

Privacy Policy

PearlAbyss H.K. Limited. (Hereinafter referred to as PearlAbyss) 'collects, uses and provides personal information based on the member's consent', and 'actively assures the right of members' (the right of self-determination on personal information).

PearlAbyss adheres to the privacy policies and guidelines of the Hong Kong. "Personal Information Processing Policy" means the guidelines that PearlAbyss must follow in order to protect users' valuable personal information so that users can use the service with peace of mind.

This Personal Information Processing Policy applies to game services that are provided by PearlAbyss, and the terms "Services provided by PearlAbyss" refer to the above scope.

- **PearlAbyss collects the following personal information from users.**

PearlAbyss collects users' personal information under the following principles.

1) PearlAbyss collects the minimum amount of personal information required to provide services.

PearlAbyss collects personal information as follows. However, this information is based on the time when the user confirmed, and in case of collecting additional personal information of the user, the company will notify of the situation and obtain consent from the user in advance.

--

- When the user uses the game service

The Company collects and uses the following personal information when the user uses the game in the Black Desert Game Service(<http://www.sea.playblackdesert.com/>)

- Items collected at the time of sign-up

1) Items required: Login ID (E-MAIL address), name, date of birth

※ Steam Account Identification No.

- Items collected during service use

The company can selectively collect email address, cell phone number through event entry, fax, phone call, email, a written letter, delivery from partner company, and customer center.

- Automatically collected items during service use

Service use records such as account and gameplay progress data, chatting data, IP address, PC information (ex. CPU type, RAM, graphic card type, graphic card RAM), cookies, web browser info, general location data, gameplay data and game service use data related to interactions with other users, advertising ID, data required to check payment records, game screenshots (game client error/crash occurrences) and Steam Identification No, may be generated and collected during the service use process.

2) PearlAbyss does not collect sensitive information.

PearlAbyss does not collect any sensitive information (race, ideology, principles, political inclination or criminal records, medical information, etc.) that may infringe on the user's human rights in any case, however in case the company collects it inevitably in accordance with the obligations set forth by laws and regulations, the company must obtain prior consent from the users.

3) If the user receives PearlAbyss service through other platform systems, from

which PearlAbyss can request and obtain personal information you have entered at the time of sign-up after successful login. Using the information, we will provide the service later.

- **For what purpose does PearlAbyss use personal information?**

PearlAbyss will only use your valuable personal information for the following purposes and will ask for your consent beforehand in case changes are made to the purposes.

1) It is used to identify the user, confirm the intention to join, or prevent unauthorized and/or inappropriate use.

2) It is used to provide various services of PearlAbyss to users and process user inquiries and complaints during the use of the service and to communicate announcements.

3) It is used to provide the service promised with the user and to settle the payment when the purchase and use of the paid service take place.

4) It is used for information delivery, marketing, and advertising etc to announce new service developments or opportunities to participate in an event.

5) It is used to provide customized services and improve services through users' service usage history, access frequency analysis and statistics on service usage.

- **How long will PearlAbyss use personal information?**

PearlAbyss only uses the user's personal information in a limited manner from the time you signed up and started to use the service to the time you are provided with the service. If the user requests a withdrawal of the consent to the collection and use of the personal information or requests a deactivation of membership, or if the purpose of collection and use is achieved or the period of use and retention

is ended, the personal information of the user will be destroyed without delay.

(Attention: After requesting deletion of the membership data, the company assume that the service contract has been suspended. As a result, you will not be able to log in to your account and use related services after the deletion request.)

However, the personal identification value (CI) of the user's personal information must be stored securely in a separate storage space separated from the existing storage space for 3 months to prevent confusion and misuse of the service.

And the company will keep personal information for a certain period of time in accordance with the provisions of relevant laws and regulations.

- **In order to provide the service promised to the user, the company entrusts the handling task of personal information as follows.**

"Outsourcing of Personal Information Handling" means that PearlAbyss entrusts some of the tasks that are essential for providing various services to users to a third party.

The tasks and companies entrusted are as follows.

However, the following information is based on the time when the user makes confirmation, so if changes are made to the entrusted tasks and companies, the company will notify the user of the changes.

PearlAbyss manages and supervises the entrusted company to ensure that there is no violation of the laws related to Personal Information Protection Act.

Trustee	Entrusted Tasks	Use Period of Personal Information
Elite Global Sourcing	Customer affairs service such as customer helplines, complaints handling, and DM sending	Until the moment of membership deactivation/ withdrawal of consent or until the end of outsourcing contract
Wisebirds	Media Operations, Reporting	Until the end of the contract period
Mezzomedia	Media Operations, Reporting	Until the end of the contract period

- **The company may provide personal information to third parties to provide the users with more variety of services as follows.**

"Providing a third party with personal information" is not an essential part to provide the service, but it is to provide a third party with personal information collected for the purpose of providing various services to users and improving service quality, etc.

PearlAbyss may provide the user's personal information to third parties for the purposes necessary to use the Services. In this case, the company is obliged to obtain consent from the user in accordance with laws and regulations, and the information will be used only for the limited manner; the purpose of using the personal information, the items of personal information to be provided, and the period of use will be separately disclosed

However, the following cases are exceptions.

1) The information is essential to provide various services promised to users but for which PearlAbyss find it very difficult to obtain consent due to economic reasons

or technical reasons.

2) When the information is necessary for the settlement of fees for service provision

3) When national authorities such as a court etc make enforcements to provide personal information of the users in accordance with laws and regulations.

- **How does PearlAbyss dispose of personal information collected from the users?**

PearlAbyss promises to dispose the information of the user without delay after" the purpose of collection and use of personal information" is achieved.

However, the personal identification value (CI) of the user's personal information is stored in a separate storage space separated from the existing storage space for 3 months from the date of membership deactivation or consent withdrawal. It is stored for a certain period of time in accordance with the internal guidelines and relevant laws and regulations before destruction. The personal information that is stored separately at that moment is never used for other purposes than settling complaints and dispute from user/member and observing the law. When the retention period ends, the company will use a technological method to completely erase the information in a way that it cannot be reproduced, and the information printed on paper will be destroyed by shredding or incineration.

- **PearlAbyss protect the rights of the users including minor.**

PearlAbyss protects the users' rights as follows.

1) The user can view and modify his or her personal information registered at any time. In order to view / modify personal information, the user may directly do so through 'Change Member Information' or 'Customer Center' after going through

the identity verification process.

2) At any time, you may withdraw your consent to provide personal information and ask for termination of membership.

3) PearlAbyss guarantees the rights of legal representatives for minors (defined by the applicable law). You shall be deemed to have the legal representative's consent by the Company at the time of completion of the membership sign-up in accordance with the laws of your country of residence. Any minor found to have signed up without the legal representative's consent shall bear any reasonable penalties and disadvantages including but not limited to being deprived of the right to use the Game Services without any notice or compensation.

4) In order to use and provide accurate personal information, user's personal information will not be used or provided until the changes are made completely. In addition, if the information has already been provided to a third party, we will make the third party informed of the changes and reflect them without any delay.

- **Cookie is installed and running and the user can decline it.**

1) What is Cookie?

Cookie is a very small text file sent to the user's browser by the server used to run the website and Cookie is stored in your computer.

2) Why does PearlAbyss use Cookie?

PearlAbyss uses Cookie to store the settings that user prefers etc, which helps provide even faster web environment and it is used to improve services for the users' convenience. This makes it easier for the users to take advantage of the game service.

PearlAbyss also analyzes the frequency of visits to various services, the duration of visits, the degree of participation in various events, the number of visits, and so on

to understand the tastes and interests of users. Based on this, the company provides services customized to each individual including advertising.

3) If the user wants to decline collection of Cookie?

The user has the option of installing Cookie. As a result, the user can allow all Cookies by setting options in your web browser, or make a check every time Cookie is saved, or refuse to save all Cookies. However, if the user refuses to install Cookies, there may be difficulty in using some services that require cookies which may give less than optimal user experience.

Examples for setting option

① For Internet Explorer:

Tools menu at the top of the web browser > Internet Options > Privacy > Set

② For Chrome:

Settings menu on the right side of the web browser > advanced settings at the bottom of the screen > Content settings button for privacy > Cookies

- **We make the following efforts to protect the user's valuable personal information.**

PearlAbyss considers the user's personal information to be sensitive and makes the following efforts in handling your personal information:

1) We encrypt your personal information.

PearlAbyss transmits personal information of the user using the encrypted communication section and encrypts important information such as passwords etc.

2) We make efforts to protect personal information against hacking and computer viruses.

PearlAbyss installs its system in a controlled area where external access is restricted to prevent your personal information from being leaked or damaged by hacking or computer viruses etc. We have installed a system, that monitors 24 hours a day, to detect and block intruders such as hackers etc. We make continuous efforts to prevent the system from getting infected with the latest malicious code or virus by keeping our anti-virus softwares up to date. We are also constantly researching and applying new hacking / security technologies to our services.

3) We minimize the people who have access to your valuable personal information.

PearlAbyss minimizes the number of employees handling personal information and reduces the risk of personal information leakage by blocking the use of external Internet services on business PCs. In addition, for the database system that stores personal information and the system that processes personal information, we have established systematic standards for creation and changes of passwords, the right to access, and conducting continuous audits.

4) Employees are regularly educated about the protection of personal information of users. Regular education and campaigns on obligations and security of personal information are conducted for all employees who handle personal information.

- **We designated the person responsible for protection of personal information.**

PearlAbyss has designated selected personnel to protect your personal information and to resolve any questions or complaints. Please contact our Customer Support at any time and we will respond promptly and fully.

- **Other additional policies**

If there are any additions, deletions or modifications to the above information, PearlAbyss will explain to the users through homepage announcement. The content changes before and after the amendment will be clearly stated in comparison for the user's convenience.

Revision Date: September 10, 2020