

Privacy Policy

Last updated: 22 July 2026

This Privacy Policy explains how **AETHERLOGIC LTD** ("Company", "we", "our", or "us") collects, uses, stores, discloses, and protects personal data when you access or use Crowns of Fortune (the "Platform"), including the website, the online game, and related services.

By accessing or using the Platform, you acknowledge that your personal data may be processed as described in this Privacy Policy.

1. Data controller

The data controller responsible for processing your personal data is:

AETHERLOGIC LTD

Company Number: **17338184**

Registered Office:

Office 1 Izabella House

24-26 Regent Place

City Centre

Birmingham

United Kingdom

B1 3NJ

Email: **info@crownsfortune.com**

2. Personal data we collect

Depending on how you use the Platform, we may collect the following categories of personal data.

Account information

- username;
- email address;
- password (stored in encrypted form);
- account identifier;
- profile preferences.

Transaction information

- purchased Digital Content;
- order history;
- payment status;
- payment amount;
- transaction identifiers.

The Company does not store complete payment card details. Payment transactions are processed by independent payment service providers. Our payment service providers are responsible for maintaining their own compliance with the Payment Card Industry Data Security Standard (PCI DSS) in respect of any payment card data they process on our behalf.

Technical information

- IP address;
- browser type and version;
- operating system;
- device characteristics;
- language settings;
- time zone;
- access logs;
- diagnostic and security logs.

Usage information

- gameplay activity necessary to operate the Platform and administer user accounts;
- interactions with Platform features;
- preferences and settings;
- customer support communications.

Affiliate program information

If you apply to participate in the Affiliate Program, we may additionally collect:

- full legal name;
- residential address;
- date of birth;
- government-issued identification documents;
- proof of address;
- payment information necessary to process affiliate commission payouts;
- a photograph, selfie image, or biometric liveness verification data, where used as part of identity verification;
- information required to comply with applicable AML and KYC obligations.

3. How we use your personal data

We may process your personal data for the following purposes:

- creating and maintaining your Account;

- providing access to the Platform and the Game;
- processing purchases of Digital Content;
- providing customer support;
- sending you marketing communications about the Platform, where you have consented or where otherwise permitted by law;
- administering the Affiliate Program;
- verifying Affiliate applicants through KYC and AML procedures;
- detecting, preventing, and investigating fraud, abuse, unauthorized activity, and security incidents;
- improving the functionality, performance, and security of the Platform;
- complying with legal and regulatory obligations;
- resolving disputes and enforcing our legal rights.

We do not sell your personal data to third parties.

4. Legal bases for processing

Where the UK GDPR or other applicable data protection laws apply, we process personal data on one or more of the following legal bases:

- performance of a contract with you;
- compliance with legal obligations;
- our legitimate interests, provided those interests are not overridden by your rights and freedoms;
- your consent, where consent is required by law.

Where we process biometric data for the purpose of uniquely identifying an Affiliate applicant, we do so on the basis of the condition in Schedule 1, Part 2 of the Data Protection Act 2018 (substantial public interest — preventing fraud), or your explicit consent, as applicable.

Where processing is based on consent, you may withdraw your consent at any time without affecting the lawfulness of processing carried out before such withdrawal.

5. Affiliate program verification (KYC/AML)

Participation in the Affiliate Program requires successful completion of the Company's identity verification procedures.

Identity verification is conducted for fraud prevention, sanctions compliance, and other legitimate business purposes, as described in our AML & KYC Policy. We require documentation and information necessary to verify your identity before approving your participation in the Affiliate Program or processing affiliate commission payouts.

Failure to provide requested information may result in rejection of an Affiliate application or suspension of Affiliate participation until verification has been completed.

Identity verification may be performed by the Company or by independent identity verification service providers acting on the Company's behalf.

6. Cookies and similar technologies

The Platform uses cookies and similar technologies to:

- operate essential Platform functionality;
- maintain user sessions;
- remember user preferences;
- improve security;
- analyze Platform performance;
- measure website usage.

Where required by applicable law, non-essential cookies will be used only after obtaining your consent.

Additional information is available in our Cookie Notice.

7. Sharing of personal data

We may disclose personal data only where reasonably necessary for the operation of the Platform or where required by law.

Recipients may include:

- payment service providers;
- identity verification providers;
- fraud prevention and security service providers;
- IT infrastructure and software service providers;
- cloud hosting providers;
- analytics providers;
- customer support providers;
- legal, accounting, and professional advisers;
- competent governmental authorities, regulators, or law enforcement agencies where disclosure is legally required.

We do not sell or rent personal data to third parties for their own marketing purposes.

Where personal data is shared with third-party service providers, such providers are authorized to process personal data only to the extent necessary to perform services on the Company's behalf and are required to protect such data in accordance with applicable law and contractual obligations.

8. International data transfers

Your personal data may be processed or transferred to countries outside your country of residence where our service providers operate.

Where personal data is transferred outside the United Kingdom, we rely on UK adequacy regulations, the UK International Data Transfer Agreement (IDTA), or other legally recognised transfer mechanisms, as applicable.

9. Data retention

We retain personal data only for as long as necessary to:

- provide the Platform and related services;
- maintain your Account;
- administer purchases and Affiliate relationships;
- comply with legal, accounting, tax, AML, and regulatory obligations;
- resolve disputes;
- enforce our agreements.

Retention periods may vary depending on the category of personal data and applicable legal requirements.

For Affiliate verification records specifically, please see the retention periods set out in our AML & KYC Policy. For other categories of personal data, we generally retain information for the duration of your Account plus 6 years, or as otherwise required by law.

When personal data is no longer required, it will be securely deleted, anonymized, or otherwise disposed of in accordance with applicable law.

10. Your rights

Subject to applicable law, you may have the right to:

- request access to your personal data;
- request correction of inaccurate personal data;
- request deletion of personal data;
- request restriction of processing;
- object to certain processing activities;
- request data portability where applicable;
- withdraw consent where processing is based on consent;
- lodge a complaint with the UK Information Commissioner's Office (ICO), ico.org.uk, or another relevant supervisory authority.

The availability of these rights depends on the applicable data protection legislation and the circumstances of the processing.

11. Security measures

The Company implements appropriate technical and organizational measures designed to protect personal data against unauthorized access, alteration, disclosure, destruction, or accidental loss.

Such measures include, where appropriate:

- encrypted communications;
- access controls;
- authentication mechanisms;
- system monitoring;
- security logging;
- regular security updates.

Although we implement reasonable safeguards, no method of electronic transmission or storage can be guaranteed to be completely secure.

12. Children's privacy

The Platform is intended only for individuals who are at least eighteen (18) years of age or the legal age of majority in their jurisdiction, whichever is higher.

We do not knowingly collect personal data from individuals who are not legally permitted to use the Platform.

If we become aware that personal data has been collected from an ineligible individual, we may delete such information and terminate the associated Account.

13. Third-party services

The Platform may contain links to third-party websites or integrate services provided by independent third parties.

This Privacy Policy applies only to personal data processed by the Company through the Platform.

We are not responsible for the privacy practices or content of third-party websites or services.

Users should review the privacy policies of any third-party services they choose to use.

14. Changes to this Privacy Policy

The Company may update this Privacy Policy from time to time to reflect changes in legal requirements, business practices, or the operation of the Platform.

The updated version will become effective upon publication on the Platform unless a different effective date is specified.

Your continued use of the Platform after the updated Privacy Policy becomes effective constitutes your acknowledgment of the revised Policy.

15. Contact information

If you have any questions regarding this Privacy Policy or the processing of your personal data, please contact:

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