

PRIVACY POLICY

This privacy policy (hereinafter also referred to as the Privacy Policy) contains information about how **Thomas Kralow LLC** (hereinafter also referred to as the Company, we, us) as a data controller, collects, uses and discloses personal data, as well as what measures it takes to protect personal data provided by the Company users and visitors to the Site (hereinafter also referred to as the User, you, your) including but not limited to when you receive the Services that we provide or may provide in the future through the Company.

By using our Services or any other related product or service, you agree to this Privacy Policy. Please read this Privacy Policy carefully each time before using accessing the Services, and before providing us with any information. If you do not agree to the terms of this Privacy Policy, do not access the Services or any other aspect of our operations.

1. DEFINITION OF TERMS

In this Privacy Policy, the following terms are used with the following meanings:

1.1. **Site** is an Internet resource owned by the Company, located on the global Internet at the address: <https://www.thomaskralowclub.com/game> (including its subdomains and sites translated into other languages) and which provides the User with access to the Company.

1.2. **Company, we, us** means Thomas Kralow LLC a company registered and operating under the laws of the state of Wyoming (USA), registration code: 84-4986687, legal address: 30 N Gould St, Ste R, Sheridan, WY 82801.

1.3. **User** means a person or organization that is using our services and Site; if you are acting on behalf of an organization, "your" and "you" mean both you, the

individual using services on Site, and the legal entity on whose behalf you are acting.

1.4. **Customer** means a person with whom you contact or will contact in the future using our services.

1.5. **Personal data** means data or a set of data that identifies a person. It can be anything, including:

- information that the User provides about themselves during registration (creating an account) or in the process of using the services on Site;
- information provided by the User about his Customer;
- data that is automatically transmitted to the Site services when the User uses them with the help of software installed on his device, including IP address, cookie data, information about the User's browser (or other program through which services are accessed), technical characteristics of hardware and software that the User uses, date and time of access to the services, addresses of requested pages and other similar information;
- any other information about the User or Customer, the processing of which is provided for in this Privacy Policy.

1.6. **Services** means providing access to tools and materials developed by Site. The list of Services we provide can be found on the Site at the link: <https://www.thomaskralowclub.com/game>

1.7. **IP address** is a unique network address of a node in a computer network built according to the IP protocol.

1.8. **Processing of personal data** means any operation or series of operations with personal data or sets of personal data with or without the use of automated means, such as collection, registration, organization, structuring, storage, adaptation or change, search, familiarization, use, disclosure through

transmission, distribution or otherwise making available, arrangement or combination, restriction, erasure or destruction.

1.9. **Confidentiality of personal data** is the requirement, mandatory for compliance by the person who has gained access to personal data, not to allow their distribution without the consent of the subject of personal data or the presence of another legal basis.

1.10. **Controller** means an individual or legal person, public authority, agency or other body that independently or jointly with others determines the purposes and means of personal data processing.

1.11. **Consent** means any freely given, specific, informed and unequivocal indication of the User's wishes, by which he or she, by making a statement or showing clear affirmative actions, confirms consent to the processing of his or her personal data.

Unless the context otherwise requires, a reference to one gender includes a reference to the other genders; words in the singular include the plural, and in the plural - the singular; any words following the terms "including", "in particular", "for example", "including but not limited to" or any similar expressions shall be construed as illustrative and shall not limit the meaning of the words, description, definition, a phrase or term preceding these terms; section headings do not affect the interpretation of this Privacy Policy.

2. GENERAL PROVISIONS

2.1. This Privacy Policy applies to data collected on the Site and any other resources used or owned by Site and Company. The Site includes any web pages, interactive features, applications, widgets, blogs, social media plug-ins, and online and offline offers that link to this Privacy Policy.

2.2. In order to provide the Services, we may collect personal data of the User and his customers.

2.3. We treat with great respect the personal data of all persons who have visited the Site, as well as those who use Site and our services. In this regard, we strive to protect the confidentiality of personal data, thereby creating and providing the most comfortable conditions when using Site and our services for each User.

2.4. This Privacy Policy explains what we do with personal data collected when you use the Site and our services. This Policy does not apply to the actions of companies not owned or controlled by us, or individuals not managed by us.

2.5. We control the ways we collect personal data and determine the purposes for which we use personal data. We are the personal data controller for personal data protection legislation.

2.6. By registering and using Site our Services or otherwise providing the appropriate consent on the Site, you thereby consent to the transfer of your personal data to us, their processing, storage, use, disclosure through transmission, distribution or otherwise providing, arrangement or combination, restriction, erasure or destruction, including by third parties, in accordance with this Privacy Policy.

2.7. To receive more detailed information related to the protection of personal data, if you have any questions or doubts about our processing of your personal data or want to submit a request, you can contact us by sending an e-mail with detailed information to the e-mail address: support@thomaskralow.com.

3. DATA WE COLLECT ABOUT YOU

3.1. Depending on how you use Site our services we may collect, process, store and transfer various types of personal data about you, including:

3.1.1. Data provided by the User. You voluntarily provide us with personal data subscribing to and using Site and our services consulting with support staff, sending us email messages, integrating Site with your website, social networks, blog and messengers or interacting with us in any other way. Information collected about you and your customers may include the following:

- first and last name or name of the organization;
- email address;
- postal address;
- a link to your website;
- information about the size of your organization;
- IP address;
- phone number;
- your account details, such as your account number or password;
- information provided by the User for the possibility of using the services.

By providing us with this information, you agree that we will collect, use, transfer, store and disclose it in accordance with the rules described in this Privacy Policy. The Company is entitled to send messages and marketing newsletters to you and you provide your consent and do not object to this.

3.1.2. *Technical data related to your use of the Site:* such as the IP address used to connect your device to the Internet, your login information (if applicable), browser type and version, location data (down to the city level), time zone settings, browser plug-in types and versions, operating system, information about your visit, including full URLs, clickstream to, through and from our Site (including date and time), page response time, loading errors, duration of visits to certain pages, information about interaction with the page (such as scrolling, clicking and hovering), methods used to navigate from the page, other technical data collected using cookies, pixel tags and other similar technologies that uniquely identify your browser

3.1.3. *Usage data*: such as information you have viewed or searched for and information about how you use our Site, Site and Services.

3.1.4. *Marketing data*: such as your preferences in receiving marketing from us and third parties.

3.1.5. *Communication data*: messages in chats with Site support, emails and registration forms, as well as your other messages and responses to our messages.

3.1.6. *Anonymous information*. We may create records of anonymous data with personal information that does not allow us to identify the user. We use this information to analyze request patterns and usage patterns. This information helps us improve Site, the Services and the navigation on our Site. We reserve the right to use anonymous information for any purpose and to disclose it to third parties at our sole discretion.

3.2. We also collect, process and provide aggregate data, such as statistical or demographic data, for any purpose. Aggregated data may be derived from your personal data, but is not considered personal data under applicable law because the data does not directly or indirectly reveal your identity. For example, we may aggregate your Site usage data to calculate the percentage of Users who access a particular feature of the Site, Site. However, if we combine or associate aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data that will be used in accordance with this Privacy Policy.

3.3. We do not collect any special categories of personal data about you (this includes information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political views, trade union membership, information about your health and genetic or biometric data).

4. PERSONAL DATA COLLECTION

4.1. We use various methods to collect personal data about our Users, including through:

- *Direct interaction with you.* You personally provide us with your personal data when interacting with us, namely: when you visit our Site, interact with Site; create an account; use our Services; submit a request to receive marketing information; participate in promotions and surveys; provide feedback or contact us, etc.;
- *Automated technologies or interactions.* As you interact with our Site, we may automatically collect technical data about your device, your actions, and browsing patterns. We collect these personal data using cookies, server logs, and other similar technologies. We may also receive technical data about you if you visit other websites that use our cookies;
- *Third parties.* We may receive personal data about you from third parties (for example, from a social media service provider through your registration or communication with us through an existing social media account; from a payment service provider in connection with the fact that you enter into an agreement on provision of services and pay a subscription; analytics providers, advertising networks, search information providers and technical providers, etc.).
- *Open sources to obtain information about you.* For example, receiving information from state authorities; publicly available information on the Internet.

We collect only those personal data (for example, first and last name or name of the organization, login and access password, e-mail address, contact phone number, etc.) that are knowingly and voluntarily provided by you as a subject of personal data for the purposes of using Site, Services, which in accordance with the requirements of the law is the consent of the subject of personal data to the processing of personal data in accordance with the purpose and goals of their processing formulated in this Policy.

5. PURPOSES OF THE PERSONAL DATA USAGE

5.1. We process your personal data only for the purpose of providing you with the Services that you ask us to provide you and to comply with legal obligations arising from the provision of the Services to you and our legitimate interests.

5.2. We will use and disclose Personal Data for the following purposes:

- to process and provide you with our Services, in particular, to register you as a new User, provide you with support and communicate with you, manage and verify transactions, collect and charge payments due to us, resolve disputes and fulfill agreements concluded between us, etc.;
- to manage our relationship with you, including sending you notifications through the channel you choose (e.g. email, other means of electronic communication you choose), in particular about changes to our Services, Site, Terms of Use or this Privacy Policy, requests for feedback or taking a survey, etc.;
- to constantly update our data about how the Users use Site and our Services;
- to collect market data to study the behavior of the Users, including their preferences, interests and how they use our Services, to define our marketing campaigns and to develop our business;
- to administer, update, maintain, protect and improve Site, the Site and the Services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and data posting);
- to store information containing personal data in backup systems;
- to disclose data to our service providers, agents, subcontractors and other related entities, our group companies and affiliates;
- to ensure compliance with the provisions described in the Terms of Use and applicable law;
- to ensure the safety and protection of the rights of our Users, third parties and our company;

- to comply with legal requirements and implement court orders, requests and other legal processes;
- to provide information to our representatives and advisers, including lawyers and accountants, who help us comply with legal, accounting and security requirements;
- to file lawsuits and protect interests in court trials, disputes and other court proceedings;
- to respond to requests from state bodies, in particular for the purpose of national security and compliance with the requirements of law enforcement agencies;
- for any other purpose for which you give your consent.

5.3. We may use your identity, contacts, profile, technical and usage data to form an idea of what we think you might need or be interested in. This is how we decide which Services and offers may be relevant to you (we call this marketing). You may receive marketing messages from us if you have requested information from us or purchased Services from us, and in each case, you have not opted out of receiving such marketing messages.

5.4. You can ask us to stop sending you marketing messages at any time by following the opt-out links in any marketing message sent to you or by contacting us at any time.

6. PERSONAL DATA DISCLOSURE

6.1. We maintain the confidentiality of personal data, except for cases where you yourself have provided the relevant information for general access to an unlimited number of people. By using certain features of Site, the Services, you agree that some of your personal data may become publicly available.

6.2. We do not sell, exchange, or transfer your personal data to any other company for any reason without your consent, except as specified in this Policy, including for the purpose of providing and improving the Services.

6.3. We reserve the right at any time to disclose any personal data we have collected: (i) when it is permitted or required by law; or (ii) to protect, prevent, investigate actual or potential fraud, security issues, technical problems, unauthorized transactions or other violations; or (iii) to enforce applicable terms of use or other agreements; or (iv) to protect our rights and safety, the rights or safety of our Users or the public as required or permitted by law; or (v) in the case you have consented to it. Also, we may transfer personal data to our successor in connection with a corporate merger, consolidation, partial or full sale of assets, bankruptcy or other corporate changes.

6.4. We share your personal data with our third-party service providers, agents, subcontractors and other related entities, our group companies and affiliates in order to operate the Services and provide the Services to you on our behalf. These companies include those we hire to manage the technical infrastructure necessary to provide the Services, help protect and secure our systems and the Services, and help promote our Services.

6.5. Our Site may contain links to the websites or services of our partner networks, advertisers, transaction processors, etc. If you link to any of these websites or services, please note that these websites and any services that may be available through them have their own privacy policies and we are not responsible for such policies or for any information, including personal data, that may be collected through these websites or services, such as contact and location data. Please read these policies before submitting any information or personal data to these websites or using these services.

7. SAFETY

7.1. We use appropriate methods of data collection, storage and processing and security measures for protection against unauthorized access, modification, disclosure, destruction or other processing of your personal data in violation of applicable laws. Only our authorized employees, agents and contractors (who have agreed to keep personal data secure and confidential) have access to personal data on an as-needed basis.

7.2. The exchange of personal data between Site and its Users is carried out through a secure SSL communication channel, encrypted and protected by digital signatures. Any payment transactions will be encrypted. If we have provided you with (or if you have chosen) a password that gives you access to certain parts of our Site service, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

7.3. You agree and acknowledge that the Internet can be subject to security breaches and that sending data over the Internet can be dangerous. We strive to use reasonable means to protect any personal data you provide us with access to, but we cannot guarantee its absolute security.

7.4. Depending on the nature of the risks associated with the proposed processing of your personal data, we will apply the following appropriate security measures:

- organizational measures (including but not limited to staff training and policy development);
- technical measures (including, but not limited to, physical data protection, pseudonymization and encryption);
- ensuring constant availability and integrity (including, but not limited to, ensuring adequate backup copies of personal data).

7.5. We have procedures in place to detect and resolve any suspected personal data breaches and will notify you and any relevant supervisory authority of the breach if we are required to do so by law.

8. PERSONAL DATA RETENTION

8.1. We will retain your personal data only as long as necessary for the purposes for which it was collected or as long as required by law. This period may continue after your relationship with us ends, but only as long as this is reasonably necessary for us to pursue our legitimate business interests, carry out audits, comply with (and demonstrate compliance with) legal obligations (for example, tax purposes), resolve disputes and enforce our agreements.

8.2. To determine the appropriate personal data retention period, we take into account the scope, nature and confidentiality of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and relevant legal requirements.

8.3. When we no longer need your personal data, we will destroy, delete or anonymize it.

9. SAFETY OF MINORS

9.1. We do not allow minors to use Site and receive the Services. We take safety issues very seriously, especially with regard to minors, and in this regard, we appeal to parents to explain to their children about Internet safety issues, their specific purpose and the need for using certain functions of Site and the Services available within it.

9.2. If the child's legal representatives become aware that the child's personal data has been provided to us, such legal representative must contact us with a request to delete such data. In this case, we will take measures to delete this information.

10. INTERNATIONAL CONFIDENTIALITY LAWS

10.1. We and our Site service operate in different countries of the world. Accordingly, personal data may be transferred to and stored in various countries around the world, including the European Union ("EU"), the United States of America and other countries in which our divisions and/or our counterparties operate. These regions often have different data protection standards. Understanding these differences, if we transfer personal data to other countries, we protect such information as described in this Privacy Policy.

10.2. We take appropriate measures to ensure that the transfer of personal data complies with applicable law and is carefully monitored to protect your privacy rights and your interests.

10.3. We guarantee adequate protection of received information (including personal data) to meet the requirements of cross-border transfer of personal data.

11. EUROPE RESIDENTS

11.1. If you are a resident of Europe, you have the right to access the information we retain about you and to request correction, update, restriction of processing or deletion of such information.

In addition, if you are a resident of Europe, please note that we process your information to fulfill agreements entered into with you (for example, if you have subscribed) or otherwise to pursue our legitimate business interests listed above.

12. USA RESIDENTS

12.1. If at any time you decide that you no longer want to receive information about us, our services, you can opt out by sending an appropriate email to our email address: support@thomaskralow.com.

13. CALIFORNIA RESIDENTS

13.1. California residents have the right to access their personal information in a portable format, request the correction or deletion of their personal information collected on the Site. If you wish to exercise this right, or if you have any questions about our privacy policy and compliance with California law, please contact us by sending an email to our email address.

14. CHANGES

14.1. We may change this Privacy Policy unilaterally, without prior notice. We will notify you of any changes by posting a new version of the Privacy Policy on the Site and by updating the "Last Updated" date at the top of this document. In addition, we may (but will not be obligated to) provide additional notice of changes by sending a notice to the account, email. By continuing to use Site, the Services, you agree to such changes. If you do not agree to the changes to this Privacy Policy, you should immediately stop using Site, the Services, or any other aspect of our business.

14.2. The new Policy enters into force from the moment of its publication on Site, unless otherwise provided by the new version of the Policy.

15. OUR CONTACTS:

ThomasKralow LLC

Registration code: 84-4986687,

Address: 30 N Gould St, Ste R, Sheridan, WY 82801

Email: support@thomaskralow.com