PRIVACY POLICY

Last Updated May 30, 2025

Welcome to the Privacy Policy (the "Policy") of Winzilla Ltd. (a company registered and existing under the laws of Cyprus, having registration number HE 474611and its registered address at 39 Dimofontos Street, 3rd Floor Office 301, Nicosia, 1075, Cyprus) and its related, affiliated or subsidiary companies (the "Company" or "we", "our"). The purpose of this Policy is to inform you how we collect, use, and share your information when you provide such information or use the Company's website(s) and platform(s) available at sweepking.com (the "Site"), as well as other related Company webpages, applications and products, services or content accessible through the Site (collectively the "Services").

When we refer to "you" or "your" in this Policy we mean any individual who interacts or uses our Services. By using the Services, you represent that you understand and agree to this Policy, and consent to the collection, use, and sharing of information as described in this Policy. If you do not consent to our practices, you can choose not to use the Services.

Privacy Policy Changes. We reserve the right to change, modify, or update this Policy by posting such changes or updates to the Services or emailing you notice of the changes. Amendments to this Policy will be posted at this URL and will be effective when posted. You can tell if this Policy has changed by checking the last modified date that appears at the top of this Policy. Your continued use of the Services following the posting of any amendment, modification or change shall constitute your acceptance thereof.

INFORMATION WE COLLECT

Information You Voluntarily Provide

The Company may collect information about you when you interact with our Services including information that you voluntarily provide when you use the Services; register and create an account for any of the Services; add or update your account information; complete any survey, questionnaire, or form of information request from the Company; submit a Contact Us inquiry; log into the Site or use the Services from one or more of your devices or otherwise interact with the Services. Information that we collect may depend on how you interact with the Company and use the Services. A description of the types of information we may collect is described in detail below.

- **Profile Data** such as username, email, password, settings, and user ID and social media accounts information such as identifiers and profile picture.
- Personal Identifiers such as first and last name, address and date of birth.
- **Contact Information** such as your billing address, residential address, email address, and mobile phone numbers.
- **Financial Information** such as credit or debit card information, bank account information, payment details, or other payment information.
- Commercial Data such as purchase amount, details about the content, products and/or services you have purchased through our Site, transaction records, and/or other details of content, products and/or services you have acquired from us in the past.

- Usage Data, includes information about how you use our Site and Services, such as statistics regarding the opening and clicking on emails, and other activities on the Site, including play or use of the Services, player stats, referring/exit pages, and clickstream data.
- Marketing and Communications Information such as marketing campaign data, click-throughs, your preferences and consent to receiving marketing from us and third parties, your communication preferences, email, phone calls and text communications.
- Audio and Visual Information such as selfie photographs.
- **Biometric Information** such as a faceprint (i.e. face geometry/photo of a person's facial features).
- **Geolocation Data** such as the approximate location information associated with your IP address and precise geolocation of your device.
- **Inference Data** including inferences drawn from the Personal Information identified above.

Sensitive Personal Information. We collect personal information that may be considered Sensitive Personal Information or Sensitive Data under state privacy law, including social security number, driver's license, passport, or other government-issued ID, and biometric information. We do not use or disclose Sensitive Personal Information for any business purposes other than as permitted by law, including providing good and services, verifying your identity, processing payments, ensuring security and integrity of our websites and apps, complying with applicable legal requirements and/or as permitted by further regulations.

Information You Provide to A Third Party. The Services may include links, plug-ins to websites operated by third parties such as Facebook, Instagram, LinkedIn, and X ("**Third-Party Sites**"). The Company does not control any Third-Party Sites and is not responsible for any information they may collect. The information collection practices of a Third-Party Site are governed by its privacy policy. It is your choice to enter any Third-Party Site. We recommend that you read its privacy policy if you choose to do so.

Retention. For each of these categories of Personal Information, we will retain the information as long as is reasonably necessary to fulfill the purpose for which it was collected, to comply with applicable laws and regulations, and/or to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.

BIOMETRIC INFORMATION POLICY

The Company uses third-party technology through its vendors to collect, store, and use biometric and other personal information, such as your faceprint, a selfie, and government-issued identification.

Consent. By using our Services, you consent to the Company, our identity verification vendor, and each of our contracted service providers, collecting, storing, and using your biometric information for the purposes identified below.

Purpose for Collection of Biometric Information. The Company and its vendor may use biometric information for the following purposes:

- To verify your identity
- To prevent fraud
- To improve products and services
- To comply with legal obligations

Data Retention. This information is retained for as long as necessary to achieve the original purpose for collecting it, or until 3 years after your last interaction with us, whichever happens first, provided we have no other legal obligation to retain such information for any longer period.

HOW WE COLLECT YOUR PERSONAL INFORMATION

Information You Provide To Us

The Company may collect Personal Information from you that you voluntarily provide to us in various ways, including, but not limited to:

- Make a purchase with us online
- Send us an email or other communication
- Join any of our social networking Services
- Register for an account with us
- Participate in our promotions, surveys, and/or contests

Information We Collect When You Use the Services

Automated technologies or interactions. As you navigate around the Site (whether or not you have created or have logged into a user account) and/or use the Services, the Company may collect certain information using various technologies to help us personalize your experience. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, .time zone setting and location, language preferences, device type and ID, and other technical information from the devices you use to access our Services. When you use our app and/or access and use our website and platforms from your mobile devices, we receive data from that mobile device. This may include your device ID, location data, IP address and device type. You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings. In some of our email, SMS or other types of text messages ("Messages") we may use a click-through URL linked to content on our Services. When you click one of these URLs, you will pass through our web server before arriving at the destination web page. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our Services. If you prefer not to be tracked through our Messages, simply avoid clicking text or graphic links in the Message.

<u>Cookies and Tracking Technologies.</u> We and our service providers use cookies, pixels, and other tracking technology to recognize your browser or device and to capture and remember certain information about your activities on our Services with the purpose of delivering customized and personalized services. While using the Services, you may be unable to

access VPN. If accessible, we may use these tracking technologies, notwithstanding the use of a VPN.

- Cookies. A cookie is a small text file that is saved on your web browser when you visit a website. You can view and delete existing cookies through your browser. If you do not want to store cookies on your computer, you can set your browser to refuse cookies or to alert you when cookies are being sent. However, some parts of the Services may not function properly if you choose not to accept cookies.
- Pixel Tags (aka clear gifs). These are tiny graphics with a unique identifier, similar in function to cookies, which allow us to monitor the use of our Services, for example, to count users who have visited those pages and for other related website statistics. Pixel tags generally work in conjunction with cookies, registering when a particular device visits a particular page. You cannot decline pixel tags; however, if you turn off cookies the pixel tag will simply detect an anonymous visit. In addition, we use pixel tags in our HTML-based emails to let us know which emails have been opened by the recipients. This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you prefer not to be tracked through our emails, most email services will allow you to turn off pixels by disabling external images in settings.
- Analytics. We use third party cookies provided by Google Analytics to assist us in better understanding our Site's visitors. These cookies collect IP address and usage data, such as the length of time a user spends on a page, the pages a user visits, and the websites a user visits before and after visiting our Site. In addition to reporting usage statistics, Google Analytics can also be used to help show more relevant ads on Google properties (like Google Search) and across the web. For more information on Google Analytics, visit Google's Privacy and Terms.

Information We Collect From Third Parties

We may receive information about you from third parties. We may associate this information with the other information we have collected about you as described in this Policy. The collection, use, and disclosure of information received from third parties may be governed by the third parties' privacy policies. Please carefully review these third-party privacy policies before submitting your information to a third-party application or otherwise interacting with it to understand how your information may be collected, used, and disclosed by these third parties. We have no control over, and cannot and do not assume responsibility for the data collection and privacy practices employed by any of these third parties or their services.

<u>Third Party Service Providers</u>. We collect Personal Information from service providers including payment processors, geolocation providers, identity verification providers, marketing and communications service providers, business intelligence providers, website hosting platforms, and social media platforms.

<u>Social Media Services</u>. When you create an account using your Facebook or Google login we receive Personal Information from those third party social media websites, which may include your public profile information and email.

<u>Third Party Advertising Partners</u>. We collect Personal Information received from third party advertising partners, including partners who host and manage various online advertisements and ad platforms. This may be combined with the website analytics data described above.

HOW WE USE YOUR INFORMATION

Our primary purpose for collecting your information is to provide you with the services you request. We may also use your information for the following purposes:

- Provide you with our Services and to operate our business.
- Verify your identity and account information in connection with our Services you request.
- Provide you with required notices, updates about our content, products and services as well as other important information.
- Provide you with recommendations for content, products and services that we believe would be of interest to you.
- Assist you with setting up and managing your account with us.
- Resolve disputes and/or questions about our Services.
- Problem troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting data.
- Enforce our <u>Terms for use</u> of our Services, <u>Sweepstakes Rules</u> and the terms of this Policy.
- Customize, measure and improve our Services and content.
- For our own internal business purposes.
- Communicate with you about content, products, services, updates, events, promotional offers, research, insights, and other information that may be of interest to you from us and our trusted partners.
- Protect our interests, including establishing, exercising and defending legal rights and claims.
- As necessary to comply with legal requirements, to prevent fraud, to co-operate with law enforcement and regulatory authorities, and to stop other prohibited, illegal, or harmful activities.
- For purposes disclosed at the time you provide/we request your information or as otherwise set forth in this Policy.

INFORMATION WE SHARE

Service Providers

We may use third-party service providers to perform certain business services and may disclose your information to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose, or retain this information to provide these services. Business services provided include, but are not limited to, hosting services; geolocation services; account authentication and user verification services; billing and accounting services; payment processors services; marketing, promotional and email services; customer and technical support services; quality assurance testing, and back-office support for the Services.

Internal Third Parties

We may share your information with our affiliated entities, successors, predecessors, assigns, licensees, or business partners, and others who may use the information for the purposes described above.

Business Transactions

We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then your information may be transferred to the new owners who may use your information in the same way as set out in this Policy.

Legal Process

Subject to applicable law, we may disclose information about you i) if we are required to do so by law, regulation or legal process, such as a subpoena; ii) in response to requests by government entities, such as law enforcement authorities; iii) when we believe disclosure is necessary or appropriate to prevent physical, financial, or other harm, injury, or loss; or iv) for the purposes of cooperation with law enforcement agencies' and/or in connection with an investigation of suspected or actual unlawful activity.

User Disclosures. Some personal information is disclosed as a matter of course as a result of your use of our Services. Any personal information shared via any shared or public forum using our Services, such as, when participating in a social game, promotion or competition, or when sharing your experience on another website (such as Facebook, Instagram or X) may become public information. You should exercise caution when disclosing information in these areas, especially your location data, and be careful how you disclose your personal information. YOU ASSUME ALL RESPONSIBILITY FOR ANY LOSS OF PRIVACY OR OTHER HARM RESULTING FROM YOUR OWN VOLUNTARY DISCLOSURE OF PERSONAL INFORMATION IN SHARED AND PUBLIC FORUMS

COMMUNICATIONS AND OPT-OUT

Depending on your marketing settings and preferences, we may use your information to let you know about our products, services and offers or other initiatives that may be of interest to you and we may contact you to do so by mail, email, phone, text, or push notification. Additional information about these marketing activities, including options for opting out are described below.

Email. We may send you emails concerning our products and services, as well as those of third parties. While we value our communications with you, if you do not want the Company or its representatives to contact you for marketing purposes, you may opt-out of this preference at any time by following the unsubscribe instructions included in the email. This opt-out will not apply to operational or informational emails related to your account or other administrative purposes. You may continue to receive promotional email messages for a short period while we process your request.

Push Notifications. Where you have chosen at a device level to begin or continue receiving push notifications from us, we may send you push notifications relating to our products, services, offers and other marketing initiatives. You can choose to stop receiving push notifications from us at any time by changing your preferences on your mobile device.

CHILDREN

The Services are intended for users aged eighteen (18) and older. If you are under the age of eighteen (18), you are not authorized to provide us with any personally identifying information, nor access or use our Services in any manner whatsoever. By using the Services, you represent that you are eighteen (18) years of age or older.

USE OF THE SERVICES

By accessing and using the Services, you acknowledge and agree that the Services are intended for use by users located in the United States of America. Unless expressly stated to the contrary, we make no representation that the Services are appropriate or will be available for use in other locations.

Your 'Do Not Track' Browser Setting. Some web browsers incorporate a Do Not Track ("DNT") feature that signals to the websites that you visit that you do not want to have your online activity tracked. Our Site may not respond to DNT signals. The Company may allow certain third-party advertising partners to place tracking technology, such as cookies and pixels on our Services. This technology allows us and/or third-parties to collect personally identifiable information about your online activities over time and across different websites.

CONTACT INFORMATION

If you have any questions about our privacy practices or this Policy, please contact us at:

Email address: support@sweepking.com

Physical Address:

- Winzilla Ltd
- Registration Number: HE 474611
- Address: Kennenty & Dimofontos 39, Flat/Office 301, 1075 Nicosia, Cyprus