### **Moonfire Entertainment Privacy Policy**

Type of website: Portfolio Effective date: 22nd day of April, 2024

**Moonfire Entertainment** (the "trading name") is owned and operated by Moonfire Entertainment Holdings. Moonfire Entertainment Holdings is the data controller and can be contacted at:

privacy@moonfireent.org	
Horsham, Victoria Australia, 3400	

#### **Purpose**

The purpose of this privacy policy (this "Privacy Policy") is to inform users of our Site of the following:

- 1. The personal data we will collect;
- 2. Use of collected data;
- 3. Who has access to the data collected;
- 4. The rights of Site users; and
- 5. The Site's cookie policy.

This Privacy Policy applies in addition to the terms and conditions of our Site.

#### **GDPR**

For users in the European Union, we adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

We have not appointed a Data Protection Officer as we do not fall within the categories of controllers and processors required to appoint a Data Protection Officer under Article 37 of the GDPR.

# Consent

By using our Site users agree that they consent to:

1. The conditions set out in this Privacy Policy.

When the legal basis for us processing your personal data is that you have provided your consent to that processing, you may withdraw your consent at any time. If you withdraw your consent, it will not make processing which we completed before you withdrew your consent unlawful.

You can withdraw your consent by: Contacting Moonfire Entertainment Holdings.

## **Legal Basis for Processing**

We collect and process personal data about users in the EU only when we have a legal basis for doing so under Article 6 of the GDPR.

We rely on the following legal bases to collect and process the personal data of users in the EU:

- 1. Users have provided their consent to the processing of their data for one or more specific purposes; and
- 2. Processing of user personal data is necessary for us to comply with a legal obligation. If a user does not provide the personal data necessary for us to perform a legal obligation the consequences are as follows: Nothing will occur.

### **Personal Data We Collect**

We only collect data that helps us achieve the purpose set out in this Privacy Policy. We will not collect any additional data beyond the data listed below without notifying you first.

### Data Collected in a Non-Automatic Way

We may also collect the following data when you perform certain functions on our Site:

- 1. First and last name;
- 2. Age;
- 3. Email address;
- 4. Phone number; and
- 5. Address.

This data may be collected using the following methods:

1. Playing our games on Roblox.

### **How We Use Personal Data**

Data collected on our Site will only be used for the purposes specified in this Privacy Policy

or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

The data we collect when the user performs certain functions may be used for the following purposes:

- 1. General Website Use;
- 2. Communication; and
- 3. Administrator Access.

# Who We Share Personal Data With

## **Employees**

We may disclose user data to any member of our organisation who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

#### Other Disclosures

We will not sell or share your data with other third parties, except in the following cases:

- 1. If the law requires it;
- 2. If it is required for any legal proceeding;
- 3. To prove or protect our legal rights; and
- 4. To buyers or potential buyers of this company in the event that we seek to sell the company.

If you follow hyperlinks from our Site to another Site, please note that we are not responsible for and have no control over their privacy policies and practices.

### **How Long We Store Personal Data**

User data will be stored until the purpose the data was collected for has been achieved.

You will be notified if your data is kept for longer than this period.

## **How We Protect Your Personal Data**

To protect your security, Moonfire Entertainment does not hold user data other than an email and geolocation.

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet as a whole can be insecure at times and therefore we are unable to guarantee the security of user data beyond what is reasonably practical.

# Your Rights as a User

Under the GDPR, you have the following rights:

- 1. Right to be informed;
- 2. Right of access;
- 3. Right to rectification;
- 4. Right to erasure;
- 5. Right to restrict processing;
- 6. Right to data portability; and
- 7. Right to object.

### Children

The minimum age to use our website is 13 years of age. We collect the personal data of children under 16 years of age. We only collect the personal data of children under 16 years of age with the express consent of their parents or guardians. This consent is collected as follows:

1. When playing our games Roblox collects your information which goes over Roblox terms and conditions.

Please see our *Children's Privacy Policy* for additional information on how we deal with children's personal data.

# How to Access, Modify, Delete, or Challenge the Data Collected

If you would like to know if we have collected your personal data, how we have used your personal data, if we have disclosed your personal data and to who we disclosed your personal data, if you would like your data to be deleted or modified in any way, or if you would like to exercise any of your other rights under the GDPR, please contact our privacy officer here:

Ryder Reid				
privacy@moonfireent.org	vacy@moonfireent.org			
Horsham, Victoria Australia, 3400				

### How to Opt-Out of Data Collection, Use or Disclosure

In addition to the method(s) described in the How to Access, Modify, Delete, or Challenge

the Data Collected section, we provide the following specific opt-out methods for the forms of collection, use, or disclosure of your personal data specified below:

1. You can Opt-Out by contacting Moonfire Entertainment Holdings. You can opt-out by you can Opt-Out by contacting Moonfire Entertainment Holdings.

## **Cookie Policy**

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits. You can choose to be notified each time a cookie is transmitted. You can also choose to disable cookies entirely in your internet browser, but this may decrease the quality of your user experience.

We use the following types of cookies on our Site:

### 1. Functional cookies

Functional cookies are used to remember the selections you make on our Site so that your selections are saved for your next visits; and

# 2. Third-Party Cookies

Third-party cookies are created by a website other than ours. We may use third-party cookies to achieve the following purposes:

a. The functionality of the website.

### **Modifications**

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

### **Complaints**

If you have any complaints about how we process your personal data, please contact us through the contact methods listed in the *Contact Information* section so that we can, where possible, resolve the issue. If you feel we have not addressed your concern in a satisfactory manner you may contact a supervisory authority. You also have the right to directly make a complaint to a supervisory authority. You can lodge a complaint with a supervisory authority by contacting the Moonfire Entertainment Holdings Office in AUS..

#### **Contact Information**

If you have any questions, concerns or complaints, you can contact our privacy officer, Ryder Reid, at:

privacy@moonfireent.org
Horsham, Victoria Australia, 3400

# Children's Privacy Policy Website: www.moonfireent.org (the "Site")

This Children's Privacy Policy supplements the www.moonfireent.org Privacy Policy and applies to the personal information of children in the United States who are under the age of thirteen (13) ("child" or "children"). This Children's Privacy Policy is made in accordance with the United States Children's Online Privacy Protection Act ("COPPA"). Any terms defined in COPPA have the same meaning when used in this Children's Privacy Policy.

## Children's Data We Collect

We collect personal information from children. We only collect personal information from children after sending a direct notice to parents and obtaining verifiable parental consent for the collection of the child's personal information.

We collect the following personal information from children:

1. Name and IP which are stored by the Roblox Corporation.

#### **Collection Methods**

We collect personal information from children using the following methods:

1. All personal information is collected by the Roblox Corporation.

#### **Use of Children's Personal Information**

We use the childrens' personal information we collect in the following ways:

1. Playing our games.

# **Public Availability**

Children are not able to make their personal information publicly available on our Site.

#### **Disclosure to Third Parties**

We do not disclose personal information we collect from children to third parties.

### **Third Party Operators**

Through our Site, third parties collect personal information about children who use our Site. Third parties only collect personal information about children who use our Site after we send a direct notice to parents and obtain verifiable parental consent for the collection of the child's personal information.

The third parties that collect, through our site, personal data about children who use our Site are:

1. Roblox Corporation.

# **Parental Rights**

A child's parent or guardian can review their child's personal information, direct us to delete their child's personal information, and refuse any further collection or use of their child's personal information. A parent or guardian can also agree to the collection and use of their child's personal information but not allow us to disclose that personal information to third parties, unless disclosure is part of the service provided by our Site. A parent or guardian can exercise these rights via the following method(s):

1. By contacting the Roblox Corporation, we do not store any of your child data on our webservers.

We will not require a child to disclose more information than is reasonably necessary to participate in an activity on our Site.

## **Contact Information**

Questions and concerns about this Children's Privacy Policy or about our, or third parties', collection and use of children's personal information, can be sent to:

Name: Ryder Reid

Email: privacy@moonfireent.org Address: Horsham, Victoria 3400