



## GAMERSAFER - DATA PRIVACY COMPLIANCE FUNDAMENTALS

GamerSafer's mission is to scale safer and fair play experiences to millions of players worldwide. Our digital identity management system helps gaming platforms defeat cheaters, criminals, fraudsters, and toxic behaviors. Through world-leading computer vision and artificial intelligence technologies, players are verified and authenticated inside the platforms served by our services.

Safety is GamerSafer's first and foremost service, and we do not charge users to create or maintain our services. **We do not sell, rent or lease users' data at any moment.**

Based on a transparent and easily understandable consent approach, GamerSafer shares relevant users' information with specific partners and customers. Users provide individual consent for any data sharing event.

The Opt-in and consent-based approach is the foundation of GamerSafer's compliance with data privacy regulations. GamerSafer also implements data minimization best practices to define the minimum data sharing required to secure users' experiences, and specific data points are never shared.

Among other data, GamerSafer collects biometric information. More specifically, a facial user picture. **GamerSafer uses biometrics for verification purposes only and does not share user biometric info.** Each user will have its set of facial coordinates measured and converted into a unique code through computer vision techniques. The user profile is associated with this unique code which can not be reverse-engineered. Neither can any image be created based on this code or coordinates. The picture used for profile creation is the only one registered permanently, or as long as the user wants to have an active GamerSafer account. All following images used for the login process are temporarily stored (for audit process only and are automatically deleted following strict safety protocols).

GamerSafer compliance foundation also incorporates user's individual rights, including and not limited to the **right to be informed** (what data is collected and how it's used), the **right of access** (including the track of data processed and any inference out of it), the **right to rectification** (securing data accuracy), the **right to erasure** (securing the right to data removal or deletion in the eventuality there is no compelling reason for its continued processing or availability) and the **right to data portability** (allowing individuals to obtain and reuse data across different services).

**GamerSafer is particularly mindful of minors' data management.** Different countries have specific standards and requirements; most of those principles were designed years ago when the technologies we utilize were not widely accessible. In that perspective, not only GamerSafer complies with regulations related to collect verifiable parental consent, but it deploys with the highest standards of accuracy.

All the above measures are part of GamerSafer's terms of service and privacy policy. Even though providing legal counseling is not our company's scope and mission, we also contribute to users' best interest, supporting our partners to deliver the same values and principles. Each partner should seek proper legal counsel and deploy similar measures to protect users' data and comply with local regulations.

## **Data collection flow**

### ***Regulation boundaries definition***

Step 1 – Before any data capture, identify regulations boundaries for that user

Data input required: DOB, Country, and State.

Why we require this data:

Date of Birth – o define the age-appropriate strategy for data capturing, most international regulations require specific consent for minors' data collection.

Country – to define the specific regulation that needs to be followed

State – for some countries, State-level information is also required because there are extra layers or specific regulation to be observed

Step 2 – With Step 1 info temporarily stored, define the age-appropriate registration flow (for most countries, under 13 years old users require parental consent inside the registration flow).

### ***Registering minors***

Step 1 – Prompt user to seek for parent support to create the account

Step 2 – Collect parent/adult information

Data input required: Full name and DOB, E-mail, username, password, biometric (selfie)

Why we require this data:

Full name and DOB: to minimize the probability of fake accounts and/or to cross-check it with the government issue ID

Username and password: to create a parent account and have proper touch with the minor responsible

Biometric (selfie): to verify if there is a real adult behind that account creation/consent process

Step 3 – Verify parent government ID (required in some countries)

Data input: picture of a government-issued ID

Why we require this data: to verify if the personal information (Full name and DOB) matches profile information and if the picture in the document matches the profile picture.

This step requirement varies per country. In the USA, to comply with Children's Online Privacy Protection Act (COPPA) Rule, verifiable parental consent for data acquisition and use is required. Federal Trade Commission it's the institution responsible to issue and enforce regulations concerning children's online privacy and their Commission has approved the use of "face match to verified photo identification" (FMVPI) as a method to verify that the person providing consent for a child to use online service is, in fact, the child's parent.

GamerSafer follows the FMVPI consent method.

#### Step 4 – Collect minor information

Data input – Name, DOB, username, password, biometric (selfie)

Why we require this data:

Name and DOB: to minimize the probability of fake accounts

Username and password: to create a parent account and have proper touch with the minor responsible

Biometric (selfie): to verify if there is a real adult behind that account creation/consent process

#### **Registering adults**

Follow the same steps of "Registering minors" without prompting government issue ID capture from users neither any minor info.

