

Privacy Policy

Last Updated: March 11, 2024

Welcome to Mindtopia offered by Shenzhen XVerse Information Technology Co., Ltd. (“XVerse”, “we”, “us”, “our”). This Privacy Policy is designed to help you understand how we collect, use, disclose, and protect your information when you use our virtual reality application (“VR App”) and other online services (collectively, the “Service”). Please read this policy carefully.

1. Collection of Information

We may collect your personal information and other data such as:

- Contact data, such as your first and last name, phone number, and email address.
- Registration data that you provide when you register through the Service, such as your first name, last name, email address, display name, state, country, gender and date of birth.
- Profile data, such as the username and password that you may set to establish an online account on the Service, photograph, list of people you follow and those who follow you and any other information that you add to your account profile.
- Communications that we exchange with you, including when you contact us through the Service, social media, or otherwise.
- **Transactional data**, such as information relating to your Mindtopia subscription plan or needed to complete your orders on or through the Service, including order numbers, subscription method and transaction history.
- **Marketing data**, such as your preferences for receiving our marketing communications.
- **User-generated content**, such as profile pictures; photos; images; music; videos; comments; questions; messages; voice recordings; lists of friends, followers, and circles you’re connected to and interact with; and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- **Relationship data**, such as familial or other relationship to third parties whose personal information you may provide to us.
- **Health and fitness data** that you store in your mobile health apps, such as Apple HealthKit and Google Fit, when you choose to grant us access to it;
- **Mood and feelings**, based on your voluntary responses to surveys and questionnaires;
- **Body dimensions** that you choose to store in the tracking features of your VR device such as a Meta Quest.
- **Payment information** needed to complete transactions, including payment card information or bank account number. Note that your payment card information is processed directly by our third-party providers.

- **Survey and promotions data**, including information you share when you choose to participate in a promotion or complete a survey. We recommend that you read any instructions, terms or rules applicable to the survey or promotion before participating.
- **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.

2. Use of Information

We may use your information for the following purposes or as otherwise described at the time of collection:

Service delivery. We may use your personal information to:

- provide, operate and improve the Service and our business;
- facilitate your invitations to friends who you want to invite to join the Service;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you direct marketing communications. You may opt-out of our marketing communications as described in the Opt-out of marketing section below.
- **Interest-based advertising.** Our third-party advertising partners may use cookies and other technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share user lists with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the Your choices 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 Service; and

- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

To create anonymous, aggregated or de-identified data. We may create anonymous, aggregated or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated or de-identified data by removing information that makes the data identifiable to you. We may use this anonymous, aggregated or de-identified data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

Cookies and other technologies. In addition to the other uses included in this section, we may use the Cookies and other technologies described above for the following purposes:

- **Technical operation.** To allow the technical operation of the Service, such as by remembering your selections and preferences as you navigate the site, and whether you are logged in when you visit password protected areas of the Service.
- **Advertising.** To help our third-party advertising partners collect information about how you use the Service and other online services over time, which they use to show you ads on other online services they believe will interest you and measure how the ads perform.
- **Analytics.** To help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails. For example, we use Google Analytics for this purpose. You can learn more about Google Analytics and how to prevent the use of Google Analytics relating to your use of our sites here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

3. Sharing of Information

We will not share personal data with third parties unless:

- We receive your explicit consent.
- It is required by law or legal processes.
- To protect our rights, privacy, safety, or property.

4. Data Security

We take industry-standard security measures to protect your information. However, no electronic storage method is perfectly secure. While we strive to protect your data, we cannot guarantee its absolute security.

5. User Rights

You have the right to access, correct, or delete your personal information at any time.

If you wish to review, change, or delete any personal data we have on record, please contact us using the information below.

6. Changes to the Privacy Policy

We reserve the right to update or change this Privacy Policy at any time. Any changes will be effective immediately upon posting. Continued use of the App after any changes constitutes acceptance of the updated policy.

7. Contact Information

If you have questions about this Privacy Policy or our data practices, please contact:

- **Email:** mindtopia@xverse.cn
- **Mail:** 1801, 1C Buiding, Gaoxinnanshidao NO.81/83/85 Shenzhen Software Industrial Base, Nanshan, Shenzhen, Guangdong, PRC

By using our VR App, you agree to this Privacy Policy and any updates thereto.