

APPQUANTUM CREATORS PROGRAM

PRIVACY POLICY

FIELD	DETAIL
Effective Date	June 1, 2026
Last Updated	June 1, 2026
Version	1.0
Controller	AppQuantum Ltd
Jurisdiction	Republic of Cyprus — GDPR applies

About This Policy

This Privacy Policy explains how AppQuantum Ltd ("AppQuantum", "we", "us", or "our") collects, uses, and protects personal data you provide when participating in the AppQuantum Creators Program (the "Program").

We are committed to protecting your personal data in accordance with the EU General Data Protection Regulation (GDPR) (EU) 2016/679, the Cyprus Law on the Protection of Natural Persons with regard to the Processing of Personal Data (Law 125(I)/2018), and any other applicable data protection legislation.

SECTION 01

WHO WE ARE

Data Controller: AppQuantum Ltd, a company incorporated under the laws of the Republic of Cyprus.

For any data protection matters, you may contact us using the details provided in Section 13 of this Policy.

SECTION 02

SCOPE OF THIS POLICY

This Policy applies solely to personal data processed in connection with the AppQuantum Creators Program — including registration, content submission, reward distribution, and ongoing creator communications.

It does not apply to personal data processed within AppQuantum's games or other products and services, which are governed by separate privacy policies.

SECTION 03

DATA WE COLLECT

We collect and process the following categories of personal data:

CATEGORY	SPECIFIC DATA	SOURCE
Identity Data	First name, last name, username / channel name	Provided by you via registration form
Contact Data	Email address	Provided by you via registration form
Content Data	Video URL(s), platform (YouTube /	Provided by you via

CATEGORY	SPECIFIC DATA	SOURCE
	TikTok / Reels / Shorts), view count at time of submission, as well as any personal data contained within the submitted content, including the Creator's channel name, voice, image, and likeness	submission form or derived from content submission
Game Account Data	In-game player ID or username used to deliver rewards	Provided by you via submission form
Communications Data	Messages exchanged via email or official Discord channel	Generated through your communication with us
Technical Data	IP address, browser type, device type, page interaction data	Collected automatically via website cookies and analytics
Usage Data	Submission history, reward history, participation tier	Generated through your use of the Program

We do not collect payment card details, government ID numbers, health data, or any special category data as defined under Article 9 GDPR.

SECTION 04

LEGAL BASIS FOR PROCESSING

We process your personal data on the following legal bases under Article 6 GDPR:

- **Performance of a contract (Art. 6(1)(b)):** Processing necessary to enrol you in the Program, verify submissions, and deliver in-game rewards.
- **Legitimate interests (Art. 6(1)(f)):** Fraud prevention, abuse detection, Program integrity, internal analytics, and improving the Program. We have assessed that these interests do not override your rights and freedoms.
- **Compliance with a legal obligation (Art. 6(1)(c)):** Where we are required to retain records under applicable law.
- **Consent (Art. 6(1)(a)):** For non-essential cookies and any optional marketing communications, as well as for promoting AppQuantum's games and products by utilizing the submitted content (including the Creator's image, voice, and likeness) in marketing, advertising, and paid User Acquisition (UA) campaigns. You may withdraw consent at any time without affecting prior processing.

SECTION 05

HOW WE USE YOUR DATA

We use the data collected for the following purposes:

- Verifying your eligibility and processing your participation in the Program
- Reviewing submitted content to confirm it meets Program requirements
- Delivering in-game rewards to your account
- Communicating with you about your submissions, tier status, and Program updates
- Featuring your content on AppQuantum's official social media pages (only where you have been notified and have not objected)
- Preventing fraud, abuse, and multiple-account manipulation
- Improving the Program through internal analysis of participation patterns
- Complying with applicable legal obligations
- Utilizing the submitted content (including excerpts, screenshots, or thumbnails) for marketing, advertising, and promotional purposes, including paid User Acquisition (UA) campaigns across various third-party advertising networks and platforms, in accordance with the license granted under the Terms of Use

SECTION 06

SHARING DATA WITH THIRD PARTIES

We do not sell, rent, or trade your personal data. We may share your data with the following categories of recipients only to the extent necessary:

RECIPIENT	PURPOSE	SAFEGUARDS
AppQuantum group companies	Reward delivery and Program administration across games	Intra-group data sharing agreement
Form & CRM service providers	Hosting submission forms and managing creator records	Data Processing Agreement (DPA); GDPR-compliant processors
Analytics providers (e.g. Google Analytics)	Website analytics and performance tracking	Data Processing Agreement (DPA); Standard Contractual Clauses where applicable
Discord Inc.	Creators community channel	Discord's own privacy policy applies to data processed on their platform
Law enforcement / regulators	When required by law or to protect legal rights	Only upon valid legal request
Third-party advertising networks and platforms	Distribution of marketing and paid User Acquisition (UA) campaigns featuring the Creator's content	Data Processing Agreement (DPA); Standard Contractual Clauses where applicable

SECTION 07

INTERNATIONAL DATA TRANSFERS

Cyprus is a Member State of the European Union. Your personal data is primarily processed within the EEA. Where we engage service providers outside the EEA, we ensure appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Adequacy decisions, where applicable
- Other lawful transfer mechanisms under Chapter V GDPR

You may request a copy of the applicable transfer safeguards by contacting us at the address in Section 13.

SECTION 08

DATA RETENTION

We retain your personal data only for as long as necessary for the purposes set out in this Policy:

- **Active participation data:** Retained for the duration of your active participation in the Program plus 12 months after your last submission or communication.
- **Communications data:** Retained for 24 months from the date of the communication, unless a longer retention period is required for legal claims.
- **Technical / analytics data:** Retained for up to 26 months in aggregated or pseudonymised form.
- **Legal compliance records:** Retained as required by applicable Cypriot and EU law, typically up to 7 years.

Upon expiry of the applicable retention period, data is securely deleted or irreversibly anonymised.

SECTION 09

YOUR RIGHTS UNDER GDPR

As a data subject under the GDPR, you have the following rights regarding your personal data:

RIGHT OF ACCESS Request a copy of the personal data we hold about you (Art. 15 GDPR).	RIGHT TO RECTIFICATION Request correction of inaccurate or incomplete data (Art. 16 GDPR).
RIGHT TO ERASURE Request deletion of your data where no longer necessary or where consent is withdrawn (Art. 17 GDPR).	RIGHT TO RESTRICTION Request that we limit processing of your data in certain circumstances (Art. 18 GDPR).
RIGHT TO PORTABILITY Receive your data in a structured, machine-	RIGHT TO OBJECT Object to processing based on legitimate interests

readable format (Art. 20 GDPR).	at any time (Art. 21 GDPR).
WITHDRAW CONSENT Where processing is based on consent, withdraw it at any time without affecting prior processing.	LODGE A COMPLAINT File a complaint with the Commissioner for Personal Data Protection of Cyprus or any EU supervisory authority.

To exercise any of the above rights, contact us at privacy@appquantum.com.

We will respond within 30 days of receipt. Where requests are complex, we may extend this by a further two months and will notify you accordingly.

Cyprus supervisory authority: Commissioner for Personal Data Protection, 1 Iasonos Street, 1082 Nicosia — www.dataprotection.gov.cy

SECTION 10

COOKIES & TRACKING TECHNOLOGIES

The Program website uses cookies and similar technologies. We use:

- **Strictly necessary cookies:** Required for the site to function. No consent required.
- **Analytics cookies:** Used to measure traffic and improve the website. Activated only with your consent.
- **Functional cookies:** Remember your preferences. Activated only with your consent.

You may manage your cookie preferences via the cookie banner on our website or through your browser settings at any time.

SECTION 11

MINORS

The AppQuantum Creators Program is intended for individuals aged 16 years or older. We do not knowingly collect personal data from anyone under the age of 16. If you believe that a child under 16 has submitted personal data to us, please contact us immediately at privacy@appquantum.com and we will take prompt steps to delete such data.

SECTION 12

CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or the Program structure. Where changes are material, we will notify active Program participants by email prior to the changes taking effect.

The "Last updated" date at the top of this document indicates when the Policy was most recently revised. We encourage you to review this Policy periodically.

SECTION 13

CONTACT US

For any questions, requests, or concerns regarding this Privacy Policy or the processing of your personal data, please contact us through any of the following channels:

Data Protection Contact

We aim to respond to all privacy-related enquiries within 5 business days, and to all formal data subject requests within 30 days as required by GDPR.

Email: privacy@appquantum.com

Postal Address: AppQuantum Ltd, Spyrou Kyprianou 61, 1st floor, SK House, 4003 Mesa Geitonia, Limassol, Cyprus

Supervisory Authority: Commissioner for Personal Data Protection — www.dataprotection.gov.cy