

**BULKHEAD LIMITED
PRIVACY NOTICE**

(Last updated October 2022)

| 1. INTRODUCTION | |
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| Who are we? | <p>We are Bulkhead Limited, a company incorporated and registered in England and Wales with registered address at Second Floor, South Point Cardinal Square, 10 Nottingham Road, Derby, Derbyshire, DE1 3QT, and registered number 09877574 ["Bulkhead", "we" or "us"], and we are a videogame developer and publisher. Where we decide the means or purpose of processing your personal data, we are the "data controller."</p> |
| What's this notice about? | <p>This notice explains how we process personal data, as a data controller, relating to individuals who play the following games (each a "Player"):</p> <ul style="list-style-type: none">• BATTALION: Legacy;• KILLRUN; and• KILLRUN Events Build (a version of KILLRUN which is used for live events), <p>(each a "Game", and together the "Games")</p> <p>We offer the Games through the Steam platform ["Steam"], which is hosted by Valve S.A.R.L. (in Europe) and Valve Corporation (in the United States). We use our own Steam account for the KILLRUN Events Build and therefore you do not need a Steam account to play this Game. However, you need a Steam account to play BATTALION: Legacy and KILLRUN. Your use of Steam is subject to the Steam Subscriber Agreement and Steam's privacy policy (as they may change from time to time).</p> <p>We update this notice from time to time, so please check back in on a regular basis.</p> |
| What are your rights? | <p>You have the following rights, although these rights may be limited in some circumstances:</p> <ul style="list-style-type: none">• Ask us to send a copy of your personal data to you or someone else• Ask us to restrict, stop processing, or delete your personal data• Object to our processing of your personal data• Object to use of your personal data for direct marketing purposes• Ask us to correct inaccuracies in your personal data <p>If we rely on consent to process personal data, or send direct marketing, you can withdraw consent by email to the email address below.</p> |

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| <p>How do you contact us?</p> | <p>If you are located in the EEA or the United Kingdom and have questions about your personal data or would like to request to access, update, or delete it, you may contact our representative at:</p> <p>In the EEA:</p> <p>Bird & Bird GDPR Representative Ireland Deloitte House 29 Earlsfort Terrace Dublin 2 D02 AY28 EUrepresentative.Splash@twobirds.com</p> <p>Key Contact: Vincent Rezzouk-Hammachi</p> <p>If you are located in a country not included in the EEA or the UK and have questions about our handling of your personal data or for any other matters, please contact privacy@bulkhead.com.</p> <p>If we can't resolve your issue, you can also get in touch with the Information Commissioner's Office: https://ico.org.uk/concerns (or if you live in a country other than the UK, you can submit a complaint to the supervisory authority in your country).</p> |
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2. YOUR PERSONAL DATA AND HOW WE USE IT

| Your personal data | How we use it | Sources and recipients |
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| <p><u>Gameplay processing activities</u></p> <p>We process each Player's Steam ID and Steam inventory (specifically to verify the ownership of weapon skins) and to enable them to play BATTALION: Legacy.</p> <p>We process each Player's username to enable them to play KILLRUN Events Build.</p> <p>We process each Player's Steam ID to enable them to play KILLRUN.</p> | <p>We process this information as it is necessary:</p> <ul style="list-style-type: none"> to perform our obligations under our End User Licence Agreement ["EULA"], namely to enable you to play the Games and provide certain related services and functionalities. You can access our EULA here. For the purposes of our legitimate interests (being to promote the success of the Games, our business and the services), and such interests are not overridden by your interests or fundamental rights and freedoms. | <p><u>Sources</u></p> <p>We collect this personal data directly from you and from Steam.</p> <p><u>Recipients</u></p> <p>PlayFab Inc (our analytics service provider), whose privacy notice can be accessed here: https://privacy.microsoft.com/en-us/privacystatement</p> |
| <p><u>Prize giveaway processing activities</u></p> <p>We process the following information to reward a Player's performance whilst playing KILLRUN Events Build:</p> <ul style="list-style-type: none"> Username and email (which we may use to contact a Player if they are a prize winner) Twitter and Instagram handles (which we may use to congratulate a Player on their performance whilst playing KILLRUN Events Build) Information requested by Bulkhead in order to send you prizes (including clothing sizes) Shipping address (which we may use to send Players prizes) | <p>We process this information on the basis of our legitimate interests (being to market and promote the success of the Games, our business and the services), and such interests are not overridden by your interests or fundamental rights and freedoms.</p> | <p><u>Sources</u></p> <p>We collect this personal data directly from you.</p> <p><u>Recipients</u></p> <ul style="list-style-type: none"> PlayFab Inc (our analytics service provider), whose privacy notice can be accessed here: https://privacy.microsoft.com/en-us/privacystatement Third party shipping companies |

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| <p><u>Leaderboard processing activities</u></p> <p>We may process the following information so that we can maintain a leaderboard of KILLRUN and KILLRUN Events Build Players:</p> <ul style="list-style-type: none"> • Steam ID (for KILLRUN) and username (for KILLRUN Events Build) • Steam Account Name • Leaderboard position • Time taken to complete KILLRUN | <p>We process this information as it is necessary:</p> <ul style="list-style-type: none"> • to perform our obligations under our EULA, namely to enable you to play the Games and provide certain related services and functionalities. You can access our EULA here • for the purposes of our legitimate interests (being to promote the success of the Games, our business and the services), and such interests are not overridden by your interests or fundamental rights and freedoms. | <p><u>Sources</u></p> <p>We collect this personal data directly from you and from Steam.</p> <p><u>Recipients</u></p> <p>We make this personal data (excluding your Steam ID) publicly available in Game, and may display this information at live events.</p> |
| <p><u>Analytics processing activities</u></p> <p>We may process the following information whilst you play KILLRUN and KILLRUN Events Build so that we can understand usage of these Games, analyse and improve these Games, develop new services or functions, and identify and remedy problems and bugs:</p> <ul style="list-style-type: none"> • Steam ID (for KILLRUN) and username (for KILLRUN Events Build) • Steam display name (for KILLRUN) and the display names of your Steam friends who also play KILLRUN • Details on your location (including country, city and coordinates) • Dates of logins to KILLRUN and KILLRUN Events Build • Game play results (e.g. wins/losses, kills/deaths) • Game play progress • Game play time | <p>We process this information as it is necessary to perform our obligations for the purposes of our legitimate interests (being to promote the success of the Games, our business and the services), and such interests are not overridden by your interests or fundamental rights and freedoms.</p> | <p><u>Sources</u></p> <p>We collect this personal data through the use of the following tracking technology and analytics (as further described in Section 4 of this notice).</p> <p><u>Recipients</u></p> <p>PlayFab Inc (our analytics service provider), whose privacy notice can be accessed here: https://privacy.microsoft.com/en-us/privacystatement</p> |

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| <ul style="list-style-type: none"> • User interface usage (e.g. buttons clicked, screens viewed) • Hardware information (e.g. CPU, RAM, video card configuration) • Any purchases you have made in KILLRUN and KILLRUN Events Build • Identification of crashes and bugs | | |
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3. STORAGE, TRANSFERS AND DISCLOSURE

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| Data retention | We generally hold each Player's personal data, in respect of each Game, for ten years from the date they played the Game.] At the end of the retention period, we assess whether it is necessary to continue to retain information to achieve the purposes for which it was collected [taking into account the amount, nature, and sensitivity of the personal data, the potential risk of unauthorised access, and legal requirements]. |
| Storage & Transfers | We are based in the United Kingdom, regularly collaborate with an international network of partners and may from time to time use subcontractors based in other countries. As a result, there may be occasions where we transfer personal data to a country which does not provide an adequate level of protection. Where this is the case, we use contracts which give personal data the same protection it has in the UK. For more information drop us a line using the contact details at the start of this notice. |
| Disclosure | <p>We may disclose your personal data:</p> <ul style="list-style-type: none">• Where required by law, government, competent authorities or the courts or to establish, exercise or defend our legal rights, and for the purposes of preventing crime and fraud (for example, we may share personal data with our professional advisors, investigators, or credit reference agencies).• With suppliers and subcontractors, as necessary for the purposes set out in this notice.• With other members of our corporate group and our international network of partners.• If involved in an investment, merger, acquisition, or sale of our organisation or assets, personal data we hold may be shared on the basis of the legitimate interests of us, our shareholders, customers and other parties to a transaction, unless those interests are outweighed by prejudicial impacts upon you. |

4. COOKIES, ANALYTICS AND SIMILAR TECHNOLOGIES

Cookies, pixels and other technologies store and access data on your device to help websites and apps work. This table explains their purpose, how long they last, and who else can access their data. We get your consent to use them unless they're essential for the SafeMoon Products and Services.

Most browsers allow control over cookies, for more information: [Google Chrome](#) | [Microsoft Edge](#) | [Mozilla Firefox](#) | [Microsoft Internet Explorer](#) | [Opera](#) | [Apple Safari](#).

| Data | Duration | Purpose | Access |
|--|----------|----------------------------------|--|
| Steam ID | 10 Years | Steam Game Integration | We use [PlayFab Inc] to store this Data |
| Steam Display Name | 10 Years | Steam Game Integration | We use [PlayFab Inc] to store this Data |
| Game Play Progress | 10 Years | Track Star Unlocks & Owned Skins | We use [PlayFab Inc] to store this Data |
| Game Login Dates | 10 Years | Core PlayFab Functionality | We use [PlayFab Inc] to store this Data |
| Game Play Time | 10 Years | Core PlayFab Functionality | We use [PlayFab Inc] to store this Data |
| Hardware Information (e.g. CPU, RAM, video card configuration) | 10 Years | Core PlayFab Functionality | We use [PlayFab Inc] to store this Data |
| Identification of crashes and bugs | 10 Years | Core PlayFab Functionality | We use [PlayFab Inc] to store this Data |
| Steam ID | 90 Days | Sentry Error Monitoring | We use Sentry by FUNCTIONAL SOFTWARE, INC to store this Data |

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| Hardware Information (e.g. CPU, RAM, video card configuration) | 90 Days | Sentry Error Monitoring | We use Sentry by FUNCTIONAL SOFTWARE, INC to store this Data |
| Operating System & Version Number | 90 Days | Sentry Error Monitoring | We use Sentry by FUNCTIONAL SOFTWARE, INC to store this Data |
| Game Crash Dump (including: Engine version, build version, crash ID, game directory, time of crash, error logs...) | 90 Days | Sentry Error Monitoring | We use Sentry by FUNCTIONAL SOFTWARE, INC to store this Data |