

PRIVACY POLICY

Novaflow Labs Ltd. (hereinafter referred to as "the company") does its best to be transparent about how users' personal data (hereinafter referred to as "personal information" or "data") is protected and processed in order to ensure the safe use of its services.

This privacy policy applies to the services on the company's website and mobile application and other related services, which will be referred to collectively as "services" in this document.

The company's policy will be updated to reflect any new regulatory or legal changes. If the policy is significantly altered, the company will do its best to notify users via pop-up screens or announcements.

A. Inquiries related to the privacy policy

If you have any inquiries or requests about the privacy policy, you can contact customer support in each service sector to get an answer as soon as possible. You can also directly contact the person in charge of personal information management using this phone number.

- Name of the controller: Novaflow Labs Ltd.
- Attn: Privacy Team / email: privacy@intellax.io

B. The company collects personal information legally.

The categories of personal information collected by the company differ by the services you use.

<Collected directly from the user>

- Customer support records (chat records, etc.)
- Additional information from participating in surveys and marketing
- Personal information required for event participation and gift giving
- Other information that the user has agreed to can be used for only those purposes

<Data collected automatically>

- The company can collect information through cookies and similar technologies (See F. Use of cookies and similar technologies for more information).
- Data on service use, such as interacting with various features provided on the company's website and mobile application

<Data collected by partner companies>

- Data received and information permitted to use by linking the service with a third-party tool (Google, INFURA) : Mobile device information, country, IP address, ad ID (ADID, IDFA)
- Ads and surveys used for the purpose of analyzing and providing better experience to the user

C. Personal information is collected and used only for specific and lawful purposes.

The company treats all information related to the user's account as personal information. Also, the data is stored for a minimum period necessary to provide the best service to the user.

<Service Operations>

- Account creation
- Sending service-related notices
- Replying to inquiries
- Sending relevant information such as updates, security warnings, and support messages
- Restricting malicious users (money laundering and other illegal activities)
- Other information that the user has agreed to can be used for only these additional purposes

D. No personal information is shared or sold to third parties outside of these purposes.

The company will not share or sell user information to a third party without the user's consent. However, the company can share information that cannot be used to identify individuals, such as statistics and public information. The company may sometimes handle personal information by entrusting work for general service provision of the company's products and to provide email delivery, prize delivery, and customer support services. Regarding this consignment work, the company will enter into a written contract with a third party that will include various personal information protection measures. If you do not wish to share this information, you may leave the service at any time.

The company may share personal information in order to comply with legal procedures such as rights protection, court orders, or to comply with requests from government agencies or other related agencies, or if there are justifiable reasons.

<The company's service providers>

The company works with third parties who provide support to the service. These third parties process your data only at and according to the company's instructions to provide the service, and perform tasks such as customer support, advertising, analytics and fraud prevention. Data is retained until the purpose of the consignment is achieved or the user's consent is withdrawn.

<Vital interests and legal rights>

We may disclose your information where we believe it is necessary to investigate, prevent, or take actions regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

<With your consent>

We may disclose your personal information for any other purpose with your consent.

<Other companies and public institutions>

The company can provide information to public authorities upon request in order to prevent fraud and illegal activities.

<User rights for international transmission>

In the event of a reason for transmission, user data may be transmitted to a computer system located between the user's countries for use, processing, or storage, and may only be used for the purposes specified in this policy. Furthermore, users have the ability to modify, delete, and restrict data sent overseas.

E. Personal information will be securely destroyed after use during the legal retention period.

Personal information is held and used while the user maintains the service. Once the purpose of using personal information is met, it is securely destroyed without delay so that it cannot be restored. However, there will be a seven-day grace period of retaining the data following the withdrawal request in order to prevent illegal use, such as personal information theft.

Furthermore, the minimal amount of data is retained for the time period specified and is not used for any other purpose other than for the reasons listed below.

<Retention period in accordance with relevant laws and regulations>

- Records regarding contract or withdrawal of subscription, etc.: 5 years
- Records of payment and supply of goods, etc.: 5 years
- Record for consumer complaints or dispute resolution: 3 years
- Record of service visits: 3 months
- Other records with consent from the user

F. Users can refuse to use of the automated personal information collection device.

<Use of cookies and similar technologies>

Cookies are pieces of information that a website stores on your computer when visiting a website. Cookies can also be used by the company to collect data about users, and may be used to send data between the company and users in accordance with policies. Users can choose to turn off all cookie settings, or have the computer alert the user whenever they are sent through browser settings.

Each browser has a slightly different setting method, so look at the browser's help menu to learn how to set your cookie settings. Turning off cookies may prevent access to many features that can make the guest environment more efficient, and some services may not work properly. The Internet Protocol ("IP") address is a unique number assigned to the server or Internet service provider ("ISP"). The IP addresses can be tracked by the company for system management, statistical reporting, site tracking, security, or to prevent server abuse.

<Targeted online ads>

Targeted online advertisements are marketing techniques that provide services that take into account user characteristics by analyzing users' online usage types and access records, and they can be collected automatically when users visit sites or run apps. Users can refuse to receive targeted online advertisements from mobile applications by checking their privacy settings and disabling "allowing app tracking requests" on Apple iOS devices or selecting "refuse to receive interest-based advertisements" on Android devices.

For more information on the Advertiser Privacy Policy and the opt-out feature, please visit the link below.

- Google Admob Privacy Policy: <https://policies.google.com/privacy>

For web browsers, you can also adjust your browser opt-out settings to restrict certain searches by visiting the Restrict Ad Tracking Sites below.

- <http://www.aboutads.info/choices>
- <http://www.youronlinechoices.eu>

< Alternative ways to control, disable and delete cookies>

You can change the settings to block cookies or to receive alerts when cookies are being sent to your device.

Click on one of the links below to go directly to your browser manual. Remember that you will have to set your preferences again or login again on some websites after removing cookies.

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

G. The company is dedicated to protecting your rights.

<Right to access and receive data>

Users have the right to inquire about how their data is handled and receive relevant information from the company. The company will send you an electronic copy of your personal information if requested.

<Right to limit the processing of personal information>

- In certain cases, users have the right to request restrictions on processing of their personal information.
- Refusal to receive marketing emails and other direct marketing materials: You can opt out of receiving promotional materials such as marketing emails from the company by following the instructions written on the sent forms.
- Push notification: You can receive push notifications from the company via the company's mobile application. You can opt out of receiving these notifications at any time by changing your mobile device's settings.

<Right to transfer data>

Users have the right to transfer data to third parties. However, not currently applied to the company's operations, the company will provide a copy of the data containing the user's most basic account information if the user requests it.

<Right to delete data>

Users may request (1) their marketing information be deleted or (2) their service account information be deleted. The service account is deleted immediately upon confirmation made by the user. After deletion, all account history will be deleted and the user will no longer have access to his or her assets. Any assets left in the account will not be refunded.

The company may hold data to (a) protect its business, systems and users from fraudulent activity, (b) address technical issues that impair existing functions, (c) exercise the necessary rights to the company or other users, (d) comply with legal enforcement requests in due course, (e) for scientific or other purposes, and (f) comply with legal obligations. The company will do its best to respond quickly to the needs of the users. However, due to the consequences or measures resulting from the user's request, the user's use of the service may be restricted or blocked.

***Note: California residents may have additional rights. Please see section K. Appendix (privacy rights for California residents) for more information.**

<Other rights>

You may exercise your rights in accordance with local law.

You have the right to have your information corrected and/or deleted, as well as to object or limit how we use or share your information. You also have the right to withdraw your consent at any time.

Within a reasonable timeframe, the company may respond to the user's request. You may also contact your local data protection authority if you have an unresolved privacy or data use concern because the company has not been able to address it properly.

H. The company maintains the integrity and security of the data.

The company employs technical, administrative, and physical security measures to prevent loss, theft, leakage, forgery, alteration, or damage to user data. Although the Internet is not a completely safe environment and security risks are constantly evolving, the company will continue to make efforts to secure the system and protect users' data.

I. The company has a special obligation to protect children's (minor's) data.

The company acknowledges that it has a special obligation to protect children's data (age required by local law).

The company's services (online, mobile, and others) are for those of the age of majority. The company does not collect data from children for any purpose whatsoever. Furthermore, if it is determined that the user is under the age of majority, the company will stop providing services to the user.

If a child has unauthorized access to the services and the parent or legal guardian believes that their child's personal information has been collected without their permission, they can contact the company and request that their child's data be deleted. The collected data is kept secure in accordance with the policy. As a result, if the policy changes, parents will be notified of the changes in a reasonable manner.

J. Comments and inquiries

If you have any questions or comments about the company's data protection, please contact us via email: privacy@intellax.io.

The company conducts regular audits of regulatory and legal compliance. The company provides personal information protection and security guidelines to executives and employees, as well as conducts education and awareness campaigns to protect personal information so that users' data is safely protected. When we receive an official inquiry, we will contact the user who provided the opinion and actively follow up. To resolve complaints that cannot be resolved directly with the company, we will work closely with regulators, including local data protection agencies.

K. Appendix (privacy rights for California residents)

The policies in the Appendix apply to California residents only.

<Right to know>

California residents have the right to request the information listed below. The company will make data easily accessible to users. Contacting the company is the simplest way to obtain that information. If the company requires additional information to identify the user, it will contact the user and request information, which may include personal information about the user or information about the company's previous purchases/use of products or services. If the company only rejects a portion of the user's request, it will explain why in an answer.

- Categories of data the company has about its users: Section B. of the Privacy Policy describes the types of personal information collected in the last 12 months.
- Categories of data collected or disclosed for business purposes for users within the last 12 months: Section C. of the Privacy Policy describes the categories of use of the collected personal information.
- Lists of third parties to which data is sold, disclosed for service purposes, or otherwise shared with: Section D. of the Policy on Privacy describes the types of personal information with which data is shared.

<Right to be forgotten>

If you are a California resident, you can ask the company to delete the collected personal information. Account deletion by the company is permanent and irreversible, and all games, assets, and histories will be permanently deleted. The company may hold data to (a) protect its business, systems and users from fraudulent activity, (b) address technical issues that impair existing functions, (c) exercise the necessary rights to the company or other users, (d) comply with legal enforcement requests in due course, (e) for scientific or other purposes, and (f) comply with legal obligations.

Furthermore, the company requires specific types of information in order to provide its services to users. Contacting the company is the simplest way to submit a deletion request. If the company requires additional information to identify the user, it will contact the user and request information, which may include personal information about the user or information about the company's previous purchases/use of products or services. If the company only rejects a portion of the user's request, it will explain why in an answer.

<Right to withdraw afterwards>

California residents may be exempt from the CCPA's definition of "sale" of personal information. The following cases, however, are not included.

- In the case a user requests the company to disclose personal information or interact with a third party, the third party does not sell the personal information.
- The company may use or share identifiers to alert third parties who have stopped selling personal information at a user's request.
- The user's data is transferred as part of a transaction in which a third party controls all or part of the company's services. In this case, the third party must notify in writing if the method of using, sharing, and sharing the data significantly changes.
- The company uses or shares user data in accordance with written contracts with service providers that are required to carry out business functions. At this time, the service provided by the service provider replaces the company, and the written contract prohibits the company from storing, using, or disclosing user data for purposes other than those specified in the contract.

<Right not to be discriminated against>

The company will not discriminate against users who exercised their rights in a reasonable manner while using the company's services.

<Legal representative>

If a legal representative is designated to exercise the right on the user's behalf, the representative must (a) provide written permission to exercise the right on the user's behalf, and (b) provide evidence to prove the legal representative's identity. If the representative fails to meet these criteria, the company will refuse to exercise its rights.

<California Shine the Light law>

California residents have the right to request the information once a year if personal information was shared with a third party for marketing purposes in the previous year.

<Privacy rights of minors>

We do not voluntarily or knowingly collect personal data from legal minors in the country of service. All users must be of the age of majority in accordance with our Terms of Service. If we discover that we have inadvertently collected personal data from minors, we will take reasonable steps to immediately remove that information from our records. If you believe we have personal data from a legal minor, please contact us at privacy@intellax.io.

L. Additional rights for EU/UK residents

To comply with the General Data Protection Regulation (2016/679) and the UK Data Protection Act 2018 we have respectively appointed a European representative and a UK representative. If you wish to contact them, their details are as follows:

For EU Representative:

Bird & Bird GDPR Representative Services SRL
Avenue Louise 235
1050 Bruxelles
Belgium
EUrepresentative.NEOWIZ@twobirds.com
Key Contact:
Vincent Rezzouk-Hammachi

For UK Representative:

Bird & Bird GDPR Representative Services UK
12 New Fetter Lane
London
EC4A1JP
United Kingdom
UKrepresentative.NEOWIZ@twobirds.com
Key Contact:
Vincent Rezzouk-Hammachi

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