

Privacy Policy of the Galaxies Portal

1. Introduction

1.1. Galaxies Gaming Ltda., a limited liability company registered with the Ministry of Finance's National Register of Corporate Taxpayers (*Cadastro Nacional da Pessoa Jurídica* – CNPJ) under No. 49.459.097/0001-94, either directly or through its controlling companies, commonly controlled subsidiaries or affiliates, or any other companies within the same economic group ("Galaxies"), respects the privacy of visitors and Users of its products, services, and functionalities made available through the Galaxies Portal, in accordance with the Terms and Conditions of Use of the Galaxies Portal (available for consultation at [https://media.galaxies.gg/documents/Galaxies_Terms_and_Conditions.pdf]), and complies with all laws applicable to privacy and data protection, especially Law No. 13,709/2018 (General Data Protection Law or "LGPD"). Accordingly, this Privacy Policy of the Galaxies Portal ("Privacy Policy") aims to establish rules regarding the collection, processing, storage, use, and sharing of personal data of Users who access the Galaxies Portal, respond to surveys hosted on the Galaxies Portal, or use the services provided by Galaxies, as outlined below.

1.2. Galaxies recommends that You (as a "User") carefully read this Privacy Policy before creating your account on the Galaxies Portal, responding to surveys hosted on the Galaxies Portal, and/or using any of the Services. If You do not agree with any of the provisions set forth herein, You should not register an account on the Galaxies Portal, respond to surveys hosted on the Galaxies Portal, or use any of the Services.

1.3. By (a) registering an account, accessing and/or using the Galaxies Portal, (b) uploading or downloading any information or content on the Galaxies Portal, (c) responding to surveys hosted on the Galaxies Portal, or (d) using any of the Services, the User declares and warrants that they have read, understood, agreed to, and will comply with the provisions of this Privacy Policy.

1.4. This Privacy Policy may be updated by Galaxies at any time by simply making a new version available on the Galaxies Portal.

1.4.1. Any changes will be communicated to the User in advance through a notice on the Galaxies Portal or by sending a notification via the application or email registered by the User, always indicating the date of the last modification. If the User does not agree with any changes made, we recommend deleting your access account to the Galaxies Portal, not responding to additional surveys hosted on the Galaxies Portal, and ceasing to use any of the Services. After the modification, if the

User continues to use their account on the Galaxies Portal, respond to surveys hosted on the Galaxies Portal, or use any of the Services, it will be considered that the User has agreed to the new Privacy Policy, which will apply to the User.

1.5. This Privacy Policy should be interpreted in conjunction with the Terms and Conditions of Use of the Galaxies Platform.

2. Definitions

2.1. For the purposes of this Privacy Policy, terms and expressions capitalized have the meanings assigned to them as follows:

- **“Personal Data”** means any information that, alone or in conjunction with other information, identifies or can identify a User as an individual or that can be associated with the User indirectly, linking them to their personal identification information.
- **“Anonymized Data”** means any information relating to an individual that does not allow their identification, considering the use of reasonable and available technical means at the time of its processing, processed by Galaxies in an aggregated or non-aggregated form, aiming to analyze and produce statistical data related to the habits, usage patterns, and demographic data of Users as a group or individuals.
- **“Galaxies Portal”** means the platform developed and managed by Galaxies, accessible to Users through the website <https://app.galaxies.gg/> or any of its subdomains, as well as through applications managed, administered, and made available by Galaxies.
- **“Services”** means any services provided to the User or any functionalities made available by Galaxies through the Galaxies Portal.
- **“Users”** means any individuals who create an account on the Galaxies Portal, respond to surveys hosted on the Galaxies Portal, or access any Services.

2.2. Other capitalized terms not defined in this Privacy Policy shall have the meanings attributed to them in the Terms and Conditions of Use of the Galaxies Platform.

3. Objective and Commitment

3.1. Galaxies is committed to creating spaces where Users can participate in surveys or events for collecting responses regarding products, services, trends, behaviors, personal preferences, personal

information, among other Personal Data. Respecting User privacy is a fundamental part of Galaxies' mission. The objective of this Privacy Policy is to ensure transparency regarding the processes of Personal Data processing carried out by Galaxies for the purposes of making the Galaxies Portal available, developing Galaxies' business activities, or any of the Services, throughout the lifecycle of the collected Personal Data.

3.2. Galaxies values the privacy of its Users and treats all Personal Data collected during the use of the Galaxies Portal, in the development of Galaxies' business activities, or any of the Services as confidential, using commercially reasonable information security and privacy practices to ensure the integrity and confidentiality of the processed personal data.

3.3. Galaxies limits the collection of Personal Data to the necessary for providing the Services and for the development of its business activities. Thus, only information that enables Galaxies to create User accounts, provide the Services properly, develop Galaxies' business activities, fulfill commitments to Users, and comply with applicable legal requirements is collected and processed.

3.4. Galaxies commits to using the collected Personal Data only for legitimate purposes, including the provision of Services and the development of its business activities. Therefore, Galaxies undertakes not to use any Personal Data for purposes other than those described in this Privacy Policy, or in a manner that contravenes current data protection laws. Galaxies also commits not to use any Personal Data for discriminatory purposes or in a way that infringes upon any individual rights or freedoms of the respective data subjects.

3.5. The User acknowledges and agrees that Galaxies is a business entity whose purpose is to provide data intelligence services to Users and third parties, within or outside the Galaxies Platform, for a fee, and that therefore the collection, processing, and use (including for Galaxies' commercial purposes) of Users' Personal Data is an essential part of its business activities. The User expressly consents to the use of their Personal Data in connection with Galaxies' business activities and for commercial purposes, provided that such use complies with the terms and conditions of this Privacy Policy.

4. Personal Data Collected

4.1. Galaxies may collect Personal Data from different sources, for different reasons, and in different situations, acting as a controller in some and as a processor in others, in accordance with applicable law, but always based on the appropriate legal bases and in line with the purposes described in this Privacy Policy.

4.2. To access the Galaxies Portal, the User must create a personal and non-transferable access account. To do so, Galaxies will require the following information from the User:

- i) Full name;
- ii) E-mail;
- iii) Username;
- iv) Date of birth;
- v) Phone number;
- vi) Country, State and City of residence; and
- vii) Responses to surveys regarding products, services, knowledge, interests, preferences, feedback, trends, and behaviors across different business sectors.

4.3. When creating the access account or using the Galaxies Portal (even if an access account is not created), the following optional information may also be provided:

- i) Games that the User has played;
- ii) Preferred genre of games;
- iii) Information about the User's knowledge and interests;
- iv) Financial data, including credit card information (name, address, credit card number, expiration date, and security code);
- v) Feedback collected by the Platform;
- vi) Responses to questions asked through surveys conducted via the Platform, whether by Galaxies or by Galaxies' partners.

4.4. When using the Galaxies Portal or any of the Services, Galaxies may automatically collect information, either directly or through the use of analytics services or similar tools, which may include:

- IP address of the device used to access the Galaxies Portal or any of the Services;
- Specific actions taken during the use of the Galaxies Portal, including visited pages, accessed content, or interactions with other Users or functionalities of the Galaxies Portal;
- Terms searched in the Galaxies Portal's search field;
- Time, frequency, and duration of the use of the Galaxies Portal;
- Information about emails sent by Galaxies to Users or received from them;

4.5. Furthermore, whenever the User visits the Galaxies Portal or receives and interacts with marketing communications and/or advertisements on the Galaxies Portal or any of the Services, Galaxies may automatically record the User's activity, as well as collect information about e-mails or

advertisements with which the User has interacted through cookies, web beacons, tracking pixels, browser plugins, and embedded scripts.

4.7. You can disable the use of the mechanisms mentioned in section 4.5 above by accessing your internet browser settings. However, disabling such mechanisms may affect the completeness of your experience with the Galaxies Portal.

5. Purposes of Personal Data Processing

5.1.1. The purposes of Personal Data collection and processing described in this Privacy Policy determine and limit which Personal Data Galaxies collects and how it will be used, how long Galaxies will store it, as well as what rights and other control mechanisms will be available to the User.

5.1.2. In this sense, in order to ensure transparency regarding the use of Personal Data by Galaxies, all purposes of Personal Data processing collected are listed below.

5.2. Legal Bases for Personal Data Processing in which Galaxies acts as Controller

5.2.1. Galaxies collects and processes certain Personal Data of registered Users to enable the use of the Galaxies Portal, develop Galaxies' business activities, and provide the Services properly, as described in the Terms and Conditions of Use of the Galaxies Platform, acting as a data controller. Such cases and respective purposes are described in the table below:

Purpose of processing:	Operation of data processing:	Legal basis for data processing:
Creation and Administration of User Account	For this data processing, personal data deemed useful for registration is utilized, as mentioned in section 4.2. of this Policy.	The legal basis for this processing is "Execução de Contrato" (Performance of a Contract- LGPD, art. 7, V).
Processing payments, cancellations, and refunds	For this processing, data regarding your payment methods are collected and processed, enabling the full experience of the Galaxies Portal. These are mentioned in section 4.3. of this Policy.	The corresponding legal basis is "Execução de Contrato" (Performance of a Contract - LGPD, art. 7, V).
Sharing Data with Third Parties	With the aim of conducting surveys and events with third parties for the offer of events and new products, the data from section 4.3. may be shared in the development	The corresponding legal basis is "Consentimento" (Consent - LGPD, art. 7, I).

	of Galaxies' business activities (within or outside the Galaxies Platform) or to continually improve your experience on the Galaxies Portal in an anonymized manner.	
Accessing User location for mapping Service opportunities	For enhancing User experience, Galaxies may access your location data and usage information on the Galaxies Portal. These are mentioned in item vi) of section 4.2. and section 4.4. of this Policy.	The corresponding legal basis is "Consentimento" (Consent - LGPD, art. 7, I).
Developing new functionalities and promoting improvements	In order to promote corrections and improvements, as well as enable the proper implementation of new functionalities, Galaxies may use or share with third parties the data mentioned in section 4.3. of this Policy (excluding payment data), in an anonymized manner.	The corresponding legal basis is "Legítimo Interesse do Controlador" (Legitimate Interests Pursued by the Controller- LGPD, art. 10).
Provide additional communications related to marketing, including new products, opportunities, and subscriptions	Through this data processing, Galaxies seeks to expand and enhance the quality of the experience, potentially offering the User new options for services similar to those provided, including by third parties. These are mentioned in section 4.3. of this Policy.	The corresponding legal basis is "Legítimo Interesse do Controlador" (Legitimate Interests Pursued by the Controller- LGPD, art. 10).
Fraud prevention on the Galaxies Platform	Data processing solely aimed at protecting the technological environment of the Galaxies Platform, aiming at the safety of Users, Partners, and Galaxies itself. These are mentioned in sections 4.2. and 4.3. of this Policy.	The corresponding legal basis is "Garantia de Prevenção a Fraude" (Purposes Of Preventing Fraud - LGPD, art. 7, IX).
Compliance with legal obligations by force of law or court order	In case of data request by competent authority or the Judiciary, Galaxies may have the duty to process the data as required. These are mentioned in sections 4.2. and 4.3. of this Policy.	The corresponding legal basis is "Cumprimento de Obrigação Legal pelo Controlador" (Compliance With A Legal Obligation To Which The Controller Is Subject- LGPD, art. 7, VI).
Defense of rights and protection of Galaxies' material and immaterial property	Galaxies may detect instances of irregular use by any User or Partner. In such cases, Galaxies withholds the right to use data and	The corresponding legal basis is "Legítimo Interesse do Controlador" (Legitimate Interests Pursued by the Controller- LGPD, art. 10).

	useful information for promoting the defense of its interests, rights and properties. These are mentioned in sections 4.2. and 4.3. of this Policy.	
Cookies	Potential statistical analyses of Galaxies Portal usage, in addition to monitoring marketing campaigns via the use of analytics (or similar tools) for tracking access metrics. These refer to the data mentioned in section 4.4. of this Policy.	The corresponding legal basis is "Consentimento" (Consent - LGPD, art. 7, I).

5.1.2. Galaxies may also access, read, preserve, and disclose any Personal Data when necessary to comply with a legal obligation or court order, enforce this Privacy Policy and other agreements, or protect the rights, property, or safety of Galaxies, its employees, contractors, or others. Lastly, Galaxies undertakes to act transparently by providing information or additional explanations when necessary to ensure conscientious use of its solutions.

5.1.3. As applicable, due to the nature of the services provided through the Galaxies Portal, the feasibility of certain services and the development of Galaxies' business activities may depend on sharing Personal Data with partner companies or service providers, both in Brazil and abroad. In these cases, Galaxies undertake to sharing only the Personal Data strictly necessary for the purposes for which the sharing is intended, and to requiring such third parties to use Personal Data only to the necessary extent and in accordance with the purposes for which it was collected, always in compliance with this Privacy Policy and applicable law.

5.1.4. By using the Galaxies Portal, You expressly consent to the potential sharing of your Personal Data with commercial partners or clients of Galaxies. In such cases, non-anonymized Personal Data will require your consent to be shared, and You should consult the specific policy applicable to each case.

5.1.4.1. In other cases, and whenever possible, data will be anonymized solely for statistical purposes, in a manner that does not allow the identification of the User.

5.1.5. By using the Galaxies Portal, You may choose to connect access accounts to other third-party platforms and services, including social networks such as Discord, YouTube, Instagram, Facebook, and Twitter, to enable integration of functionalities between the Galaxies Portal and such Third-Party Services, in which case Galaxies may receive Personal Data of the User from such third parties. In this

scenario, You should carefully review the provisions of the respective privacy policies applicable to such third parties, as Galaxies has no responsibility or control over such documents and procedures.

6. Minimum Age

6.1. If You are a individual and have not yet reached 18 years of age or have not reached the legal age of majority in the country where your account was registered, your parents or legal guardians must create an account for You and agree to these Terms for You to access and use the Galaxies Portal, to the extent permitted by law, as well as for the provision of Personal Data. Galaxies recommends that parents or legal guardians do not share personal information online.

7. Retention Period of Personal Data

7.1. Galaxies only stores your information for the period necessary for the purposes set forth in this Privacy Policy, observing the data retention period determined, especially, by the LGPD.

7.2. If You request deletion of your account, your personal information provided to Galaxies during your use of our services will be deleted, except for purposes allowed or required by data protection law.

7.3. In some cases, we may retain your information even if You delete your account, such as in cases of mandatory record-keeping requirements under applicable laws, if there is an unresolved issue related to your account (such as an unresolved complaint or dispute), as well as for the regular exercise of our rights, or if necessary for our legitimate interests, such as fraud prevention, audits, and improving the security of our users.

7.4. Galaxies may retain Personal Data for a longer period to meet legal obligations under applicable law, and Galaxies is required to keep certain transactional data under tax and civil law for a period of up to 10 (ten) years.

8. Safety Controls and Risk Mitigation Acts Adopted by Galaxies

8.1. Galaxies makes significant efforts to ensure the safety of the Personal Data processed, maintaining procedural, technical, and physical safeguards to prevent any improper handling of Personal Data.

8.2. User's or third party's Personal Data, as well as their access records, are kept confidential and stored in a secure environment, with full respect for the privacy, private life, honor, and image of the parties, in compliance with all applicable legislation and this Policy.

8.3. Personal Data is transmitted with strict controls to ensure the security of the information, which is only accessed by a restricted number of individuals with special access who are signatories to confidentiality agreements.

8.4. Despite all efforts made by Galaxies, in the current technological state, it is impossible to guarantee that any data transmission occurred over the Internet is completely safe. Therefore, if You identify or become aware of something related to Galaxies that compromises information security, please contact us as soon as possible so that incident response measures can be taken.

9. Channel for Clarifications and Requests Regarding the Processing of Personal Data

9.1. Galaxies considers essential that the parties involved in any scenario of Personal Data processing have a full understanding of the issues involved, and always seeks to document its processes and procedures in the most appropriate and transparent manner possible, aiming to meet the interests of those involved, applicable legislation, and international best practices.

9.2. If You have any questions about any matter related to the processing of Personal Data by Galaxies, this Privacy Policy, or if there are indications that your Personal Data have been improperly used, please contact our Data Protection Officer listed below.

9.3. The channel should also be used if You, as the data subject whose Personal Data is shared with Galaxies, wish to exercise the rights provided for in articles 9, 18, and 19 of the LGPD – that is, if You choose to correct, anonymize, block, delete, or request portability of such data.

Data Protection Officer:

Name: Daniel Victorino

Email: danielvictorino@galaxies.gg

This Privacy Policy is available in English and Portuguese. For interpretation purposes, the Portuguese version shall prevail.

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