

## Privacy Policy and terms of uses for Xelestia game

Last Updated: March 10<sup>th</sup>, 2025

### 1. Introduction

CREATEEN (or “we”) created this original and memorable experience so that players can have fun and find enjoyment through the game.

CREATEEN is committed to protecting your privacy and ensuring that any information we collect is handled in a safe and responsible manner.

We collect your personal data so that you can benefit from the game and so that we can offer you an optimal experience.

This Privacy Policy outlines how we collect, use, and protect your information when you play to Xelestia (herein referred to as "the game").

In the game we may include virtual currencies such as pearls, items or services for use within the game (“Virtual Goods”). Virtual Goods has no real-world monetary value and can never be exchanged for real money, real goods, or real services from IFF or CREATEEN. You agree that Virtual Goods and any in-game elements is not transferable to anyone else and will not transfer or attempt to transfer any Virtual Goods to anyone else. You have no ownership rights to Virtual Goods and CREATEEN/IFF have the right to modify or remove them.

### 3. What is personal data?

“Personal Data” (or “Data”), is all information that identifies you:

- either directly, for example, your last name, first name, user name, email address or telephone number;
- or indirectly, for example your account ID, IP address, cookie identifier or game data.

For more information about the Data that we collect, go to Section 3 “When do we collect your Data and for what purpose?”.

### 4. Information we collect

CREATEEN uses cookies, pixel tags, or similar tracking technology or other technologies (“cookies”) on the Game, to customize and improve the Game and for certain additional purposes including analysis of how you are interacting with the Game.

When you play the game, we collect the following data:

- . The time
- . The date
- . Your country code
- . Your user name
- . Your game score
- . Your IP address
- . Your interaction and progress in the game

We collect this information about your game progress to identify individuals scores and create a leaderboard. Some items of Data, such as your assigned or chosen user name, are made public if you complete the game in a

certain timeframe and collected a certain number of pearls.

We do not collect any other personal information such as your name, email address, date of birth unless you decide to share it with us (e.g. by changing your user name to your real name).

## 5. Legal Basis for Processing

We process your data based on our legitimate interest in providing and improving the game experience and in accordance with the GDPR.

## 6. Data Usage

The collected data is used for:

- Displaying leaderboards in the game
- Enhancing the gaming experience

We share this data with INTERNATIONAL FLAVORS & FRAGRANCES INC. ("IFF"), the sponsor of this game.

We also share Data with the technical service providers involved in the supply of the game (for example the developers of the game). As subcontractors, they are under the same obligations as CREATEEN to comply with applicable personal data protection laws.

We do not share, sell, or use this data to any other third parties

## 7. Data Storage and Security

All collected user names and scores are securely stored in our database. We implement appropriate security measures to protect your data, including:

- Encryption of data in transit and at rest
- Access controls to limit access to your data
- Regular security assessments

## 8. Data Retention

We will retain your data for until March 18<sup>th</sup> 2026. Unless the law specifies a different retention period, we will only keep your Data for the time strictly necessary to carry out the operations for which said Data has been collected by CREATEEN.

## 9. User Rights

You have the following rights regarding your data:

- Right to access: You can request a copy of your data.
- Right to rectification: You can request correction of any inaccurate or incomplete data.
- Right to erasure: You can request deletion of your data, subject to certain exceptions.
- Right to restriction of processing: You can request restriction of processing of your data under certain circumstances.
- Right to data portability: You can request a copy of your data in a portable format.
- Right to object: You can object to processing of your data based on legitimate interests or direct marketing.

To exercise your rights, please contact us at: "contact@xelestia-iff.com".

You can also contact administrative or judicial authorities, to verify the proper use of the Data by CREATEEN or

for the purposes of an investigation, in compliance with applicable law. CREATEEN always verifies the legitimacy of the request.

If you feel that your rights have not been respected after having contacted us, you have the right to make a complaint to the regulatory authority in your country.

If you have been sanctioned in relation to our Services, we will not be able to give you access to the Data regarding your sanction so as to maintain our ability to detect or take action against such behaviour.

## 10. Cookies and Cloud storage

We use cloud storage to track your progress in the game and enable certain game features.

We utilize session cookies to assign unique sessions to individual users, enabling us to remember your information and streamline the login process on subsequent visits.

We use various types of technologies such as cookies to collect such Data when you use the game or visit a third party site where we and our partners provide content or carry out content use analysis.

We collect your game data, to improve your experience and the security of the game such as: game progress, rewards, rankings, completed game missions, statistics including the game time or the use of the various features as well as the data associated with any bugs and malfunctions.

Your login data, to enable the operation and security of the game, such as: identifier of your device and the connection (IP address, MAC address), login dates and times, information concerning the device and the operating system you use.

We also employ Google Analytics to monitor login sessions and website traffic.

This data is shared with IFF to analyze traffic performance and generate valuable statistics, ultimately enhancing the game experience.

When you use the game, you agree and comply with the terms set out in this policy. and the codes of conduct associated with the game which are intended to protect our users, employees and more generally CREATEEN's rights. If you do not abide by these rules, you may be sanctioned including in the event of inappropriate conduct, cheating or toxic behaviour. We will keep your Data for the time needed to apply these sanctions. This Data may include for example your Account identifier, your game data, your IP address, the identifier of your device.

## 11. Children's Privacy

The game is not intended for children under the age of 18. We do not knowingly collect personal information from children under this age.

## 12. International Data Transfers

We may transfer your data outside of the EEA to provide the game. We will ensure adequate data protection safeguards are in place in accordance with applicable data protection laws.

## 13. Changes to This Policy

CREATEEN is entitled to change this policy at any time. We will inform you of the material updates and recommend that you consult this policy on a regular basis or contact us if you have any questions. Using our Services following such a change means that you accept any changes.

#### 14. Liability

In case of technical issues, server downtime, or data loss, liability of CREATEEN is limited.

#### 15. Contact Information

If you have any questions about these Terms, you can reach us at “[contact@xelestia-iff.com](mailto:contact@xelestia-iff.com)”