

National Mah Jongg League Privacy Policy

Effective: February 22, 2026

This Privacy Policy describes how the National Mah Jongg League (“**NMJL**”) collects, uses and discloses information in connection with the use of our applications, including but not limited to NMJL Online, and what choices you (the “**Customer**”) have with respect to such information.

Applicability Of This Privacy Policy

This Privacy Policy applies to the NMJL Online game applications (the “**Games**”) released under the National Mah Jongg League label, and to our Web presence at <https://faqs.nmjlonline.com> (the “**FAQ Site**”), together referred to as the “**Services**”. If you do not agree with these terms, do not access or use the Services or any other aspect of NMJL’s business.

NMJL may subcontract the administration of the Games and the FAQ Site to third parties experienced in technical matters. Any such third parties will also be bound by the policies described in this document.

Information We Collect and Receive

NMJL requires minimal personal information related to Customers of the Games or the FAQ Site. For NMJL Online, we do not require Customers to provide us with contact information such as phone numbers, physical addresses or even real names.

However, NMJL Online needs a valid email address as the primary user identifier, so we do require that information in order for users to sign on and actually play games. Such email addresses are required in order to enable certain forms of contact with Customers, such as password resets and account expiration alerts; Customers who are unable or unwilling to provide emails will be unable to access the Services.

We also ask users to create a “**User Name**” for use in the Games. This name will be displayed to other players in the game and in end-game screens, as well as on the FAQ Site.

The FAQ Site does not require users to provide any personal information.

We may obtain and retain certain information that is necessary for the operation of the Games or the FAQ Site, such as chat logs, access logs and error logs, but only for amounts of time required to ensure the proper and efficient operation of our online systems. We may also record IP Addresses of Customers, which we use for security purposes such as blocking of malicious content and for anonymized usage reporting. Such information is regularly purged as a part of the normal operation of our systems.

NMJL may collect and receive Customer Data, Game Login Data and other information and data (“**Other Information**”) in a variety of ways:

- **Customer Data.** In addition to providing emails for login purposes and User Names in the Games, Customers may send optional requests for contact via a form on our FAQ Site, which will request an email address.
- **Game Login Data.** Customers are required to log in to the Games in order to play. For the NMJL Online game, this requires a unique, valid email address and password.
 - I. The Games and the FAQ Site obtain Customer email addresses from the parent organization, the National Mah Jongg League, which provides us with lists of authorized Customers. Customers can also create accounts directly in the Games by supplying an email address.
 - II. First-time Customers will be required to create a password when logging in to the NMJL Online game. This password is unique to the game and is not shared outside of the Games and FAQ Site.
 - III. In no case do we retain Customer-created passwords in clear text; they are always stored in an obfuscated form and used only to verify the validity of the login credentials that were previously created by the Customer.
 - IV. For their own safety, we recommend that Customers use unique usernames and passwords for the Games that are different from the credentials that they use for other games, Web Sites and Services, although we cannot require Customers to do so.
- **In-Game Communications.** As part of the normal operations of our Games, we allow optional direct communication between one or more Customers. We retain logs of such activity for compliance monitoring and security purposes, but only for amounts of time required to ensure the proper and efficient operation of our online systems and to respond to lawful requests from law enforcement or government agencies.
- **Gameplay Performance Data.** For some Games, we track winners and losers and certain game scoring data such as winning or losing hands. Since each game normally includes more than one other human player, these records in our user database will indirectly connect multiple Customers and include data regarding their in-game performance as well as times of actions. Such records use internal User ID numbers as their primary keys; if the email associated with a given User ID is deleted from our records, this will break the association in our records between that ID and that email address even though the game performance data continues to exist in the database.
- **Other Information.** NMJL also collects, generates and/or receives Other Information:
 - I. Usage Information.
 - *Log data.* As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use the Services and record it in log files. This log data may include an Internet Protocol (IP) address, the address of the web page visited before using the Services, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data.
 - *Device information.* NMJL may collect information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
 - *Location information.* We do not collect location information such as street addresses from you. However, we may look up approximate location data using IP addresses as part of our normal maintenance and analytical tasks.

- II. **Cookie Information.** NMJL uses cookies and similar technologies in our FAQ Site that help us provide a good user experience while using the Games, but we do not use this information for purposes other than ensuring efficient operation of the Games.
- III. **Contact Information.** In accordance with the consent process provided by your device, any contact information that a Customer chooses to provide may be retained in order to allow us to provide requested information.
- IV. **Additional Information Provided to NMJL.** We receive Other Information when submitted via the Services or if you participate in a focus group, contest, activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with NMJL via our Games or FAQ Site.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, “**Information**”). However, certain Information is collected automatically and, if some Information is not provided, we may be unable to provide the full range of services available in the Games. For example, if no email address is provided, you will not be able to log in to the Games.

Information We Do Not Collect

The Games and FAQ Site do not collect the following types of Customer information:

- Financial Information (including but not limited to payment, credit, salary and other similar data)
- Health and Fitness Data
- Contacts from your personal Contact List
- Browsing History and Search History

How We Use Information

Customer Data and Game Login Data will be used by NMJL in accordance with Customer’s instructions, including any applicable terms in the Customer license agreement for the Games, and as required by applicable law. NMJL is a processor of Customer Data and Customer is the controller.

NMJL uses Game Login Data and Gameplay Performance Data in furtherance of our legitimate interests in operating the Games. More specifically, NMJL uses Game Login Data:

- **To allow users to play the Games.** In order for us to be able to record game activity and enable online play, we must maintain unique accounts for each Customer. Such accounts maintain only enough information to perform such functions. Game Login Data is used only to create and maintain such Customer accounts, to confirm subscription validity, and to enable resetting of the user’s password.
- **To allow users to see the results of their actions within the Games.** In some Games, we allow users to see who won and lost games, and to see cumulative scoring data. Typically, such displays use the User Name and not an email address. Additionally, our support staff may have ongoing access to gameplay records, which is used to analyze system performance and also to design new gameplay features.

- **To display player rankings.** In some games, we may retain player ranks or handicaps in order to enable players to evaluate potential game opponents based, for example, on skill level or experience. These may be displayed in “leaderboards” or other ranking reports. Customer Data such as email addresses or real names (if known) will not be displayed in any such leaderboards or ranking reports.
- **As required by applicable law, legal process or regulation.**
- **To investigate and help prevent security issues and abuse.**

NMJL uses In-Game Communications Data to provide the ability for Customers to organize games together, ask and answer questions, and discuss game strategies. In general, we do not monitor or censor such communications, and Customers should be aware that some such communications may contain content that is offensive or inappropriate for some Customers. Any such content is the responsibility of the Customer sending it; NMJL is not liable for any In-Game Communications Data. Notwithstanding the foregoing, NMJL reserves the right to monitor, censor and remove content that we in our sole discretion deem inappropriate or offensive, as further documented in our Terms of Service.

NMJL uses Other Information in furtherance of our legitimate interests in operating our Services, Web sites, Games and business. More specifically, NMJL uses Other Information:

- **To provide, update, maintain and protect our FAQ Site and business.** This includes use of In-Game Communications Data, Game Performance Data and Other Information to support delivery of the Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at a Customer’s request.
- **As required by applicable law, legal process or regulation.**
- **To communicate with you by responding to your requests, comments and questions.** If you contact us, we may use your Other Information to respond.
- **To send emails and other communications, if an email address was provided to us.** We may send you service, technical and other administrative emails, messages and other types of communications. We may also contact you to inform you about changes in our offerings, and important FAQ Site-related notices, such as security and fraud notices. These communications are considered part of the Services and you may not opt out of them.
- **To investigate and help prevent security issues and abuse.**

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, NMJL may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as “**Personal Data.**”

Data Retention

NMJL will retain Customer Data in accordance with a Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Game and FAQ Site functionality, and as required by applicable law. The deletion of Customer Data and other use of the Games by Customer may result in the deletion and/or de-identification of certain associated Other Information. NMJL may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other

Information after you have deactivated your account for the period of time needed for NMJL to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements. Under typical circumstances, such information will be kept for no more than one calendar year.

To request deletion of your Customer Data, please email privacy@nmjlonline.com or visit our Web site Deletion Request page at https://faqs.nmjlonline.com/legal/deletion_form.html.

How We Share and Disclose Information

This section describes how NMJL may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and NMJL does not control how they or any other third parties choose to share or disclose Information. As used in the following sections, the term “**Information**” includes Customer Data, Game Login Data, Other Information, In-Game Communications Data and Gameplay Performance Data, as defined above.

- **Customer’s Instructions.** NMJL will solely share and disclose Information in accordance with a Customer’s instructions, including any applicable terms in the Terms of Service and Customer’s use of Game or FAQ Site functionality, and in compliance with applicable law and legal process. Our terms of service may be found at:
 - https://faqs.nmjlonline.com/legal/NMJL-Online_Terms-of-Service.pdf
- **Customer Access.** Administrators may be able to access, modify or restrict access to Information. This may include, for example, exporting logs of Game or FAQ Site activity, In-Game Communications, or emails sent.
- **Corporate Affiliates.** NMJL may share Information with its corporate affiliates, parents and/or subsidiaries, including subcontractors tasked with administrative duties for the Games and the FAQ Site.
- **To Implement App Functionality.** NMJL uses certain third-party tools to implement functionality to contact the user, with the user’s permission, for its products. These tools include:
 - **SocketLabs:** reliable delivery of password reset emails and account-related notifications
 - **Firebase:** implementation of “push notifications” to applications in order to inform players of the status of their turns
- **During a Change to NMJL’s Business.** If NMJL engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of NMJL’s assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g., due diligence), some or all Information may be shared or transferred, subject to standard confidentiality arrangements.
- **Aggregated or De-identified Data.** We may disclose or use aggregated or de-identified Information for any purpose. For example, we may share aggregated or de-identified Information with prospects or partners for business or research purposes, such as measuring time spent on our FAQ Site or in the Games.
- **To Comply with Laws.** If we receive a request for information, we may disclose Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process.
- **To enforce our rights, prevent fraud, and for safety.** To protect and defend the rights, property or safety of NMJL or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.

- **With Consent.** NMJL may share Information with third parties when we have consent to do so.

Security

NMJL takes security of data very seriously. NMJL works hard to protect Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, NMJL cannot guarantee that Information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others.

Information sent to and from our servers is encrypted in transit, and key elements such as passwords are obfuscated in our databases.

Age Limitations

To the extent prohibited by applicable law, NMJL does not knowingly request personal information from anyone younger than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information in accordance with our standard deletion policies.

Changes To This Privacy Policy

NMJL may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If you disagree with the changes to this Privacy Policy, you should discontinue use of our Games and FAQ Site.

Data Protection Officer

To communicate with our Data Protection Officer, please email privacy@nmjlonline.com.

Identifying The Data Controller and Processor

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, the Customer is the controller of Customer Data. In general, NMJL is the processor of Customer Data and the controller of all Other Information.

Your Rights

Individuals located in certain regions, including the State of California and the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as

to seek to update, delete or correct this Information. You can do this by contacting us via email at privacy@nmjlonline.com.

To the extent that NMJL's processing of your Personal Data is subject to the California Consumer Privacy Act (CCPA) European General Data Protection Regulation (GDPR), NMJL relies on its legitimate interests, described above, to process your data. NMJL may also process Information that constitutes your Personal Data for direct marketing purposes; you have a right to object to NMJL's use of your Personal Data for this purpose at any time.

Data Protection Authority

Subject to applicable law, you also have the right to (i) restrict NMJL's use of Information that constitutes your Personal Data and (ii) lodge a complaint with your local data protection authority or directly with NMJL at privacy@nmjlonline.com.

End-User License Agreement – Apple Products

Some of the Games are available on Apple devices such as iPhone and iPad. For such products, the following End-User License Agreement applies and is incorporated herein by reference:

<https://www.apple.com/legal/internet-services/itunes/dev/stdeula>

Contacting NMJL

Please feel free to contact NMJL if you have any questions about this Privacy Policy or NMJL's practices, or if you are seeking to exercise any of your statutory rights. You may contact us with general queries or data deletion requests at privacy@nmjlonline.com.

NMJL Online is a Trademark of the National Mah Jongg League. iPhone and iPad are trademarks of Apple Inc., registered in the U.S. and other countries and regions. Other marks are the property of their respective owners.