

Privacy Policy

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PEARL ABYSS CORP. together with its affiliates and subsidiaries (collectively, “PEARL ABYSS” or “we”), provides game services and related services using various platforms, including PC and console (the “Services”). To provide, operate, and improve the Services and protect our users, we process personal information within the necessary scope, comply with applicable laws and regulations to keep personal information secure, and implement appropriate technical and administrative safeguards.

This Privacy Policy explains the purposes and methods of processing your personal information, the steps we take to protect it, and the rights you can exercise regarding your personal information.

This Privacy Policy may be updated to reflect changes in laws, regulations, our service operations, or our internal policies. We remain committed to continuously complying with laws and regulations related to personal information protection.

1. What information does PEARL ABYSS collect, and how is it collected?

We collect personal information when you create an account, use the Services, update your account information, contact Customer Support, seek assistance by phone or fax, participate in events, or when our affiliates and partners share information with us. Additionally, certain information, such as connection logs, service usage logs, and device information, may be automatically generated and collected while you use our Services.

1) Information you provide

① When you create a PEARL ABYSS account, we collect:

- Email address, password, name, region, date of birth, social login identifier

※ Users aged 13 to 18 in the United Kingdom, British Indian Ocean Territory, and British Virgin Islands may use our Services subject to legal guardian consent. We do not collect personal information from children as defined by the laws of each country, including the United States/Canada (under 13), Europe (under 16 according to GDPR, or lower if established by individual member

states), and Brazil (under 18).

- ② When you sign up via a Steam account, we collect:
 - Social login identifier, email address, name, region, date of birth
- ③ To obtain legal guardian consent, we collect:
 - Legal guardian's email address, name, date of birth
- ④ Information collected when playing on PlayStation or Xbox:
 - Console account identifier
- ⑤ When we provide additional Services, we collect:
 - **When using My Page:** nickname, mobile phone number, (secondary) email address, social login identifier, console account identifier
 - **Account linking for simplified login and other additional services:** console account identifier, social login identifier (Steam, etc.)
 - **When making payments:** Information necessary to use the chosen payment method
 - **When using Customer Support:** email address, name, mobile phone number, date of birth, address, automatically generated information, device identifier information, console account identifier, and other details needed to handle your inquiry
 - **Event/Promotion participation and processing:** name, mobile phone number, address, date of birth, email address, and any other information required by the event or promotion
 - **Prize delivery:** name, address, mobile phone number, email address
 - **Pre-registration applications and related updates:** email address, mobile phone number
 - **Newsletter subscription management and delivery:** email address, IP address, (in certain regions) date of birth
 - **Notices and other communications:** email address, mobile phone number
 - **Tax reporting and processing:** a unique identification number and other information required under the tax laws of each relevant country
 - **Refunds:** bank account information

2) Information collected during Service use

The following information may be collected automatically while you use the Services:

- IP address, web usage logs, fraud/abuse logs, cookies
- Game and service usage logs, including platform identifiers, connecting device type, Geo IP (connecting country), gameplay data, and payment-related transaction logs
- When using the Black Desert Plus app: mobile device details (device model, OS information, advertising ID, etc.)
- Information to resolve game errors: dump files, error logs, in-game screenshots, hardware information such as graphics card, save data

2. Why does PEARLABYSS collect and use personal information?

We collect and use personal information for the purposes below.

1) We collect and use data necessary to provide the Services.

We collect and use the data necessary to perform our contract with you and achieve the following detailed purposes:

- To let you create an account and use the Services
- To operate the Services
- To provide our products and Services
- To share Service-related information
- To process billing and payments for paid features
- To comply with applicable laws

2) We collect and use data to provide services better suited to you.

We collect and use data necessary to achieve the following detailed purposes in order to provide you with a more suitable experience:

- To improve the Services
- To update profiles and develop features
- To set up and manage registered accounts
- To deliver updates
- To remember your preferences and deliver content
- To handle questions and complaints and provide support
- To send notices such as changes to terms, Service outages, support updates, security alerts, and other important messages
- To run events and promotions
- To ship prizes for events and promotions
- To manage newsletter subscriptions

3) We collect and use data necessary to keep the Services safe and fair.

We collect and use data necessary to achieve the following detailed purposes in order to keep the Services safe and fair:

- To prevent and restrict fraud, abuse, and unauthorized use
- To provide Services that protect your information
- To enable smooth gameplay across multiple devices

- To find bugs and errors and fix issues
- To analyze data to handle and resolve disputes

4) We collect and use data necessary to deliver personalized ads and promotional information.

We process data:

- To track the content you access related to your Service use and online activity
- To personalize ads and send targeted marketing and promotional offers
- To provide customized Services, including content and features that better match your interests

5) To analyze data in de-identified form

We may convert the data we collect into a form that does not identify you and use it for analysis and classification.

3. Does PEARL ABYSS share personal information with third parties?

We share personal information only when you have agreed in advance, when it's necessary to provide the Services, or when we must comply with law. We follow the appropriate legal process in doing so.

1) With your prior consent

Before collecting from or sharing with a third party, we explain **who** will receive your information, **what** will be shared, and **why**, and then obtain your consent.

2) When it's necessary to provide the Services

2-1) Other users and the public

- If you post on our website forums, your posts are visible to other users or the public.
- If you use public in-game chat, your messages are visible to other users.
- If you violate our terms or policies, or if you are selected as an event participant or winner, certain gameplay information about you may be disclosed on in-game pages, our website, or official community notices.

2-2) Business partners and vendors

- We may share personal information with the following partners to operate the Services:
- **Payment processors:** to process payments and share the results of those transactions
- **Cloud platform providers:** to host the Services and store/process data in cloud environments
- **Event agencies:** to manage tickets and run online/offline events

- **Marketing agencies:** to deliver Services and offers tailored to your interests
- **Other partners:** to provide game copy protection (Denuvo), detect and prevent fraud/abuse, respond to customer inquiries, and otherwise support the operation of the game Services

3) To comply with law

3-1) Public authorities and law enforcement

- We may disclose your data to public authorities to fulfill our statutory obligations, respond to lawful legal processes, or when necessary to protect the rights, property, or safety of PEARL ABYSS, our employees, and other related parties, within the scope permitted by applicable laws and regulations
- We may provide data to investigative agencies when legally required or when a lawful request is made for an investigation under applicable procedures.

4. How long does PEARL ABYSS retain personal information and when is it deleted?

1) Retention and deletion periods

We keep personal information while your account remains active. As a rule, we delete it without undue delay once the purpose of collection and use has been fulfilled (for example, when you request account deletion or when an event's stated retention period ends). The specific deletion timelines for key personal information are as follows:

- ① Information for providing and improving the Services
 - Retained and used while the service agreement with the user remains active, and deleted without undue delay upon termination of the agreement (e.g., termination of service use, etc.)
- ② Legal guardian information
 - Deleted immediately when the user deletes their website account or reaches the age of majority.
- ③ Information for newsletter subscription, event participation, etc.
 - Retained and used for the period necessary to achieve the respective purpose, such as sending newsletters, operating events/promotions, and delivering prizes; and deleted without undue delay when the user unsubscribes or when the event/promotion ends and the purpose is fulfilled.

2) When personal information is retained instead of being deleted immediately

As a rule, we delete personal information without undue delay once the purpose of collection and use has been fulfilled. However, if necessary to protect users' rights and interests, ensure the stability of service operations, or comply with applicable laws and regulations, we may retain certain personal information for a specified period. In such cases, the personal information will be processed solely within the scope of the retention purpose and deleted without undue delay when the retention period expires or the necessity for retention ceases.

① Under our internal retention policies

- To prevent harm from identity theft (e.g., unauthorized account deletion or payment fraud), we retain key account data for 15 days after an account deletion request.
- To prevent fraud, abuse, and unauthorized use by malicious users, we retain enforcement/sanction records.
- To prevent duplicate item grants after re-registration, we retain Steam social login identifiers and DLC item grant records.

② As required by law

- We retain personal information when, and to the extent, required under the laws of each applicable country.

3) How we delete personal information

Paper records (printouts, hard copies) are destroyed by shredding or incineration. Electronic records are permanently erased using technical methods that make recovery impossible.

5. What steps does PEARL ABYSS take when transferring personal information outside your country?

Your personal information may be transferred to, stored in, accessed, or processed by PEARL ABYSS CORP. located in the Republic of Korea, as well as Pearl Abyss affiliates or subsidiaries located overseas. The major overseas affiliates and subsidiaries we operate to provide global services are as follows:

- PearlAbyss Taiwan Corp. [Taiwan]
- Pearl Abyss America, Inc. [USA]
- Pearl Abyss JP Co., Ltd. [Japan]
- Pearl Abyss Europe B.V. [The Netherlands]

Our overseas affiliates and subsidiaries process personal information within the scope necessary to operate global game services, provide accounts and game services, deliver customer support and technical assistance, respond to security threats, prevent unauthorized use, improve service quality, comply with laws and regulations, and handle disputes.

When transferring personal information across borders, we apply necessary safeguards in accordance with applicable laws and regulations. We also instruct our affiliates and subsidiaries to process personal information strictly within the scope of the transfer purpose and apply internal policies, contracts, access control management, and security standards.

If PEARL ABYSS entrusts the processing of or transfers personal information to external service providers to provide the Services, details can be found in "3. Does PEARL ABYSS share personal information with third parties?"

You may contact Customer Support or our privacy officer and related team at any time to ask us to stop cross-border transfers of your personal information. Please note that if, per your request, cross-border transfers of your personal information are stopped, you may be unable to use some or all features of our website or game Services.

※ For users in the European Economic Area (EEA)

- We apply appropriate safeguards to protect the personal data of EEA residents. For more on our protections, see “6. How does PEARL ABYSS protect personal information?”
- The EU and the Republic of Korea have adopted a GDPR adequacy decision for personal data transfers to the Republic of Korea. Under this decision, personal data can be safely transferred from the EU to the Republic of Korea, without the need to establish additional certifications or separate transfer mechanisms.
- When your personal data is transferred to our partners or service providers outside the EEA, we enter into contracts that incorporate the EU Standard Contractual Clauses so that such transfers occur with appropriate safeguards.

※ For users in Japan

- Countries where third parties are located: United States of America, Republic of Korea
- Privacy protection systems and information of the respective service region: Participant in the APEC Cross-Border Privacy Rules (CBPR) system
- Information on safeguards implemented by third parties: We utilize Microsoft Azure and AWS cloud servers, strictly apply necessary security controls, and comply with all eight OECD Privacy Principles.

※ For users in Taiwan

- Countries where third parties are located: United States of America, Republic of Korea
- Privacy protection systems and information of the respective service region: Participant in the APEC Cross-Border Privacy Rules (CBPR) system
- Information on safeguards implemented by third parties: We utilize Microsoft Azure and AWS cloud servers, strictly apply necessary security controls, and comply with all eight OECD Privacy Principles.

6. How does PEARL ABYSS protect personal information?

We use technical, administrative, and physical measures to help ensure your information is not lost, stolen, leaked, altered, or destroyed.

1) Technical measures

- Beyond items specified by law, we encrypt additional categories of personal information.
- We protect important data that contains personal information by encrypting files and transmissions or using file-locking and similar security features.
- We continuously monitor to guard against hacking and malware. We also back up personal information regularly and use a range of security tools, such as anti-virus solutions and firewalls.

- We apply required security controls to our database systems that handle personal information.

2) Administrative measures

- We limit access to personal information to the minimum number of authorized personnel.
- We provide regular privacy and security training to employees and entrusted processors.
- A dedicated team manages our privacy program and policies. We conduct regular internal compliance checks and take immediate corrective action when issues are found.

3) Physical measures

- We maintain separate, controlled facilities for systems that store personal information and operate access-control procedures for those locations.
- Documents and removable media that contain personal information are kept in locked, secure locations.

7. What information is collected automatically?

1) Use of Cookies and Similar Technologies

We use "cookies" and similar technologies (such as pixels, web beacons, tags, and scripts; collectively, "cookies, etc.") to provide you with an optimized gaming experience and personalized services.

- What are cookies? Cookies are small text files saved on your device (PC, smartphone, etc.) when you visit a website.
- What are similar technologies (Pixels, Tags, etc.)? Similar technologies are code-based tools we use to analyze user interactions on our website (e.g., page visits, clicks) or to measure the effectiveness of advertisements.
- In the course of using our Services, we may automatically collect certain information—such as IP addresses, connection logs, device and browser information, cookies, advertising identifiers, and behavioral information—and utilize cookies to save your preferences, maintain your authentication status, and deliver personalized Services.
- Additionally, we may deploy essential technologies required for Service operation and security maintenance, as well as optional technologies for behavior analysis, personalized advertising, and ad performance measurement.

2) Global Privacy Control (GPC)

Some browsers or extensions can automatically transmit your intent to opt-out of the sale or sharing of your personal information via a "Global Privacy Control (GPC)" signal.

In accordance with applicable laws, we may recognize GPC signals as valid opt-out requests. When such a signal is detected, we will take reasonable measures to restrict the sale or sharing of your personal information within the applicable scope.

However, the scope of application and processing method of GPC signals may vary depending on your region of residence and applicable laws.

3) Information on the Cookie Policy

Details of the information we automatically collect and further information on our use of cookies can be found in the Cookie Policy posted on our website. You may restrict the use of cookies or withdraw your consent to processing based thereon by following the methods described in the Cookie Policy.

8. What rights and choices do users have regarding personal information?

You have the right to view, correct, delete, transfer, restrict processing of, and withdraw consent to the use of your personal information as prescribed by applicable laws, and we respect and support these rights.

You can view or edit your information at any time under **My Page > View Account Info**.

You can delete your account under **My Page > Delete Account**. Deleting your account may also delete related information that was created or stored while you used the Services.

You may also request access, correction, deletion, restriction, or withdrawal of consent through Customer Support or our privacy inquiries team.

We may refuse a request to delete or restrict processing if we are required by law to retain certain information.

1) Rights of residents of the European Economic Area (EEA)

Residents of the European Economic Area (EEA) may have the right to access, rectify, erase, restrict processing of, port their personal data, object to processing, withdraw consent, and rights regarding automated decision-making and profiling under applicable data protection laws. Additionally, users may lodge a complaint with a competent supervisory authority regarding the processing of their personal data.

However, the availability, scope, and procedures for exercising each right may vary depending on applicable laws, our legal basis for processing, and the specific context of the processing.

2) Rights of California residents

Under the California Consumer Privacy Act (CCPA), consumers residing in California may request that We provide them with the following information:

① CCPA / CPRA Rights

California residents may have the right to know about, access, delete, correct, opt-out of the sale or sharing of their personal information, limit the use and disclosure of sensitive personal information, and the right to non-discrimination for exercising these rights.

You can automatically communicate your opt-out of the sale or sharing of personal information by enabling the Global Privacy Control (GPC) in your browser or device settings, and we will process GPC signals within the scope required by applicable laws.

We do NOT sell your personal information for monetary consideration. However, cookies, advertising identifiers, device information, access logs, and service usage logs may be shared with or accessed by our advertising and analytics partners for personalized advertising, ad performance measurement, or service analytics. If such processing constitutes the "sharing" of personal information under applicable

laws, you have the right to opt-out.

For more details on the use of data for personalized ads and marketing, see “2. 4) We collect and use data necessary to deliver personalized ads and promotional information.”

② California Shine the Light Rights

Under California Civil Code Section 1798.83, California residents may request the following information if we disclosed their personal information to third parties for direct marketing purposes during the preceding calendar year:

- The categories of personal information disclosed to third parties for direct marketing purposes during the preceding calendar year
- The names and addresses of the third parties that received such information

If we have not shared personal information with third parties for direct marketing purposes, we will inform you that no such sharing has occurred.

3) Parental Controls (For UK residents)

We provide the following parental control features for legal guardians:

- ① Set game playtime for your child
- ② Restrict your child's payments

4) Information on Automated Decision-Making

We do not currently engage in automated decision-making (including profiling) that produces legal effects or similarly significant impacts on users.

However, if such processing is implemented in the future, we will notify you in advance in accordance with applicable laws, and we will guarantee your right to request human intervention or obtain an explanation of the decision.

You may exercise all rights and features listed above at any time through the following channels:

- Official website Customer Support
- Privacy officer and related team (privacy@pearlabyss.com)
- Parental Control website (<https://parents.pearlabyss.com/>)

9. Is there an age requirement to use the Services?

1) Website Services

- We do not knowingly collect or solicit personal information from, target interest-based advertising to, or knowingly induce use of our Services by users who are considered children

under the laws of their country/region (e.g., under 13 in the U.S./Canada, under 16 in Europe (based on GDPR, or lower age if established by individual member states), under 18 in Brazil) (each, a “Child User”). (However, users aged 13 to 18 in the United Kingdom, British Indian Ocean Territory, and British Virgin Islands may use our Services subject to legal guardian consent.)

- Child Users must not send personal information to us. If we learn that we have collected personal information from a Child User, we will delete it as quickly as practicable.
- For Child Users, please do not send us any personal information, including your name, address, telephone number, or email address. If you believe we might have any information from or about a Child User, please contact us immediately.

※ If users aged 16 to 20 in Thailand consent to receiving commercial advertisements, they are deemed to have obtained the consent of their legal guardian.

2) Game Services

- We limit access to our game Services based on the age ratings authorized in each service territory.
- In compliance with the Brazilian Statute of the Child and Adolescent (ECA), we use the KWS service to verify the age of users accessing the Services from Brazil. To verify your age, your email address is shared with KWS, which processes this information strictly on our behalf. KWS does not use the collected information for its own purposes. We only receive the "age verification result" from KWS to determine your eligibility to use the game Services. For more details on how KWS handles personal information, please refer to the KWS Privacy Policy.

※ KWS Privacy Policy: <https://www.kidswebservices.com/en-US/privacy-policy>

10. How can I contact PEARL ABYSS?

If you have questions about privacy or need help resolving a privacy issue, contacting Customer Support is the fastest way to get assistance.

Privacy Complaints Handling Department: Information Security Division

Email: privacy@pearlabyss.com

1) EU Data Protection Officer (DPO) and EU Representative — Contact

If you reside in the European region, you may also contact:

DPO: The Office of the Data Protection Officer

Address: 48 Gwacheon-daero 2-gil, Gwacheon-si, Gyeonggi-do, 13824, Rep. of Korea

Email: dpo@pearlabyss.com

EU Representative — Contact

VeraSafe has been appointed as PEARL ABYSS's representative in the European Union for data protection matters, pursuant to Article 27 of the General Data Protection Regulation of the European Union. If you are in the European Economic Area, 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://verasafe.com/public-resources/contact-data-protection-representative> or via telephone at: +420 228 881 031

VeraSafe Czech Republic s.r.o Rohanské nábřeží 678/23 Prague 8, 18600 Czech Republic	VeraSafe Netherlands BV Keizersgracht 555 1017 DR Amsterdam The Netherlands	VeraSafe Ireland Ltd. Unit 3D North Point House North Point Business Park New Mallow Road Cork T23AT2P Ireland
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Effective Date:

This Privacy Policy takes effect on July 8, 2026.