



PRIVACY POLICY

Version 2

Last Revision Date: 04 June 2025

We value your privacy and are dedicated to safeguarding it. This policy outlines how we process any personal information you provide via our website <https://navi.gg>, the forum and within our interaction with fans (i.e. watch parties, community events, raffles etc.).

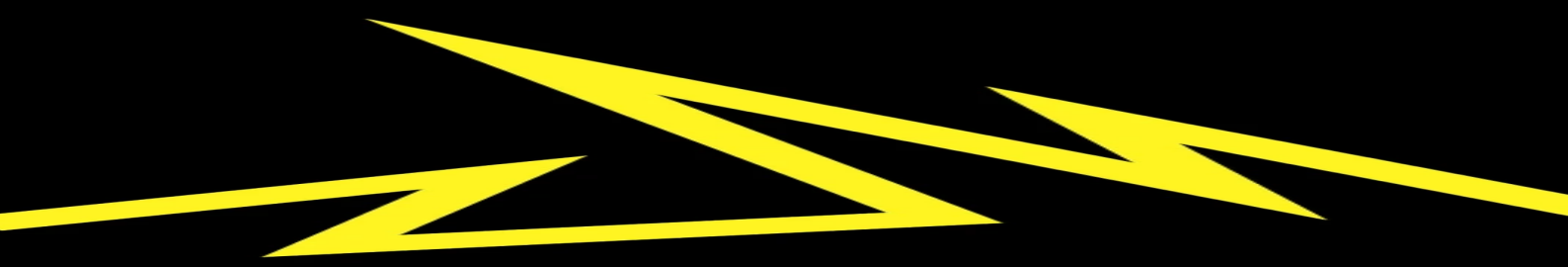
We, NAVI (NATUS VINCERE ESPORT CY LTD, a company duly established under the laws of the Republic of Cyprus, reg.No: HE398268, Spyrou Kyprianou, 79, PROTOPAPAS BLDG, 2nd floor, Flat/Office 201, 3076, Limassol, Cyprus), are the **data controller** of your personal information. We recommend that you read through this policy thoroughly to gain a clear understanding of our privacy practices.

WHAT IS THE LEGAL BASIS FOR COLLECTING AND PROCESSING YOUR PERSONAL INFORMATION?

Our legal basis for obtaining and utilizing your personal information, as this policy outlines, depends on the context in which it is collected. We act in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

We may collect your personal data based on:

- Consent
- Contract
- Legitimate interests
- Compliance with laws
- Public interests



WHY DO WE PROCESS YOUR PERSONAL INFORMATION?

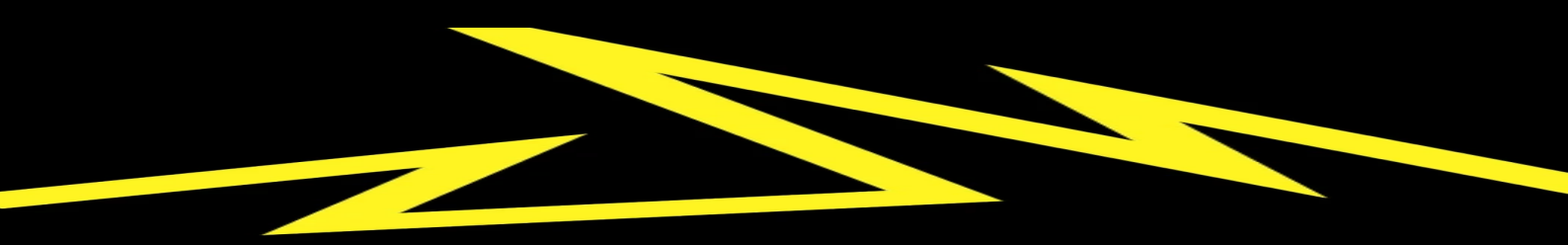
We process personal information for the following purposes:

- To operate and maintain our service
- To provide our fans the best experience through various activations and marketing activities
- To recruit contractors, employees, freelancers, volunteers for our projects
- Analyze service usage for business intelligence and insights, and to understand economic trends.
- Support business activities like account management, quality control, Web-source administration, business continuity, corporate governance, reporting, and legal compliance.
- Administer surveys, loyalty programs, sweepstakes, contests, and events.
- Send marketing communications, personalized offers, and interest-based ads, based on your preferences.
- To perform our contractual obligations, i.e. payment, agency, services etc.

WHICH CATEGORIES OF PERSONAL DATA DO WE COLLECT?

We collect the various categories of personal data depending on the format of our interaction with you. The specific categories of personal data are specified in every specific case. For instance, if you register for NAVI event, the categories of personal data we collect are those specified in the respective Google Form.

Among the categories of personal data we can collect are:

- Personal identification information: Personal Name, Second Name, Surname, Age, Nickname (Username) (descriptive name given instead of or in addition to the one belonging to a person) / Nickname (Username) on social media networks that you use to authorize for our Event.
 - Contact Information that allows us to communicate with you: e-mail address, telephone number, or social media profile links.
 - Information about your interactions with social media networks and messengers (i.e. Google, Discord, Facebook, Twitter) which accounts you may use to authorize for the Event including the information this social media networks and messengers collect, control, process and disclose.
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HOW DO WE COLLECT PERSONAL INFORMATION?

Majorly, you directly provide NAVI with most of Personal information we collect. We collect Personal information and process Personal information when you, for example:

- Fill in the registration form to participate in the NAVI In-person Watch Party;
- Register online for our events;
- Voluntarily complete a marketing or customer survey or provide feedback on any of our message boards or via email;
- Participate in our raffles either hosted by us or our partners;
- Register and participate in activities on the forum at navi.gg website;
- Use or view our event via your browser's cookies.

NAVI may also obtain Personal information from third party processors and controllers including social media networks and messengers (i.e. Google, Discord, Facebook, X) you may use to authorize for our website or other platforms.

WITH WHOM WE SHARE THE COLLECTED PERSONAL INFORMATION?

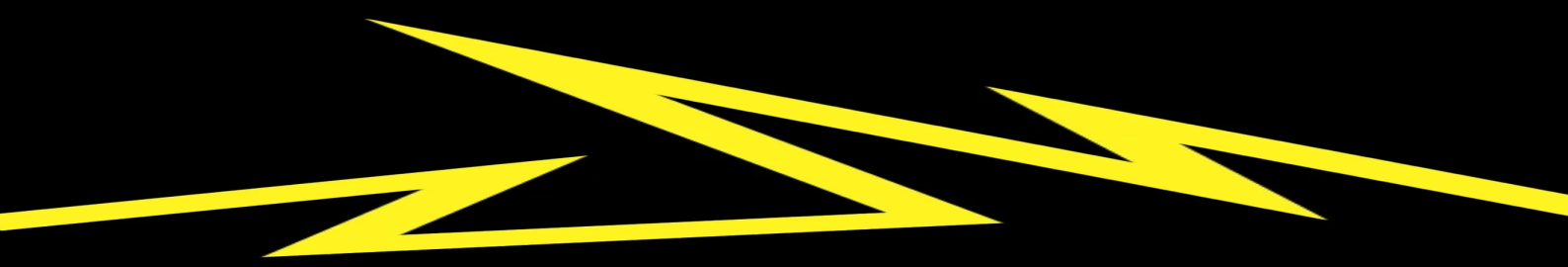
To facilitate our activities, we engage third-party companies and individuals ('Data Processors') who may require access to your personal information. These tools may use cookies and other tracking technologies. We encourage you to learn about their privacy policies in due course.

Our Data Processors are, among others:

- Google products such as G-Suite;
- Microsoft products such as Microsoft Office;
- Payment platforms or banks, such as Wise, Payoneer, Revolut, their intermediary banks;
- Contractors and service providers, such as travel agents, event managers, legal advisors, financial advisors;
- Social Media, where we have our accounts or our representatives have the accounts, including but not limited to Weibo, Facebook, X, Telegram, LinkedIn;
- NAVI Partners and Sponsors, with whom NAVI has respective agreements;
- Travel services such as airlines, railway or bus companies, etc.

NAVI may use and disclose information that is not personally identifiable. For example, we may publish reports containing aggregated or statistical data. These reports do not include Personal Information.

NAVI may disclose Personal Information when required by law, such as in response to a subpoena, including to law enforcement agencies, regulators, and courts in the European Union and other countries where we operate.



INFORMATION SECURITY

We use physical, technical, organizational, and administrative safeguards to help protect your Personal information from unauthorized access or loss. For example, we use encryption and other tools to protect sensitive information. We retain your personal information as needed for the purposes listed above and as permitted by law.

We disclaim responsibility for any privacy violations on the part of Google Inc., since Google Inc. is the operator of the registration form.

CHILDREN'S DATA

NAVI Event is not directed to children and is not designed for underage users. NAVI is responsible for security issues, especially for people under full age. In this regard, NAVI appeals to parents to explain to their children the importance of internet security.

DATA RETENTION AND LOCATION

The duration for which we retain each specific category of personal data depends on the processing purpose for which it was collected. We will store your personal data only for as long as it is necessary to fulfill the specific processing purpose for that category of data.

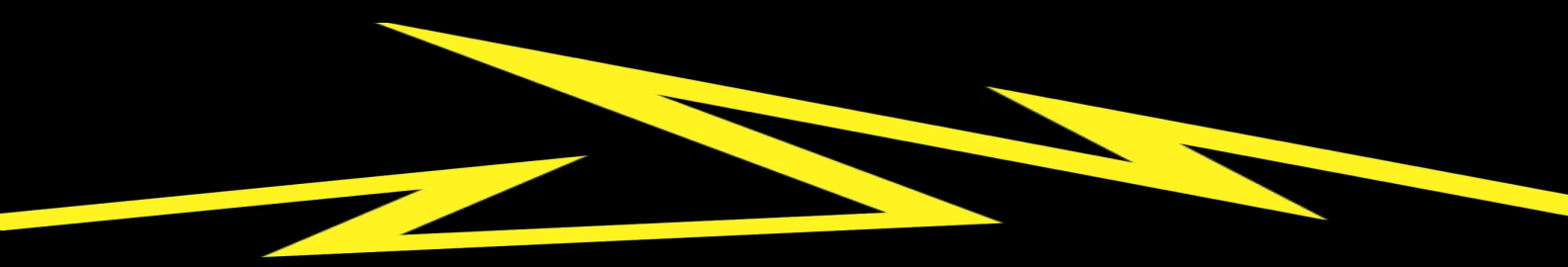
Following the deletion of your personal information from our bases, the copy can be retrieved for 30 calendar days and then is permanently deleted.

Your Personal information is stored within the European Union, but in some cases it is transferred to the processors located outside of the European Union. In such cases, we ensure that your data is transferred based on appropriate safeguards, such as adequacy decisions, standard contract clauses, or another transfer tool.

We take all reasonable steps to ensure that your data is treated securely and that no transfer of your personal data will take place to an organization or a country unless adequate controls are in place to safeguard your data and other personal information. We are committed to maintaining the security of your personal information and protecting your privacy rights.

JOINT CONTROLLERSHIP WITH GROUP COMPANIES

In certain cases, we jointly determine the purposes and means of processing your personal data together with other companies within our corporate group. In such



cases, we act as joint controllers in accordance with Article 26 of the General Data Protection Regulation.

We may jointly process identification details (e.g., name, email), business contact data, usage data, and customer relationship data. The legal basis for such joint processing is our legitimate interest in ensuring efficient internal administration and service provision across, and/or the performance of a contract where applicable.

You may exercise your rights as mentioned **below** against any of the joint controllers. For ease of processing, you may contact us at legaldepartment@navi.gg, and we will ensure your request is forwarded to the relevant Group Company where applicable.

WHAT ARE YOUR DATA PROTECTION RIGHTS?

NAVI would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access - You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification - You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete information you believe is incomplete.

The right to erasure - You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing - You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

The right to object to processing - You have the right to object to Our Company's processing of your personal data, under certain conditions.

The right to data portability - You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Write to us: legaldepartment@navi.gg.



CHANGES TO OUR PRIVACY POLICY

We may update this Privacy Notice from time to time. We will post an alert online if the changes are material. If the changes will materially affect the way we use identifiable information that we have already collected, we will notify you.

HOW TO CONTACT US?

If you have any questions about our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: legaldepartment@navi.gg.

