ALTO LUSSO LLC MASTER PRIVACY POLICY

This Master Privacy Policy (the "Policy") explains how Alto Lusso LLC ("Alto Lusso," "we," "us" or "our") collects, uses, shares and protects personal information across the Alto Lusso Products.

"**Alto Lusso Products**" means any game, app, website or service that we operate that uses the unified Alto Lusso account ("Account"). The Alto Lusso Products that are currently available are listed in Schedule 1 at the end of this Policy, as updated from time to time. Where this Policy refers to "the product" or "a product," it means the relevant Alto Lusso Product.

Alto Lusso Products share a single unified Account, and Account credentials, profile information and virtual currency balances may be synchronized across them. This Policy is therefore the single governing document for privacy and data-handling matters across all Alto Lusso Products. Each Alto Lusso Product is, unless Schedule 1 says otherwise, simulated social casino entertainment for adults aged 18 and older. None offers real-money gambling, and no real money or prize can be won or lost. A Supplemental Privacy Statement for California Consumers appears after Section 22.

SECTION 1: WHO WE ARE AND HOW TO CONTACT US

Alto Lusso LLC is a Delaware limited liability company.

General Support: support@altolussocasino.com

Privacy Rights Requests and Legal Notices: policy@altolussocasino.com

Mailing Address: Post Office Box 80, 1653 7TH ST, Santa Monica, CA 90401-9998, US

Account and Data Deletion: https://www.altolussocasino.com/delete-account

SECTION 2: SCOPE OF THIS POLICY

This Policy applies to personal information we collect in connection with the Alto Lusso Products, our websites, applications and mobile experiences, and communications between you and us. It applies when you create or use an Account; play on iOS, Android or web; sign in with a third-party identity provider; watch a rewarded video advertisement; make an in-app purchase through a Platform Store; contact support; participate in promotions, events or surveys; or otherwise interact with us. This Policy does not apply to third-party websites, applications or services linked from our products, including Apple, Google and advertisers, which are governed by their own privacy policies.

SECTION 3: INFORMATION WE COLLECT

Depending on the products you use and how you interact with us, we may collect the following categories of personal information.

3.1 Account and Profile Information. Username, email address (including a private relay email address, where you use Sign in with Apple), exact date of birth and your confirmation that you are at least 18, password (stored in hashed form), authentication method, unique Account identifiers, language preference, avatar and profile settings. This information is shared across all Alto Lusso Products.

3.2 Contact Information. Name, email address, and similar details you give us, including when you contact support or participate in promotions.

3.3 Age and Identity Verification Information. Date of birth, age confirmation and the results of age-screening checks. We do not require identity verification at standard registration. Where we have reason to believe an Account holder may be under 18, or where required for fraud prevention, legal compliance, dispute resolution

or Account security, we may request additional proof of age or identity, which may include a government-issued identification document, which we collect only for that purpose.

3.4 Gameplay and In-Game Activity. Game history and outcomes, simulated bets and results, virtual currency balances (such as Gold Coins and Diamonds) and transaction history (including exchanges, Playthrough progress and Cracked Diamond or Matured Diamond status), Virtual Item ownership, rewards claimed, session start and end times, in-game events, preferences and settings.

3.5 Social Interaction Data. In any social features an Alto Lusso Product offers, text messages, chat logs (where permitted), friend lists, social connections, avatar customizations and interactions with other players.

3.6 Purchase and Transaction Information. Transaction identifiers, timestamps, product identifiers (SKUs), purchase status, refunds, reversals and related logs. Payment card numbers and billing credentials are collected and processed solely by Apple and Google, as described in Section 10.

3.7 Device, Network and Identifier Information. Device model, operating system and version, device and online identifiers, Apple Identifier for Advertisers (IDFA) where permitted, Identifier for Vendors (IDFV), Google Advertising ID (GAID), app-instance identifiers, IP address, internet service provider, browser type and version, language and time-zone settings, device performance data, and crash and diagnostic reports.

3.8 Usage and Activity Information. Access times, screens and pages viewed, links clicked, session duration, interaction behavior, referring URLs, clickstream data and standard server log information.

3.9 Advertising Information. Information about advertisements shown to you, including ad impressions, completions of Rewarded Video Ads, clicks, ad-interaction events, and device and advertising identifiers and signals processed by Google AdMob and Google AdSense, as described in Section 8.

3.10 Location Data. Approximate location derived from your IP address. We do not collect precise device location unless you grant permission and a feature requires it. We use location to apply legal and regional restrictions, prevent fraud and personalize the experience.

3.11 Communications and Support Information. The contents of messages you send us, including support tickets, emails and feedback, and related metadata.

3.12 Third-Party Login Information. Information we receive from Apple or Google when you use a Federated Login, as described in Section 9.

3.13 User-Generated Content. Content you create or share through our products, such as avatar elements and in-game messages.

3.14 Demographic Information. Where voluntarily provided or required by law, information such as country, language and age.

SECTION 4: HOW WE COLLECT PERSONAL INFORMATION

4.1 Directly From You, when you create or maintain an Account, play, make a purchase, contact support, participate in promotions, events or surveys, submit content, or otherwise communicate with us.

4.2 Automatically, when you install, access or use any Alto Lusso Product on any device, through cookies, SDKs, pixels, server logs and similar technologies, including when you interact with advertisements or open our emails.

4.3 From Third Parties, including: Platform Partners (such as Apple and Google) in connection with in-app purchases, entitlements and account sign-in; identity providers when you use Sign in with Apple or Sign in with Google; advertising networks, including Google AdMob and Google AdSense; analytics, security and fraud-prevention providers; age and identity verification providers, where used; and publicly available sources.

SECTION 5: HOW WE USE YOUR PERSONAL INFORMATION

We process personal information only where we have a lawful basis: to perform our contract with you, to comply with a legal obligation, with your consent, or for our legitimate interests where they are not overridden by your rights. The table summarizes our purposes across all Alto Lusso Products.

Purpose of Processing	Lawful Basis
Create and administer your Account, including unified login and cross-platform synchronization	Performance of contract
Provide and operate the Alto Lusso Products, including gameplay and social features	Performance of contract
Process in-app purchases and credit virtual currency; maintain balance, exchange and Playthrough records	Performance of contract
Deliver Rewarded Video Ads and grant rewards	Performance of contract / Consent
Show advertising, including personalized advertising where you permit it, and measure ad performance	Consent / Legitimate interests
Authenticate you through Sign in with Apple or Sign in with Google	Performance of contract / Consent
Send transactional and administrative communications (confirmations, service alerts, policy updates)	Performance of contract
Provide customer support and respond to requests	Performance of contract / Legitimate interests
Verify age and eligibility, and enforce our 18+ restriction	Legal obligation / Legitimate interests
Detect, prevent and investigate fraud, bugs and exploits, ad manipulation, cheating, account trading, abuse and security incidents	Legitimate interests / Legal obligation
Enforce our Terms of Service and End User License Agreement	Performance of contract / Legitimate interests
Comply with applicable laws and lawful governmental requests	Legal obligation
Analytics, debugging, performance monitoring and development of new features	Legitimate interests
Personalize the experience	Legitimate interests / Consent
Send marketing communications where permitted by law	Consent
Tailor and send promotions and offers, including birthday-month offers based on your date of birth	Consent / Legitimate interests
Administer promotions, in-game events and seasonal content	Performance of contract / Consent
Process account deletion requests and keep records of them	Legal obligation / Legitimate interests
Protect the rights, safety and property of Alto Lusso, our users and the public	Legitimate interests / Legal obligation

We use the exact date of birth you provide to confirm that you are at least 18 and, unless you opt out as described in Section 18, to tailor and send promotions and offers to you during your birthday month. We may also process personal information for other purposes compatible with those described here and will update this Policy if we do so. We do not use personal information to target advertising to anyone we know to be under 18, and we do not process personal information of minors for any purpose other than deleting it and closing their Account.

SECTION 6: HOW WE SHARE YOUR PERSONAL INFORMATION

We do not sell your personal information for money. We do not sell or share the personal information of anyone we know to be under 18. We may disclose personal information to the following categories of recipients.

6.1 Service Providers and Vendors. Hosting, cloud storage, analytics, crash reporting, customer support, security, fraud-prevention, messaging and age-verification providers that process personal information on our behalf under contracts requiring them to use it only as we direct and in line with this Policy.

6.2 Platform Partners. We exchange limited transaction, entitlement and Account-related data with Apple and Google, and with other operators of Platform Stores, to validate purchases and deliver Virtual Items, and, if you dispute a payment with a Platform Partner, to help investigate and resolve the dispute. Platform Partners process payments and operate their stores under their own privacy policies.

6.3 Advertising Networks. We work with Google AdMob and Google AdSense, which collect and receive information through our apps and web versions to serve, measure and secure advertising, including Rewarded Video Ads, as described in Section 8. Where you permit personalized advertising, these networks may use advertising identifiers and activity data to show ads based on your interests across apps and sites. Under some US state privacy laws, this may be treated as "sharing" of personal information for cross-context behavioral advertising or as "targeted advertising." You can stop this at any time using the controls in Sections 7, 8 and 19. If you opt out, we will show only non-personalized advertising.

6.4 Identity Providers. If you use Sign in with Apple or Sign in with Google, we exchange authentication data with Apple or Google as described in Section 9.

6.5 Fraud, Safety and Legal Compliance. We may disclose personal information to law enforcement, regulators, courts and other third parties where reasonably necessary to detect, prevent or investigate fraud, bugs and exploits, ad manipulation, account trading, abuse or security incidents; to comply with law or legal process; to respond to lawful governmental requests; to protect the rights, safety or property of Alto Lusso, our users or the public; or to enforce our Terms of Service and End User License Agreement.

6.6 Corporate Transactions. In connection with a merger, acquisition, financing, reorganization, bankruptcy or sale of assets, personal information may be disclosed or transferred to the relevant parties, subject to appropriate confidentiality protections and applicable law.

6.7 With Your Consent or at Your Direction. We may share personal information with other parties when you consent or direct us to do so.

6.8 Aggregated and De-Identified Data. We may share aggregated or de-identified information that cannot reasonably be used to identify you. We maintain it in de-identified form and do not attempt to re-identify it.

SECTION 7: APP TRACKING TRANSPARENCY AND MOBILE ADVERTISING IDENTIFIERS

7.1 Identifiers We May Use. On iOS, the Apple Identifier for Advertisers (IDFA) and Identifier for Vendors (IDFV); on Android, the Google Advertising ID (GAID) and app-set ID; and, on the web, cookies and similar identifiers. Advertising identifiers are used by our advertising partners for ad delivery, frequency capping, measurement, fraud prevention and, where you permit it, interest-based advertising.

7.2 Apple App Tracking Transparency (ATT). Apple's App Tracking Transparency framework requires apps to ask permission before "tracking" users across other companies' apps and websites or accessing the IDFA. Our iOS apps show the system permission prompt, with an explanation of our use, at a point early in your first sessions, before any advertising identifier is used for tracking. We respect your choice: if you select "Ask App Not to Track" (or have turned off tracking for all apps), we do not access the IDFA, and we do not use or share data from our app to track you across other companies' apps and websites. In that case, advertisements are

non-personalized, and you will still be able to watch Rewarded Video Ads. If you allow tracking, personalized advertising may be shown to you.

7.3 Changing Your iOS Choice. You can change your selection at any time in iOS Settings under Privacy & Security, then Tracking, where you can enable or disable tracking for each of our apps. You can also limit ad personalization in iOS Settings under Privacy & Security, then Apple Advertising.

7.4 Android Advertising Controls. On Android, you can opt out of ad personalization, or reset or delete your advertising ID, in your device Settings under Privacy, then Ads. When you opt out or delete your advertising ID, we and our ad partners do not use the GAID for personalized advertising and receive only non-personalized signals or a zeroed identifier.

7.5 In-App Controls. In the app under Account Settings, then Privacy, you can manage ad personalization and opt out of sharing for targeted advertising. Your choice applies across the Alto Lusso Products linked to your Account where technically possible, and device-level choices always take priority.

7.6 Web Choices. On our web versions, you can manage cookies and advertising preferences through the cookie controls provided there and through your browser. We treat a Global Privacy Control signal as a request to opt out of sharing for targeted advertising for that browser.

7.7 Declining Does Not Affect Gameplay. Declining tracking or turning off ad personalization does not affect your access to gameplay, your Account or your Virtual Items. You may see the same number of advertisements, but they will be less relevant to you.

SECTION 8: AD NETWORKS AND MONETIZATION DISCLOSURES

8.1 Google AdMob (Mobile). Our mobile apps include the Google Mobile Ads SDK. Through the SDK, Google collects and processes information including device and advertising identifiers, IP address, device and operating system information, app information, ad impression, click and completion events, and approximate location derived from the IP address. Google uses this information to deliver, measure and optimize advertisements, to prevent fraud and invalid traffic, and, where permitted, to personalize ads.

8.2 Google AdSense (Web). Our web versions use Google AdSense, which uses cookies and similar technologies, and processes IP address, browser and device information, and page and ad interaction data, for the same purposes.

8.3 Rewarded Video Ads. If you choose to watch a Rewarded Video Ad, the ad network serves the advertisement and confirms completion. To grant your reward securely, we and the ad network process your Account or user identifier, a reward-verification transaction identifier, timestamps and ad-completion status. We use this to credit Gold Coins, to prevent duplicate claims and to detect botting and ad manipulation.

8.4 Google's Policies and Controls. Google acts as an independent controller or business for some of this processing. How Google uses information from sites and apps that use its services is described at https://policies.google.com/technologies/partner-sites, and you can manage Google ad personalization at https://adssettings.google.com.

8.5 Our Role. We do not control the content of third-party advertisements, and we do not give advertisers your name, email address or Account details. Advertising is not directed at minors.

SECTION 9: THIRD-PARTY FEDERATED AUTHENTICATION

9.1 Sign in with Apple. If you use Sign in with Apple, Apple authenticates you and gives us a unique Apple user identifier, an authorization token, and, if you choose to share them, your name and email address. If you choose "Hide My Email," Apple gives us a unique private relay email address that forwards messages to your

personal email, and we treat that relay address as your email address. Apple's processing is governed by Apple's privacy policy. Apple does not give us your Apple ID password.

9.2 Sign in with Google. If you use Sign in with Google, Google authenticates you and gives us a unique Google Account identifier, your profile name and email address, and, if available, your profile picture and email-verification status. Google's processing is governed by Google's privacy policy. Google does not give us your Google password.

9.3 How We Use This Information. We use it to create and secure your Account, authenticate you across the Alto Lusso Products, communicate with you about your Account, and prevent duplicate and fraudulent Accounts. We do not use it to access your contacts, files or other data held by Apple or Google.

9.4 Managing Connections. You can review or revoke the connection between your Account and Apple or Google in your Apple ID or Google Account settings. When you delete your Account, we revoke the authorization tokens we hold for these providers. Revoking a connection outside our products does not by itself delete your Account or data, so please use the deletion tools in Section 13 if you want your Account deleted.

SECTION 10: IN-APP PURCHASE PRIVACY

All purchases of virtual currency on iOS are processed solely by Apple In-App Purchase, and on Android solely by Google Play Billing. Payment card numbers, bank details and other billing credentials are collected and processed solely by Apple and Google under their own privacy policies, and we do not receive, process or store them. We receive only limited information needed to credit your Account and keep records: transaction identifiers, timestamps, product identifiers (SKUs), purchase status and, where provided, refund or reversal notices. No purchases or payment processing take place on our web versions unless Schedule 1 says otherwise.

SECTION 11: COOKIES AND TRACKING TECHNOLOGIES

On our web versions and websites, and through the SDKs in our apps, we and our service providers use cookies, pixels, local storage, SDKs, web beacons and similar technologies for: (a) strictly necessary purposes, such as authentication, session management and security, which cannot be disabled; (b) preferences, to remember your settings; (c) analytics, to understand usage and improve performance; (d) advertising, to deliver and measure ads through Google AdSense and Google AdMob; and (e) security and fraud prevention. Where required by law, we ask for your consent before using non-essential cookies on the web. You can manage cookies in your browser and through the controls on the web versions, but disabling some cookies may affect functionality. Our emails may include web beacons to determine whether messages are opened.

SECTION 12: DATA RETENTION

We retain personal information for as long as reasonably necessary to provide our products and maintain your Account; to comply with legal, tax and accounting obligations; to resolve disputes and enforce our agreements; to prevent fraud, bugs and exploits, ad manipulation and account trading; and for the other purposes in this Policy. Retention periods depend on the type of information, its purpose and applicable law. Chat logs are kept only for as long as needed for moderation, safety and dispute resolution. When we no longer need personal information, we delete it or de-identify it.

SECTION 13: SELF-SERVICE ACCOUNT AND DATA DELETION

13.1 How to Delete Your Account. You can delete your Account and associated personal information yourself, without contacting us, in either of two ways: (a) in the app, open Account Settings and select Delete Account, then follow the prompts to confirm; or (b) visit https://www.altolussocasino.com/delete-account, sign in to your Account, and follow the instructions. This process is available to all users, including those who registered

through Sign in with Apple or Sign in with Google. If you cannot sign in, email policy@altolussocasino.com from your Account email address and we will help you complete your request.

13.2 What Happens When You Delete. Deletion is permanent. Because your Account is unified, deleting it deletes your Account for every Alto Lusso Product on every platform. All unspent Gold Coins, Cracked Diamonds, Matured Diamonds and other Virtual Items, and all progress, are forfeited and cannot be restored or refunded, as stated in the Terms of Service. Deleting your Account does not cancel any subscription or purchase record held by Apple or Google, which you must manage with them.

13.3 Timing. We begin processing your request immediately. We delete or de-identify your personal information from our active systems within thirty (30) days of your request, and it is removed from our backups within ninety (90) days thereafter as backups are overwritten in the ordinary course.

13.4 Information We May Retain. We may retain limited information where we are legally required to, or where necessary for a legitimate purpose that survives deletion, including: transaction records needed for tax, accounting and legal compliance; records needed to detect and prevent fraud, bugs and exploits, abuse, ad manipulation and account trading, and to enforce our Terms; information subject to a legal hold or pending dispute; and a record of your deletion request. Retained information is restricted to those purposes and is deleted when no longer required.

13.5 Deleting Data Without Closing Your Account. You may ask us to delete specific personal information without deleting your Account by contacting policy@altolussocasino.com, subject to the exceptions in Section 13.4 and the fact that some information is needed to operate your Account.

SECTION 14: SECURITY OF PERSONAL INFORMATION

We maintain administrative, technical and physical safeguards designed to protect personal information against unauthorized access, loss, misuse, alteration and disclosure, including encryption in transit, access controls, secure development practices and security monitoring. Access is limited to personnel and service providers with a need to know. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. We may need to verify your identity before disclosing personal information or acting on certain requests. If you believe your interaction with us is no longer secure, contact policy@altolussocasino.com immediately.

SECTION 15: CHILDREN'S PRIVACY, COPPA AND THE 18+ RESTRICTION

15.1 18+ Only. All Alto Lusso Products are strictly for individuals who are at least eighteen (18) years of age. They are not directed to children or teenagers, and we do not knowingly collect personal information from anyone under 18.

15.2 Age Verification Mechanisms. At registration we apply a neutral age screen that requires you to enter your exact date of birth and to confirm that you are at least 18, and we do not permit registration if you indicate that you are under 18. We rely on age and account signals from Apple, Google and other Platform Partners where available, and on our own monitoring, moderation reports and support contacts. Where we have reason to believe an Account holder is under 18, we may restrict the Account and require proof of age before access is restored.

15.3 Immediate Termination and Deletion. If we learn that an Account belongs to, or that we have collected personal information from, a person under 18, we will immediately terminate the Account, forfeit its Virtual Items, and delete the associated personal information from our systems, except for the minimal information we must keep to prevent re-registration and to comply with law. The Terms of Service state the consequences for Virtual Items.

15.4 COPPA. We do not knowingly collect, use or disclose personal information from children under 13, in compliance with the Children's Online Privacy Protection Act ("COPPA"). If we discover that a child under 13 has created an Account or provided personal information, we will permanently delete that information and terminate the Account. Parents and guardians who believe a child has provided us with personal information may contact policy@altolussocasino.com to request review and deletion.

15.5 No Targeted Advertising to Minors. We do not knowingly serve personalized or interest-based advertising to anyone under 18, and we do not knowingly sell, share or use for advertising the personal information of anyone under 18.

SECTION 16: THIRD-PARTY LINKS AND SERVICES

Our products may contain links to third-party websites, applications or services, including advertisers. We are not responsible for their privacy practices, which are governed by their own policies. We encourage you to read those policies.

SECTION 17: INTERNATIONAL USERS AND DATA TRANSFERS

Alto Lusso LLC is located in the United States, and personal information is processed in the United States and in other countries where our service providers operate. Where we transfer personal information of individuals in the European Economic Area, the United Kingdom or Switzerland, we do so using appropriate safeguards, such as the European Commission's Standard Contractual Clauses and the UK International Data Transfer Addendum, or another lawful transfer mechanism. Data protection laws in other countries may differ from those of your home country. Where our processing is based on consent, you may withdraw it at any time. If you are in the EEA, UK or Switzerland, you also have the right to lodge a complaint with your local data protection authority.

SECTION 18: MARKETING CHOICES

You can opt out of marketing emails at any time using the unsubscribe link in the message, in the app under Account Settings, or by contacting us. This includes birthday-month promotions and offers that we tailor using your date of birth. Opting out of marketing does not stop transactional or service communications, and we will still use your date of birth to confirm your age. You can control advertising preferences as described in Sections 7 and 8.

SECTION 19: YOUR PRIVACY RIGHTS

Depending on where you live, applicable laws may give you the following rights: **access** (to know whether we process your personal information and obtain a copy); **rectification** (correction of inaccurate information); **deletion**; **restriction** of processing in certain circumstances; **objection** to certain processing, including processing for targeted advertising; **portability** (receiving your information in a structured, commonly used, machine-readable format); **withdrawal of consent**; **opt-out of sale, sharing or targeted advertising**; **appeal** of a refusal of your request; **complaint** to a supervisory authority or data protection regulator in your jurisdiction; and **non-discrimination** for exercising your rights.

How to Exercise Your Rights. You can delete your Account and manage ad personalization yourself in the app under Account Settings, and you can delete your Account at https://www.altolussocasino.com/delete-account. For any other request, email policy@altolussocasino.com with your name, the email address associated with your Account, your state or country of residence and the nature of your request. We may need to verify your identity before acting. We respond within the period required by applicable law, which is generally forty-five (45) days or less, and we will tell you if we need more time and why.

Appeals. If we decline your request, you may appeal by emailing policy@altolussocasino.com with the subject line "Privacy Appeal" and explaining your concern. We will respond in writing within the period required by law and, if we deny the appeal, tell you how to contact your state attorney general or other authority.

Opt-Out Preference Signals and Do Not Track. We treat a Global Privacy Control signal received from your browser as a valid request to opt out of sale and of sharing for targeted advertising for that browser, and where we can associate it with your Account, for your Account. Because there is no uniform standard for "Do Not Track" browser signals, we do not respond to them separately.

Scope. We honor the rights that applicable law gives you, and you may consult your local law to see which rights apply to you.

SECTION 20: CHANGES TO THIS POLICY

We may update this Policy from time to time and will update the Effective Date at the top. We may add, rename or remove Alto Lusso Products in Schedule 1 by updating the Schedule and the Effective Date. If we launch an Alto Lusso Product with materially different data practices, we will update this Policy to describe them and give notice before those practices begin. If we make other material changes, we will give notice as required by law, which may include a prominent notice in our products or an email to your Account address. Your continued use of our products after the effective date of an update means you accept it, to the extent permitted by law. Where the law requires your consent to a material change, we will ask for it.

SECTION 21: RELATIONSHIP TO TERMS OF SERVICE

Alto Lusso maintains separate Terms of Service for each Alto Lusso Product, together with an End User License Agreement where a product is distributed as downloadable software. Those documents govern gameplay, virtual currencies and your contractual relationship with us. This Policy is the single governing document for privacy, data collection, use, sharing, retention and deletion across all Alto Lusso Products. If a product-specific document addresses a privacy matter differently, this Policy controls. If there is a conflict between this Policy and a translation, the English version controls.

SECTION 22: CONTACT US

Alto Lusso LLC, a Delaware Limited Liability Company

General Support: support@altolussocasino.com

Privacy Rights Requests and Legal Notices: policy@altolussocasino.com

Mailing Address: Post Office Box 80, 1653 7TH ST, Santa Monica, CA 90401-9998, US

Account and Data Deletion: https://www.altolussocasino.com/delete-account

SUPPLEMENTAL PRIVACY STATEMENT FOR CALIFORNIA CONSUMERS (CCPA/CPRA)

This Supplemental Privacy Statement for California Consumers (the "California Statement") applies to natural persons who reside in California and supplements the Policy above. It is provided under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (together, the "CCPA"). Terms such as "personal information," "sell," "share" and "sensitive personal information" have the meanings the CCPA gives them. Personal information does not include publicly available, de-identified or aggregate information.

Categories of Personal Information We Collected in the Preceding 12 Months, and Why. The table lists the categories we collect across the Alto Lusso Products, the business purposes for which we use them (as

described in Section 5 of the Policy), and the categories of recipients to whom we disclose them (as described in Section 6).

Category (CCPA)	Examples	Disclosed to
Identifiers	Username, email or Apple private relay address, Account ID, IP address, device IDs, IDFA, IDFV, GAID	Service providers; Platform Partners; identity providers; advertising networks; fraud and compliance partners
Customer records (Cal. Civ. Code § 1798.80(e))	Name, email address, and, if you provide it, other contact details	Service providers; identity providers; fraud and compliance partners
Characteristics of protected classifications	Age or exact date of birth, used for the 18+ restriction and for birthday-month promotions	Service providers; age-verification providers
Commercial information	Purchase and transaction records, product SKUs, virtual currency balances, exchanges and Playthrough records	Service providers; Platform Partners
Internet or other electronic network activity	Gameplay, session data, app and web usage, ad interactions and Rewarded Video Ad completions	Service providers; advertising networks; fraud and compliance partners
Geolocation data	Approximate location derived from IP address	Service providers; advertising networks; fraud and compliance partners
Sensitive personal information	Account log-in with password; government-issued ID, if you submit it for age verification; precise geolocation, only if you grant permission	Service providers; age-verification providers
Inferences	Preferences and characteristics inferred from usage	Service providers

Sources. We collect personal information directly from you, automatically from your devices and use of our products, and from Platform Partners, identity providers, advertising networks and service providers, as described in Section 4.

Sale and Sharing. We do not sell personal information for money or other valuable consideration, and we have not sold personal information in the preceding 12 months. We do not knowingly sell or share the personal information of consumers under 16. When you permit personalized advertising, our advertising networks (Google AdMob and Google AdSense) collect identifiers, internet or other electronic network activity and advertising information through our products, which may constitute "sharing" for cross-context behavioral advertising under the CCPA. We have shared these categories for that purpose in the preceding 12 months.

Your Right to Opt Out of Sharing. You may opt out of sharing for cross-context behavioral advertising at any time: (a) in the app under Account Settings, then Privacy; (b) by declining tracking on iOS or opting out of ad personalization on Android, as described in Section 7; (c) on the web, through the cookie and privacy controls provided there or by sending a Global Privacy Control signal; or (d) by emailing policy@altolussocasino.com. We will not ask you to reconsider for at least twelve (12) months, and we do not penalize you for opting out.

Sensitive Personal Information. We use sensitive personal information only for purposes permitted by the CCPA without a right to limit, such as providing the products you request, security and fraud prevention, and verifying age. We do not use or disclose it to infer characteristics about you.

Retention. We retain each category of personal information for as long as described in Sections 12 and 13 of the Policy and delete it afterward as described there.

Your California Rights. You have the right to: (1) **know** the categories and specific pieces of personal information we collected about you, the sources, the business purposes and the categories of recipients; (2) **delete** personal information we collected from you, subject to exceptions; (3) **correct** inaccurate personal information; (4) **opt out** of the sale and sharing of personal information; (5) **limit** the use and disclosure of sensitive personal information, where we use it beyond the permitted purposes (we do not currently do so); and (6) **non-discrimination** for exercising your rights. We will not deny you the products, charge you different prices, or give you a different quality of service because you exercised these rights.

How to Submit a Request. Delete your Account at https://www.altolussocasino.com/delete-account or in the app under Account Settings. For other requests, email policy@altolussocasino.com with your full name, the email address associated with your Account, confirmation that you are a California resident and the nature of your request. As an online-only business that interacts with consumers exclusively online, we accept requests by email and through the in-app and web tools above. We must verify your identity by matching information you provide to information we hold; if we cannot do so initially, we may request additional information.

Authorized Agents. You may designate an authorized agent to submit a request on your behalf. We require a written authorization signed by you, or a valid power of attorney, and we may still ask you to verify your identity directly with us.

Notice of Financial Incentive. Rewarded Video Ads give you optional Gold Coins in exchange for watching an advertisement. The Gold Coins have no real-world monetary value. Participation is voluntary, and we do not treat the personal information collected through it as having a quantifiable monetary value beyond the business value of ad delivery. You may withdraw from watching ads at any time.

California Civil Code § 1798.83. California residents may request information about the disclosure of personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties for their own direct marketing purposes without your consent. Contact policy@altolussocasino.com for more information.

Changes to This California Statement. We may update this California Statement at any time and will update the Effective Date of the Policy when we do.

SCHEDULE 1: ALTO LUSSO PRODUCTS

This Schedule lists the Alto Lusso Products that are currently available and is part of this Policy. Updating this Schedule to add or rename a product, together with the Effective Date, is how we reflect those changes; see Section 20 for products with materially different data practices.

Alto Lusso Product	Description	Platforms
[Alto Lusso Games]	Simulated social casino game for entertainment only, for adults aged 18 and over. No real-money gambling. Web version is for gameplay only, with no purchases.	iOS (Apple App Store), Android (Google Play Store), Web