

User Privacy Policy

Last Updated: February 18, 2025

Effective Date: February 20, 2025

Welcome to using our platform!

This “User Privacy Policy” (hereinafter referred to as “this Privacy Policy”) will help you understand:

1. How we collect and use your information;
2. How we entrust the processing of, share, transfer, and publicly disclose your information;
3. How we use COOKIES or similar technologies;
4. How we store and protect your information;
5. Your rights;
6. Protection of minors;
7. The scope of this Privacy Policy;
8. Changes to this Privacy Policy;
9. How to contact us.

By signing this membership application form, you agree that ELIXIR ESPORTS PTE.LTD. may collect, use and disclose your personal data, as provided in this application form, or (if applicable) obtained by our organization as a result of your membership, for the following purposes in accordance with the Personal Data Protection Act 2012 and our data protection policy

(available at our website www.elixiresports.com

(a) the processing of this membership application; and

(b) the administration of the membership with our organization.

Please visit our website at www.elixiresports.com for further details on our data protection policy, including how you may access and correct your personal data or withdraw consent to the collection, use or disclosure of your personal data.

This Privacy Policy applies to the functions and services (including the publishing and display of information, images, articles, comments, links, etc.) of the product itself, but does not apply to any other products or services provided by third parties (collectively referred to as “Third-Party Services”). Before you choose to use any Third-Party

Services, you should fully understand the product features and privacy protection policies of those Third-Party Services.

This Privacy Policy applies to our processing of your personal information based on your authorization before its release. If you do not agree to this Privacy Policy, you can stop using our services. If you continue to use our products and/or services, it means that you agree to be bound by this Privacy Policy. Your disagreement with this Privacy Policy will not affect our previous processing of your personal information based on your authorization.

Important Reminder: Please read, understand, and agree to this Privacy Policy and relevant supplementary documents before using the platform. Be sure to carefully read and fully understand each clause, especially those that exempt or limit liability or exclude or limit your rights, as well as any separate agreements for enabling or using certain services on the platform. Unless you have read and accepted all terms of this Agreement, you have no right to use the relevant services of the platform. By registering a platform account, logging in, or using any of the services provided by the platform, you are deemed to have read and agreed to all the content of this Agreement.

I. Definitions

1. **“Company”** refers to ELIXIR ESPORTS PTE. LTD. and its affiliates. The **“Platform”** refers to the platform developed, designed, and operated by the Company to provide a range of services to users.
2. **“User”**, i.e., “you,” refers to a natural person who has successfully registered on the platform and uses the relevant services (hereinafter referred to as “Services”).
3. **“Personal Information”** refers to all kinds of information recorded electronically or in other ways that can identify a specific natural person’s identity, or reflect the activities of a specific natural person, alone or in combination with other information. This includes but is not limited to name, date of birth, ID number, address, contact information (such as phone), account password, property status, and travel trajectories. Among these, **“Personal Sensitive Information”** includes ID numbers, biometric information, bank account information, communication records and content, property information, credit information, travel trajectories, accommodation

information, health and physiological information, transactional information and etc.

II. Collection and Use of Personal Information

During your use of the following services, we, under the principles of legality, legitimacy, and necessity, need to collect some of your information to provide services to you, ensure the security of your account, improve our service quality, and comply with applicable laws, regulations, and regulatory requirements:

1. Registration and Login Services

(1) When you use the platform for the first time, you need to provide your mobile device information for identity verification and to ensure the optimal display of information for you. If you refuse to provide this information, you may not be able to use our services normally.

(2) When you register and log in to your account, you need to provide your mobile phone number. We will send you an SMS verification code to validate your identity. If you refuse to provide this information, you may not be able to use some of our services normally.

2. Browsing, Searching, Matching, etc.

(1) When you use browsing, searching, matching, recommendation services, we may collect your location information (your geographical position at that time) in order to recommend services that suit your local area. If you refuse to provide this information, you can turn off location services; we will stop collecting this information, and you may not be able to use certain location-based services, but it does not affect your use of other services we provide.

(2) We may collect or entrust a cooperative third party to collect and retain your personal information, including your real name, ID information, location, phone number, marital status, current residence, occupation, income, education level, asset status, direct relatives' names, and contact information.

(3) Risk characteristic information automatically generated based on risk control rules or machine learning and other technical means. Such characteristic information is generated based on desensitized data from various categories: your historical usage on the platform, your authorized mobile device information (including but not limited to hardware info, device

identifiers, call behavior info, contact info, etc.), and various types of information authorized by you from third parties. If you refuse to provide all relevant information, you may not be able to use services related to that information normally, but it does not affect your use of other services we provide.

(4) We may also collect your phone number and provide it to our partner in order to generate your account information on that partner's side, allowing you to complete the service. If you refuse to let us share it with the partner, you may not be able to use that service normally.

(5) We and our suppliers may collect your name (nickname), phone number, and address to provide product shipping and delivery services. We and a third-party payment channel may collect your payment card number, bank name, card type, cardholder's name, ID number, and phone number linked to the bank, so that you can pay for goods. If you refuse to provide all information, you may not be able to use such services, but it does not affect your use of other services we provide.

3. Security Management

When you use our services, to ensure the safe and stable operation of our services, manage risks, and improve our services, our server may automatically collect the categories of services you use, how you use them, your device model, IP address, device software version information, device identifiers, log information, internet records, device MAC address, software installation list, contacts, and SMS.

These separate device information and log information alone cannot identify a specific individual. If we use such non-personal information together with other information to identify a specific individual, or if it is combined with other personal information, we will anonymize or de-identify such information unless we have your specific authorization or a legally permitted situation.

4. Personalized Services

From the information we collect legally through certain services, we may provide customized content to you using your phone number or email address or through in-site messages, displaying or recommending personalized push services. If you refuse to use this service, you can turn it off, and we will stop providing it. This does not affect your use of other services we provide.

5. Service Improvements

In order to provide you with a better experience, improve our

services, or for other purposes approved by you, and under the premise of complying with relevant laws and regulations, we may use the information collected through certain services for our other services. For example, the information you provide during the use of one service may be used to display personalized content or advertisements in another service or for user research analysis and statistics. To ensure service security and help us better understand how our application is performing, we may record relevant information such as the frequency you use the application, crash data, overall usage, performance data, and the source of the application. We will not combine the information stored in our analytics software with the personal identity information you provide in the application.

6. Other

According to relevant laws, regulations, and national standards, we may collect and use your personal information without your consent in the following circumstances:

- (1) Related to our performance of obligations stipulated by laws and regulations;
- (2) Directly related to national security or national defense security;
- (3) Directly related to public safety, public health, or major public interests;
- (4) Directly related to criminal investigation, prosecution, trial, and enforcement of judgments;
- (5) Necessary for the protection of your or others' life, property, and other significant legal rights and difficult to obtain your authorization;
- (6) Personal information that you have made publicly available on your own;
- (7) Personal information collected from legally disclosed sources such as lawful news reports or government information disclosure;
- (8) Necessary for the signing and performance of contracts at your request;
- (9) Necessary for maintaining the safe and stable operation of the services provided, for example, discovering and handling service failures;
- (10) Other circumstances prescribed by laws and regulations.

7. Notice

Third parties may provide services to you through the platform. When you enter a service page operated by a third party, please note that the service is provided to you by that third party. In cases where a third party collects information from you, we

recommend that you carefully read the third party's privacy policy or agreement.

If we intend to use the information for purposes not stated in this Privacy Policy, or use the information collected for a specific purpose for other purposes, we will seek your consent in advance. We may also use your personal information to continuously improve and optimize the features described above.

III. How We Use COOKIES or Similar Technologies

1. We or our third-party partners may obtain and use your information through COOKIES or similar technologies and store such information as log data.
2. By using COOKIES, we can provide users with a simpler and more personalized online experience. A COOKIE is a small amount of data sent from a web server to your browser and stored on your computer's hard drive. We use COOKIES so that our users can benefit from it. COOKIES help us determine which pages and content you connect to, how much time you spend on specific services of the platform, and which platform services you choose.
3. COOKIES enable us to serve you better and faster and make your experience on the platform services more personalized. However, you should be able to control how COOKIES are accepted by your browser. Please refer to the documentation attached to your browser for more information.
4. We and our third-party partners may collect and use your information through COOKIES or similar technologies and store such information.
5. We use our own COOKIES or similar technologies for the following purposes:
 1. Remembering your identity. For example, COOKIES or similar technologies help us identify you as a registered user of ours, or save information about your preferences or other data you provide;

2. Analyzing how you use our services. We can use COOKIES or similar technologies to understand what activities you carry out on the platform or which services are most popular;
3. Advertising optimization. COOKIES or similar technologies help us provide advertisements related to you based on your information instead of general advertising.

While using COOKIES or similar technologies for the above purposes, we may aggregate non-personally identifiable information collected through COOKIES or similar technologies and provide it to advertisers or other partners to analyze how you and other users use the platform services and for advertising services.

6. Advertisers and other partners may place COOKIES or similar technologies on the platform services. These COOKIES or similar technologies may collect non-personally identifiable information related to you for analyzing how users use those services, sending you advertisements that may interest you, or evaluating the effectiveness of advertising services. The collection and use of such information by these third-party COOKIES or similar technologies are not governed by this policy but by their own information protection statements. We are not responsible for third-party COOKIES or similar technologies.
7. You can refuse or manage COOKIES or similar technologies through your browser or user preference mechanism. Please note that if you disable COOKIES or similar technologies, we may not be able to provide you with the best service experience, and certain services may not function properly. You will still receive advertisements; however, the relevance of these ads to you may be reduced.

IV. Entrusted Processing, Sharing, Transfer, and Public Disclosure of Personal Information

1. Entrusted Processing

Some specific modules or features of our services may be provided by external vendors. For example, we hire service

providers to help us provide customer support. Regarding any company, organization, or individual we entrust to process personal information, we will sign strict confidentiality agreements with them, requiring them to process personal information in accordance with our requirements, this Privacy Policy, and any other relevant confidentiality and security measures.

2. Sharing

(1) Without your explicit authorization, we will not share, transfer, or publicly disclose your personal information, except in the following circumstances:

- 1) Related to the performance of obligations stipulated by laws and regulations by the personal information controller;
- 2) Directly related to national security or national defense security;
- 3) Directly related to public safety, public health, or major public interests;
- 4) Directly related to criminal investigation, prosecution, trial, and enforcement of judgments;
- 5) Necessary for protecting the significant legal rights such as life or property of the personal information subject or other individuals but difficult to obtain the subject's authorization;
- 6) Personal information that the subject has made publicly available on his/her own;
- 7) Industry regulatory authorities requiring us to disclose it;
- 8) Personal information collected from legally disclosed information, such as lawful news reports or government information disclosure.

(2) We may share your personal information with our affiliates, but we only share the necessary personal information and it remains bound by the terms of this Privacy Policy.

(3) We may share your necessary personal information with partners, such as service platforms or service providers, software/hardware/system providers, to ensure that the services we provide to you can be smoothly completed. However, we will only share your personal information for legitimate, proper, necessary, specific, and explicit purposes and it remains subject to the terms of this Privacy Policy. Our partners have no right to use the shared personal information for any other purpose.

We guarantee that the following procedures will be in place to

protect user privacy while collecting data:

- 1) We do not collect, transmit, or use the user's location information without notifying or obtaining authorization from the user;
- 2) We do not transmit or use the user's private data (e.g., contacts, photos, SMS records) without the user's permission or knowledge;
- 3) We do not force users to share personal information such as email address or date of birth;
- 4) We do not collect information from minors;
- 5) There will be no frequent requests to seek user consent or malicious interference with normal usage;
- 6) We do not use pre-checked consent to the privacy policy or other default authorization methods to seek user consent;
- 7) We do not fail to provide a privacy statement or make it difficult to access or read the privacy statement;
- 8) We do not refuse users' use of core application functions if they refuse unreasonable personal information collection;
- 9) We do not collect personal information or enable business functions beyond the necessary scope;
- 10) The app includes effective features for correcting or deleting personal information and allows users to cancel their accounts.

3. Transfer

We will not transfer your personal information to any company, organization, or individual, except in the following circumstances:

- (1) You have given your explicit consent in advance;
- (2) If a transfer of personal information is involved in asset transfer, acquisition, merger, reorganization, or bankruptcy liquidation, we will inform you of the details and require the new company or organization holding your personal information to continue to be bound by this Privacy Policy. If the purpose of using personal information changes, we will request that company or organization to obtain your explicit consent again.
- (3) Based on legal regulations, legal procedures, lawsuits, or mandatory requirements of competent government authorities.

4. Public Disclosure

We will only publicly disclose your personal information under the following circumstances:

- (1) Obtaining your explicit consent in advance;
 - (2) Based on legal regulations, legal procedures, lawsuits, or mandatory requirements of competent government authorities.
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V. Storage and Security of Personal Information

1. **Storage Period**

In general, we only retain your personal information for the shortest period necessary to fulfill the intended purpose, unless otherwise provided by laws and regulations or you have given separate authorization or consent. If we exceed the aforementioned retention period, we will delete or anonymize your information.

2. **Storage Location**

Your information will be stored within the Republic of Singapore. If cross-border transmission is required, we will obtain your separate authorization and strictly comply with relevant laws and regulations.

3. **Security Protection**

We provide corresponding security safeguards for your information to prevent loss, misuse, unauthorized access, or disclosure of information.

(1) We strictly comply with laws and regulations to protect users' personal information.

(2) We will take various security measures within a reasonable security level to ensure the safety of your information. For example, we use anonymization or de-identification to protect your personal information.

(3) With your full authorization, we will first encrypt the personal information we plan to collect, then proceed to collect and store it.

(4) We have established specialized management systems, processes, and organizations to ensure information security. For example, we strictly limit the scope of people who can access the information and require them to fulfill confidentiality obligations with audits in place.

(5) We will take all reasonable and feasible measures to ensure no unrelated personal information is collected. We will only retain your personal information for as long as it is needed to fulfill the purposes described in this Privacy Policy, unless an extended retention period is necessary or permitted by law.

(6) The internet is not an absolutely secure environment. Please use a complex password to help us keep your account secure.

(7) If a personal information breach, destruction, or loss occurs, we will promptly inform you in accordance with the requirements of laws and regulations, providing details of the incident and its possible impacts, measures we have taken or will take,

suggestions for what you can do to prevent and mitigate risks, and any remedies we can offer. We will notify you via in-site notice, SMS, phone call, or email using the contact information you provided. If it is difficult to notify each individual, we will adopt reasonable and effective methods to publish an announcement. At the same time, we will proactively report the handling of the personal information security incident to the relevant regulatory authorities as required.

VI. Your Rights

According to relevant laws and regulations, we will do our best to protect your rights to your own personal information, including:

1. **Access to Personal Information.** You have the right to access your personal information, except in situations stipulated by laws and regulations. You can access and manage it through our official customer service phone line.
2. **Correction of Personal Information.** If you need to correct your personal information, or if you discover any errors in the personal information we process about you, you can access and manage it through our official customer service phone line.
3. **Deletion of Personal Information.** You can delete the personal information you have uploaded. If you discover any of the following circumstances, you can request that we delete your personal information:
 - (1) If our processing of personal information violates laws or regulations;
 - (2) If we collect or use your personal information without obtaining your consent;
 - (3) If our processing of personal information violates the agreement with you;
 - (4) If you no longer use our products or services, or you have canceled your account;
 - (5) If we no longer provide you with products or services.If we decide to respond to your deletion request, we will also notify any entity that obtained your personal information from us to delete it promptly, unless otherwise required by laws or regulations or the entity obtained your independent authorization. After you delete information from our services, we may not immediately remove the corresponding information

from our backup system but will delete it when our backup is updated.

4. **Canceling Personal Account.** You can cancel your account through [My] – [Settings] – [Manage Account] – [Close/Cancel Account]. Before canceling your account, we will verify your personal identity, security status, device information, etc. Please refer to the cancellation page for details about the procedure. You acknowledge and understand that canceling your account is an irreversible action. Once you cancel the account, you will no longer be able to use our services, and we will delete your personal information (unless otherwise required by laws or regulations), so please proceed cautiously.
 5. **Withdrawing Consent.** You can withdraw your authorization via our official customer service phone line, etc. After you withdraw your consent or authorization, we will be unable to continue providing you with the corresponding services associated with the withdrawn consent or authorization, and we will no longer process your relevant personal information. However, your decision to withdraw consent or authorization does not affect any personal information processing carried out based on your prior authorization.
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VII. Protection of Minors

We place great importance on the protection of minors' personal information. According to relevant laws and regulations, if you are a minor under 18 years of age, we recommend that you do not use our services. If you must use our services, you should obtain the consent of your parent or legal guardian in advance or use our services accompanied by your parent or legal guardian. If you are the guardian of a minor and you have questions about the personal information of the minor under your guardianship, please contact us.

VIII. Scope of This Privacy Policy

This Privacy Policy applies to all of our services. However, certain services have their own specific privacy guidelines or statements that explain in more detail how we process your information in those services. If this Privacy Policy is inconsistent with the privacy

guideline or statement of a specific service, the latter shall prevail. Additionally, this Privacy Policy and the “User Service Agreement” you signed during registration constitute an inseparable whole.

IX. Changes to This Privacy Policy

We may revise the content of this Privacy Policy in a timely manner. We will choose to publish the updated Privacy Policy text in a prominent position on the platform’s page.

If such changes significantly diminish your rights under this Privacy Policy, we will, before the changes take effect, notify you via a prominent position on the page, by in-site message, notification, or SMS, etc. If you do not agree with these changes, you may stop using our services. If you continue to use our services, it indicates that you agree to be bound by the revised Privacy Policy.

X. Contact Us

If you have any questions, comments, or suggestions about this Privacy Policy, please contact us by the following means:

Email address: **khfw@elixiresports.com**

We will review the issues you raise as soon as possible and respond within thirty days after verifying your user identity.