

WhiteWolves Gaming Studios

WEBSITE PRIVACY POLICY

From Pixels to Legends

WWGS-POL-PRI-001

v1.0 | 1 July 2026

DOCUMENT CONTROL

Version	Date	Author	Status	Approved By
v1.0	1 July 2026	Adam Grant	Approved	Adam Grant

POLICY STATEMENT

WhiteWolves Gaming Studios is committed to protecting the privacy of all individuals who interact with our gaming platforms and digital properties. We collect and process personal information in compliance with the Privacy Act 1988 (Cth) and related Australian privacy legislation. This policy establishes clear principles for the collection, use, disclosure, security, and management of all personal information entrusted to us by our community members, players, and website visitors.

PURPOSE

This policy establishes the framework for responsible data stewardship at WhiteWolves Gaming Studios. The purposes of this policy are to:

- Inform individuals about what personal information we collect and why
- Explain how we protect personal information from unauthorized access or misuse
- Establish rights of access, correction, and deletion under the Privacy Act 1988 (Cth)
- Define the organisation's obligations and accountability for privacy compliance
- Provide clear contact channels for privacy complaints and inquiries

SCOPE

This policy applies to all personal information collected by WhiteWolves Gaming Studios through the websites www.whitewolvesgamingstudios.com.au, related applications, gaming platforms, community forums, and any other digital properties operated by WhiteWolves Gaming Studios. It applies to all employees, contractors,

volunteers, and third-party service providers who handle personal information on behalf of the organisation.

POLICY DETAILS

1. Categories of Personal Information

WhiteWolves Gaming Studios collects the following categories of personal information from gaming community platform users:

- Identity Information: username, display name, email address, date of birth (for age verification), and phone number if voluntarily provided
- Account Information: password (encrypted), account preferences, language settings, and accessibility options
- Gaming Information: gaming preferences and interests, gameplay statistics and achievements, progress data, in-game purchases, and community interaction data (posts, comments, messages)
- Payment Information: payment method details (processed securely through third-party payment providers), transaction history, and billing address for premium features or subscriptions
- Technical Information: IP address, device information, browser type, operating system, and cookie identifiers
- Social Information: social media profile information (if linked), friend lists, and community relationships
- Voluntary Information: any additional information you voluntarily provide when creating your profile, participating in surveys, or contacting our support team

2. Sensitive Information

The Privacy Act 1988 (Cth) defines Sensitive Information as information or opinion about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of a trade union or professional body, criminal record, or health information. WhiteWolves Gaming Studios generally does not collect Sensitive Information. When we do collect information of a sensitive nature, we will only use it for the primary purpose for which it was obtained, for a directly related secondary purpose, or with your consent, or where required or authorised by law.

3. Collection Methods

WhiteWolves Gaming Studios collects personal information in the following ways:

- Direct Input: when you create an account, complete a profile, make a purchase, or submit support inquiries
- Automated Collection: through cookies, analytics tools, and device identifiers that track your interaction with our digital properties

- Third-Party Sources: from social media platforms (if you link your account), payment processors, and fraud prevention services

We use different types of cookies including essential cookies for website functionality, analytical cookies to improve user experience, and marketing cookies that may be set by third parties. These cookies are retained for up to 365 days and can be managed through your browser settings. Third-party cookies are subject to their respective privacy policies.

4. Purpose of Collection and Use

WhiteWolves Gaming Studios collects personal information to provide you with the best service experience possible on our platforms and keep you informed about developments in our organisation. Specific purposes include:

- Account Management: creating and administering your gaming account, verifying your age, and managing account security
- Service Delivery: enabling you to access our gaming platforms, tracking your achievements and progress, and processing transactions
- Communication: responding to inquiries, providing customer support, and sending important notifications about your account
- Community Engagement: facilitating multiplayer features, leaderboards, and social interactions with other community members
- Direct Marketing: with your consent, sending newsletters, promotional material, and updates about new features or services (you can opt out at any time)
- Analytics and Improvement: analysing user behaviour and platform usage to improve our services
- Security and Fraud Prevention: detecting and preventing fraud, unauthorised access, and other security threats
- Legal Compliance: fulfilling legal obligations and responding to lawful requests from authorities

5. Disclosure and Sharing

WhiteWolves Gaming Studios does not sell your personal information to unrelated third parties. We customarily only disclose personal information to our service providers who assist us in operating our platforms, such as:

- Payment processors and financial institutions
- Cloud infrastructure and hosting providers
- Analytics and performance monitoring services
- Customer support platforms and helpdesk software
- Email and communication service providers

Your Personal Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties. All third-party service providers are contractually obligated to maintain the confidentiality and security of your information and to use it only for the purposes specified by WhiteWolves Gaming Studios.

6. Security and Data Protection

WhiteWolves Gaming Studios stores your personal information in a way that reasonably protects it from unauthorised access, misuse, modification, or disclosure. Security measures include:

- Encrypted data transmission using SSL/TLS protocols
- Secure password storage using industry-standard hashing algorithms
- Restricted access to personal information on a need-to-know basis
- Regular security audits and vulnerability assessments
- Staff training on privacy and data protection obligations

When WhiteWolves Gaming Studios no longer requires your personal information for the purpose for which we obtained it, we will take reasonable steps to destroy and anonymise or de-identify it. Most personal information that is stored in our records will be kept for a maximum of 7 years to fulfil our record keeping obligations under the Privacy Act 1988 (Cth).

7. Your Rights and Access

The Australian Privacy Principles permit you to obtain access to the personal information we hold about you in certain circumstances (Australian Privacy Principle 12). You also have the right to correct inaccurate personal information subject to certain exceptions (Australian Privacy Principle 13). To request access to your personal information or to correct any inaccuracies, please contact us in writing at privacy@whitewolvesgamingstudios.com.au. We will respond to your request within 30 days.

8. Deletion Requests

If you wish to request deletion of your personal information before the expiry of our retention period, WhiteWolves Gaming Studios will assess your request in accordance with our obligations under the Privacy Act 1988 (Cth). We may retain certain information where required for legal, regulatory, or legitimate business purposes, including dispute resolution, enforcement of our Terms of Service, fraud prevention, and defence of legal claims.

9. Direct Marketing

By using our website and platforms, you consent to the receipt of direct marketing material. We will only use your personal information for this purpose if we have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from us. We do not use Sensitive Personal

Information in direct marketing activity. Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as an unsubscribe button link. You may unsubscribe at any time at no cost.

10. International Data Transfers

WhiteWolves Gaming Studios may store or process personal information on servers located both within Australia and in overseas jurisdictions. By providing personal information to us, you consent to the transfer of that information to overseas recipients to the extent permitted by the Privacy Act 1988 (Cth). We will take reasonable steps to ensure that overseas recipients are subject to privacy protections comparable to those under the Privacy Act 1988 (Cth).

11. GDPR Considerations

In some circumstances, the European Union General Data Protection Regulation (GDPR) provides additional protection to individuals located in Europe. The fact that you may be located in Europe does not, however, on its own entitle you to protection under the GDPR. WhiteWolves Gaming Studios' digital properties do not specifically target customers located in the European Union and we do not monitor the behaviour of individuals in the European Union. Accordingly, the GDPR does not apply to our standard operations. However, if GDPR compliance is required for a particular user or use case, we will comply with all applicable GDPR obligations.

RESPONSIBILITIES

Privacy and data protection is a shared responsibility across WhiteWolves Gaming Studios:

- Chief Executive Officer (Adam Grant): Overall accountability for privacy compliance and responsible for approving this policy and any amendments
- Studio Operations Team: Responsible for implementing privacy controls, managing data retention schedules, and responding to access requests
- Technical Operations: Responsible for system security, encryption, access controls, and infrastructure protection
- All Staff and Contractors: Required to comply with this policy, maintain confidentiality of personal information, and report any suspected breaches

COMPLIANCE AND CONSEQUENCES

Compliance with this policy is mandatory for all employees, contractors, and third-party service providers. Failure to comply with this policy may result in disciplinary action up to and including termination of employment or contract. Breaches of this policy may also result in civil liability, regulatory investigation, or criminal prosecution where applicable under the Privacy Act 1988 (Cth) or other relevant legislation.

Any suspected privacy breach or unauthorised disclosure of personal information must be reported immediately to the Chief Executive Officer. WhiteWolves Gaming Studios will investigate all reported breaches and take appropriate remedial action.

EXCEPTIONS

This policy may be subject to exceptions in the following circumstances:

- Where disclosure is required by law or court order
- Where disclosure is necessary to protect the safety or rights of an individual
- Where disclosure is in the public interest
- Where disclosure is necessary to investigate or prevent fraud or crime

Any exceptions to this policy must be documented and approved by the Chief Executive Officer.

RELATED DOCUMENTS

This policy should be read in conjunction with the following documents:

- Terms of Service (www.whitewolvesgamingstudios.com.au)
- Cookie Policy
- Unified Language and Communication Standards Framework (WWGS-FW-LNG-001)
- Email Authentication Governance Framework (WWGS-FW-EMAIL-001)

REVIEW SCHEDULE

This document is subject to review every 12 months from the date of issue, or earlier if operational requirements change, relevant legislation is amended, or a significant incident occurs. The document owner is responsible for initiating the review.

Authorised by: Adam Grant, Head of Studio Operations

Date: _____

Signature: _____