

PRIVACY POLICY

(Last Updated: August 9th, 2019)

We are Limited Liability Company “Reland Activ SRL”. This Privacy Policy (the “Policy”) will explain what data we collect from you when you use our products, services, and properties, why we collect it, and how you can access, manage, export and delete your data.

This Policy is based on and our legal relationships with you are governed by the General Data Protection Regulation (“[GDPR](#)”) and other applicable data protection laws. If you do not agree to our use of your data, please cease using our products, services, and properties.

1. Who We Are and What this Policy Governs

The data controller of your Personal Data is Limited Liability Company “Reland Activ S.R.L.”, duly incorporated under the laws of Romania, located at Sat Peretu, Comuna Peretu, Judet Teleorman, Romania, registration number: 31715471.

This Policy applies to boosteroid.com website and sub-domains (cloud.boosteroid.com, promo.boosteroid.com, help.boosteroid.com), Boosteroid user account; any application used in connection with user account (web clients in browsers, native and mobile apps, Smart TV apps); games, videos, texts, other content you use, get, purchase via our website, products, services; our available payment methods; internal chats, forums; customer support; any other products/services we provide to you (the “Product”). The Policy applies to Personal Data and other information we collect from you when you use the Product.

2. What is Personal Data

We receive and store any information you enter on the Product or give us in any other way, as well as collect information from you. Some of this information is personal data, as defined in GDPR. ‘Personal data’ means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number, location, online identifier or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural or social identity of that person. **So, Personal Data is the information that can be used to identify you personally.**

3. Our Data Protection Principles

We comply with data protection laws, which say that personal data shall be:

- used lawfully, fairly and in a transparent way, applying the data minimization principle;
- collected for valid purposes that we clearly explain to you and not used for other purposes;
- relevant to the purposes we reveal to you and limited only to those purposes;
- accurate at all times and kept up to date;
- kept only as long as necessary for the purposes we reveal to you;
- kept securely.

4. Protecting Children and Vulnerable Persons

Children merit specific protection with regard to their Personal Data. We will never knowingly collect Personal Data from any child under 14. If we decide to knowingly do that, we will ask

for consent by the holder of parental responsibility over the child. If you are a parent or guardian and are concerned about the use of Personal Data of your child (whether he/she is under 14, 16, 18 or other legal age in your jurisdiction), contact us at support@boosteroid.com.

If you are a parent or guardian and are concerned about the use of Personal Data of a partially incapacitated person or any other person who regardless of their age and for whatever reason exercise all or part of their rights through a parent or guardian, contact us at support@boosteroid.com.

5. Why Do We Collect Your Personal Data?

We collect Personal Data and other information that we need to provide the services for you as our client. Your Personal Data processing is necessary to perform our services to you as requested by you when you choose to use the Product, and to maintain the proper operation of the Product (a “legitimate interest” under GDPR), or where you explicitly consent to such collection. You may withdraw your consent at any time.

We will use Personal Data and other information collected from you to:

- Ensure network and information security (prevent breaches, attacks, thefts);
- Ensure that content is presented in the most effective manner for you and your device;
- Share information about the Product, other services and products that we provide;
- Notify you about changes and updates to the Product;
- Conduct statistical analysis necessary to evaluate and improve the Product;
- Develop and improve our Product, fix bugs and errors, introduce updates;
- Send confirmations for sign up and confirmation of other actions you make on the Product;
- Respond to your questions, assist you with issues you experience while using the Product.

See examples in the next section 6, where we explain what data we collect and mention collection cases and purposes.

6. What Data We Collect

We will collect the following Personal Data and other information from you if you choose to use the Product:

- Your email.

We need your email to provide you with your user account. Your email should be active and valid. We use it to identify you as our user. We use your email to send you confirmation to sign up, restore your password or other confirmations. We use your it to communicate with you, provide support, reply to your inquiries and requests. We use your email to send you information about changes and updates of the Product. We can also contact you by email for marketing (including direct marketing) and advertising, ask you to evaluate the Product and provide feedback, send you the content related to the Product, our company and business or the industry. You can unsubscribe from receiving emails from us at any time by clicking “Unsubscribe button” available in our emails or by contacting us at support@boosteroid.com.

- Your username.

You will obtain a random username by default when you create your account. You can change it if you want or keep on using it. You don't have to use your real name as a username. If you choose to use an abusive username we can contact you to ask you to change it or we can deactivate your account without prior notice. In such a case we will not be responsible for any loss or damage to you.

- Your account password.

It is stored encrypted in our database, we do not know it. Information available in your account is protected by your password. Make sure your password is secure enough. We require you to make up at least 8-characters long password. You should keep your password safe and do not share it with anyone. If you fail to keep your password secure, we won't be liable for any loss or damage you might experience.

- Your account avatar.

You can upload a picture to your account on the Product if you want. It will be stored on our servers as long as you have your account or till you change the avatar in your account. If you change your avatar, the previous one will be deleted. Feel free to upload any picture you want, including a photo of yourself. Your photo will not be considered a biometric data, as we do not process it through a specific technical means allowing the unique identification of you as a natural person.

- Your phone number.

Generally, we will only communicate with you via email. If you choose to communicate with us via phone we may collect the phone number you used to contact us to be able to communicate with you. We DO NOT collect other contact details about you, like your physical or registered address.

- Your real name.

We do not aim to collect your name. We will automatically collect it if you choose to provide your real name as a username, provide your real name in "Contact Us" form or other contact forms. It's optional for you to provide your name or not, or if it's not optional, you don't have to provide your real name. In fact, whichever name you provide, we'll never know if this is your real name or you've just made it up. **We don't identify our users by their names**, but by their emails.

- Limited payment processing information.

You will be making purchases and transactions within the Product, for example to pay for your subscription. You will do that using third-party payment operators, like Paypal, Twispay, Visa or Mastercard. Though you will be logged in to your Boosteroid account, you will interact with this third-party payment operators, not with us. They will be in charge of most of your data. We don't collect any information related to your actual payment details. **We process only limited payment processing information on a hashed/anonymised basis.** This includes the data on whether the transaction happened, was it successful or not, transaction type and what payment operator you have used. The relevant third-party payment operator is in charge of all other information. Such payment operators and systems can require to provide your phone number, bank card number, real name, physical address,

etc. We won't access or collect such information. Check the privacy statement of the payment operator you use to be aware of how it collects and uses your data. **We DO NOT collect information about your bank card number, bank account number, cardholder's name, other payment details.**

Here's an example for you to understand what happens when you make a transaction to by certain subscription:

To make a transaction you will be redirected to the page of a relevant payment operator (payment processor, system). Let's pick Twispay. You make a transaction via Twispay and provide the data it requires you to provide. We do not access this data. Then Twispay sends encrypted limited information about the transaction to us. We decipher this data using special cryptographic software libraries provided by Twispay and see, what type of subscription should be credited to the particular Boosteroid account. While Twispay probably knows who you are (your name, bank card number and name of your bank), this information remains unknown to us. We just know that a certain subscription should be credited to a certain Boosteroid account. As we've already mentioned, we use emails, not names, to identify our users and their accounts in our system.

- Your IP-address.

Your Internet Protocol address is a numerical label assigned to your device when it is connected to the Internet. We get this information automatically when you interact with our website, services or other software that is available online. We either collect your IP-address by ourselves, or it is provided to us by your browser.

- Technical data about your device you use to access the Product.

This includes your Internet and/or network connection (including your Internet speed, IP address); mobile device identifiers; operating system, browser type; your hardware details; technical details provided by your browser.

We will process this data to ensure that our Product interacts with your device in the most efficient way possible. This data will also help us collect statistics about the devices our users use so that we can improve the Product and make it even more user-friendly. We also need it in case of an error or issue, so that we can understand what kind of device or software experienced a problem and what can we do about that.

When you start using the Product we connect you to the closest Boosteroid server to ensure the best experience and low latency. This may be a server located in your country or in other country, area or even continent. The closer you are to the servers the better experience you have. That's how we identify which server we should connect you to: we evaluate the quality of the connection between you and all the locations where we have our servers and choose the location that shows the best connection.

- Details of your use of the Product.

This includes: metrics data about when and how you use the Product; web traffic; purchase history; your preferences and choices like subscription type, preferred language or currency.

For example, we collect and analyze data about your visits to our websites to optimize design and functionality.

We will collect technical logs, information about games you play (including games you play via third-party platforms like Steam, Origin, Uplay, Battle.Net, etc.) date and time of your play, the duration of your gaming sessions, your multiplayer sessions, what games are added to your Boosteroid account, activities you are engaged in on other platforms that are connected to your Boosteroid account.

- Bug and error reports, crash logs.

Our software automatically generates bug/crash reports to get the information about software or hardware problems that may occur while you use the Product. This data will include information about your device type, operating system and browser type, network connection and how our software interacts with your device. We will use such data to fix problems on the Product. We need it to identify the type of error or bug, where and why it occurred and how we can fix it. We also use such data to provide you with tech support.

We may integrate third-party software to generate, collect, and manage bug reports and crash logs. Such third-party software will not receive any of your data, accept bug and crash-related data mentioned above. The third-party software will deal only with our software issues that occur while you use the Product. We will always maintain the necessary level of data security when using such third-party software.

- Data collected by using cookies.

We collect Personal Data and other information from you by using cookies. Our use of cookies is described in the Cookie Policy that you should check before using the Product. If you do not agree to our use of cookies, cease using the Product.

- Your communication.

We receive your communication to us via email and support chat, your messages and comments in internal blogs/forums. We also have access to your in-game chats to provide you with the opportunity to use them while you play games through the Product.

We may intercept, record and/or monitor any communication (including phone calls or other electronic communication) between you and us. We can do so to resolve queries in the future, for the purposes of security, staff training, complying with our legal responsibilities.

- The information required in the Early Access Request Form (will be explained in the next section).

Please note that:

- We will NEVER ask you to send us any of your personal documents (passport, other ID, social security number, taxpayer number, birth/marriage certificate, driving license, health

insurance documents, etc.). If somebody asks you to provide these documents on behalf of us, never do that and contact us at support@boosteroid.com as soon as possible.

- If we need any other data not specified here, we will ask you to provide such data, explain why we need it and what we will do with it. We will ask for your consent or explain other legitimate grounds of our collection and use of such data.
- Even if you just access our website, do not register and/or use the Product, or if you do not provide us with your email, we will automatically gather information from your computer such as your IP address, browser type, referring/exit pages, and operating system.

7. EARLY ACCESS REQUEST FORM

For a certain period of time after the initial launch of the Product you should request early access to the Product to be able to use it. We need to receive feedback, evaluate how our software and hardware infrastructure operates and fix issues that may arise, so you will have to request early access that we may or may not deliver to you, depending on the operational conditions of the Product. Soon after that, the access will become public and open to everyone.

Early access request form. To request early access to the Product you should fill in the Boosteroid Early Access Form by following the corresponding links on our website. In this Form you will be asked to provide the following information:

- **your email** (so that we can send you an invitation)
- **your country** (for us to know how far you are located from our data centers and to figure out where we should scale);
- **your year of birth and gender** (so that we know the age/gender group of our users and design the Product in the most suitable way);
- **preferred game genres** (so that we know what games we should add to our game library);

If you agree to provide this information, you agree that we can store and process it for the purposes mentioned below. If you do not want to provide this information, please wait until the access to the Product is public and there is no early access request procedure.

With this information we do not mean and are not able to identify you personally. What we need is to find out who are our users in terms of their age and gender group, area from where they access the Product and what are their gaming preferences.

Since this Form is required during the initial launch of the Product, we need this information to collect statistics and set up the effective marketing campaigns. Besides, this information will help us advance our user-interface and design. We will use it to identify medium-term product development plans - to what areas should we scale first and what games should we add to our game library.

This information will be securely stored on our servers until we no longer need it for the purposes mentioned above. Anyway, it will be stored no longer than one year. We will share this information with our marketing specialists and third-parties (contractors) who are providing marketing and related services to us.

After you submit the Early Access Request Form, we will (or will not) send you the invitation. You will sign up and start enjoying Boosteroid. The information mentioned in this section will be added to other information we collect from you when you use the Product, as described earlier in this Policy.

8. Sensitive Personal Data and information.

Never send us, and never disclose or make available any sensitive Personal Data and information including: social security numbers, ethnic origin, religious or philosophical beliefs, political opinions, sex life and orientation, trade union membership, health-related information, your biological characteristics, genetic data, biometrics, social background, family, criminal history, and/or any other information that you personally consider sensitive, as well as any other information that can be reasonably considered as sensitive.

If you disclose any sensitive Personal Data/information when uploading/posting user content to the Product, you are responsible for the consequences of such disclosure. This data will be collected by us and stored on our servers (as any user content you upload/post) and its processing will be considered as processing that relates to personal data which are manifestly made public by the data subject (you). We won't process such data for profiling, marketing, etc. We'll share it with competent authorities if we are requested.

9. Social Network Accounts

You can log into our website or the Product using social network accounts, such as Twitch, Steam, Facebook, Google. These services will authenticate your identity and provide you with the option to share certain Personal Data with us such as your username, first name, last name, email address. In Facebook, you can use dev console to manually manage the information that Facebook will provide to us if you log into the Product.

10. Third-party websites and platforms

The Product contains links to and from the websites or services of third parties, e.g. to platforms like Steam, Uplay, Battle Net, etc., or developers/publishers whose games are available on the Product. Such third parties also collect personal data (like your email or name). This may include saving information to your account on the Product that is related to such third party websites and platforms (for e.g. saving game progress). This Policy does not apply to external websites, companies or providers, so please check their privacy notices.

11. Your Steam, Uplay, Origin, Epic, Battle.Net, etc. account information.

To access games through the Product you will be asked to log in to your account on a third-party digital distribution platform or game launcher. You will be redirected to the login page of such a platform or launcher where you will have to enter your login and password. We do not request, process and store your digital distribution platform or launcher account information. It is stored and processed by the digital distribution platform or launcher.

For example, to play Fortnite you'll have to log in to your Epic Games account. When you launch Fortnite while being logged in to Boosteroid, you'll be redirected to Epic Games launcher page where you will log in to your Epic Games account. Then you can play the game. We will not receive or store data related to your Epic Games login or password.

Here's another example. Fortnite is a free game, so you only need to log in to your Epic Games account to play it. But if the game is paid, e.g. GTA V, you should buy it before playing it through Boosteroid. You buy games from an owner or an official distributor, so in case of GTA V, you'll be redirected to Steam, where you will have to buy the game. We will not receive any data related to the payment details and details of your third-party accounts.

12. Use of Your Personal Data

We will strive to collect only data required for the purposes mentioned in this Policy (data minimization principle) and store it until it serves the purpose of its collection. If you think we do not comply with data minimization principle, please contact us and report your concern.

We use the Personal Data and other information that we collect for the following purposes:

- to comply with our legal or regulatory obligations, transaction recording, other compliance responsibilities, reporting to regulators and competent authorities when applicable;
- to ensure the security of our network and software infrastructure;
- to conduct know your client and anti-money laundering checks on you, and associated financial crime and fraud monitoring if requested by competent authorities or required by law;
- to carry out our obligations under our contracts with you or others;
- to protect you from unauthorized use of your account;

We have a legitimate interest in ensuring that the Product operates effectively, and to do this we may use your Personal Data:

- to monitor, improve and administer the Product;
- to contact you to ensure customer satisfaction with respect to our role as a platform and service provider and assist you in getting the best value from our services;
- to respond to customer support or other inquiries requesting information.

We also have an interest in communicating with you and others, publicizing our business, and making sure that our marketing, advertising, PR, and content is effective, so we may use your Personal Data:

- for direct marketing (you have the right to object to direct marketing at any time for free);
- to conduct surveys, analysis, identify other potential customers;
- to evaluate the popularity and performance of the Product;
- to advertise, publicize, promote the Product and our business, and to measure, understand, or improve the effectiveness of advertising we provide to you and others;
- in case of individuals/businesses that have indicated an interest in the Product, to contact you to provide the information about us, services we offer (unless you ask us not to do so);
- to create and share informative content about our business or the industry in which we operate, including contacting you about reports we publish and new products we launch;
- to provide you with news, updates about our business, other relevant information.

- also, in certain circumstances, we may seek your consent to use your Personal Data for any specific purpose. We will ask you to confirm a separate consent to your Personal Data being processed for a specific purpose, either through the Product or by other means.

We can create anonymous data records from Personal Data by excluding information that can identify you personally. Such anonymous data derives from personal data rendered anonymous in such a manner that the data subject (you) is not or no longer identifiable. So, it will be completely impossible for anyone to use such anonymous data to identify you personally. We may use such anonymous data to analyze request and usage patterns so that we may enhance the content, improve the Product and its navigation. We may use such anonymous data for any purpose and disclose it to third parties.

13. Storage and Transfer of your Personal Data, Security

Your Personal Data and other information related to you and your account (email, username, password) will be stored as long as you have your account. When your account is deleted, all your data will be deleted too. Erasure of your data and stop of its processing upon your request may in some cases lead to inability to use the Product. We will carefully explain to you all the consequences of the erasure or stop of the processing in each particular case.

The Personal Data collected by us is normally used by us. We share the Personal Data with our affiliates and trusted partners within our corporate family, third parties with which we have partnered to allow you to integrate their services into the Product, and with trusted third-party service providers as necessary for them to perform services on our behalf. We only share your Personal Data when necessary for any third party to provide the services as requested or needed on our behalf. These third parties are subject to all applicable data processing terms and are prohibited from utilizing, sharing or retaining your Personal Data for any purpose other than as they are specifically contracted for or without your consent.

The data we collect from you may be transferred to and stored on our servers located outside your country of residence, the EU, or the [European Economic Area](#) ("EEA") and Switzerland. It may also be processed by staff operating outside the EEA and working for us or one of our suppliers. Such staff may be engaged in the processing of your data, maintaining servers where it is stored, and customer support. Any potential transfer of Personal Data outside the EEA will be done in accordance with GDPR. **By consenting to this Policy, you agree to this transfer, storing or processing.** We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy and GDPR. We will ensure that your rights will remain enforceable and effective legal remedies will be available to you following the transfer.

We will disclose your Personal Data to any third parties only if:

- we need to disclose your Personal Data to third-party service providers so that they can provide their services to us. We will take reasonable precautions to ensure that these providers are obliged to keep your Personal Data secure, in compliance with relevant legal requirements. In some cases, your Personal Data may be transferred outside the EEA, if this is the case we will take steps to ensure that the transfer is protected by safeguards provided under the EU law, such as model contract clauses or the [EU-US Privacy Shield](#);

- we are required to do so by law, regulation, court order or other legitimate government body or arbitration panel.

We endeavor to take all reasonable steps to protect your data. We also require that our employees undergo mandatory data protection training. However, we cannot guarantee the security of any data you disclose online. In using the Product, you agree that you will not hold us responsible for any breach of security unless we failed to fulfill our obligations.

14. Corporate Restructuring, M&A

If any other company acquires our company, business, assets, this company will possess your Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Policy.

15. Your Data Protection and Privacy Rights

You have the right to **access your data** which means you can see what data we have collected whenever you want.

You can **request a copy** of all your personal and other data we hold. We will provide such copy for free but we will charge a reasonable fee if you ask for more than one copy of the same data. In that copy, we'll also explain how and why we use your data. You have the right to **data portability** that assumes your data can be easily transferred to another organisation.

You can request **rectification or erasure** of Personal Data. We will rectify or delete your data free of charge upon your request unless keeping your data is required for our legal and regulatory compliance. Even if you don't ask us to delete your data, will stop keeping it if we no longer need it for the purposes described in this Policy.

You can **object to our processing** of your data. We will stop processing it upon your request unless the processing is required for legal and regulatory compliance. We will carefully explain to you the consequences you might face after we stop processing your data upon your request in each particular case.

You can **object to direct marketing or other kinds of communication** we send to you at any time free of charge. Simply click "Unsubscribe" or similar button where applicable, or contact us at support@boosteroid.com.

Where you have provided your consent to the processing of your data, you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we did prior to your withdrawal and will not affect processing of your information conducted on lawful grounds other than consent.

You have the right to **contact the appropriate authority** to protect your privacy. We kindly ask you to contact us first, if you have any concerns about how we use your data, so we can try to resolve the issue. However, you can always report a complaint. To do that, contact [The](#)

[National Supervisory Authority for Personal Data Processing](#) in Romania: +40318059211, anspdcp@dataprotection.ro, or a data protection authority in your region.

You can stop all collection of your data by our mobile app or our web/desktop software by uninstalling the app or such software at any time. Use standard uninstall processes available in your mobile device, PC or another device, the mobile app store or network.

If we need or are required to confirm your identity to provide you with the opportunity to exercise your rights, we'll request the additional information from you to confirm your identity.

GDPR and other applicable data protection laws may provide you with **other rights** we have not explicitly covered in this Policy.

To send a request for a copy of your data, to tell us to delete/rectify your data, to withdraw the consent, and to exercise any other rights, please contact us at support@boosteroid.com.

16. Changes to Our Policy

We update this Policy from time to time, so we encourage you to review it frequently. We won't always notify you about the changes unless they are significant. "Last Updated" legend above indicates when the Policy was last changed. Any changes will become effective after they are posted on our website. If you do not agree to the changes, cease using the Product.

17. Contact Information

If you require more information about our Product and this Policy, please contact us at support@boosteroid.com. For other issues, please contact us at office@boosteroid.com. Besides, you can contact us via the support chat on our website.

18. Third-party privacy statements

The Product contains links from/to other websites, platforms, and services. Your Boosteroid account may be connected to your accounts on other services, like Steam, Origin, Uplay, etc. You will be offered to make transactions using third-party payment systems. It means, while you use the Product, your data will be collected by these third-party websites, platforms and services and their privacy statements will apply to you. Please, check the privacy statements of third-party services to get the full picture of your privacy. Here are some of the privacy statements that may be useful for you:

[Visa Global Privacy Notice](#), [Mastercard - Global Privacy Notice](#), [PayPal Privacy Statement](#), [Twispay's Privacy and Cookie Policy](#) - for the payment processing related information.

[Steam Privacy Policy Agreement](#) (for Steam-based games), [Ubisoft Privacy Policy](#) (for Uplay-based games), [Rockstar Games Privacy Policy](#) (for Social Club-based games), [Electronic Arts Inc. Privacy and Cookie Policy](#) (for Origin-based games), [Epic Games Global Privacy Policy](#) (for Epic games), [Blizzard Entertainment Online Privacy Policy](#) (for Battle.Net-based games), [Wargaming Privacy Policy](#) (for Wargaming games).