

Mogul Privacy Policy

Effective Date: 1 February 2019

Overview

SEA Esports PTE LTD (“**Mogul**”, “**our**”, “**us**” or “**we**”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal and other information that we receive or obtain from visitors to www.mogul.gg and/or other websites and property managed by Mogul or our affiliates (“**Mogul Sites**”), and from customers and other users of the services and offerings of Mogul and its affiliates (the “**Services**”).

We update this Privacy Policy from time to time. We will provide you with reasonable notice of any material changes before the changes take effect by posting the new Privacy Policy on the Mogul Sites. You are advised to consult this Privacy Policy regularly for any changes. The date of the last revision appears at the top of the Privacy Policy. As used in this Privacy Policy, the terms “using” and “processing” information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates internationally.

We collect, use and disclose information to administer, monitor, and improve the Mogul Sites, the features and content, to provide and improve the Services and verify that users of the Services meet the criteria required to process their requests. We do this so as to improve user experiences for Mogul Site visitors, customers, and users of our Services.

By providing us with your Personal Information (as defined below), you consent to our collection, use, disclosure (including transfer) of your Personal Information in accordance with this Privacy Policy. Please do not provide us with any Personal Information if you do not agree to us using your Personal Information in this manner

How We Collect Information; Kinds of Information We Collect

You consent to us collecting information by using “log data” and “cookies,” by obtaining information from your usage of our Services, and by asking for information when you buy a product, register for and/or use a Service, or do various other things, as described below.

Log Data. You agree that when you visit the Mogul Sites, whether as a non-registered visitor just browsing or as an individual who has registered via the Mogul Sites (any of these, a “**Mogul User**”), our servers may automatically record information that your browser sends whenever you visit a website (“**Log Data**”). This Log Data may include information such as your computer’s Internet Protocol (“**IP**”) address, browser type, the webpage you were visiting before you came to a Mogul Site, pages of the Mogul Sites that you visit, information you search for on our Mogul Sites and other statistics.

Cookies. Like many websites, we use “cookies” -- small data files transferred to your computer’s hard disk – to collect information. We use two kinds of cookies. First, we utilize session ID cookies to enable certain features of the Mogul Sites, to better understand how visitors interact with the Mogul Sites, to monitor aggregate usage by Mogul Users, and to monitor web traffic routing on the Mogul Sites. Second, we utilise persistent cookies for

persons who have registered with Mogul to save their login information for future logins to the Mogul Sites. While session cookies are deleted from your computer when you log off from the Mogul Sites and then close your browser, persistent cookies remain. You can set your browser to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Mogul Sites or all functionality of the Services.

Personal Information. We ask for and/or receive Personal Information from you. At times, we ask you for personally identifiable information – information about you that can be used to identify you by itself or together with information which we have or are likely to have access to (“**Personal Information**”) – which includes, but is not limited to, your name, photo, phone number, email address, website URL, instant message contact information, and postal address. We may also ask for and/or obtain other information such as your age, gender, [post or zip code], country and individual preferences. We ask for Personal Information in a number of situations, including when you register a product, purchase or register for a Service, sign up for a Promotion, opt-in to receive email notifications, in connection with your request for an offering or for personalisation of the Services you use or when you contact us via the Services, or other situations. In addition, we also obtain Personal Information by collecting and maintaining data on your use of Services, such as information on frequency, time and duration of use, and similar. You do not have to provide your Personal Information, but then certain features, offerings or Services may not be available to you, or you may not be able to complete a transaction. We use your Personal Information mainly to provide the Services, complete your transactions, and verify your identity to administer or respond to your inquiries or prevent fraud, or similar. We may also anonymise your Personal Information so that you are no longer identifiable from it and aggregate it with such information collected from other Mogul Users and with log data and/or data from cookies to attempt to provide you with a better experience, to improve the quality and value of the Mogul Sites, the Services, and/or our products, and to analyse and understand how the Mogul Sites and/or Services are used. We may also use the combined information without aggregating it to serve you specifically, for instance, to deliver a product or Service to you according to your preferences or restrictions.

Specific examples where we ask for or receive your Personal Information include the following:

- **Product Purchases.** If you choose to make a purchase through the store accessible via the Mogul Sites, our third party payment processors or service providers may collect Personal Information from you in order to complete your transaction, including credit card information and billing address, and information you provide to them will be governed by that party’s privacy policy. In connection with such a purchase, we receive your Personal Information (excluding payment information) for product registration and/or update purposes and, if you have consented, for solicitation purposes, such as providing information on new product or service offerings.
- **Product or Service Registrations and Updates.** To use some of our Services or offerings, you must register to create an account, and during registration we will collect your email address and possibly other Personal Information (such as your public Facebook profile if you register via Facebook).
- **Promotions.** From time to time, Mogul provides the opportunity to participate in surveys, contests, sweepstakes or other promotions (collectively, “Promotions”) through the Mogul Sites or other formats. We may request certain information (including Personal Information) from you to allow your participation. Participation in Promotions is completely voluntary and you therefore have a choice whether to disclose any of such needed Personal Information or other information. This Privacy Policy will at all times apply to any information that we collect from you for use in Promotions.

- **Newsletters and Promotional Materials.** Mogul offers newsletters, marketing or promotional materials and other information that may be of interest to you. If you register to receive any of these, Mogul will use your Personal Information to provide such materials in the manner you elect. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications or contact us at support@mogul.gg. (See “Reviewing, Updating, or Deleting Information” below.)
- **Employment Applications.** If you choose to apply for a position with Mogul via the “Careers” section of the Mogul Sites, we will also collect Personal Information (including, but not limited to, your resume, cover letter and any other application-related documents you choose to provide to Mogul), which we will use in connection with your application for a position with Mogul.
- **Team Sponsorships.** Mogul provides a variety of sponsorship packages to select gamers, as described on the “Team Mogul” portion of the Mogul Sites. If you choose to apply, we will ask you for Personal Information as well as Non-identifying Information regarding your team portal or website.
- **Contact That You Have Initiated.** If you call, email, or otherwise contact us, we may collect Personal Information from you. We may contact you where you have requested information or requested a communication from us.
- **Social Networking Mogul Sites (SNS).** As a community-driven company, we keep presences on prominent SNSs including, but not limited, to Facebook and Twitter. It is completely optional for you to be involved with our SNS activities. However, if you do choose to participate (for example, by “liking” our profile, posting a message, or answering a poll), we will have access to the information you divulge, which may include Personal Information, depending on your SNS privacy settings.

Information Sharing and/or Disclosure

Personal Information: Except as set forth below in this Privacy Policy, we do not share your Personal Information with third parties. If you have any questions about our information sharing practices, please contact us at support@mogul.gg.

- **If You Have Given Your Consent.** Your Personal Information is shared or published where you have given consent, such as in connection with a Promotion where you have been awarded a prize, or where you have provided your Personal Information for posting on the Mogul Blog, for Team Mogul sponsorship, or other similar situations.
- **Service Providers.** We may use third party companies and individuals to facilitate the provision of the Services, to provide the Services on our behalf, to organise, manage and/or facilitate tournaments and competitions on the Mogul Sites, to perform Mogul Sites-related services (e.g., without limitation, maintenance services, database management, web analytics, payment processing and improvement of the Services’ features) or to assist us in analysing how the Services are used. These third parties have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. However, for purchases through the store accessible via the Mogul Sites, information you provide to that store will be subject to the store’s privacy policy.
- **Google Analytics.** We use the Analytics Advertising Features provided by Google Analytics. Google Analytics will collect information from you via cookies and such information will be used by us to analyse your activities in order to improve the Mogul

Sites, to remember your preferences when using the Mogul Sites, and to display to you marketing material that you may be interested in. You can find out more about the Analytics Advertising Features provided by Google Analytics here <https://support.google.com/analytics/answer/3450482?hl=en>. If you do not wish to have such information collected by Google Analytics, you may do so by downloading the Google Analytics opt-out browser add-on, which is available here <https://tools.google.com/dlpage/gaoptout>. Opting out will not affect your ability to use the Mogul Sites.

- **Compliance with Laws and Law Enforcement.** Mogul cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of Mogul or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable activity.
- **Business Transfer Event.** If a third party acquires Mogul's business or specific assets (including your Personal Information) as the result, for example, of a sale, merger, reorganisation, insolvency, liquidation or other change of control, we would strive to keep your Personal Information subject to this Privacy Policy or, if that is not possible, provide notice (by posting on the Mogul Sites) before Personal Information becomes subject to a substantively different privacy policy.

Aggregate Information: We may share aggregated and anonymised information that does not include Personal Information and we may otherwise disclose Log Data (which also do not include Personal Information) with third parties for industry analysis, demographic profiling and other purposes. Any such information shared in these contexts will not contain your Personal Information. If such aggregated information is tied to your Personal Information, it will not be disclosed except as set forth in this Privacy Policy.

Advertising Networks and SNSs

We work with third party advertising networks which may collect information about your online activities through cookies and other technologies when you use the Mogul Sites. The information gathered by these advertising networks is used to make predictions about you, your interests or preferences and to display advertisements across the Internet tailored to your apparent interests. We do not permit these ad networks to collect Personal Information about you on the Mogul Sites. Please note that we do not have access to or control over cookies and other technologies these ad networks may use to collect information about your interests, and the information practices of these ad networks are not covered by this Privacy Policy. Some of these ad networks are members of the Network Advertising Initiative or the Digital Advertising Alliance, through which you may opt out of ad targeting from their member companies. To learn more, please visit Network Advertising Initiative or the Digital Advertising Alliance.

We may also provide SNSs with your e-mail address so that they can better customise the advertisements that are displayed to you when you use those SNSs. Please note that we do not have direct control over these SNSs and their activities are not covered by this Privacy Policy. However, if we provide your e-mail address to SNSs for this purpose, we shall have a reasonable basis to believe that the SNS shall (a) protect the security and integrity of the data while it is within the SNS's systems; (b) guard against the accidental or unauthorised access, use, alteration or disclosure of the data within the SNS's systems; and (c) shall not use the data if you are not a member of the SNS.

Reviewing, Updating or Deleting Your Information

Each user may review, update, correct or have us delete the Personal Information he or she provided for or during use of the Services by contacting us at support@mogul.gg. If you have us completely delete all such information, then your account for your use of the Services may become deactivated, as applicable, and you may no longer be able to use or access the Service. We may retain an archived copy of your Personal Information as required by law or for legitimate business purposes.

Our Policy Toward Children

The Services are not directed to persons under 18. We do not knowingly collect Personal Information from children under 13. If you as a parent or guardian become aware that your child has provided us with Personal Information without your consent, contact us at support@mogul.gg. If we become aware that a child under 13 has provided us with Personal Information without the consent of a parent or guardian, we will delete such information from our files, but may retain an archived copy as required or permitted by law for recordkeeping purposes.

Phishing

Identity theft and the practice currently known as "phishing" are of great concern to Mogul. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, ask for your credit card information, login information, or national identification numbers through use of a non-secure or unsolicited e-mail or through a telephone communication that we initiate without either a prior inquiry from you or a prior arrangement with you. For more information about phishing, visit <https://www.csa.gov.sg/gosafeonline/go-safe-for-me/homeinternetusers/spot-signs-of-phishing>.

Security

Mogul is very concerned with safeguarding your information. We employ reasonable physical, technological, and administrative security measures to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to your information. It is important to understand, however, that no website, server, Internet transmission, or method of electronic or other storage is 100% secure or “hacker proof.” Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your electronically stored “personal data” (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting on the Mogul Sites in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

International Transfer

Your information may be transferred to — and maintained on — computers located outside of your country or other governmental jurisdiction. When we send your Personal Information outside of your country, we will make sure that your information is protected to at least the same standard as that which is required in your country. Mogul maintains, processes and uses Personal Information in Singapore. If you submit or choose to provide information to us, you consent to such transfer, maintenance, processing and use.

Links to Third-party Sites

Our Mogul Sites contain links to other websites. The fact that we link to a website is not an endorsement, authorisation or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

Complaints

If you have any concerns or a complaint about a breach of your privacy or the way we have handled your personal information, please email us at privacy@mogul.gg and inform us of the nature of your complaint.

We will then investigate your complaint and endeavour to provide you with our response within a reasonable time (between 30-90 days dependent on your jurisdictional law) of receiving your request. If, after receiving our response, you still consider that your privacy complaint remains unresolved, you may then, for example, refer your concern to the privacy regulator in the country where you reside.

Contacting Us

If you have any questions about this Privacy Policy, please contact us at privacy@mogul.gg.