

HEIMDALL GAMES PRIVACY POLICY

Last Updated: June 23, 2026

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, Heimdall Games Ltd. (“**Heimdall Games**”, “**Heimdall**”, “**we**”, “**our**” or “**us**”) use, collect and store personal information that we collect or receive from or about you (“**you**”) in connection with <https://heimdall.games/> (the “**Website**”) and our mobile game Primal Legacy (the “**App**”).

Heimdall Games is a “data controller” under certain data protection laws. This means that we are responsible for deciding what personal information to ask of you, how to store and use it, and to explain our practices and reasons behind them, which we are about to do below. We wish to emphasize that you are not required to provide us with any personal information, but to also let you know that without it you may not be able to enjoy the full extent of our App.

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal information. With respect to Israeli law, the provision of your personal information is voluntarily, and its provision is subject to your consent and free will. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory rights, including your rights to a remedy or other means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement material changes in the way we use your personal information, in a manner that is different from that stated at the time of collection, we will notify you by posting a notice on our Website, in-App notification, or by other means and take any additional steps as required by applicable law.

1. WHAT PERSONAL INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific Personal Information we collect	Why is the Personal Information collected and for what purposes?	Legal basis (GDPR only, if applicable)	Consequences of not providing the Personal Information
<i>When you visit or browse the Website</i>			
IP address, browser/device type and version	<ul style="list-style-type: none"> • To provide you with the App and its experience. 	Legitimate Interest: Essential for the security and basic functionality of the Website.	The website will not load, and you will be unable to access our information or support pages.
<i>Website Cookies</i>			
IP address, browser/device type and version and other related cookies information	<ul style="list-style-type: none"> • Technical Operability: To deliver the website content to your browser correctly. • Site Optimization: To understand which pages are popular and improve site navigation. 	Consent Legitimate Interest: Essential cookies for the security and basic functionality of the digital service.	You can still use the Website. We will simply be unable to include your visit in our aggregated performance statistics.
<i>When you download the App</i>			
IP address, Device ID (non-marketing), OS version and device model	<ul style="list-style-type: none"> • To provide you with the App and its experience; • To enhance your experience with our App; and • To generally administer and improve the App. 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (our terms and conditions). Legitimate Interest to provide you with the App.	The app may fail to launch. Certain non-essential features may not be available.
<i>When you make use of, or interact with, the App</i>			
<i>When you create an account and log in and making use of the App</i>			
<ul style="list-style-type: none"> • Username • GooglePlay / AppStore log in credentials • Account name (publicly visible to others) • Email address • Usage pattern • Device information • Geolocation • Any other Personal Information you decide to provide/supply to us with 	<ul style="list-style-type: none"> • To allow you to create an account and use customized portions of the App. • To allow you to save your score and progress in the game • To allow you to pay for certain features. • To provide our games to you. • To improve our products and services • Communicate with you about your use of the App and for support purposes; • Send you push notifications regarding certain features of the App; • To customize in-game offers and verifying purchases; • To improve our products and games and App. 	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (our terms and conditions). Legitimate interest (to improve our products and services).	We cannot allow you to create an account and use customized portions of the App. We cannot allow you to save your score and progress in the game We cannot allow you to pay for certain features.
<ul style="list-style-type: none"> • Device information • Geolocation 	<ul style="list-style-type: none"> • To display advertisement in the App. 	Depending on the case, consent or legitimate interest.	We cannot show advertisements on the App

When you contact us for customer support			
<ul style="list-style-type: none"> • Full name • Email address • Phone number • Any other Personal Information you decide to provide/supply to us with 	<ul style="list-style-type: none"> • To respond to your questions and queries • To respond to your questions, comments, and other requests for customer support, or information • To provide you with the App • For internal quality control purposes and optimization • To establish a business relationship • To generally administer the App 	<p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (our terms and conditions).</p> <p>Legitimate interest (to provide you with customer support).</p>	<p>We cannot respond to your questions and queries.</p>
When we send you marketing communications			
<ul style="list-style-type: none"> • Full name • Email address 	<ul style="list-style-type: none"> • To send you marketing communications 	<p>Depending on the case, consent or legitimate interest.</p>	<p>Cannot send you marketing communications</p>
When you attend a webinar, contact us via social media or otherwise interact with our business			
<ul style="list-style-type: none"> • Full name • Email address • Phone number • Any other information you decide to provide us with 	<ul style="list-style-type: none"> • To establish a business connection with you. • To respond to your social media questions or inquiries. • To comply with your requests. • To send you marketing communications. 	<p>Legitimate interest</p> <p>Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (to establish a business connection)</p>	<p>Cannot establish a business connection with you</p> <p>Cannot respond to your social media questions or inquiries</p> <p>Cannot comply with your requests</p> <p>Cannot send you marketing communications</p>

Finally, please note that some of the above-mentioned Personal Information may be used to detect, prevent, and prosecute fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purpose. Personal Information may also be used to comply with applicable laws, in investigations performed by the relevant authorities, for law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may create de-identified and/or aggregated information from Personal Information and/or other information in a manner intended to prevent the information from being used to identify you. We may use such de-identified and/or aggregated information to operate, analyze, improve, and develop our App and Website and for benchmarking and research purposes.

2. HOW WE PROTECT AND RETAIN YOUR PERSONAL INFORMATION

- 2.1. **Security.** We implement and maintain industry-standard technical, organizational and security measures designed to protect your personal information. However, please note that we cannot guarantee that the personal information will not be compromised as a result of unauthorized penetration of our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us, please make sure to take appropriate measures to protect this information.
- 2.2. **Retention of your personal information.** Your Personal Information will be stored until we proactively delete it from our records, or until you send a valid deletion request. Please note that in some circumstances we store your personal information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, (iii) if we reasonably believe there is a prospect of litigation relating to your personal information or dealings and/or (iv) aggregated data that has been stripped of personal details.
- 2.3. **Aggregated and Anonymous Data:** We may aggregate and anonymize your Personal Information so that it can no longer be associated with you. Once data is aggregated, it is not likely to be considered Personal Information. We may retain and use this non-identifiable, statistical information indefinitely for research, business analysis, and service improvement without further notice to you.

3. HOW WE SHARE YOUR PERSONAL INFORMATION

We will share your personal information as follows:

- 3.1. The personal information Heimdall gathers will be shared with our partners and other third parties.
- 3.2. We also share personal information about you with our affiliated companies.
- 3.3. We use third party service providers to process your personal information for the purposes outlined above, including, without limitation:
 - 3.3.1. With cloud service providers for hosting purposes;
 - 3.3.2. With websites and web content creation platforms in order to help us manage our Website;
 - 3.3.3. With email providers, marketing, advertisement (including online and App advertisement), CRM, other similar tool providers and partners;
 - 3.3.4. With artificial intelligence tools and features;
 - 3.3.5. With analytic companies, in order to help us understand and analyze information we collect in accordance with this policy;
 - 3.3.6. With service providers for backend and databases; and
 - 3.3.7. Marketing / User acquisition service to improve and enhance our ads performance.
- 3.4. To the extent necessary, with regulators, courts, banks or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order, as well as for internal compliance procedures and to protect the safety, security, and integrity of Heimdall, our App, services, customers, employees, property, and the public. We will as necessary use or disclose the personal information we collect in order to ensure that our users are complying with all applicable aspects of our policies.
- 3.5. We will as necessary disclose personal information with our lawyers, accountants, auditors and other professional advisors where necessary to obtain legal or other advice or otherwise protect and manage our business interests;
- 3.6. We will as necessary use or disclose the personal information to investigate, prevent, or take action regarding illegal activities, suspected fraud, cybersecurity threats, situations involving potential threats to the physical safety of any person, violations of this policy, or as otherwise required or allowed by law and regulations;
- 3.7. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we will disclose your personal information to such third party (whether actual or potential) in connection with the foregoing events (including, without limitation, our current or potential investors). In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we reserve the right to transfer, disclose or assign your personal information in connection with the foregoing events.
- 3.8. Where you have otherwise provided your consent to us for sharing or transferring your personal information.

4. YOUR PRIVACY RIGHTS

- 4.1. The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by specific laws):
- i. You have the right to withdraw consent to the processing, where consent is the basis of processing.
 - ii. You have the right to request access to your personal information provided by us, along with details on how it is processed, subject to certain conditions. You have the right to demand rectification of inaccurate personal information about you. We will promptly correct any information found to be incorrect.
 - iii. You have the right to object to unlawful data processing under certain conditions.
 - iv. You have the right to the erasure of past personal information about you (your “right to be forgotten”) under certain conditions.
 - v. You have the right to demand that we restrict the processing of your personal information, under certain conditions, if you believe we have exceeded the legitimate basis for processing, the processing is no longer necessary, or if you believe your personal information is inaccurate.
 - vi. You have the right to data portability of personal information concerning you that you provided us with in a structured, commonly used, and machine-readable format, subject to certain conditions.
 - vii. If you have a concern about our use of your Personal Information, we request that you contact us directly at support@heimdall_game in the first instance so that we may attempt to resolve the issue for you.
 - United Kingdom: You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. In accordance with current regulatory guidelines, the ICO typically expects that you have attempted to resolve your complaint with the data controller before they will intervene (website: <https://www.ico.org.uk/make-a-complaint/>)
 - European Union / EEA: If you are a resident of the European Economic Area, you have the right to lodge a complaint with a supervisory authority. You may do so in the EU Member State of your habitual residence or the place of the alleged infringement regarding our processing of your personal data (a full list of European Data Protection Authorities and their contact information can be found here: https://edpb.europa.eu/about-edpb/about-edpb/members_en).
- 4.2. You can exercise your rights by contacting us at support@heimdall_games. You may use an authorized agent to submit a request on your behalf if you provide the authorized agent written permission signed by you. To protect your privacy, we may take steps to verify your identity before fulfilling your request. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initial requested, we will address your request to the maximum extent possible, all in accordance with applicable law.
- 4.3. **Deleting your account:** Should you ever decide to delete your account, you may do so by emailing support@heimdall_games. If you terminate your account, any association between your account and personal information we store will no longer be accessible through your account. We reserve the right to delete inactive accounts. We reserve the right to retain data in accordance with Section 2.2 and Section 2.3.

5. **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION.** In order to run our business and provide our Website and the App to you, we transfer personal information to certain countries around the world, including to our affiliates and service providers, many of whom are located outside of your jurisdiction. Therefore, your personal information may be processed in countries with privacy laws that are different from privacy laws in your country. Where we transfer your Personal Information outside of EU/EEA (for example to third parties who provide us with services), we will generally obtain contractual commitments from them to protect your Personal Information (for example, by entering into the EU Standard Contractual Clauses, or relying on an adequacy decision or other valid transfer mechanism, as applicable). According to Israeli law, by providing your consent to this Privacy Policy, you acknowledge and agree that Personal Information relating to you may be transferred to and stored outside the borders of Israel, in accordance with applicable law and for the purposes described herein, including in countries that may not provide a level of protection equivalent to that under Israeli law.

6. **USE BY CHILDREN.** Our App is not intended to target children; therefore, we do not knowingly collect personal information from, and/or about children under the age of 18. If you are under the age of 18, do not provide any information to us without the involvement of a parent or a guardian. We reserve the right to request proof of age or parental consent at any stage. When we need to confirm that you are old enough to access our App or use certain features. We may block users whom we suspect are under the applicable age. If we learn that a minor is using the App, we may prohibit and block such use and will make all efforts to promptly delete any personal data stored with us with regard to such minor. In the event that we become aware that you provided personal information in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at support@heimdall_games.

7. **INTERACTION WITH THIRD PARTY PRODUCTS.** Through the App and Website, we enable you to interact with third party websites, mobile software applications and products or services that are not owned, or controlled, by us (each, a “**Third Party Service**”). We are not responsible for the privacy practices or the content of such Third Party Services. Please be aware that Third Party Services can collect personal information from you. Accordingly, we encourage you to read the terms and conditions and privacy policies of each Third Party Service.

8. ANALYTIC TOOLS/COOKIES

- **Google Analytics.** The App uses a tool called “**Google Analytics**” to collect information about use of the Website and App. Google Analytics collects information such as how often users visit the App, what pages they visit when they do so, and what other websites they used prior to coming to the App. We use the information we get from Google Analytics to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with information we collect. Google’s ability to use and share information collected by Google Analytics about your visits to the App is restricted by the Google Analytics Terms of Service, available at <https://marketingplatform.google.com/about/analytics/terms/us/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- **AppsFlyer.** We use a tool called “**AppsFlyer**”, a mobile attribution and marketing analytics platform to understand the use of our App. AppsFlyer is exposed to the following data: (i) unique identifiers and technical data, such as IP address, User agent, IDFA (Identifier For Advertisers) or Android ID (in Android devices); and (ii) technical data regarding your operating system, device attributes and settings, applications, advertising opt-out signals, Google Advertiser ID, in-app events, device motion parameters and carrier. The use of this data allows us to analyze our campaigns and performance, as well as your habits and characteristics. For example, the data AppsFlyer receives includes downloads, impressions, clicks and installations of the App, mobile device use and data regarding in-app events. AppsFlyer’s terms of use (available at <https://www.appsflyer.com/terms-of-use/>) and privacy policy (available at <https://www.appsflyer.com/legal/processing-customer-data/>) also apply to the use of AppsFlyer.
- **Firebase Analytics.** We also use “**Google Analytics for Firebase**”. By enabling this tool, we enable the collection of data about App users, including via identifiers for mobile devices (including Android Advertising ID and Advertising Identifier for iOS), cookies and similar technologies. We use the information we get from Google Analytics for Firebase to maintain and improve our App. Google Analytics for Firebase’s terms (available at <https://firebase.google.com/terms/>) shall also apply.
- **Meta:** We use the “**Meta Pixel**”, a tracking technology provided by Meta. The Meta Pixel collects information about your visits to the Website, including pages viewed, actions taken, and custom events and form submissions, and transmits this information to Meta. The data transmitted to Meta may be linked to your Facebook account if you are logged in, allowing Meta to connect your on-site behavior to your identity on its platforms. For more information see the Meta privacy policy (available at <https://www.facebook.com/privacy/policy/>).
- **Applovin:** We use tracking technologies provided by “**AppLovin**”. AppLovin collects data regarding your interactions with the App and advertisements, including device identifiers (such as IP address and mobile advertising IDs), browser type, and event data related to ad views and clicks. AppLovin uses this information to deliver personalized advertisements, measure the performance of our marketing campaigns, and perform “attribution” to understand which ads led to a specific action or download. This data helps AppLovin and its advertising partners serve ads that are more relevant to your interests. You can learn more about how AppLovin processes your data and find instructions on how to opt out of interest-based advertising by visiting the AppLovin Privacy Policy (available at <https://legal.applovin.com/privacy/>).
- **Amplitude:** We use “**Amplitude**”, a product analytics service, to better understand how users interact with our Website and App. Amplitude collects behavioral data, such as the features you use, the pages you visit, and the frequency of your interactions. This information is used to analyze user patterns, improve the functionality of our Website and App, and optimize the overall user experience. For more information, please see the Amplitude Privacy Policy (available at <https://amplitude.com/privacy/>).

- **Google AdMob:** We use Google AdMob, a mobile advertising and analytics platform provided by Google. AdMob automatically collects and shares certain data types to support advertising, analytics, and fraud prevention, including: (i) your device's IP address, which may be used to estimate general location; (ii) user product interactions, such as app launches, taps, and video views; (iii) diagnostic information related to App performance, including launch time, hang rate, and energy usage; and (iv) device and account identifiers, such as the Android advertising ID (AAID), app set ID, and other identifiers linked to signed-in Google accounts on the device. Google uses this data to deliver personalized advertisements, measure ad performance, and ensure the security and integrity of our services. You can manage your ad preferences and opt-out of personalized advertising through your device settings or by visiting Google's My Ad Center. This data processing is governed by the Google Privacy Policy (available at <http://www.google.com/policies/privacy/>).
 - Through our App we allow third party advertising partners to set technologies and other tracking tools to collect information, which in certain cases could be considered personal information, regarding your activities and your device (e.g., your IP address, mobile identifiers, page(s) visited, location, time of day). We also combine and share such personal information and other personal information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners may use this personal information (and similar information collected from other websites) for the purpose of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as "interest-based advertising" or "online behavioral advertising". We may allow access to other data collected by the App to share information that may be useful, relevant, valuable or otherwise of interest to you.
 - We use log files. We use such personal information to analyze trends, administer the Website, track user movement around the Website, and gather demographic information.
 - We reserve the right to remove or add new analytic tools, cookies, pixels and other tracking technologies.
9. **CONTACT US.** For any questions, concerns, or to exercise your privacy rights, please contact us at support@heimdall.games.
