To notify contest and sweepstakes winners;
- To better understand the needs, characteristics and usage patterns of users of our Services and perform research and analysis in connection with improving our Services, developing new products and services, and marketing our products and services more effectively;
- To prevent or investigate actual or suspected fraud, hacking, infringements of our contracts and policies, violations of applicable laws, or other misconduct involving our Services or any of our other products and services;
- To evaluate and enter into a reorganization, restructuring, merger, acquisition, divestiture, financing, or whole or partial sale or transfer of our business or assets ("**Business Transaction**");
- To use or disclose personal data for targeted advertising purposes;
- To use cookies and tracking technologies;
- To send you direct marketing, including newsletters, surveys, contest and sweepstakes announcements.

### **What Criteria Do We Consider When Retaining Personal Information?**

We retain your personal information only as necessary for the purposes for which the personal information is processed or for legal requirements. The length of time for which we retain personal information depends on the purposes for which we collect and use it and how long we need to retain it to comply with applicable laws (including for the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements), to

establish, exercise or defend our legal rights, or to make the data available to judges and courts or the competent public authorities. Once the personal information is no longer necessary for the purposes for which we collected it, we will delete it.

## Your Rights Under California's Shine the Light Act

We do not disclose Personal Information to third parties for their direct marketing purposes.

## 2. California Consumer Privacy Act Privacy Policy

Last Updated: May 12, 2025

### Our Personal Information Handling Practices

We have set out below categories of personal information about California residents we have collected, and as applicable disclosed, for a business purpose in the preceding 12 months. The table is followed by a description of the purposes for which we collected personal information. If we process de-identified information, we will maintain the information in a deidentified form and not attempt to reidentify the information, except that we may attempt to reidentify the information solely for the purpose of determining whether deidentification processes used satisfy legal requirements.

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
<i>Personal Information</i>				
<b>Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.</b>	<ul style="list-style-type: none"> <li>• Directly from consumers</li> <li>• Indirectly (e.g., from third party sources)</li> </ul>	Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	Yes, we may have "shared" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	<p>To various service providers to receive services from them.</p> <p>To corporate partners, for corporate transaction purposes.</p> <p>To government agencies for purposes of complying with law.</p>
<b>Any information that identifies, relates to, describes, or is capable of being associated with, a particular</b>	<ul style="list-style-type: none"> <li>• Directly from consumers.</li> <li>• Indirectly (e.g., from</li> </ul>	No.	No.	To various service providers to receive services from them.

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
<b>individual, including, but not limited to, his or her name, physical characteristics or description, address, telephone number, credit card number, debit card number, or any other financial information, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.</b>	third party sources)			To corporate partners, for corporate transaction purposes.  To government agencies for purposes of complying with law.
<b>Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</b>	Directly from consumers.	No.	No.	To various service providers to receive services from them.
<b>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.</b>	Indirectly from consumers (e.g., through the use of our Service)	Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	Yes, we may have "shared" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	To various service providers to receive services from them.  To corporate partners, for corporate transaction purposes.  To government agencies for purposes of complying with law.
<b>Geolocation data.</b>	Indirectly from consumers (e.g., through the use of our Service).	Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting	Yes, we may have "shared" this category of personal information to advertising business partners for the	To various service providers to receive services from them.  To corporate partners, for corporate transaction

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
		our advertising efforts.	purposes of supporting our advertising efforts.	purposes. To government agencies for purposes of complying with law.
<b>Audio, electronic, visual, or similar information.</b>	Directly from consumers.	No.	No.	To various service providers to receive services from them.  To corporate partners, for corporate transaction purposes.  To government agencies for purposes of complying with law.
<b>Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</b>	<ul style="list-style-type: none"> <li>• Directly from consumers.</li> <li>• Indirectly</li> </ul>	No.	No.	To various service providers to receive services from them.
<b><i>Sensitive Personal Information</i></b>				
<b>The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.</b>	<ul style="list-style-type: none"> <li>• Directly from consumers.</li> </ul>	No.	No.	To various service providers to receive services from them.

## Business or Commercial Purpose for Collecting Personal Information

We use personal information about our Service users for the following purposes:

- To process your requests or transactions;
- To personalize and provide you with our Services;
- To facilitate your use, and our administration and operation, of our Services;
- To operate any console games you play and provide you with related Services, and maintain their compatibility with the third-party console platform provider's services;
- To contact or communicate with you about your use of our Services, including welcome messages, and other important information about our Services and our relationship with you;
- To notify contest and sweepstakes winners;
- To better understand the needs, characteristics and usage patterns of users of our Services and perform research and analysis in connection with improving our Services, developing new products and services, and marketing our products and services more effectively;
- To prevent or investigate actual or suspected fraud, hacking, infringements of our contracts and policies, violations of applicable laws, or other misconduct involving our Services or any of our other products and services;
- To evaluate and enter into a reorganization, restructuring, merger, acquisition, divestiture, financing, or whole or partial sale or transfer of our business or assets ("**Business Transaction**");
- To use or disclose personal data for targeted advertising purposes;
- To use cookies and tracking technologies;
- To send you direct marketing, including newsletters, surveys, contest and sweepstakes announcements.

We do not have actual knowledge that we sell, or share for cross context behavioral advertising, the personal information of California residents under 16 years of age.

## CCPA Rights

As a California resident, you have the following rights under the CCPA:

- The **right to know** what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you. You may only exercise your right to know twice within a 12-month period.
- The **right to delete** personal information that we have collected from you, subject to certain exceptions.

- The **right to correct** inaccurate personal information that we maintain about you.
- The **right to opt out of the sale or sharing** of your personal information by us. We disclose California residents' personal information to advertising business partners for the purposes of supporting our advertising efforts and, as such, we "sell" and "share" personal information as these terms are defined under the CCPA. Please note that we do not monetize personal information in the sense of disclosing your personal information in exchange for money. Please also note that, if you exercise your right to opt-out of the "sale" and "sharing" of your personal information, we may still disclose your personal information to third parties for purposes other than cross-contextual behavioral advertising, as described in our privacy disclosures.
- The **right to limit** our use and disclosure of sensitive personal information to purposes specified in Cal. Civil Code 1798.121(a). We do not use or disclose sensitive personal information that is subject to Cal. Civil Code 1798.121 for purposes other than those specified in Cal. Civil Code 1798.121(a).
- The **right not to receive discriminatory treatment** by the business for the exercise of privacy rights conferred by the CCPA, in violation of California Civil Code § 1798.125.

## How to Exercise CCPA Rights

**Methods of Submission and Instructions:** To submit a request to exercise your **rights to know, delete or correct**, please call 888-413-9998 (toll free) or populate our web form at <https://support.arcgames.com>.

**Verification:** Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may designate an authorized agent by taking the steps outlined under "Authorized Agent" further below. In your request or in response to us seeking additional information, you, or your authorized agent, must provide sufficient information to allow us to reasonably verify that you are, in fact, the person whose personal information was collected which will depend on your prior interactions with us and the sensitivity of the personal information being requested. We may ask you for information to verify your identity and, if you do not provide enough information for us to reasonably verify your identity, we will not be able to fulfil your request. We will only use the personal information you provide to us in a request for the purposes of verifying your identity and to fulfill your request.

**Opt-Out Preference Signals:** We respond to opt-out preference signals communicated via the Global Privacy Control and will process such signals with respect to the browser or device communicating the signals, or with respect to you specifically if you have signed onto your Company account while communicating Global Privacy opt-out preference signals. To use Global Privacy Control opt-out preference signals, please follow the instructions here: <https://globalprivacycontrol.org/>.

**Authorized Agents:** You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity and the agent provides proof that you gave the agent signed permission to submit the request; and
- You directly confirm with Company that you provided the authorized agent with permission to submit the request.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

## **Contact Us**

If you have any questions or comments about these disclosures or our practices, please contact us at:

Webform: <https://support.arcgames.com>.

Postal address: Arc Games Inc.

Attn: Privacy Policy Inquiry

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United States of America