

# Privacy policy

The current version of this Privacy Policy is effective as of March 12, 2026.

This Privacy Policy (hereinafter referred to as the «**Policy**») describes how Axlebolt ME L.L.C.-FZ (Registration No.: 2201269, registered address: The Meydan Hotel, Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, U.A.E) (hereinafter referred to as «**Axlebolt**», «we», «us» or related terms) processes personal data in connection with providing access to the website store.standoff2.com (hereinafter referred to as the «**Website**»). By using our Website and/or expressing your consent to the Policy by completing the relevant forms on the Website, you or your legal representative («**User**») accept this Policy.

If you are a minor, please ask your parents (legal representative) to review the Policy. For a minor, the Policy is accepted by their legal representative. If you are a minor and are unable to provide the Policy to your legal representative, or if you or your legal representative do not agree with the terms of the Policy, **please immediately discontinue use of the Website**.

If a legal representative allows a minor to use the Website, we presume that the legal representative has reviewed the Policy and accepted it on behalf of the minor.

At the same time, we do not intentionally collect personal data from Users under the age of 18, as the Website is intended for a general audience and is designed for a broad range of legally capable individuals who are able to enter into transactions.

The most up-to-date version of the Policy is available at:

[https://web-static.cdn.boltgaming.io/store2/legal/ru/web/privacy-policy\\_me\\_en\\_2026-03-12.pdf](https://web-static.cdn.boltgaming.io/store2/legal/ru/web/privacy-policy_me_en_2026-03-12.pdf).

From time to time, we may unilaterally amend the Policy, including to comply with recent changes in applicable laws and judicial practice. All amendments become effective upon their publication on this page. We will use our best efforts to provide additional means of notifying Users about any published changes to the Policy; however, we ask that you regularly check the Website for the latest version yourself.

## TERMS AND DEFINITIONS

- «**Access**» – the right to use the Content either by means of a purchased access code or under cloud gaming terms (at the User's discretion);
- «**Additional Game Features**» – a service related to enabling the use of Content within the gameplay in order to expand the Game's functionality or to obtain additional gaming experience, offered for purchase on the Website;
- «**Game ID**» – a unique identifier (a combination of letters and numbers) that ensures authorization of a specific Game user and allows access to the Personal Account;
- «**Device Information**» – technical information about your device, including data about the browser and types of browser plug-ins, the operating system and its version, network information, device type and manufacturer, device language settings, IP address and other technical information;
- «**Contact Details**» – data that the User may share with Axlebolt in order to receive assistance within the framework of user support and feedback, to receive marketing offers and

notifications, as well as for compliance with legal requirements. Such data include email address and contact phone number;

- «**Content**» – in-game items (including in-game currency), the list and description of which are presented on the Website, forming part of the Additional Game Features;
- «**Personal Account**» – a section of the Website that allows the User to place orders, store information about purchased Access, and use other Website functionality associated with the User's identity;
- «**Public Offer**» – a legally binding offer setting out the terms and conditions governing purchases made by the User on the Website and the relationship between Axlebolt and the User in connection therewith. The current version of the Public Offer is available at: [https://web-static.cdn.boltgaming.io/store2/legal/ru/web/privacy-policy\\_me\\_en\\_2026-03-12.pdf](https://web-static.cdn.boltgaming.io/store2/legal/ru/web/privacy-policy_me_en_2026-03-12.pdf).
- «**Personal Data**» – information or data of any kind that allow identification of an individual, including but not limited to Contact Details, Financial Information, Game ID, Device Information, and Cookies;
- «**Right Holder**» – Axlebolt LTD (Republic of Cyprus), the holder of rights to the Website and the Additional Game Features;
- «**Financial Information**» – information about the payment instruments used by the User on the Website and the transactions carried out by the User on the Website, including data on purchases and refunds available to the User in the Personal Account, banking information (payment card details, payment card identifier in the payment gateway), and electronic receipt data;
- «**Payment Transaction Data**» – information about payments made by the User, required solely for the performance of the contract with the User;
- «**Cookies**» – small files stored on the User's device from the moment of the first visit to the Website. We process **technical** Cookies (necessary for the functioning of the Website) based on our legitimate interest in maintaining it. We also process **session** Cookies (necessary for convenient use of the Website) and **analytical** Cookies (necessary to improve the quality of our services). Cookies may also be used to ensure the security of collected data and the information system as a whole.

## 1. WHAT DATA DO WE COLLECT?

We process the following information relating to Users:

- Avatar, nickname, and Game ID (if the User registers a Personal Account on the Website);
- Contact Details (if the User registers a Personal Account on the Website, makes transactions on the Website, or contacts Axlebolt customer support);
- Payment Transaction Data (if the User makes transactions on the Website);
- Cookies: technical, session, and analytical.

We strive to minimize the collection of Personal Data and do not collect any additional information about you.

In order to process Users' data, we obtain consent in accordance with this Policy.

Users may withdraw their consent or request the deletion of any information we have collected at any time; however, in such case, we will be required to restrict access to certain Website features, including access to the Personal Account.

In addition to consent, we rely on the performance of the Public Offer concluded between us and the Users, as well as on our legitimate interest, as legal grounds for processing data.

## 2. ON WHAT BASIS AND FOR WHAT PURPOSE DO WE PROCESS THIS DATA?

Below you can find the legal grounds and purposes for collecting the data listed in Section 1 of the Policy:

Data category	Legal grounds	Purpose of processing
Avatar, Nickname, Game ID	<ul style="list-style-type: none"> <li>• Performance of obligations under the Public Offer;</li> <li>• Consent (including consent expressed through implied actions).</li> </ul>	Personalization of the Personal Account at the User's discretion. The User may choose not to use their real personal data (name, image) as a nickname or avatar on the Website.
Game ID, Payment Transaction Data, Contact Details	<ul style="list-style-type: none"> <li>• Performance of obligations under the Public Offer;</li> <li>• Our legitimate interest in accounting, reporting, and ensuring the security of transactions;</li> <li>• Legal requirements relating to electronic payments, accounting and reporting, and anti-money laundering (AML) and counter-terrorism financing (CTF).</li> </ul>	Transaction accounting, preparation of reports, issuance of electronic receipts, payment verification, provision of customer support services and proper performance of obligations under the Public Offer.
Game ID, Analytical Cookies, Device Information	<ul style="list-style-type: none"> <li>• Consent (including consent expressed through implied actions);</li> <li>• Our legitimate interest in obtaining statistical data for analysis, market research, and improvement of services and the Website.</li> </ul>	Analysis of Website usage statistics and User behavior when using the Website.
Game ID, Payment Transaction Data, Contact Details	<ul style="list-style-type: none"> <li>• Consent (including consent expressed through implied actions);</li> <li>• Performance of obligations under the Public Offer.</li> </ul>	Provision of user support in the event of a User's inquiry, enabling us to contact the User and properly identify them.

Game ID, Device Information	<ul style="list-style-type: none"> <li>• Consent (including consent expressed through implied actions);</li> <li>• Performance of obligations under the Public Offer;</li> <li>• Our legitimate interest in ensuring the security of the Website and services provided through it.</li> </ul>	Personalization of the Website's appearance and its sections for the User, ensuring proper display of information on the Website, proper functioning of the Website, and ensuring security in the provision of services.
Contact Information	<ul style="list-style-type: none"> <li>• Consent;</li> <li>• Our legitimate interest in promoting products and services.</li> </ul>	Informing the User about projects and offers of potential interest from Axlebolt.

### 3. TO WHOM MAY PERSONAL DATA BE DISCLOSED?

By agreeing to the Policy, you confirm your consent to the transfer of your data to our affiliates specified in the Policy, as well as to our partners who are not our affiliates.

We ensure that agreements concluded with third parties provide a level of data protection no lower than that set forth in this Policy and in compliance with applicable personal data protection laws.

In order to provide you with the best possible user experience and to fulfill the provisions of the User Agreement concluded between you and us, we may transfer your Personal Data to third parties.

We disclose data to third parties solely for the following purposes:

#### 1) Provision of Access to Additional Game Features

If you purchase services granting Access to Additional Game Features, we, acting as an agent of the Right Holder, notify the Right Holder and, together with the Right Holder, ensure the provision of such services.

#### 2) Improvement of the Website and Services; Market Research

We allow third-party service providers to collect your data in order to enable us to provide services to our Users, measure, analyze and improve the performance of the Website, and continuously update and enhance our Website and services.

We may use this information to correct any errors on the Website, assess demographic data of our Users, determine the need to support new types of devices for the Website, and identify the need to modify our marketing and distribution strategies.

Cookie data may be shared with and used by us to better understand our audience, evaluate the effectiveness of measures taken to generate interest in our Website and its services, and assess the viability of our services as business projects.

In this connection, the following categories of Personal Data may be shared with partners:

- Device Information;
- Cookies (technical, session, and analytical).

The above data may be transferred to the following third party:

Google LLC (1600 Amphitheatre Parkway, Mountain View, California, 94043, USA).

You can find Google LLC's Privacy Policy [here](#).

### **3) Disclosure pursuant to law**

We transfer data relating to completed transactions to a fiscal data operator, which independently forwards such data to the competent tax authority. This is also necessary to enable our partner to generate and issue an electronic receipt.

Such transfer is carried out for the purpose of complying with applicable legislation governing the use of cash register equipment in payment processing.

The Website provides a function allowing Users to save payment card details for subsequent use when making transactions on the Website. This function is implemented through partners acting as payment providers, who ensure the processing and storage of data in accordance with applicable security standards.

Axlebolt does not receive or store Users' payment details. The User may refuse to use the payment data storage function when making a payment. Making a payment using previously saved payment details is considered the User's explicit consent to the processing of such data.

Please note that our payment partners may independently collect the following categories of Personal Data:

- Identifiers;
- Financial Information.

Axlebolt does not receive or process your Financial Information.

We may also disclose information you provide in response to subpoenas, requests, notices, court orders or requests from governmental authorities in any legal proceedings, as well as to establish or exercise our legal rights.

We may also disclose your information to defend against legal claims if we believe disclosure is necessary to protect our rights, your safety, or the safety of others, to investigate fraud or to respond to requests from governmental authorities.

### **4) Disclosure for the Prevention of Fraud and Other Offenses**

We may transfer your information to investigate, prevent or take action regarding unlawful activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our User Agreement, or as otherwise required by law.

In this connection, the following data may be disclosed to third parties:

- User IP address;
- User email address.

## **4. MAY WE RECEIVE PERSONAL DATA FROM THIRD PARTIES?**

When a User logs into the Website using their Game ID, we may receive additional information that the User has provided to the Right Holder for the purpose of using the Game.

At the same time, we may receive aggregated data from our partners acting as fiscal data operators, which may include the following categories of Personal Data:

- Identifiers;
- Financial Information.

By accepting the Policy, you also agree that we may process Personal Data received from other third parties. In order to ensure the protection of your rights, we independently request confirmation from such third parties that they have a lawful basis for transferring your data to us.

However, if you believe that third parties are transferring your Personal Data to us without your consent, please inform us at [dpo@axlebolt.com](mailto:dpo@axlebolt.com).

## **5. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?**

We will process your Personal Data for as long as you continue to use the Website.

If you stop using the Website and its services or delete your Personal Account, as a general rule, we will continue to process your Personal Data for a period of three (3) years thereafter. This allows you to resume use of the Website and enables us to use the data for analytical and promotional purposes.

Upon expiration of this period, we will delete your Personal Data.

## **6. ARE USERS' DATA SECURE?**

The security of your Personal Data is important to us.

We follow generally accepted standards to protect your information both during transmission and after it is received. However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee absolute security.

Although no security system is completely secure, we and our partners implement appropriate technical and organizational measures to protect against unauthorized access to or disclosure of the information we collect.

For Axlebolt, this includes, among other things, preventing disclosure of your data unless necessary, ensuring that all information collected by Axlebolt is transmitted via secure connections, and applying appropriate software-based protection and encryption measures to safeguard against unauthorized access.

Our employees and third parties who are granted access to your data are obligated to maintain the confidentiality of your information.

## **7. WHAT RIGHTS DO I HAVE?**

### ***For users in the European Union***

If you are located in the EEA, you have the following rights under the GDPR:

- the right to access your personal data;
- the right to rectification of inaccurate data;
- the right to erasure of data («right to be forgotten»);
- the right to restriction of processing;
- the right to data portability;
- the right to object to processing carried out on the basis of legitimate interest;
- the right to lodge a complaint with a data protection supervisory authority.

If processing is based on your consent, you have the right to withdraw it at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal.

### ***Cross-Border Data Transfers***

Where personal data are transferred outside the EEA, such transfers are carried out subject to appropriate safeguards according to the GDPR, including adequacy decisions, standard contractual clauses or other lawful transfer mechanisms.

#### ***For residents of the Russian Federation***

If you are a personal data subject from the Russian Federation, then you have the right to ensure the protection of your rights and freedoms when processing personal Data, protection of the rights to privacy, personal and family secrets, in particular you have the right:

- require us, as an operator, to clarify your Personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take legal measures to protect your rights;
- to receive information related to the processing of your Personal Data, including: confirmation of the fact of processing Personal Data by the operator; legal grounds and purposes of processing Personal Data; purposes and methods of processing Personal Data used by the operator; name and location of the operator, information about persons (except for employees of the operator) who have access to Personal Data or to whom Personal Data may be disclosed on the basis of an agreement with the operator or on the basis of Federal Law; processed Personal Data related to the relevant Personal Data subject, the source of their receipt; terms of processing of Personal Data, including the terms of their storage; information about the performed or proposed cross-border data transfer; name or surname, first name, patronymic and address of the person processing Personal Data on behalf of the operator, if processing is entrusted or will be assigned to such a person; other information;
- to protect their rights and legitimate interests, including compensation for damages and (or) compensation for moral damage in court.

In the event of a transfer of personal data outside the Russian Federation or the European Economic Area, such transfer shall be carried out on the basis of lawful grounds and subject to appropriate safeguards according to applicable law.

#### ***For residents of the Republic of Moldova***

If you are a personal data subject located in the Republic of Moldova, your rights are governed by the Law No. 133 of 08.07.2011 on Personal Data Protection. You have the right to ensure the protection of your rights and freedoms in connection with the processing of Personal Data, including the protection of privacy. In particular, you have the right:

- to access your Personal Data and obtain information regarding its processing;
- to request rectification of inaccurate or incomplete Personal Data;
- to request the blocking or erasure of Personal Data that is processed unlawfully or is no longer necessary for the purposes for which it was collected;
- to object to the processing of Personal Data on legitimate grounds;
- to request restriction of processing in cases provided by law;
- to data portability where technically feasible;
- to withdraw consent at any time where processing is based on consent (such withdrawal does not affect the lawfulness of processing carried out prior to withdrawal);
- to lodge a complaint with the National Center for Personal Data Protection of the Republic of Moldova;

- to seek judicial protection of your rights, including compensation for material and moral damages.

In the event of cross-border transfer of Personal Data outside the Republic of Moldova, such transfer shall be carried out in accordance with applicable Moldovan legislation and subject to appropriate safeguards.

### ***For residents of Brazil***

If you are located in Brazil, your rights are governed by the Brazilian General Data Protection Law (Lei Geral de Proteção de Dados – LGPD, Law No. 13,709/2018). Under the LGPD, you have the following rights:

- the right to confirmation of the existence of processing of your Personal Data;
- the right to access your Personal Data;
- the right to correction of incomplete, inaccurate or outdated data;
- the right to anonymization, blocking or deletion of unnecessary or excessive data or data processed in non-compliance with the LGPD;
- the right to data portability to another service or product provider, subject to regulatory requirements;
- the right to deletion of Personal Data processed on the basis of consent;
- the right to information about public and private entities with which we have shared your data;
- the right to information about the possibility of denying consent and the consequences of such denial;
- the right to withdraw consent at any time, where processing is based on consent (without affecting the lawfulness of processing carried out prior to withdrawal);
- the right to object to processing carried out in violation of applicable law;
- the right to request review of decisions made solely on the basis of automated processing of Personal Data;
- the right to lodge a complaint with the Brazilian National Data Protection Authority (ANPD) and to seek judicial protection, including compensation for damages.

Where Personal Data are transferred outside Brazil, such transfers are carried out in accordance with the LGPD and subject to appropriate safeguards, including standard contractual clauses or other lawful transfer mechanisms.

### ***For residents of Mongolia***

If you are located in Mongolia, your rights are governed by the Law of Mongolia on Personal Data Protection. You have the right to ensure the protection of your rights and legitimate interests in connection with the processing of your Personal Data. In particular, you have the right:

- to be informed about the collection and processing of your Personal Data;
- to access your Personal Data and obtain information regarding the purposes and legal grounds for its processing;
- to request correction of inaccurate, incomplete or outdated Personal Data;
- to request deletion of Personal Data where it has been processed unlawfully or is no longer necessary for the stated purpose;

- to restrict or object to the processing of Personal Data in cases provided by law;
- to withdraw your consent at any time where processing is based on consent (such withdrawal does not affect the lawfulness of processing carried out prior to withdrawal);
- to request suspension of processing if your rights or legitimate interests have been violated;
- to lodge a complaint with the competent supervisory authority or seek judicial protection of your rights, including compensation for damages.

Where Personal Data are transferred outside Mongolia, such transfers shall be carried out on lawful grounds and subject to appropriate safeguards in accordance with applicable Mongolian legislation.

## **8. Contact the data protection authorities**

For residents of the European Union: If you live in the European Union and believe that we are illegally processing your personal data, you have the right to file a complaint with the local data protection supervisory authority. You can find contact information here: [https://commission.europa.eu/about-european-commission/contact\\_en](https://commission.europa.eu/about-european-commission/contact_en).

For residents of the Russian Federation: if you believe that your rights are being violated, you can contact the Authorized Body for the Protection of the rights of personal data subjects – Federal Service for Supervision of Communications. You can find contact information at: [https://rkn.gov.ru/contacts /](https://rkn.gov.ru/contacts/).

For residents of the Republic of Moldova: If you believe that your personal data are being processed unlawfully, you have the right to file a complaint with the National Center for Personal Data Protection of the Republic of Moldova. You can find contact information at: <https://datepersonale.md/>

For residents of Brazil: If you believe that your personal data are being processed in violation of applicable law, you have the right to file a complaint with the Brazilian National Data Protection Authority (Autoridade Nacional de Proteção de Dados - ANPD). You can find contact information at: <https://www.gov.br/mj/pt-br>

For residents of Mongolia: If you believe that your personal data are being processed unlawfully or that your rights have been violated, you have the right to file a complaint with the competent supervisory authority responsible for personal data protection in Mongolia. You may find relevant contact information through official government resources, including: <https://legalinfo.mn/mn>

## **9. WHERE IS PERSONAL DATA STORED?**

Personal data of Users from the Russian Federation are processed and stored on servers located within the territory of the Russian Federation in accordance with the requirements of Russian law.

Personal data of users located in the European Economic Area may be processed on servers located both within and outside the EEA, provided that the requirements of applicable data protection laws are complied with and appropriate safeguards for cross-border transfers are in place.

For residents of the Republic of Moldova: Personal Data may be processed on servers located within or outside the Republic of Moldova, provided that such cross-border transfers comply with applicable Moldovan data protection legislation and are subject to appropriate safeguards.

For residents of Brazil: Personal Data may be processed on servers located within or outside Brazil, provided that international transfers are carried out in accordance with the Brazilian General Data

Protection Law (LGPD) and are subject to appropriate safeguards, including contractual, organizational or other lawful transfer mechanisms.

For residents of Mongolia: Personal Data may be processed on servers located within or outside Mongolia, provided that such processing complies with applicable Mongolian legislation and that appropriate legal grounds and safeguards for cross-border data transfers are in place.

Where cloud or other technology providers are engaged, processing is carried out on the basis of agreements that impose obligations to ensure the confidentiality and security of personal data.

Thank you for choosing our services!