

XCBT: Privacy Policy

- Updated November 1, 2024.

Please read this privacy policy carefully, as it contains important information on how we collect and process personal information. It also contains important information about your rights with regard to your personal information and on how to contact us about your privacy rights.

1. Who we are

XCBT LABS LLC. (“XCBT,” “We,” or “Us”) collects, uses, and is responsible for certain personal information about you, in offering the XCBT service, including the website located at <https://xcbt.io> (“Website”) and any associated software applications (together, the “Service”).

The Service has different user types:

- Gamer(s) (“User” or “Users”) has/have the opportunity to earn points and win prizes through playing the games and participating in promotional activities on the Website; and
- XCBT’s clients (“Clients”) may use our Service for marketing, analytics, testing, and other purposes.

Each user type will have different personal data collected, and some users’ personal information will be shared with others as part of our operation of the Service. Keep reading to find out more about this information sharing.

2. The Personal Information we collect and use

Information collected by us: We collect the following personal information when you use the Service:

Type of data collected	Examples of the data collected	How we use it	Our legal basis for collecting the data	Deletion Policy
Contact Information	Name, email address, address, other contact information provided by you	To contact you for issues, customer and technical support, contests and surveys, and marketing and promotional purposes (including, for	To fulfill a contract with you, under GDPR Art. 6 (1) (b).	Data will be kept for one year after termination of your account, or deleted upon request

		example, promotional emails and newsletters)		
Account Information	Name, email address, username, password, electronic wallet address	To create your account, provide you with the Service, and operate tournament participation on the Service	To fulfill a contract with you, under GDPR Art. 6 (1) (b).	Data will be kept for one year after termination of your account, or deleted upon request
Profile Information	Age, ethnicity, gender, birthdate, profile photograph, country, as well as the number of reviews, surveys, hours of gameplay, game downloads, and other similar Service usage data	For allowing users to create and display a profile on the Service, and to operate playtesting services on the Service	To fulfill a contract with you, under GDPR Art. 6 (1) (b).	Data will be kept for one year after termination of your account, or deleted upon request
Posts	Your public message board posts, chats, and comments, including those on connected third-party community services such as Discord	To operate any user communication portions of the Service	To fulfill a contract with you, under GDPR Art. 6 (1) (b).	Data will be kept for the length of time required to provide the Service
Technical Information	IP address and location data, access times, device and operating system information, MAC address, UUID, and other technical information	To troubleshoot the Service, provide technical and customer support, to operate playtesting services on the Service, ensure Service stability, and ensure compatibility with the Service and games played on the Service	To fulfill a contract with you, under GDPR Art. 6 (1) (b).	Data will be kept for the length of time required to provide the Service
Analytic Information	Username, country, survey	For player demographic and	To fulfill a contract with	Data will be kept for the

	responses, and gameplay and Service-related data collected when you use the Service and play games	analytics purposes in providing the Service	you, under GDPR Art. 6 (1) (b).	length of time required to provide the Service
Third Party Account Information	Your name and other profile information when you connect a third-party account (such as your Facebook profile) to the Service	For connecting your third-party account and operating the Service	To fulfill a contract with you, under GDPR Art. 6 (1) (b).	Data will be kept for one year after termination of your account, or deleted upon request

Information shared with us by others: You may have the option to use a third-party sign-on service, such as Google or Metamask, to register and log into your account on the Service. This third party will share certain personal information, like your name, email address, and profile picture, when you register. The collection and sharing of that personal information is subject to that third party’s privacy policy.

Additionally, if you use other third-party platforms in connection with the Services, such as Steam or Discord, those third-party platforms may share certain information with us about your usage, including games played, the time spent playing games, your public posts on the platform, platform user related data, and game related data etc. The collection and sharing of that personal information is subject to that third party’s privacy policy.

Who we share your personal information with: We share your personal information with certain third parties as part of our operation of the Service:

- Clients: We may share various User information with our Clients in providing them with the Service, including Users’ analytic information and technical information, for marketing, analytics, and other purposes.
- Public Profiles: Certain Profile Information is publicly available on your User profile, which may be seen by other users. Additionally, your posts may be visible to other Users on the Service.
- Communications: We use mailing services such as Google to manage our newsletter mailing list and other promotional communications. We share your Contact Information with them for these purposes.
- Analytics: We use multiple service providers to improve the Service through analyzing usage and user data. These service providers include not limited to:
 - Google Analytics: We use Google Analytics to gather and pool certain information with other users’ information, for the purposes of improving the Service, such as tracking the total number of users or visitors to the Service, their aggregate activities on the Service, and tracking the sites that refer visitors to the Service. Google anonymizes this information. You

can view the Google privacy policy [here](#).

- Facebook Analytics: We use Facebook Analytics service to analyze user behavior and improve the Service. You can view the Facebook privacy policy [here](#).
- Coresight Analytics: We use Coresight Analytics service to analyze in-game User behavior and to improve games on the Service. You can view the Coresight website [here](#).
- Other Sharing: We will share your personal information if we have a good faith belief that (i) access, use, preservation or disclosure of such information is reasonably necessary to satisfy any applicable law, regulation, legal process, such as a court order or subpoena, or a request by law enforcement or governmental authorities, (ii) such action is necessary to detect, prevent, or otherwise address fraud, security or technical issues associated with the Service, or (iii) such action is appropriate to protect XCBT's or its employees', Clients', or Users' rights, property, or safety.

Some of these third-party recipients may be based outside the European Economic Area — for further information see their individual privacy policies linked to above and the section entitled “Transfer of your Information out of the EEA,” below.

We will not share your personal information with any other third party.

How long your Personal Information will be kept: We will keep your personal information for the length of time required to provide you with the Service, unless we are required by law to keep it longer. Afterwards, we delete all of your personal data within a reasonable timeframe. We do not verify whether the personal data that we collect or you provide is accurate.

Some data may be retained if necessary to resolve disputes, enforce our agreements, and comply with technical and legal requirements related to the Service.

Children's Privacy: We do not knowingly collect any personal information from children under the age of 13, nor do we allow them to create accounts, sign up for newsletters, make purchases, or use the Service. In addition, we may limit how we collect, use, and store some of the information of EU users between 13 and 16.

“Do Not Track” Signals: Because there's not yet a consensus on how companies should respond to web browser-based or other “do not track” mechanisms yet, we do not respond to web browser-based do not track signals.

Cookies: “Cookies” are small bits of electronic information that a website sends to a visitor's browser and are stored on the visitor's hard drive. Like many services, we employ cookies in certain areas of the Service to allow us to provide information to make your online experience more convenient and to enhance your experience with the Service.

For example, when you return to the Service after logging in, cookies provide information so that the Service will remember who you are on subsequent visits, tailoring content on the Service to you. Cookies are not spyware or adware, and can't deliver viruses or run

programs on your computer. You may configure your web browsers to accept or reject or delete the cookies, or notify the user when a cookie is being set. If you do that, however, the Service may not function as expected or may not function at all.

3. Transfer of your Information out of the EEA

XCBT is based in the Saint Vincent and the Grenadines. No matter where you are located, you consent to the processing, transfer and storage of your information in and to this country, in accordance with this privacy policy and the privacy policies of third parties that we share your personal information with. The laws of this country governing data collection and use may not be as comprehensive or protective as the laws of the country where you live.

If you would like more information, please contact us (see “How to contact us” below).

4. EU Residents - Your Rights

Under the laws of some jurisdictions, including the General Data Protection Regulation in the EEA, you have a number of important rights with regard to your Personal Information.

- By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. If we have asked for your consent to process your personal data, you may withdraw that consent at any time.
- If we are processing your personal data for reasons of consent or to fulfill a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.
- If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.
- You have the right to ask us to stop using your information for a period of time, if you believe we are not doing so lawfully.
- Finally, in some circumstances, you can ask us not to reach decisions affecting you using automated processing or profiling.

If you would like to exercise any of those rights, please email us at admin@xcbt.io. We may ask for additional verification information, such as your username and other information required to be sure that you are the owner of that data.

5. Certain U.S. Residents – Your Rights

California Residents:

If you are a California resident, beginning on January 1, 2020, the California Consumer Privacy Act (CCPA) gives you the following rights:

Right to Know: You can ask us what personal data we hold about you and request a copy of the information. This information includes:

- The categories of personal information we have collected about you.
- The categories of sources from which we collect the personal information.
- The business or commercial purpose for collecting your personal information.
- The categories of third parties with whom we share that information.
- The specific pieces of personal information we have collected about you.

Right to Delete: You can request that your personal information be erased. However, there are some exceptions to this right, in situations where we:

- Need to complete the transaction for which the personal information was collected, provide a good or service that you requested, or that is reasonably anticipated within our ongoing business relationship with the consumer, or to otherwise perform a contract between us.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law.
- Need to comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- Enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with us.
- Need to comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Opt Out: XCBT does not sell any of your personal information for any purposes.

Other Rights: In addition to the rights above, you also have the right to request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the calendar year preceding your request. This request is free and may be made only once a year.

You also have the right not to be discriminated against for exercising any of the rights of California residents listed in this section.

If you would like to exercise any of the rights listed above, please contact us at the addresses below in the section entitled "How to contact us." We may ask for additional info to verify that you're the owner of that data.

Virginia Residents:

We are regulated under the Virginia Consumer Data Protection Act (VCDPA), which applies to Virginia residents.

Under the VCDPA, Virginia residents have several important rights:

- The right to access their personal data that we have collected or processed.
- The right to request that we delete their personal data.
- The right to correct inaccurate personal data.
- The right to opt-out of processing of personal data for targeted advertising, sale of personal data and profiling.

Sale of your personal data: We do not sell personal data, as defined in the VCDPA.

Other Rights: We do not process personal data for the purpose of profiling in furtherance of decisions that produce legal or similarly significant effects concerning consumers.

If you would like to exercise any of the rights listed above, please contact us at the addresses below in the section entitled “How to contact us.” We may ask for additional info to verify that you’re the owner of that data.

Colorado Residents:

Beginning on July 1, 2023, we are regulated under the Colorado Privacy Act (CPA), which applies to Colorado residents.

Under the CPA, Colorado residents have several important rights:

- The right to access their personal data that we have collected or processed.
- The right to request a copy of their personal data that we have collected or processed.
- The right to request that we delete their personal data.
- The right to correct inaccurate personal data.
- The right to opt-out of processing of personal data for targeted advertising, sale of personal data and profiling.

Sale of your personal data: We don’t sell any of your personal data for any purposes.

Other Rights: We do not process personal data for the purpose of profiling in furtherance of decisions that produce legal or similarly significant effects concerning consumers.

If you would like to exercise any of the rights listed above, please contact us at the addresses below in the section entitled “How to contact us.” We may ask for additional info to verify that you’re the owner of that data.

Connecticut Residents:

Beginning on July 1, 2023, we are regulated under the Connecticut Data Privacy Act (CTDPA), which applies to Connecticut residents. Under the CTDPA, Connecticut residents have several important rights:

Under the CTDPA, Connecticut residents have several important rights:

- The right to access their personal data that we have collected or processed.
- The right to request a copy of their personal data that we have collected or processed.
- The right to request that we delete their personal data.
- The right to correct inaccurate personal data.

Sale of your personal data: We don't sell any of your personal data for any purposes.

Right to Opt Out: The CTDPA allows Connecticut residents to "opt out" of the processing of personal data for targeted advertising, the sale of personal data and profiling. If you are under the age of 16, you have the right to "opt in" to the processing of personal data for targeted advertising, the sale of personal data and profiling.

Other Rights: We do not process personal data for the purpose of profiling in furtherance of decisions that produce legal or similarly significant effects concerning consumers.

If you would like to exercise any of the rights listed above, please contact us at the addresses below in the section entitled "How to contact us." We may ask for additional info to verify that you're the owner of that data.

6. Canadian Residents – Your Rights

For Canadian residents, we are committed to protecting your personal information in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA). PIPEDA's ten fair information principles include accountability, identifying purposes, consent, limiting collection, limiting use, disclosure and retention, accuracy, safeguards, openness, individual access, and challenging compliance.

Under PIPEDA, you have certain rights regarding your personal information. These rights include:

1. **Right to Access:** You have the right to access the personal information we hold about you and request a copy of that information.
2. **Right to Rectification:** If you believe that any of the personal information we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it.
3. **Right to Withdraw Consent:** If you have previously provided your consent for the collection, use, or disclosure of your personal information, you have the right to withdraw that consent at any time. Please note that withdrawing your consent may affect our ability to provide certain services to you.
4. **Right to Object:** You have the right to object to the collection, use, or disclosure of your personal information for certain purposes, such as direct marketing.
5. **Right to Erasure:** In certain circumstances, you have the right to request the

deletion or removal of your personal information from our records.

6. **Right to Data Portability:** You have the right to request a copy of your personal information in a structured, commonly used, and machine-readable format, and to transmit that information to another organization.

If you would like to exercise any of those rights, just contact us using the contact details provided below in the section entitled “How to contact us.” We will respond to your request or inquiry within a reasonable timeframe and in accordance with applicable laws. We may ask for additional info to verify that you’re the owner of that data.

Please note that there may be limitations on these rights as set out in PIPEDA or other applicable laws.

7. Southeast Asia Residents – Your Rights

For residents of Southeast Asia, we only collect personal data when you authorize it or provide it to us.

You may withdraw your consent and request that we stop using and disclosing your personal data for the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below in the section entitled “How to contact us.”

We may require a reasonable amount of time to process your request, but in any event we will try to process your request within 10 business days. Please note that, depending on the scope of your request, we may not be able to continue providing the Service to you. We will try to notify you if this is the case.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

You can also contact us to request access to a copy of the personal information we have about you, or to correct or update any of the personal information that we have. Just contact us using the contact details provided below in the section entitled “How to contact us.” We will try to respond to these requests as soon as possible, but if it takes longer than 30 days, we will let you know.

8. Keeping your Personal Information secure

We have taken steps to put appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way.

For example, we limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner.

Additionally, we use access controls, firewalls and other industry-grade security protocols through our Amazon Web Servers, one-way password encryption, and regular backups to protect personal information we collect and process.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

9. Resolving Disputes

We hope that we can resolve any questions or concern you raise about our use of your Personal Information. Please contact us via the methods listed below in the section entitled “How to contact us” to let us know about any of your questions or concerns, and we will get back to you to resolve the issue.

If you are an EU citizen, the General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

10. Changes to this Privacy Notice

We may change this privacy notice from time to time. When we do, we will inform you via email to the email address you have provided us with through your account, or by posting a message about the change on the Service.

11. How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy policy or the information we hold about you.

You can contact them by email to admin@xcbt.io, through a contact form on the Service, or by postal mail to Euro House, Richmond Hill Road, Kingstown, St. Vincent and the Grenadines.