

Privacy Policy for United States Residents

Effective Date: August 2022

This Privacy Policy (the "Policy") applies to personal information provided or collected while using the MementoMori online properties, including our [website](#) or mobile applications that link to it, and our social media pages or handles (together the "Services") operated by BANK OF INNOVATION (the "Company").

This Policy does not apply to third-party websites, mobile applications, or services that may link to the Services or be linked to from the Services. Please review the privacy policies on those websites and applications directly to understand their privacy practices.

We may change this Policy from time to time. If we do, we will notify you by posting the updated version.

1. What Data Do We Collect?

We collect information from you directly, from the devices you use to interact with us, and from third parties. We may combine information from the Services together and with other information we obtain from our business records. We may use and share information that we aggregate (compile to create statistics that cannot identify a particular individual) or de-identify (strip information of all unique identifiers such that it cannot be linked to a particular individual) at our discretion.

(1) Information you provide to us when using or signing up for Services

You may provide the following information to us directly when signing up for or using the Services:

- Contact information, including name, and application username. For minors under the age of 16, the contact information and date of birth of your parent or legal guardian.
- Account information, such as a User ID, postal address, date of birth, language preferences, and country of residence.
- Information about your use of and interaction with our Services, such as your gameplay, online status, Service use history, and interactions with other users.
- Payment information, including purchase history, purchase ID, and transaction information.
- Information contained in your communications to us, including survey responses, emails, text messages, and any other information provided within online forms.
- Information you make available to us via a social media platform.
- Any information or data you provide by interacting in our social media online forums and chatrooms, within our gameplay chat and message boards, or by commenting on content posted on our Services. Please note that these comments are also visible to other users of our Services.
- Any other information you submit to us.

(2) Information we collect automatically

We and partners working on our behalf may use log files, cookies, or other digital tracking technologies to collect the following information from the device you use to interact with our Services. We also create records when you make purchases or otherwise interact with the Services.

- *Device information*, including IP address, operating system, hardware version, equipment set-up, device identifiers (which includes the IDFA and Advertising ID), and details about your web browser.
- *Analytics information*, including details about your interaction with our website, app, and electronic newsletters, such as search history, chat history, and gameplay contents.
- *Log (Diagnostic) information*, including web traffic logs, IP address, and use time.
- *Location information*, including specific geographical location detected through GPS, Bluetooth or Wi-Fi.
- *Advertising information*, including special advertising and other unique identifiers that enable us or third parties working on our behalf to target advertisements to you. Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.
- *Business record information*, including records of your purchases of products and services.

The following is a list of our partners who collect the information described above. Please follow the links to find out more information about the partner’s privacy practices.

Partner	Information Type Collected
Apple	Device information, analytics information, log information, location information, advertising information, business record information
AppsFlyer	Device information, analytics information, log information, location information
Backtrace	Device information, analytics information, log information, location information
Cookiebot	Device information, analytics information, log information, location information
Facebook	Device information, analytics information, log information, location information, advertising information
Google Tag Manager	Device information, analytics information, log information, location information, advertising information
Google Analytics	Device information, analytics information, log information, location information, advertising information
Google/DoubleClick	Device information, analytics information, log information, location information, advertising information, business record information
MOLOCO	Device information, analytics information, log information, location information, advertising information
nend	Device information, analytics information, log information, location information, advertising information
SEPTENI	Device information, analytics information, log information, location information, advertising information

Partner	Information Type Collected
SpiderAF	Device information, analytics information, log information, location information, advertising information
TikTok	Device information, analytics information, log information, location information, advertising information
Twitter	Device information, analytics information, log information, location information, advertising information

(3) Information We Collect From Other Sources

We may collect the following information about you from third-party sources.

- Contact information, demographic information, and information about your interests and purchases, from consumer data providers, other gaming providers, and/or affiliates.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.

2. How We Use Your Information

We may use any of the information we collect for the following purposes.

- **Service functionality:** To provide you with our Services, including to sign up for the Services, process payments, confirm your identification, send service communications (including renewal reminders), and conduct general business operations, such as accounting, recordkeeping, and audits.
- **Service improvement:** To improve and grow our Services, including to develop new Services and understand how our Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- **Personalization:** To offer you recommendations and tailor the Services to your preferences.
- **Advertising and marketing:** To send you marketing communications, personalize the advertisements you see on our Services and third-party online properties, and measure the effectiveness of our advertising. We may share your information with business partners, online advertising partners, and social media platforms for this purpose.
- **Security:** To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- **Legal compliance:** To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

3. How We Share Your Information

We may share any of the information we collect with the following recipients.

- **Affiliates:** We share information with other members of our group of companies.

- **Service providers:** We may engage vendors to perform specific business functions on our behalf, and they may receive information about you from us or collect it directly. The business functions that these vendors provide may include:
 - *Supporting Service functionality*, such as vendors that support customer service and customer relationship management, application development, list cleansing, postal mailings, and communications (email, fax).
 - *Auditing and accounting firms*, such as firms that assist us in the creation of our financial records.
 - *Professional services consultants*, such as firms that perform analytics, assist with improving our business, provide legal services, or supply project-based resources and assistance.
 - *Analytics and marketing services*, including entities that analyze traffic on our online properties and assist with identifying and communicating with potential customers.
 - *Security vendors*, such as entities that assist with security incident verification and response, service notifications, and fraud prevention.
 - *Information technology vendors*, such as entities that assist with website design, hosting and maintenance, data and software storage, and network operation.
 - *Marketing vendors*, such as entities that support distribution of marketing emails.
- **Business partners:** From time to time, we may share your contact information with other organizations for marketing purposes.
- **Online advertising partners:** We partner with companies that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.
- **Social media platforms:** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.
- **Government entities/Law enforcement:** We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our customers, or other individuals.
- **Other businesses in the context of a commercial transaction:** We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

4. Security

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

5. Other Important Information

(1) Data retention

The Company will retain personal information for as long as reasonably required for the purposes for which the Company has collected such data. Exact periods are determined based on consideration of the purpose for which Personal Data is collected, the nature of the Personal Data, and legal or business requirements for retention of Personal Data.

(2) Cross-border data transfer

We may collect, process, and store your information in the United States and other countries, such as Japan. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law.

(3) Information about children

The Services are intended for users age 16 and older. We do not knowingly collect information from children. In the event that anyone under the age of 16 wishes to use the Service, the Company will require prior consent by their parent or legal guardian. Please contact us for more information.

6. Your Options and Rights Regarding Your Information

Your Account: Please visit your account page within the app to update your account information.

Ad Choices: You have options to limit the information that we and our partners collect for online advertising purposes.

- You may disable cookies in your browser or mobile device using their settings menus. Your mobile device may give you the option to disable advertising functionality. Because we use cookies to support Service functionality, disabling cookies may also disable some elements of our online properties.
- You may use our privacy settings menu within the app.
- You may contact us directly.

If you exercise these options, please be aware that you may still see advertising, but it will not be personalized. Nor will exercising these options prevent other companies from displaying personalized ads to you. If you delete your cookies, you may also delete your opt-out preferences.

Do Not Track: Your browser or device may include "Do Not Track" functionality. The information collection and disclosure practices and the choices that we provide to you will continue to operate as described in this privacy policy, whether a Do Not Track signal is received.

Jurisdiction-specific rights: You may have certain rights with respect to your personal information depending on your location or residency. Please see "privacy disclosures for specific jurisdictions" below. Please contact us to exercise your rights.

7. Privacy Disclosures for Specific Jurisdictions

(1) European Economic Area, United Kingdom, and Switzerland

We process “personal data,” as that term is defined in the European Union’s General Data Protection Regulation (“GDPR”). If you are located within the European Economic Area, the United Kingdom, or Switzerland, please review the “Privacy Policy for EEA Residents.”

(2) California

Your California Privacy Rights; “Shine the Light” Law

California residents are entitled once a year, free of charge, to request and obtain certain information regarding our disclosure, if any, of certain categories of personal information to third parties for their own direct marketing purposes in the preceding calendar year. Please contact us to obtain this information.

California Consumer Privacy Act

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and disclosure of information about them, as well as rights to know/access, delete, and limit disclosure of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

Notice at Collection Regarding the Categories of Personal Information Collected

You have the right to receive notice of the categories of personal information we collect and the purposes for which we use personal information. The following table summarizes the categories of personal information we collect, the categories of sources of that information, and whether we disclose or sell that information to service providers or third parties, respectively. The categories we use to describe personal information are those enumerated in the CCPA. We collect this personal information for the purposes described in Section 1 of this Policy.

Category	Information Type	Source	We disclose to:	We sell to:
Identifiers	<ul style="list-style-type: none"> Contact information or personal characteristics (name; postal address) Social media handles 	You; our social media pages; third party subscription service providers	Service Providers	Business partners; advertising partners
Financial Information	<ul style="list-style-type: none"> Payment card data Bank account information 	You	Service Providers	Not sold
Protected Classifications and Other Sensitive Data	<ul style="list-style-type: none"> Date of Birth 	You	Service Providers	Not sold
Commercial Information	<ul style="list-style-type: none"> Transaction information Billing and payment records Order history 	You	Service Providers	Not sold

Category	Information Type	Source	We disclose to:	We sell to:
Geolocation Information	<ul style="list-style-type: none"> Precise (information that describes location with more precision than ZIP code, e.g., GPS data) Coarse (information that describes location at ZIP code-level or less precision) 	You; our analytics and advertising partners	Service Providers	Advertising partners (coarse location only)
Internet or Electronic Network Activity Information	<ul style="list-style-type: none"> IP address Device identifier (e.g., MAC) Advertising identifier (e.g., IDFA, AAID) Information provided in URL string (e.g., search keywords) Cookie or tracking pixel information Information about your interaction with our website, app, email correspondence, or products Browsing history Search history Diagnostic information (e.g., crash logs, performance data) 	You; our analytics and advertising partners	Service Providers	Advertising partners
Inferences Drawn About You	<ul style="list-style-type: none"> User profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes 	You; our analytics and advertising partners	Service Providers	Advertising partners
Content of Communications	<ul style="list-style-type: none"> Contents of emails, or text messages Photos 	You	Service Providers	Not sold
Contacts	<ul style="list-style-type: none"> List of contacts that you supply to us List of contacts we collect from your device with your permission 	You	Service Providers	Not sold

Entities to whom we disclose information for business purposes are *service providers*, which are companies that we engage to conduct activities on our behalf.

Entities to whom we “sell” information are *third parties*. Under the CCPA, a business “sells” personal information when it discloses personal information to a company for monetary or other benefit. A company may be considered a third party either because we disclose personal information to the company for something other than an enumerated business purpose under California law, or because its contract does not restrict it from using personal information for purposes unrelated to the service it provides to us.

Your rights under the CCPA

- Opt-out of sale of personal information: You have the right to opt out of our sale of your personal information to third parties. To exercise this right, please visit our Do Not Sell My Personal Information link or contact us. Please be aware that your right to opt out does not apply to our disclosure of personal information to service providers.
- Know and request access to and deletion of personal information: You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with to whom we sell or disclose it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you. Please contact us to exercise these rights.

Financial incentives

We may offer you the opportunity to participate in special promotions and programs from time to time, such as Instant Wins on Twitter and the program we offer may qualify as a financial incentive program (FIP) under California law. We use the Personal Information you provide to enter you into a lottery for a chance to win in-game currency and your participation is voluntary. The category of Personal Information we collect is social media information and gaming account information which we use to facilitate your participation in the program. If we run the program jointly with a business partner, we may disclose the information to that business partner.

You may opt in to Instant Wins using the means we present to you, such as an online registration page, at the time we make the offer. You may opt out of Instant Wins at any time by following the instructions in Section 8 below.

8. Contact Information, Submitting Requests, and Our Response Procedures

(1) Contact

Please contact us if you have questions or wish to take any action with respect to information to which this privacy policy applies.

Email us at: dataprotectionofficer-team@boi.jp

Mail: Bank of Innovation, Inc.
Shinjuku Eastside Square
6-27-30 Shinjuku, Shinjuku-ku, Tokyo 160-0022, Japan

(2) Making a request to exercise your rights

Submitting requests: You may request to exercise your rights by submitting the form by making a request using the contact information above.

If you are a California resident, you may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

Verification: We must verify your identity before responding to your request. We verify your identity by asking you to provide personal identifiers that we can match against information we may have collected from you previously. We may need to follow up with you to request more information to verify identity. We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.