

Global Privacy Notice

PlatinumGames knows that privacy is important to you. This Privacy Notice describes how PlatinumGames Inc. (“Platinum”, “we”, “us” or “our”) as the controller and with registered office at Umeda Sky Building Tower West 8F 1- 1-30 Oyodonaka, Kita-ku Osaka, 531-6108 Japan, collects, uses discloses, stores, processes and protects your information in compliance with applicable data protection laws and this Global Privacy Notice (this “Privacy Notice”).

Regarding the processing of personal information of persons located in the State of California in the United States, “Appendix: Processing of Personal Information of California Residents” shall apply.

1. CATEGORIES OF YOUR INFORMATION WE COLLECT

We collect personal information and other information that you provide to us. The types of information we collect include:

- Information that our users provide, including name, address, postcode, gender, language, country of residence, date of birth, telephone number, e-mail address, gaming platform, correspondence sent directly to us and that we send, and other information provided;
- Information regarding the contact person of the business partner including name, company name, department name, position, telephone number, email address, etc.;

2. PURPOSES OF USE AND LEGAL GROUNDS FOR PROCESS OF INFORMATION

We collect and process the collected information to achieve the following purposes of use (the “Purposes of Use”) in connection with the services. Such processing of personal information is based on our legitimate interests for the provision the service to you and the provision of opportunities for communication with you or expressed consent obtained from you.

- To operate, provide, maintain, and improve our services, including recording, analyzing data, troubleshooting, authentication;
- To send products, presents, and email newsletters to you;
- To process the transactions;

- To comply with applicable laws and regulations;
- To protect and exercise our legal rights or defend against legal claims; and
- To contact you to answer your inquiries or forward any requested information, notify you about changes to our policies and terms, notify you about changes or improvements to our services, and notify you about other services we offer.

We collect your personal information as set forth in “1. CATEGORIES OF YOUR INFORMATION WE COLLECT” directly from you. In other instances, we may collect your personal information as set forth in “1. CATEGORIES OF YOUR INFORMATION WE COLLECT” indirectly from other companies such as subcontractors.

3. DISCLOSURE OF INFORMATION

We may disclose and share your information in order to achieve the purpose described in “2. PURPOSES OF USE AND LEGAL GROUNDS FOR PROCESS OF INFORMATION”, in compliance with applicable data protection requirements, with following third party.

- (i) Outsourcing companies such as services in connection with reward sending, service providers, security service providers to offer the Service, and these contractors will access and process your personal information to the extent necessary to offer the Service.
- (ii) Public authorities in accordance with applicable laws and regulations (including ordinances, court rulings, and administrative orders and recommendations).

We may transfer your personal information to countries other than your country, including Japan and the US, which may have a lower level of data protection than your country. When providing personal information to third parties outside your country, we take the necessary measures therefor, such as obtaining consent and concluding data transfer agreements, etc., in accordance with applicable laws and regulations.

If you are located in a country of the European Union, where such third party are located outside the European Union respectively the European Economic Area, such third party are either located in a third country where the European Commission has decided that this country ensures an adequate level or appropriate safeguards for an

adequate level of data protection are provided for by standard data protection clauses that have been adopted by the European Commission and that have been entered into between Platinum and the third party.

Should you need more information, such as obtaining a copy of the standard contractual clauses, etc., please refer to the contact information set forth in section “11. INQUIRIES”.

4. SECURITY

Platinum uses appropriate technical, administrative and organizational measures to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration and destruction. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

5. STORAGE TIME

We retain your personal information as set forth in “1. CATEGORIES OF YOUR INFORMATION WE COLLECT” for as long as necessary in order to fulfill the Purposes of Use.

To determine the appropriate retention period for the personal information, we evaluate: (i) whether there is an ongoing relationship with you, (ii) whether Platinum is legally obligated to retain the personal information, and (iii) whether retention is necessary to perform our obligations to you.

6. RIGHTS FOR DISCLOSURE, CORRECTION, DELETION ETC., OF PERSONAL INFORMATION

You may be entitled to request the disclosure, correction or deletion of your personal information, subject to applicable laws and regulations.

For example, if you are located in the European Economic Area (EEA), you will have the following rights under the GDPR; provided that these rights may be limited, on an exceptional basis, if complying with your request would infringe the rights of Platinum or a third party, or if we are requested to delete information that we are required to retain in accordance with laws and regulations:

- (i) the right to access personal information (including issuance of any copies thereof);
- (ii) the right to request the correction of personal information;
- (iii) the right to request deletion of personal information (known as “the right to be forgotten”);
- (iv) the right to request restriction of the processing of personal information (the right to stop such processing); and
- (v) the right to receive personal information in a structured, machine-readable form (the right to data portability).

To exercise any of these rights, please contact us using the contact information listed in “11. INQUIRIES” below.

7. RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL INFORMATION

If you are located in the EEA, you are entitled to object to any processing of personal information carried out on the basis of legitimate interests at any time.

To exercise this right, please contact us using the contact information listed in “11. INQUIRIES” below.

8. RIGHT TO WITHDRAW CONSENT

You are entitled to withdraw your consent whenever Platinum processes your personal information based on your consent. This withdrawal does not affect the legality of any processing already carried out on the basis of consent previously given. To exercise this right, please contact us using the contact information listed in “11. INQUIRIES” below.

9. REQUIRED PERSONAL INFORMATION

Personal information required for Platinum to provide the services is indicated in the form to be completed by you. You are under no obligation to provide such personal information to us, but we may not be able to provide all or a part of the services if you choose to opt out of the provision of such personal information.

10. THE RIGHT TO FILE A COMPLAINT WITH A SUPERVISORY AUTHORITY

You may be entitled to file a complaint with a supervisory authority under applicable

laws and regulations. If you are located in the EEA, you may file complaints to the supervisory authorities of the member states where you reside or work or the location where the violation of the GDPR occurred.

11. INQUIRIES

You may use the following to reach us for general inquiries regarding our processing of your personal information. You may use the same to reach us if you would like to exercise your rights regarding your personal information.

PlatinumGame's Personal Information Protection Manager:

PlatinumGames Inc. Attn: Personal Information Protection Manager,
Umeda Sky Building Tower West 8F 1-1-30 Oyodonaka, Kita-ku Osaka, 531-6108
Japan

pg_dpow@platinumgames.co.jp

Appendix: Processing of Personal Information of California Residents

In addition to the provisions set forth above, the following provisions apply to the processing of personal information of residents of the State of California in the United States in accordance with the California Consumer Privacy Act of 2018 (including amendment by the California Consumer Privacy Rights Act of 2020, hereinafter referred to as the “CCPA”).

1. DEFINITION

The definition of the terms used in this Appendix are the same as under the CCPA. In particular:

“**Sell**”, means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating a consumer’s personal information by the business to a third party for monetary or other valuable consideration.

“**Share**”, means sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating a consumer’s personal information by the business to a third party for cross-context behavioral advertising.

2. NOTICE OF COLLECTION

Platinum will collect and has collected in the last twelve (12) months, the following categories of your personal information. Further, Platinum has disclosed all categories of the personal information collected in the last twelve (12) months to the receiving party indicated below. The section numbers indicated under “Receiving Party” are the numbers indicated in section “3. DISCLOSURE OF INFORMATION” of the Privacy Notice above.

Category	Receiving Party
Identifiers	(i)

Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	(i)
Commercial information	(i)

We do not collect sensitive personal information from you. We do not sell or share and will not sell or share in the future the personal information collected from you.

For details on personal information we collect, refer to section “1. CATEGORIES OF YOUR INFORMATION WE COLLECT” of the Privacy Notice above; for the business purposes and commercial purposes of personal information we collect, refer to section “2. PURPOSES OF USE AND LEGAL GROUNDS FOR PROCESS OF INFORMATION” of the Privacy Notice above; and for the retention period of the personal information we collect, refer to section “5. STORAGE TIME” of the Privacy Notice above.

3. YOUR RIGHTS UNDER THE CCPA

The CCPA provides residents of California with specific rights regarding personal information. If you are a California resident, the following describes your rights under the CCPA and explains how to exercise those rights.

(1) Right to access personal information

You are entitled to request that we disclose certain information to you about our collection, sharing, disclosure or use of your personal information. Once we receive and confirm a verifiable request, we will disclose the following information to you.

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purposes for collecting, selling, or sharing such personal information;
- The categories of third parties with whom we share such personal information;
- The categories of personal information that we sold, and for each category identified, the categories of third parties to whom we sold such personal information;
- The categories of personal information that we disclosed for a business purpose, and for each category identified, the categories of third parties to

whom we disclosed such personal information; and

- The specific pieces of personal information we collected about you.

(2) Right to request deletion

You are entitled to request to delete any of your personal information that we have collected and retained, subject to certain exceptions. Once we receive and confirm a verifiable request, we will delete such personal information from our records (and notify our service providers to delete the same), unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers in order to:

- Complete the transaction for which personal information was collected, fulfill the terms of product recall conducted in accordance with a written warranty or federal law, provide goods or services requested by you, or take measures that are reasonably anticipated by you within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the rights of other consumers to exercise their free speech rights, or exercise other rights provided for by laws;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. Seq.);
- 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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations and the context in which you provided the personal information based on the relationship between you and Platinum; or
- Comply with legal obligations.

(3) Right to request correction

You are entitled to request that we correct any inaccurate personal information of you that we have collected and retained. Once we receive and confirm a verifiable

request, we will correct such your inaccurate personal information (and notify our service providers to correct the same). We may deny your request for correction if we determine that the contested personal information is more likely than not to be accurate based on the totality of the circumstances.

(4) Right to opt-out of sale or sharing

We have not sold or shared your personal information in the past twelve (12) months and we will not sell or share such personal information in the future. Will not intentionally sell or share the personal information of anyone under the age of 16.

(5) Right to non-discrimination

We will not discriminate against California residents for exercising any of their rights under the CCPA. Moreover, unless permitted under the CCPA, due to your exercise of their rights, we will not:

- Deny goods or services to you;
- Charge you different prices or rates for goods or services;
- Provide you a different level or quality of goods or services;
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services; or
- Retaliate against an employee, applicant for employment, or independent contractor.

(6) How to exercise your rights

In order for you to exercise the rights under the CCPA, please submit a verifiable request to us by contacting us as set forth in section “11. INQUIRIES” of the Privacy Notice above. You need to complete a request with sufficient detail that allows us to properly understand, evaluate, and respond thereto.

Only you, a natural person or a person registered with the California Secretary of State that you authorizes to act on your behalf, or a person who has a power of attorney or is acting as a conservator for you, may submit a verifiable request related to your personal information. If permitted under the CCPA, we may perform procedures to verify the identity and authority of the agent as required under the CCPA.

Established: March 1, 2025