

PRIVACY POLICY

Effective Date: July 02, 2025

1. Introduction

This Privacy Policy explains how **WL Games LTD**, a company incorporated under the laws of the Republic of Cyprus, with its registered office at Aigaiou, 83, office 104, Lakatamia, 2302, Nicosia, Cyprus, ("Company", "we", "us", or "our"), collects, uses, stores, and protects personal data when you ("User", "you", or "your") access and use <https://wishlistgames.net> ("Website").

Company is committed to protecting your privacy and handling your personal data in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR"), Regulation (EU) 2022/2065 (Digital Services Act, "DSA"), and applicable laws of the Republic of Cyprus.

By using Website, you acknowledge that you have read and understood this Privacy Policy.

This Privacy Policy applies solely to Website and does not apply to any third-party websites, services, or applications that may be linked from Website.

2. Data Controller Information

Data controller responsible for processing personal data collected through Website is:

WL Games LTD

A company incorporated under the laws of the Republic of Cyprus

Registered office: Aigaiou, 83, office 104, Lakatamia, 2302, Nicosia, Cyprus

Email: general@wishlistgames.com

If you have any questions regarding this Privacy Policy or your personal data, you may contact Company at the email address provided above.

3. What Data We Collect

Company may collect the following categories of personal data when you access or use Website:

- **Technical Data:** IP address, browser type, operating system, device information, language settings, access times, and referring URLs.
- **Usage Data:** Information about your interaction with Website, including pages visited, time spent on pages, clicks, and navigation patterns.
- **Contact Data:** Information you provide voluntarily by filling out contact forms, subscribing to newsletters, or otherwise communicating with Company, including name, email address, and any other information you choose to provide.
- **Cookies and Tracking Technologies Data:** Information collected through cookies and similar technologies. Details are provided in the Cookie section of this Privacy Policy.

Company does not knowingly collect any sensitive personal data (as defined under GDPR) or data relating to minors.

4. How We Use Your Data

Company processes personal data for the following purposes:

- To operate, maintain, and improve Website.

- To analyze Website usage and monitor technical performance.
- To respond to inquiries, requests, or messages submitted via contact forms or email.
- To communicate with User regarding updates, notices, or information related to Website.
- To ensure network and information security, including protection against fraud, abuse, and unauthorized access.
- To comply with legal obligations applicable under the laws of the Republic of Cyprus, GDPR, DSA, and other relevant regulations.
- To enforce these Terms of Service and protect rights, property, or safety of Company, Users, or others.

Personal data is not used for automated decision-making or profiling that produces legal effects or similarly significant impacts on User.

5. Legal Bases for Processing

Company processes personal data based on the following legal grounds, as provided by Article 6 of GDPR:

- **Consent:** Where User has given clear consent for processing specific personal data for specific purposes, such as when submitting a contact form or subscribing to a newsletter.
- **Contractual Necessity:** Processing is necessary to respond to User's requests or inquiries prior to entering into a contract or to perform a contract with User.
- **Legal Obligation:** Processing is necessary to comply with legal obligations applicable under the laws of the Republic of Cyprus, GDPR, DSA, and other relevant regulations.
- **Legitimate Interests:** Processing is necessary for the legitimate interests pursued by Company, including maintaining Website functionality, ensuring security, preventing fraud, and analyzing Website usage to improve services, provided such interests are not overridden by User's fundamental rights and freedoms.

If processing is based on consent, User has the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

6. Third-Party Links

Company may share personal data with third parties in the following circumstances:

- **Service Providers:** With third-party service providers who perform services on behalf of Company, including website hosting, analytics, IT support, and communication tools. These providers are bound by contractual obligations to process personal data only on Company's instructions and in compliance with applicable data protection laws.
- **Legal Compliance:** Where required to comply with legal obligations, regulatory requirements, court orders, or lawful requests from public authorities, including data protection authorities or law enforcement agencies.
- **Business Transfers:** In connection with any merger, sale of assets, financing, or acquisition of all or a portion of Company's business, where personal data may be transferred as part of the transaction.
- **Protection of Rights:** Where necessary to protect rights, property, or safety of Company, Users, or others, and to enforce these Terms of Service.

Company does not sell, rent, or trade User's personal data to third parties.

All data sharing is conducted in accordance with GDPR, DSA, and applicable laws of the Republic of Cyprus.

7. International Data Transfers

Personal data collected by Company may be transferred to and processed in countries outside the European Economic Area (“EEA”), where data protection laws may differ from those of the EEA.

Whenever personal data is transferred outside EEA, Company ensures that appropriate safeguards are implemented in accordance with GDPR to protect personal data, including:

- Transfers to countries that have been recognized by the European Commission as providing an adequate level of data protection; or
- Use of Standard Contractual Clauses (“SCCs”) adopted by the European Commission; or
- Other legally valid transfer mechanisms as permitted under GDPR.

User may request additional information regarding international data transfers and obtain copies of applicable safeguards by contacting Company using the contact details provided in this Privacy Policy.

8. Data Retention

Company retains personal data only for as long as necessary to fulfill the purposes for which it was collected, including to comply with legal, accounting, or reporting obligations.

Retention periods are determined based on the following criteria:

- Duration necessary to provide access to Website and respond to User’s requests or inquiries.
- Duration required to comply with legal obligations under applicable laws, including tax, accounting, and regulatory requirements.
- Duration necessary to protect Company’s legitimate interests, including security, fraud prevention, and dispute resolution.
- Where processing is based on consent, until User withdraws such consent, unless there is another legal ground for retention.

Once personal data is no longer necessary for these purposes, it is securely deleted or anonymized, unless further storage is required by applicable law.

9. Data Subject Rights

User agrees to indemnify, defend, and hold harmless Company, its affiliates, directors, officers, employees, and agents from and against any and all claims, liabilities, damages, losses, costs, expenses, or fees (including reasonable legal fees) arising from or related to:

- User’s violation of these Terms or applicable law.
- User’s misuse of Website.
- User’s infringement of any rights of any third party, including intellectual property, privacy, or other rights.
- Any content or information submitted by User, if applicable in the future.

Company reserves the right to assume exclusive control of any matter subject to indemnification by User. User agrees to cooperate with Company in asserting any available defenses.

Under GDPR, User has the following rights regarding personal data:

- **Right of Access:** To obtain confirmation as to whether Company processes personal data and to access such data.
- **Right to Rectification:** To request correction of inaccurate or incomplete personal data.
- **Right to Erasure (“Right to Be Forgotten”):** To request deletion of personal data where there is no legal ground for continued processing.
- **Right to Restriction of Processing:** To request restriction of processing under certain circumstances.
- **Right to Data Portability:** To receive personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller where processing is based on consent or contract.
- **Right to Object:** To object to processing based on legitimate interests, including profiling, unless Company demonstrates compelling legitimate grounds.
- **Right to Withdraw Consent:** Where processing is based on consent, User may withdraw consent at any time without affecting the lawfulness of processing before withdrawal.
- **Right to Lodge a Complaint:** To file a complaint with a supervisory authority, in particular in the Member State of User’s habitual residence, place of work, or place of alleged infringement.

The competent supervisory authority for Company is:

Office of the Commissioner for Personal Data Protection (Cyprus)

Website: <https://www.dataprotection.gov.cy>

To exercise any of these rights, User may contact Company using the contact details provided in this Privacy Policy.

10. Security Measures

Company implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- Protection against unauthorized access, disclosure, alteration, or destruction of personal data.
- Use of secure servers, encryption technologies, and firewalls.
- Regular monitoring, testing, and assessment of security measures.
- Restriction of access to personal data to authorized personnel who are subject to confidentiality obligations.

Despite these measures, no method of transmission over the Internet or electronic storage is entirely secure. Therefore, Company cannot guarantee absolute security of personal data.

11. Use of Cookies

Website uses cookies and similar tracking technologies to enhance functionality, analyze usage, and improve User experience.

Cookies are small text files stored on User’s device when accessing Website. They may be:

- **Strictly Necessary Cookies:** Essential for Website to function properly. These cookies cannot be disabled.
- **Analytics Cookies:** Used to collect aggregated data on how Users interact with Website, including pages visited and time spent. These cookies help improve Website performance.

- **Functional Cookies:** Enable enhanced features and personalization, such as remembering User preferences.

Where required by applicable laws, Company obtains User's consent for the use of non-essential cookies. User may manage or disable cookies through browser settings at any time.

For detailed information on how cookies are used, User may refer to Company's Cookie Policy, which forms part of this Privacy Policy.

12. Changes to This Privacy Policy

Company reserves the right to amend, modify, or update this Privacy Policy at any time to reflect changes in legal requirements, business practices, or Website functionality.

Any changes become effective upon publication on Website unless a different effective date is specified. Company may, but is not obligated to, notify Users of material changes via Website or other communication channels.

User is responsible for reviewing this Privacy Policy periodically. Continued use of Website after changes become effective constitutes acceptance of the updated Privacy Policy.

13. Contact

If you have any questions about these Terms, please contact us at:

Email: general@wishlistgames.com

Address: Aigaiou, 83, office 104, Lakatamia, 2302, Nicosia, Cyprus