

Privacy Policy

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Pearl Abyss and its affiliated companies (Hereinafter referred to as "Pearl Abyss" or the "Company") provides PC, mobile, and the other game and related Services ("Services"). Pearl Abyss stores, processes, and shares personal information in certain circumstances in order to provide you with Services. However, the security of your personal information is a priority to us and ample measures will be taken to protect it. This Privacy Policy applies to all Services provided by Pearl Abyss.

This Privacy Policy provides information on how your personal data is used for which purpose, and which measures the company is taking to protect your personal

data.

The company's Privacy Policy is subject to change in accordance with the modifications made to the government's relevant law or guideline, or to the regulation of the company. When a revision is made, it is disclosed on the official website. Therefore, users are recommended to look into the official website and keep track of any changes made to the policy.

1. What information does Pearl Abyss collect?

The company collects the following personal information when you sign up to our official website, use provided services (including mobile services), edit personal information, or submit inquiries via phone call, fax, or Support, and when partners provide and collect your information using a data collecting tool.

The company collects the following necessary information to provide Services:

1) The information you give us.

① The information provided during account creation.

- Official Website: Name, nationality, email address, password

② The information collected while using Services on PlayStation or Xbox One.

- Account Information

③ Following additional services collect respective personal information.

Type	Collected/	Collected personal information
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	Optional	
Customer support	Collected	Email address
	Optional	Name, mobile number, date of birth, address, automatically formed information, device identification number, and other information required for support. ※ Collected personal information may differ depending on the type of inquiry, and there may be additionally collected personal information.
Events/promotions	Optional	Name, mobile number, address, gender, date of birth, email address ※ Collected personal information may differ depending on the type of event and promotion, and there may be additionally collected personal information.
Gift delivery	Collected	Delivery of physical products: Name, address, mobile number
		Mobile/ online products: mobile number, email address
Notice on new services and updates	Optional	Email address, mobile number
Taxes and the Public Utilities' Charge	Collected	Resident Registration Number, name, address (Republic of Korea) Passport number, name, address (other regions)
Refund (Republic of Korea)	Collected	Bank account information (name of the account holder, account number, name of the bank)

※ Additional information may be gathered from users using certain services and participants of certain events or promotions.

※ When in need of additional data, we will ask for your consent after notifying you on the type of data to be collected, the purpose, and the storing period.

2) Data created while using our Services.

The company collects data that is created while you use our Services with or without an account.

- Game progress data

- Accounts used for PlayStation and XBOX Live
- IP addresses and information about devices
- The information collected through Cookies and related technology
- Web browser information
- Location information
- Gameplay data, interactions with other players while using Services, and all data related to the use of our Services
- Advertising ID
- Data required to verify payment
- Member Identification Number when linking PlayStation™Network/PlayStation® and XBOX to the official website

2. Why does Pearl Abyss collect information?

The company collects information for the following reasons.

1) We process the necessary data to provide Services.

The company collects information to provide Services you on our contractual relationship with us

- To allow you to make an account and provide you Services;
- To operate our Services;
- To confirm payments;
- To provide products and Services you request;
- To send information about Services;

- To settle payments for purchases and paid services;
- To abide by relevant legislations

2) The company collects information to provide appropriate Services.

The company collects the following information for legitimate interest as the information is used:

- To improve and develop the Services provided by the company;
- To update and develop player profiles;
- To improve and develop optimization of Services and game experience;
- To set and manage registered account;
- To provide software updates;
- To maintain settings and provide content;
- To reply and provide support to submitted opinions or inquiries;
- To provide notices on changes made to Terms of Service, service errors, updates, security warnings, support, etc.;
- To create events and promotion programs for customers;
- To send event and promotion gifts

3) The company processes relevant data to provide safe and fair Services.

The company has legitimate interest in collecting and processing the data necessary to accomplish the following purposes in order to keep your Services safe and fair. Please see our Terms of Services for legal usage policies:

- To prevent abusive and unauthorized use of malicious users;
- To provide services to protect personal information;

- To find bugs, errors, and provide solutions;
- To allow quality game experience across multiple devices;
- To allow appropriate automatic or manual chatting;
- To adhere, investigate, and restrict legal disputes, fraud, and other illegal behaviors

4) The company processes necessary data to create targeted advertisements.

The company has legitimate interest in collecting and processing the data necessary to establish targeted advertisements on our Services, other websites, and emails. However, commercial advertisements (direct marketing information) will only be sent to users who have agreed to receiving commercial advertisements (receiving marketing information).

- To track content accessed by users in relation to services and online behaviors;
- To customize advertisement and offer targeted marketing and promotions;
- To recommend or suggest information on services users may find interesting

5) For all the aforementioned cases and purposes, the company may analyze and assort the entire collected data.

The company may have legitimate interest when collecting and processing data necessary to meet contracts, provide and retain appropriate services, and set up behavioral advertisements. However, any personal data users have not agreed to provide will not be used.

3. Who does Pearl Abyss share your information with?

The company does not share identifiable personal information with a third party without the consent of the relevant user. When requesting consent from a user, the

company will provide information on the subject receiving the data, the purpose, and the type of data shared. However, the company shares information with third parties if it is required by law, or is deemed necessary to enforce our rights, property, or operations or to protect users or third parties or if we engage partners and service providers in order to provide our Services to you by the due process of law.

1) Other players and users

- If you chat using our Services or post on the Forums, it will be displayed for other players or the public to see. (e.g. If you use in-game chat, it will be displayed to other players).

2) Partners and service providers

- The company provides the information to its vendors, consultants, marketing partners, research firms and other service providers or business partners.

Our consignment company for processing personal information and its consigned duties are as follows:

Consigned Company	Consigned Duties
Elite Global	Providing customer service, handling complaints, sending matters of notification

3) Public authorities and Investigative Bodies

- The company may share your information to third parties and public authorities to comply with the law and to curb fraud and illegal behavior.

- The company may share your information to third parties and public authorities by the due process of law to protect the safety and property of the company, employees of the company, and you.

- The company may provide user data upon request from an investigative body under the right procedure and process specified in the regulation or statute law.

4) Advertising companies and social media

- The company shares your information to advertising companies and social media (Facebook, Google, Twitter). Relevant third parties will have access to your information in accordance with the Privacy Policy to use tools that interact with social media, in-game advertising, and other operations of third-party companies. For more detail on how these third-party companies handle your information, please refer to the relevant third-party company's Privacy Policy.

- Facebook: <https://www.facebook.com/about/privacy>

- Google: <https://policies.google.com/privacy>

- Twitter: <https://twitter.com/en/privacy>

5) Delivery companies

- The company may share your address and contact information you provided to delivery companies to ship prizes.

4. How long does Pearl Abyss retain the information and how is it deleted?

The company maintains and uses the collected information for the duration of users' membership with a given consent. In principle, once the purpose of gathering and using provided personal information is fulfilled (ex. on request of membership withdrawal, closing of a participatory event), the relevant information will be eliminated immediately. (However, to prevent undesired membership withdrawal due to any identity theft and account-takeover identity theft, the user's personal information will be stored for 15 days after requesting account deletion.)

However, the following information will be retained for the specified period of time under respective reasons in accordance with the relevant act on data in the Republic of Korea. They will not be used for any other purposes.

1) Reasons for retaining information under relevant laws

① Protection of Communications Secrets Act

- Log-in records: 3 months

② Act on the Consumer Protection in Electronic Commerce, etc.

- Records of labeling and advertisement: 6 months
- Records of contracts or withdrawal of subscription: 5 years
- Records on payment and supply of goods, etc.: 5 years
- Records on consumer complaint and conflict settlement: 3 years

③ Framework Act on National Taxes, Corporate Tax Act

- Account book and evidential document for all transactions stipulated in the tax law: 5 years

2) Reasons for separating and preserving personal information of long-term inactive accounts

In accordance with the Personal Information Protection Act and corresponding enforcement decree in the Republic of Korea, accounts that have not logged into the official website for 12 consecutive months will be converted to an inactive account. The company will acknowledge relevant users 30 days before taking the

action that his/her personal data will be eliminated or separately stored.

3) Reasons for retaining personal information under the company's internal guidelines

The company may retain personal information collected through events or promotions for a maximum of 1 year. The duration may differ depending on each event or promotion, and the period of collecting and utilizing data guided in each event or promotion will be employed first.

Additionally, the Company has legitimate interest to store the following information to restrict users from acquiring certain items multiple times by deleting and re-registering their accounts. (We cannot determine the identity of Users using this information.)

- User identification number (XBOX, PlayStation), package, pearl box, and DLC item delivery information

In principle, the company instantly eliminates users' personal information once the purpose of collecting and utilizing relevant information is fulfilled or the duration for preserving and utilizing relevant data is expired. The procedure and operation of deleting personal information are as follows:

1) Deletion Procedure

User's personal information will be instantly erased once the purpose of collecting and utilizing relevant information is fulfilled (15 days after the grace period for membership withdrawal). However, it is held for a certain period, under the reasons for information protection stipulated by the laws (refer to **"4. How long does Pearl**

Abyss retain the information?”).

2) Deletion Method

Personal information printed out on paper (printed material, papers, etc.) is shredded or incinerated, and information saved in the form of an electronic format is permanently deleted with an unreturnable method.

5. How does Pearl Abyss transfer information overseas?

Your information may be sent overseas as the company provides Services worldwide. Each country may have different laws pertaining to information protection. In particular, if you are residing in a European country, laws on the protected range of information in other countries outside of the EEA (European Economic Area) may be different to that of your own country of residence. The company will comply with the relevant laws to protect your information. Please refer to '**6. How is the information protected?**' for details on how your information will be protected.

The Republic of Korea and the EU have adopted the Personal Information Protection Adequacy Decision for the transfer of personal information to the Republic of Korea in accordance with the GDPR.

- The Personal Information Protection Act in the Republic of Korea guarantees equal protection of personal information as the GDPR of the EU.
- Personal information can be safely transferred from the EU to the Republic of Korea without the need for additional authentication according to the Adequacy Decision.

You can always reach Support (<https://www.console.playblackdesert.com/Support/>) or the personnel or department in charge of privacy protection (privacy@pearlabyss.com) and request discontinuance of an overseas transfer of your personal data. However, if some information is not provided to an overseas partner under your quest, you may experience partial limitation when using our official website or game services.

When transferring your information to partners and service providers listed under '**3. Who does Pearl Abyss share your information with?**', the company transfers information in compliance with the European Commission's Standard Contractual Clauses. Your information will be transferred with adequate protection. For more information, please feel free to contact Support on our official website (<https://www.console.playblackdesert.com/Support/>) or the personnel or department in charge of privacy protection (privacy@pearlabyss.com).

6. How is the information protected?

The company uses the following technology, management, and physical measures to prevent data loss, theft, breach, alteration, and destruction. However, the company is not liable if the data is leaked due to your negligence such as poor password management or mishaps outside of the company's control.

1) Technology

The company encrypts the information when it gets stored. Personal information can only be changed or viewed after you've requested it and verified your identity.

- Files and data transfers containing important information (including your personal information) are protected by encryptions, file locks, or such protection methods

- The company has backup systems to prevent your information from getting leaked or destructed. The company utilizes Anti-Virus programs, Firewalls, and other various security devices to protect your information.
- The company is taking security steps necessary for our systematically organized database system for processing personal information.

2) Management

The company control access right to your information to a minimum. The minimum number of personnel given access to your information are the following:

- Personnel that are directly involved with marketing, events, customer support, and delivery (including personnel in partner companies and service providers);
 - Personnel that are in charge of personal information including our Data Protection Officer;
 - Parties handling personal information for inevitable business purposes.
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- The company carries out a training program about personal information protection on a regular basis for personnel and consigned companies handling personal data.
 - The company established Privacy Policy with the department in charge of personal information protection. Additionally, the company aims to enforce internal regulations and rectify issues as soon as they are discovered.

3) Physical Security

- The company has a separate location where personal information is physically stored. Entry to and operations of this location is strictly monitored with an

established entry protocol.

- Documents with personal information and other forms of information storage are installed by locking devices in safe locations.

7. What information is automatically collected (ex. Cookies)?

The company uses 'Cookies'. Cookies are small text files sent by the company's official website that is stored in your hard drive. Cookies are used for the following purposes:

1) Purposes for using Cookies

Analysis of subscribers and non-subscribers accessing our official website and duration, to understand and track user preferences and interests, provide other personalized Services by tracking the number of times the website has been accessed and other information.

The company and third-party analysis service providers use tracking technologies such as cookies, beacons, tags, or scripts. These technologies are generally used by the company to collect statistics about the websites to analyze tendencies, manage the website, and to understand how our website is used. The company may receive collected data as a whole from analysis service providers that use these technologies.

2) How to block Cookies from getting saved

You have the right to block cookies from getting saved on your hard drive. This can be done by going to your web browser's option settings to allow all cookies, ask for permission each time cookies get saved, or to block all cookies from getting

saved. However, if the user refuses to have Cookies saved, some services may be no longer available.

- Internet Explorer: Go to [Tools] at the top of the browser → [Internet Options] → [Personal Information] → [Advanced]

- Chrome: [Settings] → [Advanced] → Privacy and security [Content settings] to change your settings.

※ Other web browsers adhere to the respective settings.

The company may use various external weblog analyzing tools such as Google Analytics, and is allowing advertisers providing targeted advertisement online to collect behavioral data.

① Block Google Analytics: <https://tools.google.com/dlpage/gaoptout/>

※ Other weblog analyzing tools adhere to the respective blocking method.

② How to withdraw consent for receiving targeted advertising

- Online advertisers providing targeted advertisement: Google, Facebook, Twitter
- Behavioral data collection method: Automatically collected when the user visits the official website or open the application.

※ Online Behavioral Advertisement: A marketing strategy that provides customized services for users by analyzing their online behaviors and access records, etc.

- Android: Click on privacy settings then select to block certain ads.

- iOS: Click on privacy setting then select limit ad tracking.

8. What rights and choices do I have pertaining to my personal information?

You may always inquire about your registered personal information, and if you do not want the company to process your personal information, you may withdraw consent or request membership withdrawal. Yet, once your personal information is eliminated for membership withdrawal, related information the user has created or stored while using the company's services may be eliminated as well.

You can view or edit your personal information on "My Page" after logging into the website, and request membership withdrawal through My Page > Delete Account. You can also contact Support (<https://www.console.playblackdesert.com/Support/>) or the personnel or department in charge of privacy protection (privacy@pearlabyss.com) to view or edit your personal information or withdraw membership.

Once the user has requested the correction of an error in his or her personal information, the relevant information will not be used or provided until the rectification is made. Likewise, if any wrong personal information was already provided to a third party, corrected data will be delivered to the third party instantly for further correction.

The company processes personal information withdrawn or deleted under the request of the user following **"4. How long does Pearl Abyss retain the information?"** and limits the information from being used or searched for other purposes.

You can always exercise the aforementioned rights through Customer Support in

our official website (<https://www.console.playblackdesert.com/Support>) or by sending an email to dpo@pearlabyss.com.

1) Privacy rights of users residing in the European Economic Area (EEA)

Users accessing the Services from the European Economic Area have the following additional rights relating to personal information, but their effectiveness and procedures may be determined in accordance with the laws and regulations of individual countries.

- 1) The right to request the company to send personal information to another company.
- 2) The right to contact the supervisory authority

2) Privacy rights of users residing in California

Under California law, you have the right to request the following information from the company if you are a resident of California.

- 1) A description of the categories of personal information disclosed to any third party to whom the company may have disclosed your personal information for that third party's direct marketing purposes within the previous calendar year.
- 2) Information that identifies any such third party(ies)

The company does not purposely share or sell your personal information to unaffiliated third parties for direct marketing purposes without your consent.

For all the aforementioned rights, please contact Support (<https://www.console.playblackdesert.com/Support/>) or send an email to dpo@pearlabyss.com. You can also exercise your rights by contacting the personnel

or department in charge of personal information (privacy@pearlabyss.com).

9. Is there an age restriction for the use of service?

The company does not collect or request personal information from users regarded as minors in respective countries (ex. 18 or under in Korea, 13 or under in the US/Canada, 13-18 or under in Europe, and 17 or under in Japan) on purpose. We intentionally do not target these users when showing behavioral advertisements and do not permit them to use our services.

- Underage users cannot send their personal information to the company, and if their personal information is found collected, we will immediately delete relevant data.

- If you are an underage user, please do not send any of your personal information to the company including your name, address, contact number, or email address. If you suppose the company is keeping data collected from such a user, please contact us immediately.

10. How do you contact Pearl Abyss?

If you have any questions about personal information protection or have issues related to personal information, please send an inquiry through Customer Support on our official website (<https://www.console.playblackdesert.com/Support>). The company will answer your inquiries as soon as possible.

Also, you may report any of your concerns regarding personal data while using our services to the personnel or department in charge of personal data protection.

Pearl Abyss will do its best to thoroughly address and answer all complaints as

quickly as possible. Please contact the following institutions if you need to report or receive consultation about personal information.

▶ Chief Privacy Officer	▶ Department that handles issues on personal information
Name: Jin-Young Heo Title: CPO Number: +82) 1661-8572 Email: privacy@pearlabyss.com Fax: +82) 031-624-5897	Department: Policy & External Relations Division Number: +82) 1661-8572 Email: privacy@pearlabyss.com Fax: +82) 031-624-5897

1) Authorities and consulting agencies handling infringement of personal information in the Republic of Korea

If you are residing in the Republic of Korea, you may contact the following bodies for additional reports and consultations on any infringement of personal data.

- Infringement of Personal Information Report Center (privacy.kisa.or.kr / Without Area Code: 118)
- Supreme Prosecutors' Office Cybercrime Investigation Division (spo.go.kr / 02-3480-3573)
- Korean National Police Agency Cyber Bureau (cyberbureau.police.go.kr / Without Area Code: 182)
- Personal Information Dispute Mediation Committee (kopico.go.kr / Without Area Code: 1833-6972)

2) Company and agency in charge of personal information protection in Europe (located in the Republic of Korea)

If you are residing in Europe, you may ask questions regarding your personal information through the following contact information.

Company in charge of personal information protection: Pearl Abyss Corp.

Address: Simin-daero 327 beon-gil Dongan-gu, Anyang-si, Gyeonggi-do, 14055,
Rep. of KOREA

Email: dpo@pearlabyss.com

Company and agency in charge of personal information protection in Europe

VeraSafe has been appointed as PEARL ABYSS H.K. LIMITED's representative in the European Union for data protection matters, pursuant to Article 27 of the General Data Protection Regulation of the European Union.

VeraSafe can be contacted in addition to dpo@pearlabyss.com, only on matters related to the processing of personal data. To make such an inquiry, please contact VeraSafe using this contact form: <https://www.verasafe.com/privacy-services/contact-article-27-representative>

Alternatively, VeraSafe can be contacted at:

VeraSafe Czech Republic s.r.o

Klimentská 46

Prague 1, 11002

Czech Republic

11. Overseas Transfer of Personal Information (for Korean users)

Pearl Abyss stores the following personal information overseas to provide stable and safe service.

1) Personal Information that is Transferred (Stored) Abroad:

① When signing into the official website: Email address (account name), name, country, date of birth, password

② When using PlayStation or Xbox Live Service:

- Member Identification Code
- Data on game progress
- Accounts used in PlayStation™Network, Xbox Live
- IP address, device information
- Data collected from Cookies or through similar technologies
- Web browser information
- General Location Data
- Collected data while using services such as interacting with another player in the game and gameplay data
- Advertising ID
- Data required for payment verifications, etc.

③ When requesting customer support: information provided by the user when requesting customer support

2) Countries personal information is transferred or stored

① United States of America

- When signing up to the official website
- When using game services (PlayStation, XBOX) on the NA server

② Philippines

- When requesting customer support

③ Netherlands

- When using game services (PlayStation, XBOX) on the EU server

3) Purpose of transferring or storing personal information and the company storing or receiving the transferred data

- ① To provide an environment for users when using the official website

: Microsoft Azure (02-531-4500, contact number of MS Korea)

- ② To provide games services on PlayStation™Network and XBOX Live

: Microsoft Azure (02-531-4500, contact number of MS Korea)

- ③ To provide customer support

: ELITE GLOBAL SOURCING INC. (https://elitegsl.com/wp_2019/) ELITE GLOBAL SOURCING INC.

4) Personal information transfer method and time:

- ① Sent through the network when signing up and using the official website

- ② Sent through the network when using the game.

5) Transferring and storing period of personal information

- ① Transfer/storage of personal information to provide services on the official website and game.

- Until the user withdraws membership

Users can always contact Support on the official website and ask for the termination of his or her personal information's transfer to another country. However, the user may experience limitations when using services if certain personal information is not transferred to another country under request.

This Privacy Policy does not apply to any data collected on the website of another company associated with the services that the company provides. Hence, please check the relevant Privacy Policy when visiting the linked website of another company.

Additional Clause

This Privacy Policy will take effect on February 3, 2022.