

Sugar Quest - Privacy Policy

Last Update: April 3, 2025

The Friendly Company Inc. (“**The Friendly Company**”, “**we**”, “**our**” or “**us**”) respects the privacy of your personal information (“**Personal Information**”) and is committed to protecting it and using it solely for the purposes for which it was collected. This privacy policy (“**Privacy Policy**”) is designed to help you understand our privacy practices and to provide you with information on why and how we collect your Personal Information and how it is stored and used.

This Privacy Policy applies to your access and/or use of the SugarQuest Mini Game, whether on your computer, on a mobile device, on our website sugarquest.gg (the “**Website**”) or any other website, device or platform, including the Telegram platform (the “**Mini Game**”). It also applies to our Marketing and Advertising activities on all platforms and other Services that we will provide to you from time to time including campaigns. This Privacy Policy also applies to any other Services that we may provide in relation to our Mini Game, such as communications you may have with us, customer support, social media, community channels and other websites that we may operate from time to time (we refer to our Mini Game and other services collectively as our “**Services**”).

The Friendly Company is not responsible for any data collection, processing, or usage carried out by Telegram or any third parties integrated into Telegram’s platform. Please refer to [Telegram’s Privacy Policy](#) for details on how your data is managed by their services.

If you are an individual who has provided us with your express consent to collect and use your Personal Information in certain ways, you may withdraw your consent at any time by contacting our Privacy Officer using the contact information provided in the “Contact us” section of this Privacy Policy.

PERSONAL INFORMATION WE COLLECT

Information you provide to us. Personal Information you may provide to us through the Mini Game or otherwise includes:

- **Your Telegram account data**, including your username, Telegram ID (an internal API reference), display name, and other information provided by the Telegram API.
- **Communications data**, including your email address and when you contact us or other users through the Mini Game, social media, email or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Account data**, such as the username and password that you may set to establish an account on the Mini Game.
- **Transaction information**, such as your wallet address or credit card number for payment purposes. In order to engage in certain transactions or purchases on the Mini Game, you may need to provide us or our third-party service providers, such as

payment processors, with your payment information and allow us or our providers to connect to your Telegram Open Network (“**TON**”) digital wallet by providing us with your public TON wallet address. We will never ask you to provide or collect your private keys. We do not directly collect or store any payment card information entered through our Mini Game or access your TON wallet, but we may store your TON wallet address and receive from our third-party payment processing providers or TON wallet providers information associated with your payment card information (such as your billing or transaction details) and/or digital transactions.

- **Interactive features data**, such as Personal Information that you submit or make available through our interactive features (e.g., commenting functionalities, forums, blogs, chat). Any information you provide using the public sharing features of the Mini Game will be considered “public,” unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein.
- **Sweepstakes, raffles or contests data**, such as Personal Information you provide to participate in any sweepstakes, raffles or contests that we or our third-party service providers offer. In some jurisdictions, we are required to publicly share information of sweepstakes, raffle and contest winners.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may combine Personal Information we receive from you with Personal Information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Data providers**, such as information services and data licensors that provide demographic and other information that we use to provide the Mini Game.
- **Referrals and Sharing Features**, such as tools and functionalities that allow you to provide Personal Information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend, such as a message inviting your friend to use our Mini Game with a referral code. Please only share with us contact information of people with whom you have a relationship.

Automatic data collection. We, our service providers, and our business partners may automatically log certain data about you, your computer or mobile device, and your interaction over time with the Mini Game, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device’s operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 5G), and general location information such as city, state or general geographic area.

- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing the Mini Game, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Communication interaction data** such as your interactions with our emails, or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

Cookies and similar technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices to allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.
- **Analytics**, which are technologies that we may use to process analytics information on our Mini Game. These technologies allow us to better understand how our digital services are used and to continually improve and personalize our services. Some of our analytics providers include Google Analytics. For more information about how Google uses your Personal Information (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics' Privacy Policy](#). To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).

We may use cookies to allow the technical operation of the Mini Game, enhance the functionality of the Mini Game, and help us understand user activity on the Mini Game (including which pages are most and least visited and how visitors move around the Mini Game, as well as user interactions with our emails).

HOW WE USE PERSONAL INFORMATION

In general, we will only use Personal Information for the primary purpose(s) and applicable legitimate purposes for which it was collected (all of which will usually be identified to you at the time we collect it), or for purposes consistent with these primary purposes. Beyond that, we may

use your Personal Information for the following legitimate business purposes (or in other ways that we ask you for at the time we collect it):

Mini Game delivery and operations. We may use your Personal Information to:

- manage your Account;
- provide, operate and improve the Mini Game and our business, along with certain services, features or functionalities;
- depersonalize or anonymize it;
- communicate with you about the Mini Game, including by sending announcements, updates, security alerts, and support and administrative messages;
- process applications if you apply for a job with us;
- allow you to register for events, sweepstakes, contests or raffles;
- understand your needs and interests, and personalize your experience with the Mini Game and our communications; and
- provide support for the Mini Game, and respond to your requests, questions and feedback.

Marketing. We and our service providers may collect and use your Personal Information to send you direct marketing communications. We may use Personal Information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law. Some of the ways we may market to you include email campaigns, text messages, custom audiences advertising, and “personalized advertising” or “targeted advertising,” including through cross-device tracking. You may opt-out of our marketing communications as described in the “Opt-out of marketing” section below.

Compliance and protection. We may use your Personal Information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Mini Game; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your Personal Information, such as when required by law, or for when we have a new legitimate purpose for using your Personal Information that we did contemplate at the time it was originally collected from you.

Other purposes. We also use your Personal Information for other purposes as requested by you or as permitted by applicable law:

- **De-identified and Aggregated Information.** We may use Personal Information to create de-identified and/or aggregated information, such as demographic information, information about how you use the Mini Game, information about the device from which you access our Mini Game, or other analyses we create. De-identified and/or aggregated information is not Personal Information, and we may use, disclose, and retain such information as permitted by applicable laws including, but not limited to, for research, analysis, analytics, and any other legally permissible purposes. De-identified and/or aggregated information will not be used to identify individuals.

HOW WE DISCLOSE YOUR PERSONAL INFORMATION

In general, we only share or communicate de-identified or anonymized, aggregated information that does not directly or indirectly identify any individual to our customers and partners, on behalf of our users. However, there are some exceptions to this, as explained below.

Sharing with third-party service providers. We may share your Personal Information with third-party service providers and/or partners who provide us with website, application development, hosting, analytics, or other services who need to access or process your Personal Information in connection with the services they provide to us. In such cases, they are contractually bound to keep your data confidential and to comply with privacy laws. You may choose to share Personal Information or interact with third-party websites and/or third-party applications, including, but not limited to, third-party electronic wallet extensions. Before you share your Personal Information with a third-party website or a third-party application, it is important that you review and understand their privacy policy, as it will govern their use of your Personal Information. We encourage you to closely read each third-party website or third-party application privacy policy before sharing your Personal Information or otherwise interacting with them. Please note that we do not control, and we are not responsible for the third-party website's or the third-party application's processing of your Personal Information.

Sharing with employees. Our employees are bound by a duty of confidentiality. They only have access to your Personal Information in an anonymized or de-identified form, on a "need-to-know" basis or if reasonably required by their duties.

Sharing with legal authorities. We may also need to disclose Personal Information to comply with a legal obligation or to enforce our rights, including to government authorities and law enforcement agencies where required by applicable law.

YOUR PRIVACY CHOICES AND RIGHTS

Under certain circumstances and in accordance with applicable privacy laws, you have a number of rights when it comes to the Personal Information you provide to us:

- **Access:** right to ask whether we hold Personal Information about you and the right to access that information.
- **Rectification:** right to request the rectification of any incomplete or inaccurate Personal Information we hold about you.
- **Withdrawal of consent:** right to withdraw your consent to the disclosure or use of Personal Information collected.
- **Destruction request:** right to request the destruction of the Personal Information we hold about you.
- **Request for information:** right to request certain information relating to decisions based exclusively on the automated processing of Personal Information.

If you would like to exercise any of these rights, please contact us as set forth in the “Contact Us” section below. We will process such requests in accordance with applicable laws.

SUPPLEMENTAL REGION-SPECIFIC DISCLOSURES

We may be required by law to provide different or additional disclosures relating to the processing of Personal Information to residents of certain countries, regions or states. Please see below for such region-specific notices.

NEVADA

If you are resident in the State of Nevada, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. To submit such a request, please contact us as detailed in the “Contact Us” section.

EUROPEAN ECONOMIC AREA, SWITZERLAND AND UNITED KINGDOM

If your Personal Information is subject to the applicable data protection laws of the European Economic Area, Switzerland, or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority if you believe our processing of your Personal Information violates applicable law.

- [EEA Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner’s Office \(ICO\)](#)

PROTECTION OF PERSONAL INFORMATION

We follow generally accepted industry best-practices and standards to protect the information transferred to us. We maintain appropriate physical, technical, logical, and administrative safeguards, proportional to the sensitivity of the Personal Information, to protect it from

unauthorized disclosure or access, accidental or unlawful alteration, loss or destruction, misuse, or other unlawful form of processing of the Personal Information in our possession.

Although we ensure that adequate safeguards are in place to protect Personal Information, data transmission over the Internet still comes with inherent risks. We cannot guarantee that third party actors will not maliciously attempt to hack our systems, and we are not responsible for third party interceptions of data in transit if they have managed to circumvent our security protocols in circumstances where there were no vulnerabilities or deficiencies in our systems. In those situations, we cannot be held liable for any misappropriation, interception, modification, deletion, destruction, or use of data provided through our Mini Game.

If you have reason to believe that any Personal Information has been compromised, please contact us as set forth in the "Contact us" section.

In the case of a data security breach involving your Personal Information, we will notify you without undue delay after we become aware of such breach, and will work diligently to investigate, contain, and remediate the breach, all as required by applicable law.

THIRD-PARTY WEBSITES

The Mini Game may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services that you use.

INTERNATIONAL TRANSFERS

We are incorporated in Panama and may use service providers that operate in other countries. Your Personal Information may be stored or transferred to other locations where privacy laws may not be as protective as those in your state, province, or country. If you are considered a "data subject" under the EU General Data Protection Regulation (GDPR), then we will handle your Personal Information in accordance with the GDPR.

If we transfer Personal Information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the [EU Standard Contractual Clauses](#).

RETENTION OF PERSONAL INFORMATION

We will retain Personal Information only for as long as necessary for the purposes set out in this Privacy Policy and to comply with our legal and regulatory obligations. To find out more about how long we keep Personal Information, please contact us as set forth in the "Contact us" section.

UPDATES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. If we make material changes to it, we will notify you by updating the date of this Privacy Policy and posting it on the Mini Game or other appropriate means. Any changes to this Privacy Policy will be effective upon our posting of the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Mini Game after the effective date of any modifications indicates your acceptance of the modifications. If you have any issues with any modifications, please contact us to discuss them.

CONTACT US

To exercise your rights, file a complaint, obtain information about our policies and practices or if you have questions or comments about this Privacy Policy, please contact our Privacy Officer by email at privacy@sugarquest.gg.

If you prefer not to receive marketing communications from us through any channel (including in-game notifications, email, postal mail, or phone), please follow the unsubscribe instructions within the relevant communication, adjust your preferences in the game settings, or contact us at info@sugarquest.gg.

Please note that such requests may take up to 2 weeks to become effective. In addition, if you ask us to remove your name and address from our email lists, we will maintain your name in a “do not mail” file to ensure that we can honour your request.